

## Schurkamp, Lynnea - AMS

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**From:** Meade, Rita </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MEADE, RITA870808C0-C514-4C03-8E99-BCBE6703E84E730>  
**Sent:** Tuesday, July 17, 2012 2:57 PM  
**To:** Updike, Scott - AMS  
**Subject:** Emailing: Schedule of Texas Panhandle Trip  
**Attachments:** Schedule of Texas Panhandle Trip.docx

Hi Scott,

Attached is the schedule for Texas. Everyone has agreed to the schedule. The POC and phone numbers are listed.

Your message is ready to be sent with the following file or link attachments:

Schedule of Texas Panhandle Trip

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

## Schurkamp, Lynnea - AMS

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**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Thursday, July 05, 2012 1:18 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: Aorora updates #2  
**Attachments:** Apx update 2.zip

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**From:** Allen, Carey [mailto:callen@nsf.org]  
**Sent:** Friday, June 29, 2012 11:32 AM  
**To:** Updike, Scott - AMS  
**Subject:** Aorora updates #2

Message 2 of 3

*Carey Allen*

Quality Specialist  
NSF International  
Quality Assurance International (QAI)  
734 214 6261  
[callen@nsf.org](mailto:callen@nsf.org)

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## Schurkamp, Lynnea - AMS

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**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Tuesday, October 09, 2012 2:25 PM  
**To:** Michael, Matthew - AMS  
**Subject:** FW: Aurora Dairy updated appendices  
**Attachments:** AOF Inspection Docs.zip

Mathew,

I searched through my emails and did not find an email which stated who the representative would be. Would you like for me to contact Carey Allen to find the name of the representative?

Scott Updike  
USDA-AMS-NOP  
202-260-8076

---

**From:** Allen, Carey [<mailto:callen@nsf.org>]  
**Sent:** Tuesday, July 10, 2012 2:03 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: Aurora Dairy updated appendices

Scott,

Please find attached the inspection report and supporting documents, the NC letter and response.

*Carey Allen*

Quality Specialist  
NSF International  
Quality Assurance International (QAI)  
734 214 6261  
[callen@nsf.org](mailto:callen@nsf.org)

---

**From:** Updike, Scott - AMS [<mailto:Scott.Updike@ams.usda.gov>]  
**Sent:** Tuesday, July 10, 2012 1:41 PM  
**To:** Allen, Carey  
**Subject:** RE: Aurora Dairy updated appendices

Carey,

Miles has also requested the most recent inspection report. Could you send a copy of that as well?

Scott

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**From:** Allen, Carey [<mailto:callen@nsf.org>]  
**Sent:** Friday, June 29, 2012 2:04 PM  
**To:** Updike, Scott - AMS  
**Cc:** Morr, Craig; Randolph, Alexis  
**Subject:** RE: Aurora Dairy updated appendices

Scott,

Thank you for the update below.

I will be out of the office July 2 – 7, 2012. Please copy Craig Morr on any communication during this time such that he may respond to any request or communicate with QAI management any travel details.

Best wishes,

*Carey Allen*

Quality Specialist

NSF International

Quality Assurance International (QAI)

734 214 6261

[callen@nsf.org](mailto:callen@nsf.org)

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**From:** Updike, Scott - AMS [<mailto:Scott.Updike@ams.usda.gov>]

**Sent:** Friday, June 29, 2012 2:00 PM

**To:** Allen, Carey

**Subject:** RE: Aurora Dairy updated appendices

Carey,

Thank. I received the 3 messages.

We are still in the planning stages. Plans have changed such that I will not be travelling, though Miles may or may not. Once plans are set, I will let you know if NOP will be going to the Aurora dairy and if so, on which day so that a representative from QAI may be there as well.

Thank you,

Scott

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**From:** Allen, Carey [<mailto:callen@nsf.org>]

**Sent:** Friday, June 29, 2012 11:31 AM

**To:** Updike, Scott - AMS

**Subject:** Aurora Dairy updated appendices

Hello Scott,

QAI received updates on several of the OCP appendices from Aurora Dairy earlier this week. This is 1 of 3 messages with the zip files attached.

Do you have an update on what your travel plans will be as far as the specific dates you'll be on the farm in Stratford?

QAI would like to send a representative.

Also, did you want to have your visit coincide with our inspection?

Please confirm when you have received all three messages.

Thanks,

*Carey Allen*

Quality Specialist

NSF International

Quality Assurance International (QAI)

734 214 6261

[callen@nsf.org](mailto:callen@nsf.org)

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## Schurkamp, Lynnea - AMS

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**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Thursday, July 05, 2012 1:16 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: Aurora Organic Dairy--Coldwater Dairy Visit

-----Original Message-----

From: Lee F. Sachnoff [mailto:lhs@krendl.com]  
Sent: Monday, July 02, 2012 3:14 PM  
To: Updike, Scott - AMS  
Cc: 'Brent Cannell'  
Subject: Aurora Organic Dairy--Coldwater Dairy Visit

Dear Mr. Updike:

I am corporate counsel for Aurora Organic Dairy. I understand that you plan to visit their Coldwater Dairy later this month. When you have a few minutes, could you or someone from the USDA please give me a call. I have a couple of questions regarding keeping Aurora Organic Dairy's confidential business information protected. Thank you.

Lee F. Sachnoff  
Krendl Krendl Sachnoff & Way, P.C.  
370 Seventeenth Street, Suite 5350  
Denver, CO 80202  
303-629-2629, direct  
303-629-2600, general  
303-629-2606, fax

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## Schurkamp, Lynnea - AMS

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**Sent:** Thursday, July 05, 2012 1:17 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: Aurora updates #3  
**Attachments:** Apx update 3.zip

---

**From:** Allen, Carey [mailto:callen@nsf.org]  
**Sent:** Friday, June 29, 2012 11:32 AM  
**To:** Updike, Scott - AMS  
**Subject:** Aurora updates #3

Message 3 of 3. Please confirm when you have received all three.

*Carey Allen*

Quality Specialist  
NSF International  
Quality Assurance International (QAI)  
734 214 6261  
[callen@nsf.org](mailto:callen@nsf.org)

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**Sent:** Monday, July 16, 2012 3:08 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: Idea proposal

Miles,

If you are still interested, I am going to schedule the conference call for this Thursday at 1. Your calendar is clear for then.

Scott

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**From:** Mary Ellen Holliman [mailto:Mary.Holliman@TexasAgriculture.gov]  
**Sent:** Monday, July 16, 2012 1:30 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: Idea proposal

Good morning Scott:

I've received confirmation from all three dairymen that Thursday, July 19 from 11:00 -12:00 CST (1-2:00 EST) is the preferable date and time for the conference call please forward the call-in number, pass code,etc. and I will forward to my producers. I plan to mail the CD-ROMS with all the OSPs and inspection reports today via FedEx so you should receive them on Thursday.

Sincerely,

*Mary Ellen Holliman*

Coordinator for Organic Certification Program  
Texas Department of Agriculture

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**From:** Mary Ellen Holliman  
**Sent:** Tuesday, July 10, 2012 4:56 PM  
**To:** 'Updike, Scott - AMS'  
**Subject:** RE: Idea proposal

Hi Scott:

I will send an email to my producers requesting the date and time that they prefer. I'm pretty sure all four dairy operations have different morning and afternoon milking schedules and one dairyman has to travel across the New Mexico-Texas state line. Typically I get the best results in reaching the dairymen via telephone between 1 and 2:00 CST (2-3 EST).

I have been including copies of the inspection reports with the OSP but will double-check before mailing. Please note that all inspections were conducted prior to the variance request so there will be no mention of how the operations were handling the variance request at the time of inspection.

Also, can you give me a tentative agenda of when you plan to start/finish the tour of the TDA operations? I need to schedule my travel and the producers have requested tentative dates and times that we will be on-site at their operations. My suggestion would be to start with the smallest operation, Redland Dairy and then travel to Boehning Dairy and Hilltop

Dairy (both owned and operated by Brian Boehning) and then finish with the largest operation (which is also the furthest distance), Natural Prairie Organic Dairy Farm.

Sincerely,

*Mary Ellen Holliman*

Coordinator for Organic Certification Program  
Texas Department of Agriculture

---

**From:** Updike, Scott - AMS [\[mailto:Scott.Updike@ams.usda.gov\]](mailto:Scott.Updike@ams.usda.gov)

**Sent:** Tuesday, July 10, 2012 12:38 PM

**To:** Mary Ellen Holliman

**Subject:** RE: Idea proposal

Hi Mary Ellen,

I talked to Miles and he likes the idea of having a round table conference call. NOP could host the call on our teleconference line. Miles would have some time on Tuesday the 17<sup>th</sup> around noon eastern time or Thursday the 19<sup>th</sup> sometime between 11 and 2 eastern. Would any of those times work for you and the producers? Dairy and beef farmers I have worked with here in the east were amenable to teleconference calls around lunch time. Do Texas cattle farmers feel the same way?

I appreciate all of your thoughts on the why there is such a lack of organic slaughter capacity. That seems to be the biggest stumbling block to more US production of organic beef. I was in a high end grocery store here in the MD to look at organic meat prices and all of the organic beef was from South America.

Miles has also requested a copy of the most recent inspection reports for the farms. Would it be possible for you to send those as well?

Scott

---

**From:** Mary Ellen Holliman [\[mailto:Mary.Holliman@TexasAgriculture.gov\]](mailto:Mary.Holliman@TexasAgriculture.gov)

**Sent:** Friday, July 06, 2012 5:40 PM

**To:** Updike, Scott - AMS

**Cc:** Organic

**Subject:** Idea proposal

Hi Scott:

I tried to leave a voice mail but my antiquated office phone was not cooperating. I've spoken with a couple of our livestock producers that will be part of the tour and if possible, they would like to have a round-table conference call. This would help decrease the chance of you and Miles hearing the same comments multiple times, and decrease the amount of time that the producers have to spend away from daily work activities. The operations I certify have at least 2 milking a day and are in the early season of harvesting feed crops. The conference call system used by TDA would allow for several more producers and their ACAs to join in on the conference call so you would be able to get a good pool for addressing the issues mentioned in your previous email. I am currently in the process of finding available locations for that week that could host the conference call. Please let me know what if you and Miles would like for me to pursue this further.

Also, I received some help from an intern in scanning all the OSP files so those should be over-night mailed to you by next Tuesday at the latest.

Sincerely,

*Mary Ellen Holliman*

Coordinator for Organic Certification Program  
Texas Department of Agriculture

Office: (512) 463-7513  
Fax: (888) 215-5295  
[Organic@TexasAgriculture.gov](mailto:Organic@TexasAgriculture.gov)

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## Schurkamp, Lynnea - AMS

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**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Friday, July 06, 2012 9:03 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: Idea proposal

Miles,

Would you like to have a conference call with the producers before the trip?

Scott

---

**From:** Mary Ellen Holliman [mailto:Mary.Holliman@TexasAgriculture.gov]  
**Sent:** Friday, July 06, 2012 5:40 PM  
**To:** Updike, Scott - AMS  
**Cc:** Organic  
**Subject:** Idea proposal

Hi Scott:

I tried to leave a voice mail but my antiquated office phone was not cooperating. I've spoken with a couple of our livestock producers that will be part of the tour and if possible, they would like to have a round-table conference call. This would help decrease the chance of you and Miles hearing the same comments multiple times, and decrease the amount of time that the producers have to spend away from daily work activities. The operations I certify have at least 2 milking a day and are in the early season of harvesting feed crops. The conference call system used by TDA would allow for several more producers and their ACAs to join in on the conference call so you would be able to get a good pool for addressing the issues mentioned in your previous email. I am currently in the process of finding available locations for that week that could host the conference call. Please let me know what if you and Miles would like for me to pursue this further.

Also, I received some help from an intern in scanning all the OSP files so those should be over-night mailed to you by next Tuesday at the latest.

Sincerely,

*Mary Ellen Holliman*

Coordinator for Organic Certification Program

Texas Department of Agriculture

Office: (512) 463-7513

Fax: (888) 215-5295

[Organic@TexasAgriculture.gov](mailto:Organic@TexasAgriculture.gov)

## Schurkamp, Lynnea - AMS

---

**From:** Mary Ellen Holliman <Mary.Holliman@TexasAgriculture.gov>  
**Sent:** Friday, July 20, 2012 5:33 PM  
**To:** Michael, Matthew - AMS; Updike, Scott - AMS; McEvoy, Miles - AMS  
**Cc:** Bob Tarrant  
**Subject:** FW: NOP trip to Texas and New Mexico - latest schedules  
**Attachments:** Schedule of Texas Panhandle Trip (2).docx

Good evening everyone:

As promised during my telephone conversation with Scott earlier this afternoon, I am forwarding the contact information for Mr. Bob Tarrant, the TDA representative that will be participating in the tours.

Mr. Bob Tarrant  
Regional Director of the West Texas Regional Office (Lubbock)  
Office: (806) 799-8555  
Blackberry: (b) (6)  
[Bob.Tarrant@TexasAgriculture.gov](mailto:Bob.Tarrant@TexasAgriculture.gov)

Please contact him once you arrive in Amarillo as he would like to meet up (possibly over dinner) to coordinate travel schedules.

Sincerely,  
*Mary Ellen Holliman*  
Coordinator for Organic Certification Program  
Texas Department of Agriculture  
Office: (512) 463-7513  
Fax: (888) 215-5295  
[Organic@TexasAgriculture.gov](mailto:Organic@TexasAgriculture.gov)

---

**From:** Michael, Matthew - AMS [mailto:Matthew.Michael@ams.usda.gov]  
**Sent:** Friday, July 20, 2012 1:48 PM  
**To:** Mary Ellen Holliman  
**Subject:** NOP trip to Texas and New Mexico - latest schedules

Hi Ms. Holliman:

I left you a phone message, but want to get this to you in case we didn't talk today. The schedule for Miles' and my visits to operations in Texas and New Mexico has changed for July 26 and 27. I believe that someone from the Texas Department of Agriculture was going to accompany us on some or all of the Texas visits, so I wanted you to have the revised schedule.

Let me know if you have any questions.

Have a nice weekend.

Matthew Michael  
Director, Compliance and Enforcement Division  
USDA National Organic Program  
1400 Independence Ave SW; Room 2959



Washington, DC 20250-0268

Phone: (202) 260-8657

[matthew.michael@ams.usda.gov](mailto:matthew.michael@ams.usda.gov)

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## Schurkamp, Lynnea - AMS

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**Sent:** Thursday, July 05, 2012 1:19 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: NOP visit to Aurora Organic Farms -Coldwater

---

**From:** Allen, Carey [mailto:callen@nsf.org]  
**Sent:** Friday, June 22, 2012 2:09 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: NOP visit to Aurora Organic Farms -Coldwater

Hello,  
For my peace of mind, please confirm when you have received all 5 emails with the attachments. Thanks!

*Carey Allen*  
Quality Specialist  
NSF International  
Quality Assurance International (QAI)  
734 214 6261  
[callen@nsf.org](mailto:callen@nsf.org)

---

**From:** Updike, Scott - AMS [<mailto:Scott.Updike@ams.usda.gov>]  
**Sent:** Friday, June 22, 2012 10:38 AM  
**To:** Allen, Carey  
**Subject:** NOP visit to Aurora Organic Farms -Coldwater

Hi Ms. Allen,

Miles McEvoy asked me (the new livestock specialist for the NOP) to arrange a trip to Texas to assess the pasture rule exemption that was given to ruminant livestock producers in most Texas counties. We plan on going to Amarillo and then visiting some organic dairy and beef farms. While touring organic beef and dairy farms, we will also examine some other issues that have been raised to the attention of the NOP including how the farms are sourcing replacement females and breeder stock for potential revisions of the Origin of Livestock regulations, how farms and dairy processors coordinate sanitizer use of bulk milk trucks, and the availability of organic slaughter facilities for organic beef producers and culling of organic dairy cattle.

We would like to visit the Aurora Organic Farms-Coldwater dairy, in Stratford, Texas, the week of July 23 – 27.  
Is Kavin Caris the best contact person?  
Is 806-769-4447 the best contact number?  
Could you send us a copy of their Organic System Plan?

A representative from QAI would be welcome to join us.

Sincerely,  
Scott Updike

M. Scott Updike, PhD  
Agricultural Marketing Specialist  
Standards Division  
USDA-AMS-NOP  
1400 Independence Ave., S.W.  
Room 2646-S, STOP 0268  
Washington, D.C. 20250  
Phone 202-260-8076

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**Sent:** Thursday, July 05, 2012 1:18 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: NOP visit to Aurora Organic Farms -Coldwater

---

**From:** Allen, Carey [mailto:callen@nsf.org]  
**Sent:** Friday, June 22, 2012 2:27 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: NOP visit to Aurora Organic Farms -Coldwater

According to our system records the inspection has been completed in one day in the past. I would expect a full day at least.

*Carey Allen*  
Quality Specialist  
NSF International  
Quality Assurance International (QAI)  
734 214 6261  
[callen@nsf.org](mailto:callen@nsf.org)

---

**From:** Updike, Scott - AMS [mailto:Scott.Updike@ams.usda.gov]  
**Sent:** Friday, June 22, 2012 2:14 PM  
**To:** Allen, Carey  
**Subject:** RE: NOP visit to Aurora Organic Farms -Coldwater

Carey,  
Yes, I did receive all 5. Thank you for your very prompt reply to my email.  
Do you have an idea as to how long the inspection might last for this farm?

Scott

---

**From:** Allen, Carey [mailto:callen@nsf.org]  
**Sent:** Friday, June 22, 2012 2:09 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: NOP visit to Aurora Organic Farms -Coldwater

Hello,  
For my peace of mind, please confirm when you have received all 5 emails with the attachments. Thanks!

*Carey Allen*  
Quality Specialist  
NSF International  
Quality Assurance International (QAI)  
734 214 6261

**From:** Updike, Scott - AMS [<mailto:Scott.Updike@ams.usda.gov>]  
**Sent:** Friday, June 22, 2012 10:38 AM  
**To:** Allen, Carey  
**Subject:** NOP visit to Aurora Organic Farms -Coldwater

Hi Ms. Allen,

Miles McEvoy asked me (the new livestock specialist for the NOP) to arrange a trip to Texas to assess the pasture rule exemption that was given to ruminant livestock producers in most Texas counties. We plan on going to Amarillo and then visiting some organic dairy and beef farms. While touring organic beef and dairy farms, we will also examine some other issues that have been raised to the attention of the NOP including how the farms are sourcing replacement females and breeder stock for potential revisions of the Origin of Livestock regulations, how farms and dairy processors coordinate sanitizer use of bulk milk trucks, and the availability of organic slaughter facilities for organic beef producers and culling of organic dairy cattle.

We would like to visit the Aurora Organic Farms-Coldwater dairy, in Stratford, Texas, the week of July 23 – 27.

Is Gavin Caris the best contact person?

Is 806-769-4447 the best contact number?

Could you send us a copy of their Organic System Plan?

A representative from QAI would be welcome to join us.

Sincerely,  
Scott Updike

M. Scott Updike, PhD  
Agricultural Marketing Specialist  
Standards Division  
USDA-AMS-NOP  
1400 Independence Ave., S.W.  
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Washington, D.C. 20250  
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**Sent:** Wednesday, July 18, 2012 2:50 PM  
**To:** Meade, Rita  
**Cc:** McEvoy, Miles - AMS  
**Subject:** FW: NOP visit to Aurora Organic Farms -Coldwater  
**Attachments:** image001.jpg

Rita,  
Here are some of the directions I received. You told me you were going to put together the directions for Miles.

Scott

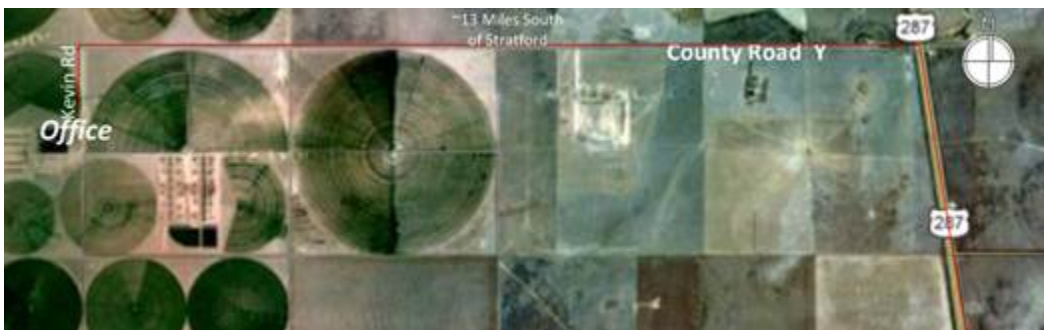
---

**From:** Randolph, Alexis [mailto:Randolph@qai-inc.com]  
**Sent:** Wednesday, July 18, 2012 2:36 PM  
**To:** Updike, Scott - AMS  
**Cc:** Allen, Carey  
**Subject:** FW: NOP visit to Aurora Organic Farms -Coldwater

Scott,

I am also attending the NOP Aurora visit and just received the following information regarding directions to the farm. Please pass these along to Miles and anyone else who is attending.

The directions provided by Google and most GPS units are incorrect. From Dumas, head North on U.S. 287 toward Stratford. You will pass through Cactus and continue North on U.S. 287 until you reach County Road Y which is about 13 miles south of Stratford with its entrance on the west side of U.S. 287. Head west on County Road Y for ~ 3 miles until you reach Kevin Rd, which is the entrance road to the dairy. Upon arrival at the main gate, press the button and someone in the office will let you in. Note: the main office is next to the truck scale on the way into the dairy.



Thank you,  
Alexis

Ms. Alexis Randolph  
Technical and Regulatory Advisor  
QAI, Inc.  
[www.qai-inc.com](http://www.qai-inc.com)  
858-792-3531 voice

---

**From:** Updike, Scott - AMS [<mailto:Scott.Updike@ams.usda.gov>]  
**Sent:** Wednesday, July 18, 2012 10:02 AM  
**To:** Allen, Carey  
**Subject:** RE: NOP visit to Aurora Organic Farms -Coldwater

Carey,  
I wanted to let you know that Miles's plans have been finalized. He will visit the dairy on Tuesday, July 24<sup>th</sup> from 3:00 to 5:30 Pm.

Scott

---

**From:** Allen, Carey [<mailto:callen@nsf.org>]  
**Sent:** Friday, June 22, 2012 10:53 AM  
**To:** Updike, Scott - AMS  
**Cc:** Morr, Craig  
**Subject:** RE: NOP visit to Aurora Organic Farms -Coldwater

Hello Mr. Updike,  
Thank you for contacting me. I will get back to you shortly with the requested information.

*Carey Allen*  
Quality Specialist  
NSF International  
Quality Assurance International (QAI)  
734 214 6261  
[callen@nsf.org](mailto:callen@nsf.org)

---

**From:** Updike, Scott - AMS [<mailto:Scott.Updike@ams.usda.gov>]  
**Sent:** Friday, June 22, 2012 10:38 AM  
**To:** Allen, Carey  
**Subject:** NOP visit to Aurora Organic Farms -Coldwater

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We would like to visit the Aurora Organic Farms-Coldwater dairy, in Stratford, Texas, the week of July 23 – 27.  
Is Kavin Caris the best contact person?  
Is 806-769-4447 the best contact number?



Could you send us a copy of their Organic System Plan?

A representative from QAI would be welcome to join us.

Sincerely,  
Scott Updike

M. Scott Updike, PhD  
Agricultural Marketing Specialist  
Standards Division  
USDA-AMS-NOP  
1400 Independence Ave., S.W.  
Room 2646-S, STOP 0268  
Washington, D.C. 20250  
Phone 202-260-8076

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## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Thursday, July 05, 2012 1:20 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: NOP visit to Aurora Organic Farms -Coldwater

---

**From:** Allen, Carey [mailto:callen@nsf.org]  
**Sent:** Friday, June 22, 2012 10:53 AM  
**To:** Updike, Scott - AMS  
**Cc:** Morr, Craig  
**Subject:** RE: NOP visit to Aurora Organic Farms -Coldwater

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**Sent:** Thursday, July 05, 2012 1:20 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: NOP visit to Aurora Organic Farms -Coldwater

---

**From:** Allen, Carey [mailto:callen@nsf.org]  
**Sent:** Friday, June 22, 2012 1:01 PM  
**To:** Updike, Scott - AMS  
**Cc:** Morr, Craig; Randolph, Alexis  
**Subject:** RE: NOP visit to Aurora Organic Farms -Coldwater

Dear Dr. Updike,

The contact you have below is the local facility contact. The better contact to arrange the visit is Brent Cannell, who is our main contact for the corporate entity, at 303-222-0688 or [brentc@aodmilk.com](mailto:brentc@aodmilk.com). QAI is scheduled to conduct the annual inspection at this facility beginning July 17<sup>th</sup>. Would you like to possibly coordinate your visit with our inspection date in order to witness the inspection?

Alternatively, we could potentially reschedule to conduct our inspection during your dates mentioned below. Please provide feedback on this.

I have several zip files to send you with the requested OCP documentation. There will be five additional emails with attachments, the file sizes are large so if you have trouble receiving them please let me know if haven't received all five.

Thank you,

*Carey Allen*  
Quality Specialist  
NSF International  
Quality Assurance International (QAI)  
734 214 6261  
[callen@nsf.org](mailto:callen@nsf.org)

---

**From:** Updike, Scott - AMS [mailto:Scott.Updike@ams.usda.gov]  
**Sent:** Friday, June 22, 2012 10:38 AM  
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**Subject:** NOP visit to Aurora Organic Farms -Coldwater

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Is 806-769-4447 the best contact number?

Could you send us a copy of their Organic System Plan?

A representative from QAI would be welcome to join us.

Sincerely,  
Scott Updike

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## Schurkamp, Lynnea - AMS

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**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Thursday, July 05, 2012 1:20 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: NOP visit to Aurora Organic Farms -Coldwater  
**Attachments:** Apx 1-11 + Table.zip

---

**From:** Allen, Carey [mailto:callen@nsf.org]  
**Sent:** Friday, June 22, 2012 1:32 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: NOP visit to Aurora Organic Farms -Coldwater

1 of 5 with attachments

*Carey Allen*

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**Sent:** Thursday, July 05, 2012 1:20 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: NOP visit to Aurora Organic Farms -Coldwater  
**Attachments:** Apx 12-16.zip

---

**From:** Allen, Carey [mailto:callen@nsf.org]  
**Sent:** Friday, June 22, 2012 1:32 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: NOP visit to Aurora Organic Farms -Coldwater

2 of 5 with attachments.

*Carey Allen*

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**Sent:** Thursday, July 05, 2012 1:20 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: NOP visit to Aurora Organic Farms -Coldwater  
**Attachments:** Apx 17-24.zip

---

**From:** Allen, Carey [mailto:callen@nsf.org]  
**Sent:** Friday, June 22, 2012 1:33 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: NOP visit to Aurora Organic Farms -Coldwater

3 of 5 with attachments

*Carey Allen*  
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**Sent:** Thursday, July 05, 2012 1:19 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: NOP visit to Aurora Organic Farms -Coldwater  
**Attachments:** Tabs.zip

---

**From:** Allen, Carey [mailto:callen@nsf.org]  
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5 of 5 with attachments

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**Sent:** Thursday, July 05, 2012 1:19 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: NOP visit to Aurora Organic Farms -Coldwater  
**Attachments:** OCP Docs.zip

---

**From:** Allen, Carey [mailto:callen@nsf.org]  
**Sent:** Friday, June 22, 2012 1:33 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: NOP visit to Aurora Organic Farms -Coldwater

4 of 5 with attachments

*Carey Allen*  
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## Schurkamp, Lynnea - AMS

---

**From:** Crail, Lars - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=CRAIL, LARS0C132495-1A12-46E6-BF8D-5C684C97C461>  
**Sent:** Monday, July 09, 2012 4:03 PM  
**To:** Updike, Scott - AMS  
**Cc:** Crail, Lars - AMS  
**Subject:** Fw: NOP visit to Livestock Operations in the Texas Panhandle

Scott, please confirm when you have the date and time set for visiting the operation so I can notify QAI. QAI indicated that they have already sent you the last IR and OSP.

Lars Crail  
USDA-AMS-NOP  
202.205.5536 office  
(b) (6) BB

---

**From:** Allen, Carey [mailto:callen@nsf.org]  
**Sent:** Monday, July 09, 2012 12:02 PM  
**To:** Crail, Lars - AMS; Morr, Craig <CMorr@nsf.org>  
**Cc:** Courtney, Cheri - AMS; Randolph, Alexis <Randolph@qai-inc.com>  
**Subject:** RE: NOP visit to Livestock Operations in the Texas Panhandle

Hi Lars,

The CPM informed me that Aurora received a call from Anita at NOP to schedule the visit as you mentioned below so it sounds as though the plans are made. We'd like to get a confirmation directly from NOP regarding the date and time so that Alexis can make her travel plans.

Could you help us get this confirmation?

*Carey Allen*  
Quality Specialist  
NSF International  
Quality Assurance International (QAI)  
734 214 6261  
callen@nsf.org

---

**From:** Crail, Lars - AMS [mailto:Lars.Crail@ams.usda.gov]  
**Sent:** Monday, July 09, 2012 10:21 AM  
**To:** Allen, Carey; Morr, Craig  
**Cc:** Courtney, Cheri - AMS; Randolph, Alexis  
**Subject:** Re: NOP visit to Livestock Operations in the Texas Panhandle

Hi Carey,

I will pass on any additional information when received. If you already sent Scott the files there is no need to send them to me. Thank you.



Lars Crail  
USDA-AMS-NOP  
202.205.5536 office  
(b) (6) BB

---

**From:** Allen, Carey [<mailto:callen@nsf.org>]  
**Sent:** Monday, July 09, 2012 08:58 AM  
**To:** Crail, Lars - AMS; Morr, Craig <[CMorr@nsf.org](mailto:CMorr@nsf.org)>  
**Cc:** Courtney, Cheri - AMS; Randolph, Alexis <[Randolph@gai-inc.com](mailto:Randolph@gai-inc.com)>  
**Subject:** RE: NOP visit to Livestock Operations in the Texas Panhandle

Hi Lars,

I will forward you everything I sent to Scott Updike, which will be in several emails due to the large number of files.

My last communication with Scott the week of June 25th he indicated that the schedule was changing and he thought he may not be attending and the visit may not occur at all. Could you let me know if indeed the schedule is finalized? We would like to have Alexis attend the visit.

Thank you,

*Carey Allen*  
Quality Specialist  
NSF International  
Quality Assurance International (QAI)  
734 214 6261  
[callen@nsf.org](mailto:callen@nsf.org)

---

**From:** Crail, Lars - AMS [<mailto:Lars.Crail@ams.usda.gov>]  
**Sent:** Saturday, July 07, 2012 7:06 PM  
**To:** Morr, Craig; Allen, Carey  
**Cc:** Courtney, Cheri - AMS  
**Subject:** NOP visit to Livestock Operations in the Texas Panhandle

Carey and Craig,

Miles and Scott Updike, Standards Division staff specialist, will be traveling to the Texas panhandle and visiting several livestock operations to assess the effects of the pasture rule and the temporary variance issued to ruminant livestock producers in 2011. The temporary variance was issued in response to a severe drought in the 2011 grazing season. While touring organic poultry, beef and dairy farms, other issues will be explored including how organic dairy farms are sourcing replacement heifers; how farms and dairy processors coordinate sanitizer use of bulk milk trucks, and outdoor access for poultry.

NOP is contacting the operations directly to make visit arrangements. QAI's client Aurora Organic Farms - Coldwater in Stratford, Texas, was selected as one of the operations for a visit on Tuesday, July 24th, between 3 and 5:30 pm. Could you please send me this operation's current OSP and most recent Inspection Report. Thank you.

Regards,

Lars Crail  
USDA-AMS-NOP-AIA  
Direct: 202.205.5536  
BB: (b) (6)

*Organic Integrity from Farm to Table, Consumers Trust the Organic Label*



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## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Thursday, July 05, 2012 1:18 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: NOP visit with dairies in NM

---

**From:** Bakker, Brett [mailto:bbakker@nmda.nmsu.edu]  
**Sent:** Friday, June 22, 2012 2:16 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: NOP visit with dairies in NM

Mike

i will send you the requested information as soon as i can gather it . we are still paper-based so i will make copies and fedex to you.

i would like to join you on at least part of the visits.

thank you

let me know if you have any questions or concerns

brett

Brett Bakker  
New Mexico Department of Agriculture, Organic Program  
4501 Indian School Rd NE  
Suite 100 Rm G104  
Albuquerque NM 87110  
[bbakker@nmda.nmsu.edu](mailto:bbakker@nmda.nmsu.edu)  
(505)889-9924 or (575)646-0339  
fax: (505) 883-3235  
<http://www.nmda.nmsu.edu/marketing/organic-program/>

---

**From:** Updike, Scott - AMS [mailto:[Scott.Updike@ams.usda.gov](mailto:Scott.Updike@ams.usda.gov)]  
**Sent:** Friday, June 22, 2012 9:20 AM  
**To:** Bakker, Brett  
**Subject:** NOP visit with dairies in NM

Hi Brett Bakker,

Miles McEvoy asked me (the new livestock specialist for the NOP) to arrange a trip to Texas to assess the pasture rule exemption that was given to ruminant livestock producers in most Texas counties in 2011. While in the Amarillo area, we wanted to visit some dairies in NM near the Texas border. While touring organic beef and dairy farms, we will also examine some other issues that have been raised

to the attention of the NOP including how the farms are sourcing replacement females and breeder stock for potential revisions of the Origin of Livestock regulations, how farms and dairy processors coordinate sanitizer use of bulk milk trucks, and the availability of organic slaughter facilities for organic beef producers and culling of organic dairy cattle.

We would like to visit several farms which NMDA certifies the week of July 23 – 27.

Native Pastures in Clovis, NM

Lake Ridge LLC in Portales, NM

Nature's Way Management in Portales, NM

For each of these farms could you send us a copy of their Organic System Plan and the best contact person?

A representative from NMDA would be welcome to join us.

Sincerely,  
Scott Updike

M. Scott Updike, PhD  
Agricultural Marketing Specialist  
Standards Division  
USDA-AMS-NOP  
1400 Independence Ave., S.W.  
Room 2646-S, STOP 0268  
Washington, D.C. 20250  
Phone 202-260-8076

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## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Thursday, July 05, 2012 1:18 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: NOP visit with dairies in NM

---

**From:** Bakker, Brett [mailto:bbakker@nmda.nmsu.edu]  
**Sent:** Friday, June 22, 2012 4:02 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: NOP visit with dairies in NM

Scott  
same here. we have certified four or five over the past twenty years but these have all been small packing house that pretty much have all the custom business they need and so don't bother to certify any longer. we've tried to get NMDA plant to certify but they don't want to provide competition to independents. but the large independents don't want to certify either because they have enough business from the non-organic industry. our beef/lamb producers have to go to southern colorado!

Brett Bakker  
New Mexico Department of Agriculture, Organic Program  
4501 Indian School Rd NE  
Suite 100 Rm G104  
Albuquerque NM 87110  
[bbakker@nmda.nmsu.edu](mailto:bbakker@nmda.nmsu.edu)  
(505)889-9924 or (575)646-0339  
fax: (505) 883-3235  
<http://www.nmda.nmsu.edu/marketing/organic-program/>

---

**From:** Updike, Scott - AMS [mailto:Scott.Updike@ams.usda.gov]  
**Sent:** Friday, June 22, 2012 1:47 PM  
**To:** Bakker, Brett  
**Subject:** RE: NOP visit with dairies in NM

Brett,  
Thank you for sending the information.

We would be glad to have you join us. Once I have all the contact information, I am going to contact the various farms to see which dates work best for them. We plan on spending 1 day of our trip in New Mexico. Once I finalize the itinerary, I will let you know so that you can join us.

I have been in contact with the Texas Department of Ag as well and I was surprised to hear that there are no organic beef slaughter plants in Texas. Are there any in New Mexico?

Scott

---

**From:** Bakker, Brett [<mailto:bbakker@nmda.nmsu.edu>]

**Sent:** Friday, June 22, 2012 2:16 PM

**To:** Updike, Scott - AMS

**Subject:** RE: NOP visit with dairies in NM

Mike

i will send you the requested information as soon as i can gather it . we are still paper-based so i will make copies and fedex to you.

i would like to join you on at least part of the visits.

thank you

let me know if you have any questions or concerns

brett

Brett Bakker

New Mexico Department of Agriculture, Organic Program

4501 Indian School Rd NE

Suite 100 Rm G104

Albuquerque NM 87110

[bbakker@nmda.nmsu.edu](mailto:bbakker@nmda.nmsu.edu)

(505)889-9924 or (575)646-0339

fax: (505) 883-3235

<http://www.nmda.nmsu.edu/marketing/organic-program/>

---

**From:** Updike, Scott - AMS [<mailto:Scott.Updike@ams.usda.gov>]

**Sent:** Friday, June 22, 2012 9:20 AM

**To:** Bakker, Brett

**Subject:** NOP visit with dairies in NM

Hi Brett Bakker,

Miles McEvoy asked me (the new livestock specialist for the NOP) to arrange a trip to Texas to assess the pasture rule exemption that was given to ruminant livestock producers in most Texas counties in 2011. While in the Amarillo area, we wanted to visit some dairies in NM near the Texas border. While touring organic beef and dairy farms, we will also examine some other issues that have been raised to the attention of the NOP including how the farms are sourcing replacement females and breeder stock for potential revisions of the Origin of Livestock regulations, how farms and dairy processors coordinate sanitizer use of bulk milk trucks, and the availability of organic slaughter facilities for organic beef producers and culling of organic dairy cattle.

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Native Pastures in Clovis, NM

Lake Ridge LLC in Portales, NM

Nature's Way Management in Portales, NM

For each of these farms could you send us a copy of their Organic System Plan and the best contact person?

A representative from NMDA would be welcome to join us.

Sincerely,  
Scott Updike

M. Scott Updike, PhD  
Agricultural Marketing Specialist  
Standards Division  
USDA-AMS-NOP  
1400 Independence Ave., S.W.  
Room 2646-S, STOP 0268  
Washington, D.C. 20250  
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## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Thursday, July 05, 2012 1:18 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: NOP visit with dairies in NM

---

**From:** Bakker, Brett [mailto:bbakker@nmda.nmsu.edu]  
**Sent:** Thursday, June 28, 2012 7:19 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: NOP visit with dairies in NM

Scott  
my apologies! leaving for the day and realized i haven't gotten you the info. i will mail it tomorrow and email you specific contacts info.

thanks

brett

Brett Bakker  
New Mexico Department of Agriculture, Organic Program  
4501 Indian School Rd NE  
Suite 100 Rm G104  
Albuquerque NM 87110  
[bbakker@nmda.nmsu.edu](mailto:bbakker@nmda.nmsu.edu)  
(505)889-9924 or (575)646-0339  
fax: (505) 883-3235  
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I have been in contact with the Texas Department of Ag as well and I was surprised to hear that there are no organic beef slaughter plants in Texas. Are there any in New Mexico?

Scott



---

**From:** Bakker, Brett [<mailto:bbakker@nmda.nmsu.edu>]  
**Sent:** Friday, June 22, 2012 2:16 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: NOP visit with dairies in NM

Mike

i will send you the requested information as soon as i can gather it . we are still paper-based so i will make copies and fedex to you.

i would like to join you on at least part of the visits.

thank you

let me know if you have any questions or concerns

brett

Brett Bakker  
New Mexico Department of Agriculture, Organic Program  
4501 Indian School Rd NE  
Suite 100 Rm G104  
Albuquerque NM 87110  
[bbakker@nmda.nmsu.edu](mailto:bbakker@nmda.nmsu.edu)  
(505)889-9924 or (575)646-0339  
fax: (505) 883-3235  
<http://www.nmda.nmsu.edu/marketing/organic-program/>

---

**From:** Updike, Scott - AMS [<mailto:Scott.Updike@ams.usda.gov>]  
**Sent:** Friday, June 22, 2012 9:20 AM  
**To:** Bakker, Brett  
**Subject:** NOP visit with dairies in NM

Hi Brett Bakker,

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Native Pastures in Clovis, NM

Lake Ridge LLC in Portales, NM

Nature's Way Management in Portales, NM

For each of these farms could you send us a copy of their Organic System Plan and the best contact person?

A representative from NMDA would be welcome to join us.

Sincerely,  
Scott Updike

M. Scott Updike, PhD  
Agricultural Marketing Specialist  
Standards Division  
USDA-AMS-NOP  
1400 Independence Ave., S.W.  
Room 2646-S, STOP 0268  
Washington, D.C. 20250  
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## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Friday, July 06, 2012 3:56 PM  
**To:** Crail, Lars - AMS  
**Subject:** FW: Overview of Trip to Texas Panhandle  
**Attachments:** Texas livestock tour - July 2012.docx

The trip is the week of July 23<sup>rd</sup>.

scott

---

**From:** McEvoy, Miles - AMS  
**Sent:** Friday, July 06, 2012 3:16 PM  
**To:** Meade, Rita; Updike, Scott - AMS  
**Cc:** Crail, Lars - AMS; Hartley, Julie - AMS; Pooler, Bob - AMS; Rakola, Betsy - AMS; Kuhn, Meg - AMS  
**Subject:** FW: Overview of Trip to Texas Panhandle

Rita is going to start contacting the operations on Monday to set up the schedule. Please work with her to get all the background information together. I need a copy of the OSP and the last inspection report. The certifiers should be notified that I am conducting these visits. I am also copying the AIA accreditation managers as I will be visiting operations certified by 5 different certifiers (NMDA, TDA, QCS, CCOF and QAI)

---

**From:** Updike, Scott - AMS  
**Sent:** Friday, July 06, 2012 7:17 AM  
**To:** McEvoy, Miles - AMS  
**Subject:** RE: Overview of Trip to Texas Panhandle

Miles,  
Here is the updated schedule with the information I have for the operations.

Scott

---

**From:** McEvoy, Miles - AMS  
**Sent:** Thursday, July 05, 2012 6:16 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: Overview of Trip to Texas Panhandle

Scott – thanks. Could you provide the email and phone numbers of the operations and I will contact them directly to set up the visits. I have attached the modified schedule and a column for the email/phone numbers.

Miles

---

**From:** Updike, Scott - AMS  
**Sent:** Thursday, July 05, 2012 3:55 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** Overview of Trip to Texas Panhandle

Miles,

I have attached the document I created for the over view of the trip. I have added a chart with a tentative schedule for each day with 1 additional farm in case the one of the first two farms for that day is not available.

Scott

## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Friday, June 22, 2012 2:00 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: TDA organic livestock operation tours the week of July 23 - 27

Miles,

I checked C&E. Cornucopia filed a complaint against the relatively large dairy Natural Prairie over the use of transitioned animals as organic dairy animals. Lorraine had that case prior to working with the NOSB and the case sat during that time. According to Lorraine, the owners have been open in providing all records requested. One of the dairy's practices is (b) (5), (b) (4)

This is one of the practices which the proposed Origin of Livestock regulations would prohibit.

Would you be interested in visiting that farm or should we skip it?

Scott

---

**From:** Mary Ellen Holliman [mailto:Mary.Holliman@TexasAgriculture.gov]  
**Sent:** Friday, June 22, 2012 12:49 PM  
**To:** Updike, Scott - AMS  
**Cc:** Organic; Randy Rivera  
**Subject:** RE: TDA organic livestock operation tours the week of July 23 - 27

Dear Mr. Updike:

Thank you for the notification. As several of these accounts are still in the renewal process, it may take time to complete the reviews and prepare the OSPs to send to you. Please be aware that these are extremely large files (each operation has at least 3 different certifications) so I must mail the files to you. For these reasons, please clarify if you just want the current OSP for each certification or if you need multiple years. Also, all of these locations were inspected as part of the organic milk audit conducted by the USDA/OIG, and the Boehning Dairy Livestock account was selected as the livestock witness audit in May 2012 as part of TDA's accreditation renewal audit. Therefore, it may be of little to no benefit in gaining new information. However, Natural Prairie has an outstanding complaint investigation with NOP that is approximately 2 years old and the owners would greatly appreciate NOP officials coming out to their facility to conduct an on-site inspection in order to complete the complaint investigation.

TDA does not currently certify any organic livestock slaughter facilities and to TDA's knowledge, there are no certified organic livestock slaughter facilities in Texas. The Texas organic producers certified by TDA do not have the resources to ship their ruminant livestock long distances and must sell their product either on the hoof or labeled as produced without the use of hormones or antibiotics.

Sincerely,

*Mary Ellen Holliman*

Coordinator for Organic Certification Program

Texas Department of Agriculture

Office: (512) 463-7513

Fax: (888) 215-5295

[Organic@TexasAgriculture.gov](mailto:Organic@TexasAgriculture.gov)

**From:** Updike, Scott - AMS [<mailto:Scott.Updike@ams.usda.gov>]  
**Sent:** Friday, June 22, 2012 10:11 AM  
**To:** Pooler, Bob - AMS  
**Cc:** Mary Ellen Holliman  
**Subject:** RE: Request for livestock contacts with certifiers

Hi Ms. Holliman,

Miles McEvoy asked me (the new livestock specialist for the NOP) to arrange a trip to Texas to assess the pasture rule exemption that was given to ruminant livestock producers in most Texas counties in 2011. We plan on going to Amarillo and then visiting some organic dairy and beef farms. While touring organic beef and dairy farms, we will also examine some other issues that have been raised to the attention of the NOP including how the farms are sourcing replacement females and breeder stock for potential revisions of the Origin of Livestock regulations, how farms and dairy processors coordinate sanitizer use of bulk milk trucks, and the availability of organic slaughter facilities for organic beef producers and culling of organic dairy cattle.

We would like to visit several farms which you TDA certifies the week of July 23 – 27.

Boehning Dairy Farm in Earth, TX

Hilltop Dairy, Llc in Earth, TX

Redland Dairy, Llc in Farwell, TX

Natural Prairie Dairy in Channing, TX

For each of these farms could you send us a copy of their Organic System Plan and the best contact person?

I was looking to see if there are any beef slaughter plants in the panhandle region of Texas which are certified organic. Do you know of any even if TDA does not certify them? Where do the organic beef cattle in Texas go for slaughter?

A representative from TDA would be welcome to join us.

Sincerely,  
Scott Updike

---

**From:** Pooler, Bob - AMS  
**Sent:** Thursday, June 21, 2012 12:52 PM  
**To:** Updike, Scott - AMS  
**Cc:** Mary Ellen Holliman ([Mary.Holliman@texasagriculture.gov](mailto:Mary.Holliman@texasagriculture.gov))  
**Subject:** RE: Request for livestock contacts with certifiers

TDA Contact: Mary Ellen Holliman

Phone: 512-463-7513

Email: [Mary.Holliman@texasagriculture.gov](mailto:Mary.Holliman@texasagriculture.gov)

---

**From:** Updike, Scott - AMS  
**Sent:** Thursday, June 21, 2012 12:49 PM  
**To:** Kuhn, Meg - AMS; Crail, Lars - AMS; Pooler, Bob - AMS  
**Subject:** Request for livestock contacts with certifiers

Hi,

Miles has asked for me to set up a trip with him to the Texas panhandle to learn about a couple of different aspects of ruminant production (dairy and beef). I have identified several ruminant farms in the area and Miles suggested that I ask you who the appropriate livestock contact person is for each of these certifiers.

QAI  
QCS  
Texas DOA

On the ACA assignment sheet, I did not see who was responsible for New Mexico DOA. Who should I contact to ask about the livestock contact with NM DOA?

Scott

M. Scott Updike, PhD  
Agricultural Marketing Specialist  
Standards Division  
USDA-AMS-NOP  
1400 Independence Ave., S.W.  
Room 2646-S, STOP 0268  
Washington, D.C. 20250  
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## Schurkamp, Lynnea - AMS

---

**From:** Bailey, Melissa - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BAILEY, MELISSA36E01F8B-F138-45AC-A605-43FB548DB3DB>  
**Sent:** Tuesday, October 09, 2012 12:11 PM  
**To:** Updike, Scott - AMS  
**Subject:** FW: texas trip report  
**Attachments:** TX-NM trip report - 100512.docx

Scott – please take a look at this trip report as it touches on OOL issues. You will see I sent a note to Heather back on our outstanding questions. Have you finished adding more detail to the OOL preamble yet that discusses alternatives and why we opted to choose a particular direction?

Thanks, Melissa

---

**From:** Michael, Matthew - AMS  
**Sent:** Friday, October 05, 2012 2:33 PM  
**To:** McEvoy, Miles - AMS; Ahramjian, Lisa - AMS  
**Cc:** Courtney, Cheri - AMS; Tucker, Jennifer - AMS; Bailey, Melissa - AMS  
**Subject:** RE: texas trip report

Hi Miles:

Here is the revised report with photos. You may have additional or better photos.

I added the names except for the woman who accompanied us at Aurora. I will check with Scott next week to see if he knows. Also, Meg is out today. Next week I will confirm with her the date that the NONC went to Cottonwood.

Matthew Michael  
Director, Compliance and Enforcement Division  
USDA National Organic Program  
1400 Independence Ave SW; Room 2959  
Washington, DC 20250-0268  
Phone: (202) 260-8657  
[matthew.michael@ams.usda.gov](mailto:matthew.michael@ams.usda.gov)

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---

**From:** McEvoy, Miles - AMS  
**Sent:** Saturday, September 29, 2012 7:06 AM  
**To:** Michael, Matthew - AMS; Ahramjian, Lisa - AMS  
**Cc:** Courtney, Cheri - AMS; Tucker, Jennifer - AMS; Bailey, Melissa - AMS  
**Subject:** texas trip report

The report looks good. We should add some photos. The summary findings include a number of items that need followup.



We also need to include the correct names for the QAI, TDA and QCS people that were present during our visits.

Miles V McEvoy  
Deputy Administrator  
National Organic Program  
202-720-3252

## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Wednesday, July 11, 2012 2:06 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: Visit Schedule  
**Attachments:** FW: Cottonwood Cattle Co - information needed.msg; ATT00030.txt  
**Importance:** High

Miles,

I just wanted to verify that this is not an inspection and that producers can say no. This particular family was planning on taking a vacation that week. If they can not be there, NOP will not hold anything against them about it.

I have received some of the OSP's. I am still waiting for the ones from TDA, though I was told they have been mailed.

Scott

---

**From:** Ramkrishnan [mailto:ram@qcsinfo.org]  
**Sent:** Wednesday, July 11, 2012 12:11 PM  
**To:** Updike, Scott - AMS  
**Cc:** ram@qcsinfo.org  
**Subject:** FW: [MALWARE FREE]Visit Schedule  
**Importance:** High

Scott,

I am contacting since the client want to finalize the dates. The client has a family vaccination that he need to postpone and wanted to firm up the dates.

---

**From:** Dan Bornemeier [mailto:(b) (6)]  
**Sent:** Wednesday, July 11, 2012 12:03 PM  
**To:** [meg.kuhn@ams.usda.gov](mailto:meg.kuhn@ams.usda.gov)  
**Cc:** 'Ramkrishnan'  
**Subject:** [MALWARE FREE]Visit Schedule  
**Importance:** High

Meg,

I am contacting you in regards to an email forwarded to me from Quality Inspection Services, copy attached.

It seems that we are on the visit list for the Deputy Administrator's visit to Texas/New Mexico that is shortly upcoming.

The email indicated Rita Meade would be contacting us to arrange a time and date, but that has yet to happen. Since the date is rapidly approaching, I'd like to get the schedule down ASAP. I tried calling the 202-720-3252 main line but received a full voicemail box.

Can you assist in getting this scheduled?

Regards,

Dan Bornemeier

Controller, CA Skiles, Jr. ET AL

mailto: (b) (6)

office: 806-384-3377

mobile: (b) (6)

fax: 806-384-3379

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No virus found in this outgoing message.

Checked by AVG - [www.avg.com](http://www.avg.com)

Version: 9.0.930 / Virus Database: 2437.1.1/5124 - Release Date: 07/11/12 01:34:00

## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Thursday, July 05, 2012 1:20 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: NOP visit to Aurora Organic Farms -Coldwater  
**Attachments:** Apx 12-16.zip

---

**From:** Allen, Carey [mailto:callen@nsf.org]  
**Sent:** Friday, June 22, 2012 1:32 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: NOP visit to Aurora Organic Farms -Coldwater

2 of 5 with attachments.

*Carey Allen*

Quality Specialist  
NSF International  
Quality Assurance International (QAI)  
734 214 6261  
[callen@nsf.org](mailto:callen@nsf.org)

---

**From:** Updike, Scott - AMS [mailto:Scott.Updike@ams.usda.gov]  
**Sent:** Friday, June 22, 2012 10:38 AM  
**To:** Allen, Carey  
**Subject:** NOP visit to Aurora Organic Farms -Coldwater

Hi Ms. Allen,

Miles McEvoy asked me (the new livestock specialist for the NOP) to arrange a trip to Texas to assess the pasture rule exemption that was given to ruminant livestock producers in most Texas counties. We plan on going to Amarillo and then visiting some organic dairy and beef farms. While touring organic beef and dairy farms, we will also examine some other issues that have been raised to the attention of the NOP including how the farms are sourcing replacement females and breeder stock for potential revisions of the Origin of Livestock regulations, how farms and dairy processors coordinate sanitizer use of bulk milk trucks, and the availability of organic slaughter facilities for organic beef producers and culling of organic dairy cattle.

We would like to visit the Aurora Organic Farms-Coldwater dairy, in Stratford, Texas, the week of July 23 – 27.  
Is Kavin Caris the best contact person?  
Is 806-769-4447 the best contact number?  
Could you send us a copy of their Organic System Plan?

A representative from QAI would be welcome to join us.

Sincerely,  
Scott Updike

M. Scott Updike, PhD  
Agricultural Marketing Specialist  
Standards Division  
USDA-AMS-NOP  
1400 Independence Ave., S.W.  
Room 2646-S, STOP 0268  
Washington, D.C. 20250  
Phone 202-260-8076

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## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Thursday, July 05, 2012 3:55 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** Overview of Trip to Texas Panhandle  
**Attachments:** Overview of Trip to Texas Panhandle.docx

Miles,

I have attached the document I created for the over view of the trip. I have added a chart with a tentative schedule for each day with 1 additional farm in case the one of the first two farms for that day is not available.

Scott

## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Thursday, June 21, 2012 1:15 PM  
**To:** McEvoy, Miles - AMS  
**Cc:** Bailey, Melissa - AMS  
**Subject:** Overview of Trip to Texas Panhandle  
**Attachments:** Overview of Trip to Texas Panhandle.docx

Miles,

I have attached an overview of the trip to Texas as well as a list of farms that are in the area. I have included two additional farms from New Mexico that are relatively close to the dairy in Clovis you wanted to visit. Of particular interest is that the sole organic product from one of these farms is transitioned dairy heifers.

I have contacted the appropriate AIA people to find the livestock contacts for the 4 certifiers which correspond to these farms. Once I have your revisions for the purpose of the trip, I will contact the certifiers and the farms to begin arranging the trip.

Scott

## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Tuesday, October 09, 2012 3:50 PM  
**To:** 'Allen, Carey'  
**Subject:** RE: Aurora Dairy updated appendices

Thank you

Scott Updike  
USDA-AMS-NOP  
202-260-8076

---

**From:** Allen, Carey [mailto:callen@nsf.org]  
**Sent:** Tuesday, October 09, 2012 3:02 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: Aurora Dairy updated appendices

That was Alexis Randolph.

*Carey Allen*  
Quality Specialist  
NSF International  
Quality Assurance International (QAI)  
734 214 6261  
[callen@nsf.org](mailto:callen@nsf.org)

---

**From:** Updike, Scott - AMS [<mailto:scott.updike@ams.usda.gov>]  
**Sent:** Tuesday, October 09, 2012 2:43 PM  
**To:** Allen, Carey  
**Subject:** RE: Aurora Dairy updated appendices

Hi Carey,  
I am helping to put together a trip report. Unfortunately we did not write down the name of the QAI representative who went on the visit at Aurora. Could you please give me her name?

Scott

Scott Updike  
USDA-AMS-NOP  
202-260-8076

---

**From:** Allen, Carey [<mailto:callen@nsf.org>]  
**Sent:** Tuesday, July 10, 2012 2:03 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: Aurora Dairy updated appendices

Scott,



Please find attached the inspection report and supporting documents, the NC letter and response.

*Carey Allen*

Quality Specialist  
NSF International  
Quality Assurance International (QAI)  
734 214 6261  
[callen@nsf.org](mailto:callen@nsf.org)

---

**From:** Updike, Scott - AMS [<mailto:Scott.Updike@ams.usda.gov>]  
**Sent:** Tuesday, July 10, 2012 1:41 PM  
**To:** Allen, Carey  
**Subject:** RE: Aurora Dairy updated appendices

Carey,  
Miles has also requested the most recent inspection report. Could you send a copy of that as well?

Scott

---

**From:** Allen, Carey [<mailto:callen@nsf.org>]  
**Sent:** Friday, June 29, 2012 2:04 PM  
**To:** Updike, Scott - AMS  
**Cc:** Morr, Craig; Randolph, Alexis  
**Subject:** RE: Aurora Dairy updated appendices

Scott,  
Thank you for the update below.  
I will be out of the office July 2 – 7, 2012. Please copy Craig Morr on any communication during this time such that he may respond to any request or communicate with QAI management any travel details.

Best wishes,

*Carey Allen*

Quality Specialist  
NSF International  
Quality Assurance International (QAI)  
734 214 6261  
[callen@nsf.org](mailto:callen@nsf.org)

---

**From:** Updike, Scott - AMS [<mailto:Scott.Updike@ams.usda.gov>]  
**Sent:** Friday, June 29, 2012 2:00 PM  
**To:** Allen, Carey  
**Subject:** RE: Aurora Dairy updated appendices

Carey,  
Thank. I received the 3 messages.  
We are still in the planning stages. Plans have changed such that I will not be travelling, though Miles may or may not. Once plans are set, I will let you know if NOP will be going to the Aurora dairy and if so, on which day so that a representative from QAI may be there as well.  
Thank you,  
Scott

---

**From:** Allen, Carey [<mailto:callen@nsf.org>]  
**Sent:** Friday, June 29, 2012 11:31 AM  
**To:** Updike, Scott - AMS  
**Subject:** Aurora Dairy updated appendices

Hello Scott,

QAI received updates on several of the OCP appendices from Aurora Dairy earlier this week. This is 1 of 3 messages with the zip files attached.

Do you have an update on what your travel plans will be as far as the specific dates you'll be on the farm in Stratford?  
QAI would like to send a representative.  
Also, did you want to have your visit coincide with our inspection?

Please confirm when you have received all three messages.

Thanks,

*Carey Allen*

Quality Specialist

NSF International

Quality Assurance International (QAI)

734 214 6261

[callen@nsf.org](mailto:callen@nsf.org)

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## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
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Hi Carey,

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Scott

Scott Updike  
USDA-AMS-NOP  
202-260-8076

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**Sent:** Tuesday, July 10, 2012 2:03 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: Aurora Dairy updated appendices

Scott,

Please find attached the inspection report and supporting documents, the NC letter and response.

*Carey Allen*

Quality Specialist  
NSF International  
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734 214 6261  
[callen@nsf.org](mailto:callen@nsf.org)

---

**From:** Updike, Scott - AMS [<mailto:Scott.Updike@ams.usda.gov>]  
**Sent:** Tuesday, July 10, 2012 1:41 PM  
**To:** Allen, Carey  
**Subject:** RE: Aurora Dairy updated appendices

Carey,

Miles has also requested the most recent inspection report. Could you send a copy of that as well?

Scott

---

**From:** Allen, Carey [<mailto:callen@nsf.org>]  
**Sent:** Friday, June 29, 2012 2:04 PM  
**To:** Updike, Scott - AMS  
**Cc:** Morr, Craig; Randolph, Alexis  
**Subject:** RE: Aurora Dairy updated appendices

Scott,

Thank you for the update below.

I will be out of the office July 2 – 7, 2012. Please copy Craig Morr on any communication during this time such that he may respond to any request or communicate with QAI management any travel details.

Best wishes,

*Carey Allen*

Quality Specialist

NSF International

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[callen@nsf.org](mailto:callen@nsf.org)

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**From:** Updike, Scott - AMS [<mailto:Scott.Updike@ams.usda.gov>]

**Sent:** Friday, June 29, 2012 2:00 PM

**To:** Allen, Carey

**Subject:** RE: Aurora Dairy updated appendices

Carey,

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We are still in the planning stages. Plans have changed such that I will not be travelling, though Miles may or may not. Once plans are set, I will let you know if NOP will be going to the Aurora dairy and if so, on which day so that a representative from QAI may be there as well.

Thank you,

Scott

---

**From:** Allen, Carey [<mailto:callen@nsf.org>]

**Sent:** Friday, June 29, 2012 11:31 AM

**To:** Updike, Scott - AMS

**Subject:** Aurora Dairy updated appendices

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Also, did you want to have your visit coincide with our inspection?

Please confirm when you have received all three messages.

Thanks,

*Carey Allen*

Quality Specialist

NSF International

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734 214 6261

[callen@nsf.org](mailto:callen@nsf.org)

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## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Tuesday, July 10, 2012 2:16 PM  
**To:** 'Allen, Carey'  
**Subject:** RE: Aurora Dairy updated appendices

Carey,  
Thank you.

Scott

---

**From:** Allen, Carey [<mailto:callen@nsf.org>]  
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*Carey Allen*  
Quality Specialist  
NSF International  
Quality Assurance International (QAI)  
734 214 6261  
[callen@nsf.org](mailto:callen@nsf.org)

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Best wishes,  
*Carey Allen*  
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Thank you,  
Scott

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**Sent:** Friday, June 29, 2012 11:31 AM  
**To:** Updike, Scott - AMS  
**Subject:** Aurora Dairy updated appendices

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QAI would like to send a representative.  
Also, did you want to have your visit coincide with our inspection?

Please confirm when you have received all three messages.

Thanks,  
*Carey Allen*  
Quality Specialist  
NSF International  
Quality Assurance International (QAI)  
734 214 6261  
[callen@nsf.org](mailto:callen@nsf.org)

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## Schurkamp, Lynnea - AMS

---

**From:** Meade, Rita </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MEADE, RITA870808C0-C514-4C03-8E99-BCBE6703E84E730>  
**Sent:** Thursday, July 12, 2012 3:52 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: Emailing: Texas Panhandle Schedule

Yes, thanks.

Rita Meade  
Executive Assistant to the Deputy Administrator USDA, National Organic Program  
1400 Independence Ave SW  
Room 2648-S, STOP 0268  
Washington, DC 20250-0268  
Phone: (202) 720-3252  
rita.meade@ams.usda.gov

-----Original Message-----

From: Updike, Scott - AMS  
Sent: Thursday, July 12, 2012 2:46 PM  
To: Meade, Rita  
Subject: RE: Emailing: Texas Panhandle Schedule

Rita,  
Here are some alternative contacts

Natural Prairie: 806-365-4189  
Native pastures: 575-760-6645 or 575-760-2630 Idalou Egg ranch: 806-892-2755

Is this all that you need?

Scott

-----Original Message-----

From: Meade, Rita  
Sent: Thursday, July 12, 2012 12:55 PM  
To: Updike, Scott - AMS  
Subject: Emailing: Texas Panhandle Schedule

FYI

Your message is ready to be sent with the following file or link attachments:

Texas Panhandle Schedule

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

## Schurkamp, Lynnea - AMS

---

**From:** Crail, Lars - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=CRAIL, LARS0C132495-1A12-46E6-BF8D-5C684C97C461>  
**Sent:** Saturday, July 14, 2012 9:39 AM  
**To:** Updike, Scott - AMS  
**Subject:** FW: Overview of Trip to Texas Panhandle  
**Attachments:** Texas livestock tour - July 2012.docx

Hi Scott, Can you confirm that a visit to QAI's client is scheduled to the attached schedule. One of QAI's representatives would like to attend. Thanks.

Lars

---

**From:** McEvoy, Miles - AMS  
**Sent:** Friday, July 06, 2012 3:16 PM  
**To:** Meade, Rita; Updike, Scott - AMS  
**Cc:** Crail, Lars - AMS; Hartley, Julie - AMS; Pooler, Bob - AMS; Rakola, Betsy - AMS; Kuhn, Meg - AMS  
**Subject:** FW: Overview of Trip to Texas Panhandle

Rita is going to start contacting the operations on Monday to set up the schedule. Please work with her to get all the background information together. I need a copy of the OSP and the last inspection report. The certifiers should be notified that I am conducting these visits. I am also copying the AIA accreditation managers as I will be visiting operations certified by 5 different certifiers (NMDA, TDA, QCS, CCOF and QAI)

---

**From:** Updike, Scott - AMS  
**Sent:** Friday, July 06, 2012 7:17 AM  
**To:** McEvoy, Miles - AMS  
**Subject:** RE: Overview of Trip to Texas Panhandle

Miles,  
Here is the updated schedule with the information I have for the operations.

Scott

---

**From:** McEvoy, Miles - AMS  
**Sent:** Thursday, July 05, 2012 6:16 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: Overview of Trip to Texas Panhandle

Scott – thanks. Could you provide the email and phone numbers of the operations and I will contact them directly to set up the visits. I have attached the modified schedule and a column for the email/phone numbers.

Miles

---

**From:** Updike, Scott - AMS  
**Sent:** Thursday, July 05, 2012 3:55 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** Overview of Trip to Texas Panhandle

Miles,

I have attached the document I created for the over view of the trip. I have added a chart with a tentative schedule for each day with 1 additional farm in case the one of the first two farms for that day is not available.

Scott

## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Wednesday, July 18, 2012 3:37 PM  
**To:** Mary Ellen Holliman  
**Subject:** RE: FedEx Shipment 798629567306 Delivered

Thank you for that confirmation. I appreciate all of your work in getting this done.

scott

---

**From:** Mary Ellen Holliman [mailto:Mary.Holliman@TexasAgriculture.gov]  
**Sent:** Wednesday, July 18, 2012 3:35 PM  
**To:** Updike, Scott - AMS  
**Subject:** FW: FedEx Shipment 798629567306 Delivered

Hi Scott:

Just received notice that the CD-ROM has been delivered to you and A.ARSENAULT was the person who signed for the package.

Sincerely,  
*Mary Ellen Holliman*  
Coordinator for Organic Certification Program  
Texas Department of Agriculture

---

**From:** [trackingupdates@fedex.com](mailto:trackingupdates@fedex.com) [mailto:trackingupdates@fedex.com]  
**Sent:** Wednesday, July 18, 2012 2:33 PM  
**To:** Mary Ellen Holliman  
**Subject:** FedEx Shipment 798629567306 Delivered

---

This tracking update has been requested by:

Company Name: texas dept of agriculture  
Name: Mary Ellen Holliman  
E-mail: [mary.ellen.holliman@TexasAgriculture.gov](mailto:mary.ellen.holliman@TexasAgriculture.gov)

---

Our records indicate that the following shipment has been delivered:

|                    |                          |
|--------------------|--------------------------|
| Reference:         | 11781-03131              |
| Ship (P/U) date:   | Jul 17, 2012             |
| Delivery date:     | Jul 18, 2012 3:29 PM     |
| Sign for by:       | A.ARSENAULT              |
| Delivery location: | WASHINGTON, DC           |
| Delivered to:      | Receptionist/Front Desk  |
| Service type:      | FedEx Standard Overnight |

Packaging type: FedEx Envelope  
Number of pieces: 1  
Weight: 0.50 lb.  
Special handling/Services: Deliver Weekday

Tracking number: [798629567306](#)

Shipper Information

Mary Ellen Holliman  
texas dept of agriculture  
1700 North Congress Avenue  
Room 1125E  
Austin  
TX  
US  
78701

Recipient Information

Mr. Scott Updike  
USDA National Organic Program  
1400 INDEPENDENCE AVE SW  
WASHINGTON  
DC  
US  
20250

Please do not respond to this message. This email was sent from an unattended mailbox. This report was generated at approximately 2:32 PM CDT on 07/18/2012.

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All weights are estimated.

To track the latest status of your shipment, click on the tracking number above, or visit us at [fedex.com](#).

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## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Monday, July 16, 2012 3:19 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** RE: Idea proposal

I am sorry. I thought I just checked and you had the time.

I will let Mary Ellen know that the teleconference won't be possible and that you look forward to seeing them in Texas.

Scott

---

**From:** McEvoy, Miles - AMS  
**Sent:** Monday, July 16, 2012 3:17 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: Idea proposal

Looks like I'm booked on Thursdy afternoon.

---

**From:** Updike, Scott - AMS  
**Sent:** Monday, July 16, 2012 3:08 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: Idea proposal

Miles,

If you are still interested, I am going to schedule the conference call for this Thursday at 1. Your calendar is clear for then.

Scott

---

**From:** Mary Ellen Holliman [<mailto:Mary.Holliman@TexasAgriculture.gov>]  
**Sent:** Monday, July 16, 2012 1:30 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: Idea proposal

Good morning Scott:

I've received confirmation from all three dairymen that Thursday, July 19 from 11:00 -12:00 CST (1-2:00 EST) is the preferable date and time for the conference call please forward the call-in number, pass code,etc. and I will forward to my producers. I plan to mail the CD-ROMS with all the OSPs and inspection reports today via FedEx so you should receive them on Thursday.

Sincerely,

*Mary Ellen Holliman*

Coordinator for Organic Certification Program  
Texas Department of Agriculture



---

**From:** Mary Ellen Holliman  
**Sent:** Tuesday, July 10, 2012 4:56 PM  
**To:** 'Updike, Scott - AMS'  
**Subject:** RE: Idea proposal

Hi Scott:

I will send an email to my producers requesting the date and time that they prefer. I'm pretty sure all four dairy operations have different morning and afternoon milking schedules and one dairyman has to travel across the New Mexico-Texas state line. Typically I get the best results in reaching the dairymen via telephone between 1 and 2:00 CST (2-3 EST).

I have been including copies of the inspection reports with the OSP but will double-check before mailing. Please note that all inspections were conducted prior to the variance request so there will be no mention of how the operations were handling the variance request at the time of inspection.

Also, can you give me a tentative agenda of when you plan to start/finish the tour of the TDA operations? I need to schedule my travel and the producers have requested tentative dates and times that we will be on-site at their operations. My suggestion would be to start with the smallest operation, Redland Dairy and then travel to Boehning Dairy and Hilltop Dairy (both owned and operated by Brian Boehning) and then finish with the largest operation (which is also the furthest distance), Natural Prairie Organic Dairy Farm.

Sincerely,  
*Mary Ellen Holliman*  
Coordinator for Organic Certification Program  
Texas Department of Agriculture

---

**From:** Updike, Scott - AMS [<mailto:Scott.Updike@ams.usda.gov>]  
**Sent:** Tuesday, July 10, 2012 12:38 PM  
**To:** Mary Ellen Holliman  
**Subject:** RE: Idea proposal

Hi Mary Ellen,

I talked to Miles and he likes the idea of having a round table conference call. NOP could host the call on our teleconference line. Miles would have some time on Tuesday the 17<sup>th</sup> around noon eastern time or Thursday the 19<sup>th</sup> sometime between 11 and 2 eastern. Would any of those times work for you and the producers? Dairy and beef farmers I have worked with here in the east were amenable to teleconference calls around lunch time. Do Texas cattle farmers feel the same way?

I appreciate all of your thoughts on the why there is such a lack of organic slaughter capacity. That seems to be the biggest stumbling block to more US production of organic beef. I was in a high end grocery store here in the MD to look at organic meat prices and all of the organic beef was from South America.

Miles has also requested a copy of the most recent inspection reports for the farms. Would it be possible for you to send those as well?

Scott

---

**From:** Mary Ellen Holliman [<mailto:Mary.Holliman@TexasAgriculture.gov>]  
**Sent:** Friday, July 06, 2012 5:40 PM  
**To:** Updike, Scott - AMS  
**Cc:** Organic  
**Subject:** Idea proposal

Hi Scott:

I tried to leave a voice mail but my antiquated office phone was not cooperating. I've spoken with a couple of our livestock producers that will be part of the tour and if possible, they would like to have a round-table conference call. This would help decrease the chance of you and Miles hearing the same comments multiple times, and decrease the amount of time that the producers have to spend away from daily work activities. The operations I certify have at least 2 milking a day and are in the early season of harvesting feed crops. The conference call system used by TDA would allow for several more producers and their ACAs to join in on the conference call so you would be able to get a good pool for addressing the issues mentioned in your previous email. I am currently in the process of finding available locations for that week that could host the conference call. Please let me know what if you and Miles would like for me to pursue this further.

Also, I received some help from an intern in scanning all the OSP files so those should be over-night mailed to you by next Tuesday at the latest.

Sincerely,

*Mary Ellen Holliman*

Coordinator for Organic Certification Program

Texas Department of Agriculture

Office: (512) 463-7513

Fax: (888) 215-5295

[Organic@TexasAgriculture.gov](mailto:Organic@TexasAgriculture.gov)

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## Schurkamp, Lynnea - AMS

---

**From:** McEvoy, Miles - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MCEVOY, MILES19F09CBD-BE7F-4909-8DAA-6F3FA5E2BC08>  
**Sent:** Monday, July 16, 2012 3:17 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: Idea proposal

Looks like I'm booked on Thursdy afternoon.

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**From:** Updike, Scott - AMS  
**Sent:** Monday, July 16, 2012 3:08 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: Idea proposal

Miles,

If you are still interested, I am going to schedule the conference call for this Thursday at 1. Your calendar is clear for then.

Scott

---

**From:** Mary Ellen Holliman [<mailto:Mary.Holliman@TexasAgriculture.gov>]  
**Sent:** Monday, July 16, 2012 1:30 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: Idea proposal

Good morning Scott:

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Sincerely,

*Mary Ellen Holliman*

Coordinator for Organic Certification Program  
Texas Department of Agriculture

---

**From:** Mary Ellen Holliman  
**Sent:** Tuesday, July 10, 2012 4:56 PM  
**To:** 'Updike, Scott - AMS'  
**Subject:** RE: Idea proposal

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I will send an email to my producers requesting the date and time that they prefer. I'm pretty sure all four dairy operations have different morning and afternoon milking schedules and one dairyman has to travel across the New Mexico-Texas state line. Typically I get the best results in reaching the dairymen via telephone between 1 and 2:00 CST (2-3 EST).

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Sincerely,

*Mary Ellen Holliman*

Coordinator for Organic Certification Program  
Texas Department of Agriculture

---

**From:** Updike, Scott - AMS [\[mailto:Scott.Updike@ams.usda.gov\]](mailto:Scott.Updike@ams.usda.gov)

**Sent:** Tuesday, July 10, 2012 12:38 PM

**To:** Mary Ellen Holliman

**Subject:** RE: Idea proposal

Hi Mary Ellen,

I talked to Miles and he likes the idea of having a round table conference call. NOP could host the call on our teleconference line. Miles would have some time on Tuesday the 17<sup>th</sup> around noon eastern time or Thursday the 19<sup>th</sup> sometime between 11 and 2 eastern. Would any of those times work for you and the producers? Dairy and beef farmers I have worked with here in the east were amenable to teleconference calls around lunch time. Do Texas cattle farmers feel the same way?

I appreciate all of your thoughts on the why there is such a lack of organic slaughter capacity. That seems to be the biggest stumbling block to more US production of organic beef. I was in a high end grocery store here in the MD to look at organic meat prices and all of the organic beef was from South America.

Miles has also requested a copy of the most recent inspection reports for the farms. Would it be possible for you to send those as well?

Scott

---

**From:** Mary Ellen Holliman [\[mailto:Mary.Holliman@TexasAgriculture.gov\]](mailto:Mary.Holliman@TexasAgriculture.gov)

**Sent:** Friday, July 06, 2012 5:40 PM

**To:** Updike, Scott - AMS

**Cc:** Organic

**Subject:** Idea proposal

Hi Scott:

I tried to leave a voice mail but my antiquated office phone was not cooperating. I've spoken with a couple of our livestock producers that will be part of the tour and if possible, they would like to have a round-table conference call. This would help decrease the chance of you and Miles hearing the same comments multiple times, and decrease the amount of time that the producers have to spend away from daily work activities. The operations I certify have at least 2 milking a day and are in the early season of harvesting feed crops. The conference call system used by TDA would allow for several more producers and their ACAs to join in on the conference call so you would be able to get a good pool for addressing the issues mentioned in your previous email. I am currently in the process of finding available locations for that week that could host the conference call. Please let me know what you and Miles would like for me to pursue this further.

Also, I received some help from an intern in scanning all the OSP files so those should be over-night mailed to you by next Tuesday at the latest.

Sincerely,

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## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Monday, July 09, 2012 7:15 AM  
**To:** McEvoy, Miles - AMS  
**Subject:** RE: Idea proposal

I will set that up with Mary Ellen.

Scott

---

**From:** McEvoy, Miles - AMS  
**Sent:** Friday, July 06, 2012 11:45 PM  
**To:** Updike, Scott - AMS  
**Subject:** Re: Idea proposal

Yes. Sounds great.

---

**From:** Updike, Scott - AMS  
**Sent:** Friday, July 06, 2012 07:02 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: Idea proposal

Miles,  
Would you like to have a conference call with the producers before the trip?

Scott

---

**From:** Mary Ellen Holliman [\[mailto:Mary.Holliman@TexasAgriculture.gov\]](mailto:Mary.Holliman@TexasAgriculture.gov)  
**Sent:** Friday, July 06, 2012 5:40 PM  
**To:** Updike, Scott - AMS  
**Cc:** Organic  
**Subject:** Idea proposal

Hi Scott:

I tried to leave a voice mail but my antiquated office phone was not cooperating. I've spoken with a couple of our livestock producers that will be part of the tour and if possible, they would like to have a round-table conference call. This would help decrease the chance of you and Miles hearing the same comments multiple times, and decrease the amount of time that the producers have to spend away from daily work activities. The operations I certify have at least 2 milking a day and are in the early season of harvesting feed crops. The conference call system used by TDA would allow for several more producers and their ACAs to join in on the conference call so you would be able to get a good pool for addressing the issues mentioned in your previous email. I am currently in the process of finding available locations for that week that could host the conference call. Please let me know what if you and Miles would like for me to pursue this further.

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Sincerely,  
*Mary Ellen Holliman*

Coordinator for Organic Certification Program  
Texas Department of Agriculture  
Office: (512) 463-7513  
Fax: (888) 215-5295  
[Organic@TexasAgriculture.gov](mailto:Organic@TexasAgriculture.gov)

## Schurkamp, Lynnea - AMS

---

**From:** Allen, Carey <[callen@nsf.org](mailto:callen@nsf.org)>  
**Sent:** Wednesday, July 18, 2012 10:04 AM  
**To:** Updike, Scott - AMS  
**Cc:** Crail, Lars - AMS  
**Subject:** RE: NOP visit to Aurora Organic Farms -Coldwater

Thank you Scott.

*Carey Allen*  
Quality Specialist  
NSF International  
Quality Assurance International (QAI)  
734 214 6261  
[callen@nsf.org](mailto:callen@nsf.org)

---

**From:** Updike, Scott - AMS [<mailto:Scott.Updike@ams.usda.gov>]  
**Sent:** Wednesday, July 18, 2012 10:02 AM  
**To:** Allen, Carey  
**Subject:** RE: NOP visit to Aurora Organic Farms -Coldwater

Carey,  
I wanted to let you know that Miles's plans have been finalized. He will visit the dairy on Tuesday, July 24<sup>th</sup> from 3:00 to 5:30 Pm.

Scott

---

**From:** Allen, Carey [<mailto:callen@nsf.org>]  
**Sent:** Friday, June 22, 2012 10:53 AM  
**To:** Updike, Scott - AMS  
**Cc:** Morr, Craig  
**Subject:** RE: NOP visit to Aurora Organic Farms -Coldwater

Hello Mr. Updike,  
Thank you for contacting me. I will get back to you shortly with the requested information.

*Carey Allen*  
Quality Specialist  
NSF International  
Quality Assurance International (QAI)  
734 214 6261  
[callen@nsf.org](mailto:callen@nsf.org)

---

**From:** Updike, Scott - AMS [<mailto:Scott.Updike@ams.usda.gov>]  
**Sent:** Friday, June 22, 2012 10:38 AM  
**To:** Allen, Carey  
**Subject:** NOP visit to Aurora Organic Farms -Coldwater



Hi Ms. Allen,

Miles McEvoy asked me (the new livestock specialist for the NOP) to arrange a trip to Texas to assess the pasture rule exemption that was given to ruminant livestock producers in most Texas counties. We plan on going to Amarillo and then visiting some organic dairy and beef farms. While touring organic beef and dairy farms, we will also examine some other issues that have been raised to the attention of the NOP including how the farms are sourcing replacement females and breeder stock for potential revisions of the Origin of Livestock regulations, how farms and dairy processors coordinate sanitizer use of bulk milk trucks, and the availability of organic slaughter facilities for organic beef producers and culling of organic dairy cattle.

We would like to visit the Aurora Organic Farms-Coldwater dairy, in Stratford, Texas, the week of July 23 – 27.

Is Kavin Caris the best contact person?

Is 806-769-4447 the best contact number?

Could you send us a copy of their Organic System Plan?

A representative from QAI would be welcome to join us.

Sincerely,  
Scott Updike

M. Scott Updike, PhD  
Agricultural Marketing Specialist  
Standards Division  
USDA-AMS-NOP  
1400 Independence Ave., S.W.  
Room 2646-S, STOP 0268  
Washington, D.C. 20250  
Phone 202-260-8076

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## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Wednesday, July 18, 2012 2:50 PM  
**To:** 'Randolph, Alexis'  
**Subject:** RE: NOP visit to Aurora Organic Farms -Coldwater  
**Attachments:** image001.jpg

Alexis,  
Thank you for the directions and the instructions.

Scott

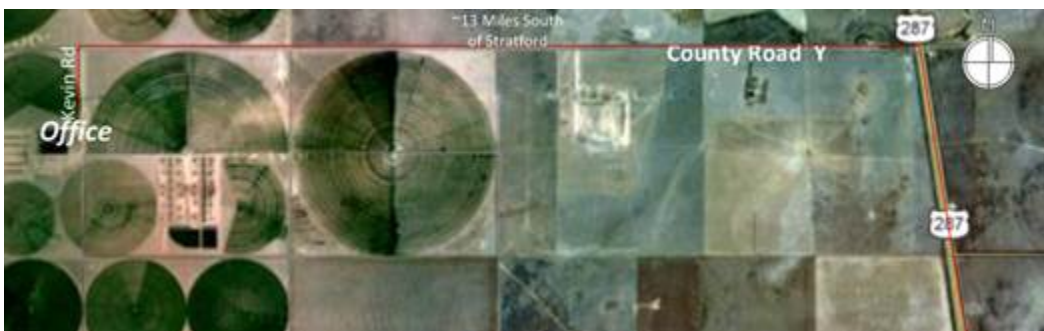
---

**From:** Randolph, Alexis [mailto:Randolph@gai-inc.com]  
**Sent:** Wednesday, July 18, 2012 2:36 PM  
**To:** Updike, Scott - AMS  
**Cc:** Allen, Carey  
**Subject:** FW: NOP visit to Aurora Organic Farms -Coldwater

Scott,

I am also attending the NOP Aurora visit and just received the following information regarding directions to the farm. Please pass these along to Miles and anyone else who is attending.

The directions provided by Google and most GPS units are incorrect. From Dumas, head North on U.S. 287 toward Stratford. You will pass through Cactus and continue North on U.S. 287 until you reach County Road Y which is about 13 miles south of Stratford with its entrance on the west side of U.S 287. Head west on County Road Y for ~ 3 miles until you reach Kevin Rd, which is the entrance road to the dairy. Upon arrival at the main gate, press the button and someone in the office will let you in. Note: the main office is next to the truck scale on the way into the dairy.



Thank you,  
Alexis

Ms. Alexis Randolph  
Technical and Regulatory Advisor  
QAI, Inc.  
[www.qai-inc.com](http://www.qai-inc.com)  
858-792-3531 voice  
734-827-6167 fax

---

**From:** Updike, Scott - AMS [<mailto:Scott.Updike@ams.usda.gov>]  
**Sent:** Wednesday, July 18, 2012 10:02 AM  
**To:** Allen, Carey  
**Subject:** RE: NOP visit to Aurora Organic Farms -Coldwater

Carey,

I wanted to let you know that Miles's plans have been finalized. He will visit the dairy on Tuesday, July 24<sup>th</sup> from 3:00 to 5:30 Pm.

Scott

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**From:** Allen, Carey [<mailto:callen@nsf.org>]  
**Sent:** Friday, June 22, 2012 10:53 AM  
**To:** Updike, Scott - AMS  
**Cc:** Morr, Craig  
**Subject:** RE: NOP visit to Aurora Organic Farms -Coldwater

Hello Mr. Updike,  
Thank you for contacting me. I will get back to you shortly with the requested information.

*Carey Allen*

Quality Specialist  
NSF International  
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734 214 6261  
[callen@nsf.org](mailto:callen@nsf.org)

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Is Kavin Caris the best contact person?  
Is 806-769-4447 the best contact number?  
Could you send us a copy of their Organic System Plan?

A representative from QAI would be welcome to join us.

Sincerely,  
Scott Updike

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Agricultural Marketing Specialist  
Standards Division  
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## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Wednesday, July 18, 2012 10:02 AM  
**To:** Allen, Carey  
**Subject:** RE: NOP visit to Aurora Organic Farms -Coldwater

Carey,

I wanted to let you know that Miles's plans have been finalized. He will visit the dairy on Tuesday, July 24<sup>th</sup> from 3:00 to 5:30 Pm.

Scott

---

**From:** Allen, Carey [mailto:callen@nsf.org]  
**Sent:** Friday, June 22, 2012 10:53 AM  
**To:** Updike, Scott - AMS  
**Cc:** Morr, Craig  
**Subject:** RE: NOP visit to Aurora Organic Farms -Coldwater

Hello Mr. Updike,  
Thank you for contacting me. I will get back to you shortly with the requested information.

*Carey Allen*

Quality Specialist  
NSF International  
Quality Assurance International (QAI)  
734 214 6261  
[callen@nsf.org](mailto:callen@nsf.org)

---

**From:** Updike, Scott - AMS [mailto:Scott.Updike@ams.usda.gov]  
**Sent:** Friday, June 22, 2012 10:38 AM  
**To:** Allen, Carey  
**Subject:** NOP visit to Aurora Organic Farms -Coldwater

Hi Ms. Allen,

Miles McEvoy asked me (the new livestock specialist for the NOP) to arrange a trip to Texas to assess the pasture rule exemption that was given to ruminant livestock producers in most Texas counties. We plan on going to Amarillo and then visiting some organic dairy and beef farms. While touring organic beef and dairy farms, we will also examine some other issues that have been raised to the attention of the NOP including how the farms are sourcing replacement females and breeder stock for potential revisions of the Origin of Livestock regulations, how farms and dairy processors coordinate sanitizer use of bulk milk trucks, and the availability of organic slaughter facilities for organic beef producers and culling of organic dairy cattle.

We would like to visit the Aurora Organic Farms-Coldwater dairy, in Stratford, Texas, the week of July 23 – 27.  
Is Kavin Caris the best contact person?  
Is 806-769-4447 the best contact number?

Could you send us a copy of their Organic System Plan?

A representative from QAI would be welcome to join us.

Sincerely,  
Scott Updike

M. Scott Updike, PhD  
Agricultural Marketing Specialist  
Standards Division  
USDA-AMS-NOP  
1400 Independence Ave., S.W.  
Room 2646-S, STOP 0268  
Washington, D.C. 20250  
Phone 202-260-8076

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## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Friday, June 22, 2012 2:14 PM  
**To:** 'Allen, Carey'  
**Subject:** RE: NOP visit to Aurora Organic Farms -Coldwater

Carey,

Yes, I did receive all 5. Thank you for your very prompt reply to my email.  
Do you have an idea as to how long the inspection might last for this farm?

Scott

---

**From:** Allen, Carey [mailto:callen@nsf.org]  
**Sent:** Friday, June 22, 2012 2:09 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: NOP visit to Aurora Organic Farms -Coldwater

Hello,

For my peace of mind, please confirm when you have received all 5 emails with the attachments. Thanks!

*Carey Allen*

Quality Specialist  
NSF International  
Quality Assurance International (QAI)  
734 214 6261  
[callen@nsf.org](mailto:callen@nsf.org)

---

**From:** Updike, Scott - AMS [<mailto:Scott.Updike@ams.usda.gov>]  
**Sent:** Friday, June 22, 2012 10:38 AM  
**To:** Allen, Carey  
**Subject:** NOP visit to Aurora Organic Farms -Coldwater

Hi Ms. Allen,

Miles McEvoy asked me (the new livestock specialist for the NOP) to arrange a trip to Texas to assess the pasture rule exemption that was given to ruminant livestock producers in most Texas counties. We plan on going to Amarillo and then visiting some organic dairy and beef farms. While touring organic beef and dairy farms, we will also examine some other issues that have been raised to the attention of the NOP including how the farms are sourcing replacement females and breeder stock for potential revisions of the Origin of Livestock regulations, how farms and dairy processors coordinate sanitizer use of bulk milk trucks, and the availability of organic slaughter facilities for organic beef producers and culling of organic dairy cattle.

We would like to visit the Aurora Organic Farms-Coldwater dairy, in Stratford, Texas, the week of July 23 – 27.  
Is Kavin Caris the best contact person?  
Is 806-769-4447 the best contact number?  
Could you send us a copy of their Organic System Plan?

A representative from QAI would be welcome to join us.

Sincerely,  
Scott Updike

M. Scott Updike, PhD  
Agricultural Marketing Specialist  
Standards Division  
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## Schurkamp, Lynnea - AMS

---

**From:** Sanchez, Martin <MSanchez@nmda.nmsu.edu>  
**Sent:** Friday, July 20, 2012 12:45 PM  
**To:** Bakker, Brett; Updike, Scott - AMS  
**Subject:** RE: NOP visit with dairies in NM

Scott,

I am planning on meeting you at Native Pastures in Clovis, NM at 12 noon on Wednesday the 25<sup>th</sup> and accompanying you on your visit. Please let me know where you have planned to meet up and I'll see you there.

Thanks,

Martin Sanchez

---

**From:** Bakker, Brett  
**Sent:** Wednesday, July 18, 2012 11:26 AM  
**To:** 'Updike, Scott - AMS'  
**Cc:** Sanchez, Martin  
**Subject:** RE: NOP visit with dairies in NM

thanks Scott.

i will pass this to Martin Sanchez who will join you at some point. i am unable to make it.

Brett Bakker  
New Mexico Department of Agriculture, Organic Program  
4501 Indian School Rd NE  
Suite 100 Rm G104  
Albuquerque NM 87110  
[bbakker@nmda.nmsu.edu](mailto:bbakker@nmda.nmsu.edu)  
(505)889-9924 or (575)646-0339  
fax: (505) 883-3235  
<http://www.nmda.nmsu.edu/marketing/organic-program/>

---

**From:** Updike, Scott - AMS [<mailto:Scott.Updike@ams.usda.gov>]  
**Sent:** Wednesday, July 18, 2012 8:09 AM  
**To:** Bakker, Brett  
**Subject:** RE: NOP visit with dairies in NM

Brett,

Here is the final schedule for the New Mexico certified farms:

|   |      |                 |
|---|------|-----------------|
| Native Pastures in Clovis, NM           | 7/25 | 12:00 – 2:30 PM |
| Lake Ridge LLC in Portales, NM          | 7/25 | 3:00 – 5:30 PM  |
| Nature's Way Management in Portales, NM |      | not scheduled   |

Scott

---

**From:** Bakker, Brett [<mailto:bbakker@nmda.nmsu.edu>]

**Sent:** Friday, June 22, 2012 2:16 PM

**To:** Updike, Scott - AMS

**Subject:** RE: NOP visit with dairies in NM

Mike

i will send you the requested information as soon as i can gather it . we are still paper-based so i will make copies and fedex to you.

i would like to join you on at least part of the visits.

thank you

let me know if you have any questions or concerns

brett

Brett Bakker

New Mexico Department of Agriculture, Organic Program

4501 Indian School Rd NE

Suite 100 Rm G104

Albuquerque NM 87110

[bbakker@nmda.nmsu.edu](mailto:bbakker@nmda.nmsu.edu)

(505)889-9924 or (575)646-0339

fax: (505) 883-3235

<http://www.nmda.nmsu.edu/marketing/organic-program/>

---

**From:** Updike, Scott - AMS [<mailto:Scott.Updike@ams.usda.gov>]

**Sent:** Friday, June 22, 2012 9:20 AM

**To:** Bakker, Brett

**Subject:** NOP visit with dairies in NM

Hi Brett Bakker,

Miles McEvoy asked me (the new livestock specialist for the NOP) to arrange a trip to Texas to assess the pasture rule exemption that was given to ruminant livestock producers in most Texas counties in 2011. While in the Amarillo area, we wanted to visit some dairies in NM near the Texas border. While touring organic beef and dairy farms, we will also examine some other issues that have been raised to the attention of the NOP including how the farms are sourcing replacement females and breeder stock for potential revisions of the Origin of Livestock regulations, how farms and dairy processors coordinate sanitizer use of bulk milk trucks, and the availability of organic slaughter facilities for organic beef producers and culling of organic dairy cattle.

We would like to visit several farms which NMDA certifies the week of July 23 – 27.

Native Pastures in Clovis, NM

Lake Ridge LLC in Portales, NM

Nature's Way Management in Portales, NM

For each of these farms could you send us a copy of their Organic System Plan and the best contact person?

A representative from NMDA would be welcome to join us.

Sincerely,  
Scott Updike

M. Scott Updike, PhD  
Agricultural Marketing Specialist  
Standards Division  
USDA-AMS-NOP  
1400 Independence Ave., S.W.  
Room 2646-S, STOP 0268  
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## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Tuesday, July 10, 2012 2:38 PM  
**To:** 'Bakker, Brett'  
**Subject:** RE: NOP visit with dairies in NM

Brett,  
Thank you.

Scott

---

**From:** Bakker, Brett [mailto:bbakker@nmda.nmsu.edu]  
**Sent:** Tuesday, July 10, 2012 2:23 PM  
**To:** Updike, Scott - AMS  
**Cc:** Sanchez, Martin  
**Subject:** RE: NOP visit with dairies in NM

Scott

i'll copy and fedex the reports for you.

unfortunately i am unable to make it that week but my assistant Martin Sanchez (Certifier/Inspector) may be able to meet you for part of the visit. please keep us both in the loop.

my apologies for neglecting to send you the contact recommendations. sounds like you've already made contact with the operations. just in case, these are the staff members who coordinate applications/OSP, inspections, etc:

Native Pastures  
Andy Bolema

(b) (6)

Lake Ridge LLC in Portales, NM  
D'Shawn Osbourne

(b) (6)

[.net](#)

Nature's Way Management  
Michelle Ingram

(b) (6)

[.com](#)

thanks

brett

Brett Bakker  
New Mexico Department of Agriculture, Organic Program

4501 Indian School Rd NE  
Suite 100 Rm G104  
Albuquerque NM 87110  
[bbakker@nmda.nmsu.edu](mailto:bbakker@nmda.nmsu.edu)  
(505)889-9924 or (575)646-0339  
fax: (505) 883-3235  
<http://www.nmda.nmsu.edu/marketing/organic-program/>

---

**From:** Updike, Scott - AMS [\[mailto:Scott.Updike@ams.usda.gov\]](mailto:Scott.Updike@ams.usda.gov)  
**Sent:** Tuesday, July 10, 2012 11:43 AM  
**To:** Bakker, Brett  
**Subject:** RE: NOP visit with dairies in NM

Brett,

Miles has also requested a copy of the most recent inspection report. Could you send a copy of these as well? The final times for each farm are being set up with the farmers. Once I know, I will let you know when.

Scott

---

**From:** Bakker, Brett [\[mailto:bbakker@nmda.nmsu.edu\]](mailto:bbakker@nmda.nmsu.edu)  
**Sent:** Thursday, June 28, 2012 7:19 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: NOP visit with dairies in NM

Scott  
my apologies! leaving for the day and realized i haven't gotten you the info. i will mail it tomorrow and email you specific contacts info.

thanks

brett

Brett Bakker  
New Mexico Department of Agriculture, Organic Program  
4501 Indian School Rd NE  
Suite 100 Rm G104  
Albuquerque NM 87110  
[bbakker@nmda.nmsu.edu](mailto:bbakker@nmda.nmsu.edu)  
(505)889-9924 or (575)646-0339  
fax: (505) 883-3235  
<http://www.nmda.nmsu.edu/marketing/organic-program/>

---

**From:** Updike, Scott - AMS [\[mailto:Scott.Updike@ams.usda.gov\]](mailto:Scott.Updike@ams.usda.gov)  
**Sent:** Friday, June 22, 2012 1:47 PM  
**To:** Bakker, Brett  
**Subject:** RE: NOP visit with dairies in NM

Brett,  
Thank you for sending the information.

We would be glad to have you join us. Once I have all the contact information, I am going to contact the various farms to see which dates work best for them. We plan on spending 1 day of our trip in New Mexico. Once I finalize the itinerary, I will let you know so that you can join us.

I have been in contact with the Texas Department of Ag as well and I was surprised to hear that there are no organic beef slaughter plants in Texas. Are there any in New Mexico?

Scott

---

**From:** Bakker, Brett [<mailto:bbakker@nmda.nmsu.edu>]  
**Sent:** Friday, June 22, 2012 2:16 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: NOP visit with dairies in NM

Mike

i will send you the requested information as soon as i can gather it . we are still paper-based so i will make copies and fedex to you.

i would like to join you on at least part of the visits.

thank you

let me know if you have any questions or concerns

brett

Brett Bakker  
New Mexico Department of Agriculture, Organic Program  
4501 Indian School Rd NE  
Suite 100 Rm G104  
Albuquerque NM 87110  
[bbakker@nmda.nmsu.edu](mailto:bbakker@nmda.nmsu.edu)  
(505)889-9924 or (575)646-0339  
fax: (505) 883-3235  
<http://www.nmda.nmsu.edu/marketing/organic-program/>

---

**From:** Updike, Scott - AMS [<mailto:Scott.Updike@ams.usda.gov>]  
**Sent:** Friday, June 22, 2012 9:20 AM  
**To:** Bakker, Brett  
**Subject:** NOP visit with dairies in NM

Hi Brett Bakker,

Miles McEvoy asked me (the new livestock specialist for the NOP) to arrange a trip to Texas to assess the pasture rule exemption that was given to ruminant livestock producers in most Texas counties in 2011. While in the Amarillo area, we wanted to visit some dairies in NM near the Texas border. While touring organic beef and dairy farms, we will also examine some other issues that have been raised to the attention of the NOP including how the farms are sourcing replacement females and breeder stock for potential revisions of the Origin of Livestock regulations, how farms and dairy processors coordinate sanitizer use of bulk milk trucks, and the availability of organic slaughter facilities for organic beef producers and culling of organic dairy cattle.

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Native Pastures in Clovis, NM

Lake Ridge LLC in Portales, NM

Nature's Way Management in Portales, NM

For each of these farms could you send us a copy of their Organic System Plan and the best contact person?

A representative from NMDA would be welcome to join us.

Sincerely,  
Scott Updike

M. Scott Updike, PhD  
Agricultural Marketing Specialist  
Standards Division  
USDA-AMS-NOP  
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Room 2646-S, STOP 0268  
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## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Friday, July 06, 2012 3:18 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** RE: Overview of Trip to Texas Panhandle

I will do so.

---

**From:** McEvoy, Miles - AMS  
**Sent:** Friday, July 06, 2012 3:16 PM  
**To:** Meade, Rita; Updike, Scott - AMS  
**Cc:** Crail, Lars - AMS; Hartley, Julie - AMS; Pooler, Bob - AMS; Rakola, Betsy - AMS; Kuhn, Meg - AMS  
**Subject:** FW: Overview of Trip to Texas Panhandle

Rita is going to start contacting the operations on Monday to set up the schedule. Please work with her to get all the background information together. I need a copy of the OSP and the last inspection report. The certifiers should be notified that I am conducting these visits. I am also copying the AIA accreditation managers as I will be visiting operations certified by 5 different certifiers (NMDA, TDA, QCS, CCOF and QAI)

---

**From:** Updike, Scott - AMS  
**Sent:** Friday, July 06, 2012 7:17 AM  
**To:** McEvoy, Miles - AMS  
**Subject:** RE: Overview of Trip to Texas Panhandle

Miles,  
Here is the updated schedule with the information I have for the operations.

Scott

---

**From:** McEvoy, Miles - AMS  
**Sent:** Thursday, July 05, 2012 6:16 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: Overview of Trip to Texas Panhandle

Scott – thanks. Could you provide the email and phone numbers of the operations and I will contact them directly to set up the visits. I have attached the modified schedule and a column for the email/phone numbers.

Miles

---

**From:** Updike, Scott - AMS  
**Sent:** Thursday, July 05, 2012 3:55 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** Overview of Trip to Texas Panhandle

Miles,  
I have attached the document I created for the over view of the trip. I have added a chart with a tentative schedule for each day with 1 additional farm in case the one of the first two farms for that day is not available.



Scott

## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Friday, July 06, 2012 7:17 AM  
**To:** McEvoy, Miles - AMS  
**Subject:** RE: Overview of Trip to Texas Panhandle  
**Attachments:** Texas livestock tour - July 2012.docx

Miles,

Here is the updated schedule with the information I have for the operations.

Scott

---

**From:** McEvoy, Miles - AMS  
**Sent:** Thursday, July 05, 2012 6:16 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: Overview of Trip to Texas Panhandle

Scott – thanks. Could you provide the email and phone numbers of the operations and I will contact them directly to set up the visits. I have attached the modified schedule and a column for the email/phone numbers.

Miles

---

**From:** Updike, Scott - AMS  
**Sent:** Thursday, July 05, 2012 3:55 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** Overview of Trip to Texas Panhandle

Miles,

I have attached the document I created for the over view of the trip. I have added a chart with a tentative schedule for each day with 1 additional farm in case the one of the first two farms for that day is not available.

Scott

## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Tuesday, June 26, 2012 11:20 AM  
**To:** Kuhn, Meg - AMS  
**Subject:** RE: Request for livestock contacts with certifiers

Meg,  
Thank you for the updated information.

scott

---

**From:** Kuhn, Meg - AMS  
**Sent:** Tuesday, June 26, 2012 11:19 AM  
**To:** Updike, Scott - AMS  
**Subject:** FW: Request for livestock contacts with certifiers

AND... it's actually @qcsinfo.org. Sorry! Thought I had given you the right info.

---

**From:** Kuhn, Meg - AMS  
**Sent:** Tuesday, June 26, 2012 8:14 AM  
**To:** Updike, Scott - AMS  
**Subject:** RE: Request for livestock contacts with certifiers

You're totally right, sorry about that.

---

**From:** Updike, Scott - AMS  
**Sent:** Friday, June 22, 2012 1:22 PM  
**To:** Kuhn, Meg - AMS  
**Subject:** RE: Request for livestock contacts with certifiers

Hi Meg,  
That email bounced back. Would it be @qcs.org and not .com ?

Scott

---

**From:** Kuhn, Meg - AMS  
**Sent:** Thursday, June 21, 2012 3:05 PM  
**To:** Updike, Scott - AMS; Crail, Lars - AMS; Pooler, Bob - AMS  
**Subject:** RE: Request for livestock contacts with certifiers

Hi Scott,

You can contact the main contact at QCS, Ramkrishnan Balasubramanian. His email is [ram@qcs.com](mailto:ram@qcs.com). He can direct you to QCS support staff, if he is unable to answer your request directly.

Thanks,  
meg

---

**From:** Updike, Scott - AMS  
**Sent:** Thursday, June 21, 2012 12:49 PM  
**To:** Kuhn, Meg - AMS; Crail, Lars - AMS; Pooler, Bob - AMS  
**Subject:** Request for livestock contacts with certifiers

Hi,  
Miles has asked for me to set up a trip with him to the Texas panhandle to learn about a couple of different aspects of ruminant production (dairy and beef). I have identified several ruminant farms in the area and Miles suggested that I ask you who the appropriate livestock contact person is for each of these certifiers.

QAI  
QCS  
Texas DOA

On the ACA assignment sheet, I did not see who was responsible for New Mexico DOA. Who should I contact to ask about the livestock contact with NM DOA?

Scott

M. Scott Updike, PhD  
Agricultural Marketing Specialist  
Standards Division  
USDA-AMS-NOP  
1400 Independence Ave., S.W.  
Room 2646-S, STOP 0268  
Washington, D.C. 20250  
Phone 202-260-8076

## Schurkamp, Lynnea - AMS

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**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Thursday, June 21, 2012 12:56 PM  
**To:** Pooler, Bob - AMS  
**Subject:** RE: Request for livestock contacts with certifiers

Thanks Bob,

Scott

---

**From:** Pooler, Bob - AMS  
**Sent:** Thursday, June 21, 2012 12:52 PM  
**To:** Updike, Scott - AMS  
**Cc:** Mary Ellen Holliman (Mary.Holliman@texasagriculture.gov)  
**Subject:** RE: Request for livestock contacts with certifiers

TDA Contact: Mary Ellen Holliman  
Phone: 512-463-7513  
Email: [Mary.Holliman@texasagriculture.gov](mailto:Mary.Holliman@texasagriculture.gov)

---

**From:** Updike, Scott - AMS  
**Sent:** Thursday, June 21, 2012 12:49 PM  
**To:** Kuhn, Meg - AMS; Crail, Lars - AMS; Pooler, Bob - AMS  
**Subject:** Request for livestock contacts with certifiers

Hi,  
Miles has asked for me to set up a trip with him to the Texas panhandle to learn about a couple of different aspects of ruminant production (dairy and beef). I have identified several ruminant farms in the area and Miles suggested that I ask you who the appropriate livestock contact person is for each of these certifiers.

QAI  
QCS  
Texas DOA

On the ACA assignment sheet, I did not see who was responsible for New Mexico DOA. Who should I contact to ask about the livestock contact with NM DOA?

Scott

M. Scott Updike, PhD  
Agricultural Marketing Specialist  
Standards Division  
USDA-AMS-NOP  
1400 Independence Ave., S.W.  
Room 2646-S, STOP 0268  
Washington, D.C. 20250  
Phone 202-260-8076



## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Friday, June 22, 2012 11:11 AM  
**To:** Pooler, Bob - AMS  
**Cc:** 'Mary Ellen Holliman (Mary.Holliman@texasagriculture.gov)'  
**Subject:** RE: Request for livestock contacts with certifiers

Hi Ms. Holliman,

Miles McEvoy asked me (the new livestock specialist for the NOP) to arrange a trip to Texas to assess the pasture rule exemption that was given to ruminant livestock producers in most Texas counties in 2011. We plan on going to Amarillo and then visiting some organic dairy and beef farms. While touring organic beef and dairy farms, we will also examine some other issues that have been raised to the attention of the NOP including how the farms are sourcing replacement females and breeder stock for potential revisions of the Origin of Livestock regulations, how farms and dairy processors coordinate sanitizer use of bulk milk trucks, and the availability of organic slaughter facilities for organic beef producers and culling of organic dairy cattle.

We would like to visit several farms which you TDA certifies the week of July 23 – 27.

Boehning Dairy Farm in Earth, TX

Hilltop Dairy, Llc in Earth, TX

Redland Dairy, Llc in Farwell, TX

Natural Prairie Dairy in Channing, TX

For each of these farms could you send us a copy of their Organic System Plan and the best contact person?

I was looking to see if there are any beef slaughter plants in the panhandle region of Texas which are certified organic. Do you know of any even if TDA does not certify them? Where do the organic beef cattle in Texas go for slaughter?

A representative from TDA would be welcome to join us.

Sincerely,  
Scott Updike

---

**From:** Pooler, Bob - AMS  
**Sent:** Thursday, June 21, 2012 12:52 PM  
**To:** Updike, Scott - AMS  
**Cc:** Mary Ellen Holliman (Mary.Holliman@texasagriculture.gov)  
**Subject:** RE: Request for livestock contacts with certifiers

TDA Contact: Mary Ellen Holliman

Phone: 512-463-7513

Email: [Mary.Holliman@texasagriculture.gov](mailto:Mary.Holliman@texasagriculture.gov)

---

**From:** Updike, Scott - AMS  
**Sent:** Thursday, June 21, 2012 12:49 PM  
**To:** Kuhn, Meg - AMS; Crail, Lars - AMS; Pooler, Bob - AMS  
**Subject:** Request for livestock contacts with certifiers

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QAI

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On the ACA assignment sheet, I did not see who was responsible for New Mexico DOA. Who should I contact to ask about the livestock contact with NM DOA?

Scott

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## Schurkamp, Lynnea - AMS

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**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Thursday, June 21, 2012 3:18 PM  
**To:** Kuhn, Meg - AMS  
**Subject:** RE: Request for livestock contacts with certifiers

Thanks Meg

---

**From:** Kuhn, Meg - AMS  
**Sent:** Thursday, June 21, 2012 3:05 PM  
**To:** Updike, Scott - AMS; Crail, Lars - AMS; Pooler, Bob - AMS  
**Subject:** RE: Request for livestock contacts with certifiers

Hi Scott,

You can contact the main contact at QCS, Ramkrishnan Balasubramanian. His email is [ram@gcs.com](mailto:ram@gcs.com). He can direct you to QCS support staff, if he is unable to answer your request directly.

Thanks,  
meg

---

**From:** Updike, Scott - AMS  
**Sent:** Thursday, June 21, 2012 12:49 PM  
**To:** Kuhn, Meg - AMS; Crail, Lars - AMS; Pooler, Bob - AMS  
**Subject:** Request for livestock contacts with certifiers

Hi,  
Miles has asked for me to set up a trip with him to the Texas panhandle to learn about a couple of different aspects of ruminant production (dairy and beef). I have identified several ruminant farms in the area and Miles suggested that I ask you who the appropriate livestock contact person is for each of these certifiers.

QAI  
QCS  
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On the ACA assignment sheet, I did not see who was responsible for New Mexico DOA. Who should I contact to ask about the livestock contact with NM DOA?

Scott

M. Scott Updike, PhD  
Agricultural Marketing Specialist  
Standards Division  
USDA-AMS-NOP  
1400 Independence Ave., S.W.  
Room 2646-S, STOP 0268  
Washington, D.C. 20250

Phone 202-260-8076

## Schurkamp, Lynnea - AMS

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**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Thursday, June 21, 2012 3:17 PM  
**To:** Crail, Lars - AMS  
**Subject:** RE: Request for livestock contacts with certifiers

Thanks Lars

---

**From:** Crail, Lars - AMS  
**Sent:** Thursday, June 21, 2012 3:17 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: Request for livestock contacts with certifiers

QAI contact is:

Carey Allen  
Quality Specialist  
NSF International  
Quality Assurance International (QAI)  
734 214 6261  
[callen@nsf.org](mailto:callen@nsf.org)

---

**From:** Updike, Scott - AMS  
**Sent:** Thursday, June 21, 2012 12:49 PM  
**To:** Kuhn, Meg - AMS; Crail, Lars - AMS; Pooler, Bob - AMS  
**Subject:** Request for livestock contacts with certifiers

Hi,  
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QCS  
Texas DOA

On the ACA assignment sheet, I did not see who was responsible for New Mexico DOA. Who should I contact to ask about the livestock contact with NM DOA?

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M. Scott Updike, PhD  
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1400 Independence Ave., S.W.  
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Washington, D.C. 20250  
Phone 202-260-8076

## Schurkamp, Lynnea - AMS

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**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Tuesday, July 17, 2012 2:56 PM  
**To:** 'Mary Ellen Holliman'  
**Subject:** RE: Shipment tracking of OSPs for organic dairies certified by TDA

Thank you

---

**From:** Mary Ellen Holliman [mailto:Mary.Holliman@TexasAgriculture.gov]  
**Sent:** Tuesday, July 17, 2012 2:51 PM  
**To:** Updike, Scott - AMS  
**Subject:** FW: Shipment tracking of OSPs for organic dairies certified by TDA

See below.

Sincerely,  
*Mary Ellen Holliman*  
Coordinator for Organic Certification Program  
Texas Department of Agriculture

---

**From:** [trackingupdates@fedex.com](mailto:trackingupdates@fedex.com) [mailto:trackingupdates@fedex.com]  
**Sent:** Tuesday, July 17, 2012 1:49 PM  
**To:** Mary Ellen Holliman  
**Subject:** FedEx Shipment Notification

---

This tracking update has been requested by:

Company Name: texas dept of agriculture  
Name: Mary Ellen Holliman  
E-mail: [mary.ellen.holliman@TexasAgriculture.gov](mailto:mary.ellen.holliman@TexasAgriculture.gov)

---

Mary Ellen Holliman of texas dept of agriculture sent Mr. Scott Updike of USDA National Organic Program 1 FedEx Standard Overnight package(s).

This shipment is scheduled to be sent on 07/17/2012.

Reference information includes:

Reference: 11781-03131  
Special handling/Services: Deliver Weekday  
  
Status: Shipment information sent to FedEx  
  
Tracking number: [798629567306](#)

To track the latest status of your shipment, click on the tracking number above, or visit us at [fedex.com](https://fedex.com).

To learn more about FedEx Express, please visit our website at [fedex.com](https://fedex.com).

This tracking update has been sent to you by FedEx on the behalf of the Requestor noted above. FedEx does not validate the authenticity of the requestor and does not validate, guarantee or warrant the authenticity of the request, the requestor's message, or the accuracy of this tracking update. For tracking results and fedex.com's terms of use, go to [fedex.com](https://fedex.com).

Thank you for your business.

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## Schurkamp, Lynnea - AMS

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**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Wednesday, July 18, 2012 10:06 AM  
**To:** 'Mary Ellen Holliman'  
**Subject:** RE: TDA organic livestock operation tours the week of July 23 - 27

Mary Ellen,  
Here is the final schedule for TDA certified operations.

Boehning Dairy Farm in Earth, TX – 7/26 10:00 AM – 1:00 PM  
Hilltop Dairy, LLC in Earth, TX - 7/26 8:00 AM – 10:00 AM  
Redland Dairy, LLC in Farwell, TX 7/25 8:30 AM – 11:00 AM  
Natural Prairie Dairy in Channing, TX 7/24 8:30 AM – 11:00 AM

Scott

---

**From:** Mary Ellen Holliman [mailto:Mary.Holliman@TexasAgriculture.gov]  
**Sent:** Friday, June 22, 2012 12:49 PM  
**To:** Updike, Scott - AMS  
**Cc:** Organic; Randy Rivera  
**Subject:** RE: TDA organic livestock operation tours the week of July 23 - 27

Dear Mr. Updike:

Thank you for the notification. As several of these accounts are still in the renewal process, it may take time to complete the reviews and prepare the OSPs to send to you. Please be aware that these are extremely large files (each operation has at least 3 different certifications) so I must mail the files to you. For these reasons, please clarify if you just want the current OSP for each certification or if you need multiple years. Also, all of these locations were inspected as part of the organic milk audit conducted by the USDA/OIG, and the Boehning Dairy Livestock account was selected as the livestock witness audit in May 2012 as part of TDA's accreditation renewal audit. Therefore, it may be of little to no benefit in gaining new information. However, Natural Prairie has an outstanding complaint investigation with NOP that is approximately 2 years old and the owners would greatly appreciate NOP officials coming out to their facility to conduct an on-site inspection in order to complete the complaint investigation.

TDA does not currently certify any organic livestock slaughter facilities and to TDA's knowledge, there are no certified organic livestock slaughter facilities in Texas. The Texas organic producers certified by TDA do not have the resources to ship their ruminant livestock long distances and must sell their product either on the hoof or labeled as produced without the use of hormones or antibiotics.

Sincerely,  
*Mary Ellen Holliman*  
Coordinator for Organic Certification Program  
Texas Department of Agriculture  
Office: (512) 463-7513  
Fax: (888) 215-5295  
[Organic@TexasAgriculture.gov](mailto:Organic@TexasAgriculture.gov)

**From:** Updike, Scott - AMS [<mailto:Scott.Updike@ams.usda.gov>]  
**Sent:** Friday, June 22, 2012 10:11 AM  
**To:** Pooler, Bob - AMS  
**Cc:** Mary Ellen Holliman  
**Subject:** RE: Request for livestock contacts with certifiers

Hi Ms. Holliman,

Miles McEvoy asked me (the new livestock specialist for the NOP) to arrange a trip to Texas to assess the pasture rule exemption that was given to ruminant livestock producers in most Texas counties in 2011. We plan on going to Amarillo and then visiting some organic dairy and beef farms. While touring organic beef and dairy farms, we will also examine some other issues that have been raised to the attention of the NOP including how the farms are sourcing replacement females and breeder stock for potential revisions of the Origin of Livestock regulations, how farms and dairy processors coordinate sanitizer use of bulk milk trucks, and the availability of organic slaughter facilities for organic beef producers and culling of organic dairy cattle.

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For each of these farms could you send us a copy of their Organic System Plan and the best contact person?

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A representative from TDA would be welcome to join us.

Sincerely,  
Scott Updike

---

**From:** Pooler, Bob - AMS  
**Sent:** Thursday, June 21, 2012 12:52 PM  
**To:** Updike, Scott - AMS  
**Cc:** Mary Ellen Holliman ([Mary.Holliman@texasagriculture.gov](mailto:Mary.Holliman@texasagriculture.gov))  
**Subject:** RE: Request for livestock contacts with certifiers

TDA Contact: Mary Ellen Holliman

Phone: 512-463-7513

Email: [Mary.Holliman@texasagriculture.gov](mailto:Mary.Holliman@texasagriculture.gov)

---

**From:** Updike, Scott - AMS  
**Sent:** Thursday, June 21, 2012 12:49 PM  
**To:** Kuhn, Meg - AMS; Crail, Lars - AMS; Pooler, Bob - AMS  
**Subject:** Request for livestock contacts with certifiers

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M. Scott Updike, PhD  
Agricultural Marketing Specialist  
Standards Division  
USDA-AMS-NOP  
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## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Tuesday, October 09, 2012 12:25 PM  
**To:** Bailey, Melissa - AMS  
**Subject:** RE: texas trip report

That is fine. I will send you a revised preamble by the end of this week and you can distribute it.

Scott

Scott Updike  
USDA-AMS-NOP  
202-260-8076

---

**From:** Bailey, Melissa - AMS  
**Sent:** Tuesday, October 09, 2012 12:23 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: texas trip report

Sure, yes, can you please send to me and Emily? I was also thinking of asking for Mark Bradley's perspective since he has worked on this issue for a long time. While we have already chosen major policy directions, he could comment on what we may need to explain/defend more in the preamble. If you are fine with this, then I will send along to him with a specific request to review using that perspective.

---

**From:** Updike, Scott - AMS  
**Sent:** Tuesday, October 09, 2012 12:16 PM  
**To:** Bailey, Melissa - AMS  
**Subject:** RE: texas trip report

Melissa,

I will look the report over to see what implications it has for OoL. I had planned in finishing up that revision to the preamble by the end of this week. Once I am done, did you want me to send it to you?

Scott Updike  
USDA-AMS-NOP  
202-260-8076

---

**From:** Bailey, Melissa - AMS  
**Sent:** Tuesday, October 09, 2012 12:11 PM  
**To:** Updike, Scott - AMS  
**Subject:** FW: texas trip report

Scott – please take a look at this trip report as it touches on OOL issues. You will see I sent a note to Heather back on our outstanding questions. Have you finished adding more detail to the OOL preamble yet that discusses alternatives and why we opted to choose a particular direction?

Thanks, Melissa

---

**From:** Michael, Matthew - AMS  
**Sent:** Friday, October 05, 2012 2:33 PM  
**To:** McEvoy, Miles - AMS; Ahramjian, Lisa - AMS  
**Cc:** Courtney, Cheri - AMS; Tucker, Jennifer - AMS; Bailey, Melissa - AMS  
**Subject:** RE: texas trip report

Hi Miles:

Here is the revised report with photos. You may have additional or better photos.

I added the names except for the woman who accompanied us at Aurora. I will check with Scott next week to see if he knows. Also, Meg is out today. Next week I will confirm with her the date that the NONC went to Cottonwood.

Matthew Michael  
Director, Compliance and Enforcement Division  
USDA National Organic Program  
1400 Independence Ave SW; Room 2959  
Washington, DC 20250-0268  
Phone: (202) 260-8657  
[matthew.michael@ams.usda.gov](mailto:matthew.michael@ams.usda.gov)

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**From:** McEvoy, Miles - AMS  
**Sent:** Saturday, September 29, 2012 7:06 AM  
**To:** Michael, Matthew - AMS; Ahramjian, Lisa - AMS  
**Cc:** Courtney, Cheri - AMS; Tucker, Jennifer - AMS; Bailey, Melissa - AMS  
**Subject:** texas trip report

The report looks good. We should add some photos. The summary findings include a number of items that need followup.

We also need to include the correct names for the QAI, TDA and QCS people that were present during our visits.

Miles V McEvoy  
Deputy Administrator  
National Organic Program  
202-720-3252

## Schurkamp, Lynnea - AMS

---

**From:** Sanchez, Martin <MSanchez@nmda.nmsu.edu>  
**Sent:** Friday, July 20, 2012 1:15 PM  
**To:** Bakker, Brett  
**Cc:** Michael, Matthew - AMS; Updike, Scott - AMS  
**Subject:** RE: trip schedule

Thanks for the updated schedule. I am planning on meeting everyone at 413 Curry Rd L in Clovis, NM at 10 am on 7/25. Please let me know if this changes.

Thanks,

Martin Sanchez  
[msanchez@nmda.nmsu.edu](mailto:msanchez@nmda.nmsu.edu)  
(505) 889-9880

---

**From:** Bakker, Brett  
**Sent:** Friday, July 20, 2012 10:55 AM  
**To:** Sanchez, Martin  
**Subject:** FW: trip schedule

Brett Bakker  
New Mexico Department of Agriculture, Organic Program  
4501 Indian School Rd NE  
Suite 100 Rm G104  
Albuquerque NM 87110  
[bbakker@nmda.nmsu.edu](mailto:bbakker@nmda.nmsu.edu)  
(505)889-9924 or (575)646-0339  
fax: (505) 883-3235  
<http://www.nmda.nmsu.edu/marketing/organic-program/>

---

**From:** Michael, Matthew - AMS [<mailto:Matthew.Michael@ams.usda.gov>]  
**Sent:** Friday, July 20, 2012 10:31 AM  
**To:** Bakker, Brett  
**Subject:** trip schedule

Hi Brett:

Here is the revised schedule for the New Mexico portion of our trip.

|         |                          |      |              |              |                       |
|---------|--------------------------|------|--------------|--------------|-----------------------|
| July 25 | Native Pastures – Dairy  | NMDA | Clovis, NM   | 10:00 – 1:00 | Andy Bollema (b) (6)  |
| July 25 | Lake Ridge LLC - Heifers | NMDA | Portales, NM | 2:00 – 5:30  | Kit Pettigrew (b) (6) |

Have a nice weekend.

Matthew Michael  
Director, Compliance and Enforcement Division  
USDA National Organic Program  
1400 Independence Ave SW; Room 2959  
Washington, DC 20250-0268  
Phone: (202) 260-8657  
[matthew.michael@ams.usda.gov](mailto:matthew.michael@ams.usda.gov)

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## Schurkamp, Lynnea - AMS

---

**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Friday, June 22, 2012 3:55 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** RE: Vaccines  
**Attachments:** image001.jpg; image002.png

Miles,  
I think we could visit. The farms cluster into 3 distinct trips from Amarillo  
Northwest – Aurora, Natural Prairie, and Cottonwood  
West – Native Pastures, Lake Ridge and Redland Dairy  
South – Boehning Dairy, Hilltop Dairy and much further south is Chino Valley Farm.

Scott

---

**From:** McEvoy, Miles - AMS  
**Sent:** Friday, June 22, 2012 2:32 PM  
**To:** Updike, Scott - AMS  
**Subject:** FW: Vaccines

If we can fit it in it would be very worthwhile.

---

**From:** David Will [\[mailto:david@chinovalleyranchers.com\]](mailto:david@chinovalleyranchers.com)  
**Sent:** Friday, June 22, 2012 1:34 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** RE: Vaccines

Idalou Egg Ranch  
14515N FM 400  
Idalou, Tx. 79329

You would want to fly into Lubbock (LUB)

I would be happy to schedule your visit, please use me as the point of contact. We are wide open to any day you wish.

Thank you!

---

**From:** McEvoy, Miles - AMS [\[mailto:Miles.McEvoy@ams.usda.gov\]](mailto:Miles.McEvoy@ams.usda.gov)  
**Sent:** Friday, June 22, 2012 10:26 AM  
**To:** David Will  
**Subject:** RE: Vaccines

Thanks David. We'll be in touch as we gather this information.

What is the name and location of the Chino Valley Farm in Texas. We are organizing a trip to Texas and would like to visit if we can fit it into our travel schedule.

Miles McEvoy  
Deputy Administrator  
National Organic Program  
202-720-3252

---

**From:** David Will [<mailto:david@chinovalleyranchers.com>]  
**Sent:** Wednesday, June 20, 2012 11:50 AM  
**To:** [miles.McEvoy@usda.gov](mailto:miles.McEvoy@usda.gov)  
**Cc:** 'Krista Eberle'  
**Subject:** Vaccines

<http://www.ams.usda.gov/AMSv1.0/getfile?dDocName=STELPRDC5098924>

Mr. McEvoy,

We just saw the request from the NOSB Livestock committee linked above. I am sure this request will be addressed quickly by the NOP and I wanted to offer our assistance. Through United Egg Producers we could quickly gather a list that could be regional in nature of all vaccines used by organic egg producers. I would think we could reach greater than 75% of all layers in production in the United States and could represent big, medium and small. I think the list could be quite thorough.

We have already started working on this list and could also provide you the current manufacturer for each vaccine as well. I do not know if the manufacturers will all cooperate on the exact methods used to make the individual vaccines but we or you could try.

I am sure the first and most important piece of the puzzle is what is being used followed by where it is being sourced. In this area I feel quite confident we can as an Industry respond quickly. Please let me know if we can be of any assistance in this area.

Thank you,

David Will  
General Manager  
Chino Valley Ranchers  
Chairman  
United Egg Producers Organic Committee  
Office 626-652-0890  
Toll Free 800-354-4503  
Fax 866-264-3447  
Cell (b) (6)  
[www.chinovalleyranchers.com](http://www.chinovalleyranchers.com)



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## Schurkamp, Lynnea - AMS

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**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Thursday, July 12, 2012 6:38 AM  
**To:** McEvoy, Miles - AMS  
**Subject:** RE: Visit Schedule

Miles,

Yes I was referring to them. However, after sending this email to you, I received a message from Rita saying the meeting had been scheduled.

Scott

---

**From:** McEvoy, Miles - AMS  
**Sent:** Wednesday, July 11, 2012 4:14 PM  
**To:** Updike, Scott - AMS  
**Subject:** Re: Visit Schedule

You are referring to cottonwood cattle?

---

**From:** Updike, Scott - AMS  
**Sent:** Wednesday, July 11, 2012 01:06 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: Visit Schedule

Miles,

I just wanted to verify that this is not an inspection and that producers can say no. This particular family was planning on taking a vacation that week. If they can not be there, NOP will not hold anything against them about it.

I have received some of the OSP's. I am still waiting for the ones from TDA, though I was told they have been mailed.

Scott

---

**From:** Ramkrishnan [<mailto:ram@qcsinfo.org>]  
**Sent:** Wednesday, July 11, 2012 12:11 PM  
**To:** Updike, Scott - AMS  
**Cc:** [ram@qcsinfo.org](mailto:ram@qcsinfo.org)  
**Subject:** FW: [MALWARE FREE]Visit Schedule  
**Importance:** High

Scott,

I am contacting since the client want to finalize the dates. The client has a family vaccination that he need to postpone and wanted to firm up the dates.

---

**From:** Dan Bornemeier [[mailto:\(b\) \(6\)@ams.usda.gov](mailto:(b) (6)@ams.usda.gov)]  
**Sent:** Wednesday, July 11, 2012 12:03 PM  
**To:** [meg.kuhn@ams.usda.gov](mailto:meg.kuhn@ams.usda.gov)  
**Cc:** 'Ramkrishnan'

**Subject:** [MALWARE FREE]Visit Schedule

**Importance:** High

Meg,

I am contacting you in regards to an email forwarded to me from Quality Inspection Services, copy attached.

It seems that we are on the visit list for the Deputy Administrator's visit to Texas/New Mexico that is shortly upcoming.

The email indicated Rita Meade would be contacting us to arrange a time and date, but that has yet to happen. Since the date is rapidly approaching, I'd like to get the schedule down ASAP. I tried calling the 202-720-3252 main line but received a full voicemail box.

Can you assist in getting this scheduled?

Regards,

*Dan Bornemeier*

Controller, CA Skiles, Jr. ET AL

mailto: (b) (6)

office:806-384-3377

mobile: (b) (6)

fax:806-384-3379

*Confidentiality Note This message is intended only for the person or entity to which it is addressed. It may contain confidential and/or privileged material. Any review, transmission, dissemination or other use, or taking of any action in reliance upon this message by persons or entities other than the intended recipient is prohibited and may be unlawful. If you received this message in error, please contact the sender and delete it from your computer.*

No virus found in this outgoing message.

Checked by AVG - [www.avg.com](http://www.avg.com)

Version: 9.0.930 / Virus Database: 2437.1.1/5124 - Release Date: 07/11/12 01:34:00

## Schurkamp, Lynnea - AMS

---

**From:** McEvoy, Miles - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MCEVOY, MILES19F09CBD-BE7F-4909-8DAA-6F3FA5E2BC08>  
**Sent:** Wednesday, July 11, 2012 4:14 PM  
**To:** Updike, Scott - AMS  
**Subject:** Re: Visit Schedule

You are referring to cottonwood cattle?

---

**From:** Updike, Scott - AMS  
**Sent:** Wednesday, July 11, 2012 01:06 PM  
**To:** McEvoy, Miles - AMS  
**Subject:** FW: Visit Schedule

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Scott

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**Sent:** Wednesday, July 11, 2012 12:11 PM  
**To:** Updike, Scott - AMS  
**Cc:** ram@qcsinfo.org  
**Subject:** FW: [MALWARE FREE]Visit Schedule  
**Importance:** High

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**Sent:** Wednesday, July 11, 2012 12:03 PM  
**To:** [meg.kuhn@ams.usda.gov](mailto:meg.kuhn@ams.usda.gov)  
**Cc:** 'Ramkrishnan'  
**Subject:** [MALWARE FREE]Visit Schedule  
**Importance:** High

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Can you assist in getting this scheduled?

Regards,

*Dan Bornemeier*

Controller, CA Skiles, Jr. ET AL

mailto: [bornemeier@wtrt.net](mailto:bornemeier@wtrt.net)

office: 806-384-3377

mobile: (b) (6)

fax: 806-384-3379

*Confidentiality Note This message is intended only for the person or entity to which it is addressed. It may contain confidential and/or privileged material. Any review, transmission, dissemination or other use, or taking of any action in reliance upon this message by persons or entities other than the intended recipient is prohibited and may be unlawful. If you received this message in error, please contact the sender and delete it from your computer.*

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Version: 9.0.930 / Virus Database: 2437.1.1/5124 - Release Date: 07/11/12 01:34:00



Agricultural Marketing Service  
Livestock and Seed Program  
Audit, Review, and Compliance Branch

ARC 1415A Form  
Page 1 of 3

| Company Information: |  |
|----------------------|--|
| Company Name:        | New Jersey Department of Agriculture   |
| Est. No.:            | NA   |
| Street Address:      | 369 South Warren Street  |
| City, State, Zip:    | Trenton, NJ 08625  |
| Contact:             | Erich Bremer   |
| Phone:               | 609-984-2225   |
| Email:               | <a href="mailto:erich.bremer@ag.state.nj.us">erich.bremer@ag.state.nj.us</a> |
| Program:             | USDA National Organic Program (NOP)  |
| Comments:            | Renewal Assessment   |

| Audit Objectives:  |
|--|
| To verify continuing conformance to the audit criteria; and to verify the implementation and effectiveness of corrective actions in addressing the previous non-compliances. |

| Audit Scope:  |
|---|
| The company's quality manual including personnel, processes, procedures, facilities, and related records. |

| Audit Criteria & Reference Documents:  |
|--|
| 7 CFR Part 205 National Organic Program, Final Rule, dated December 21, 2000 as amended March 15, 2012 |

Company Name: New Jersey Department of Agriculture

| Audit Team and Responsibilities |             |   |
|---------------------------------|-------------|---|
| Auditor:                        | Title:      | Responsibility:                               |
| David J. Hildreth               | Team Leader | All areas of the audit                        |
| Betsy Rakola                    | Team Member | All areas of audit as assigned by team leader |



Agricultural Marketing Service  
Livestock and Seed Program  
Audit, Review, and Compliance Branch

ARC 1415A Form  
Page 2 of 3

| Audit Schedule |              |   |                          |                                 |
|----------------|--------------|---|--------------------------|---------------------------------|
| <i>Date:</i>   | <i>Time:</i> | <i>Activity:</i>  | <i>Location:</i>         | <i>Auditor</i>                  |
| 5/21/2012      | 2:00 PM      | Opening Meeting NJDOA Office<br>Discuss audit process and procedures                            | Trenton, NJ              | Audit Team:<br>Hildreth, Rakola |
| 5/22/2012      | 8:00 AM      | Witness Audit - Producer/Handler  | Millville, NJ            | Hildreth                        |
| 5/22/2012      | 8:00 AM      | Continue Office Audit   | Trenton, NJ              | Rakola                          |
| 5/23/2012      | 8:00 AM      | Livestock/Crops Witness Audit<br>Stephens Farm/ Wild Crop - Walnut<br>Grove/Walnut Grove Farm - | Sussex and<br>Augusta NJ | Rakola                          |
| 5/23/2012      | 8:00 AM      | Continue Office Audit- review record  | Trenton, NJ              | Hildreth                        |
| 5/24/2012      | 8:00 AM      | Continue Office Audit -   | Trenton, NJ              | Hildreth/Rakola                 |
| 5/25/2012      | 8:00 AM      | Continue Office Audit   | Trenton, NJ              | Hildreth/Rakola                 |
| 5/25/2012      | 11:00 AM     | Closing Meeting   | Trenton NJ               | Hildreth/Rakola                 |
|                |              |   |                          |                                 |
|                |              |   |                          |                                 |
|                |              |   |                          |                                 |
|                |              |   |                          |                                 |
|                |              |   |                          |                                 |
|                |              |   |                          |                                 |
|                |              |   |                          |                                 |

Approved by \_\_\_\_\_ JLR  
NP2141ACA Audit Plan and Cost Estimate New Jersey Department of Agriculture Trenton NJ 0305-12 Approved: 08/09/07

AMS04223



Agricultural Marketing Service  
Livestock and Seed Program  
Audit, Review, and Compliance Branch

ARC 1415A Form  
Page 3 of 3

Company Name: New Jersey Department of Agriculture

| Cost Estimate            |                   |                   |              |                |
|--------------------------|-------------------|-------------------|--------------|----------------|
| <i>Audit Time:</i>       | <i>Auditor 1:</i> | <i>Auditor 2:</i> | <i>Rate:</i> | <i>Amount:</i> |
| Onsite Audit             |                   |                   |              |                |
| Travel                   | 2.00              | 10.00             | \$ 108.00    | \$ 1,296.00    |
| Pre-Audit                | 4.00              | 0.00              | \$ 108.00    | \$ 432.00      |
| Audit                    | 29.00             | 29.00             | \$ 108.00    | \$ 6,264.00    |
| Post-Audit               | 5.00              | 0.00              | \$ 108.00    | \$ 540.00      |
| Desk Audit Only          | 0.00              | 0.00              | \$ 108.00    | \$ -           |
| <i>Per Diem:</i>         | <i>Auditor 1:</i> | <i>Auditor 2:</i> | <i>Rate:</i> | <i>Amount:</i> |
| Per Diem Days            | 4.50              | 4.50              | n/a          | 9.00           |
| Lodging                  | 405.00            | 405.00            | \$ 90.00     | \$ 810.00      |
| M&IE                     | 274.50            | 274.50            | \$ 61.00     | \$ 549.00      |
| <i>Associated Costs:</i> | <i>Auditor 1:</i> | <i>Auditor 2:</i> | <i>Cost:</i> | <i>Amount:</i> |
| Airfare                  | 0.00              | 0.00              | \$ -         | \$ -           |
| Local Transportation     | 0.00              | 0.00              | \$ -         | \$ -           |
| Room Tax                 | 54.00             | 54.00             | \$ 108.00    | \$ 108.00      |
| Rental Car               | 0.00              | 340.00            | \$ 340.00    | \$ 340.00      |
| Parking                  | 0.00              | 0.00              | \$ -         | \$ -           |
| POV Miles                | 54.00             | 0.00              | \$ 0.510     | \$ 27.54       |
| Administrative Cost      | 0.00              | 0.00              | \$ 108.00    | \$ 108.00      |
| GRAND TOTAL              |                   |                   |              | \$ 10,474.54   |

*I have reviewed the audit plan and cost estimate; and agree to them. I realize that the actual audit and cost may differ from this document. Additionally, I realize that audit costs associated with a corrective action audit are not included in this estimate.*

Erich Bremer

Client (Auditee) Name:

Date:

David J. Hildreth

3/6/2012

Lead Auditor Signature

Date:

\*The ARC Branch meets the requirements outlined in 5 CFR 2635.703, Use of nonpublic information.

Approved by \_\_\_\_\_ JLR  
NP2141ACA Audit Plan and Cost Estimate New Jersey Department of Agriculture Trenton NJ 03054 Approved: 08/09/07

AMS04224



| National Organic Program Accreditation Assessment Checklist |  |
|---|--|
| <b>Date:</b>  | May 21 - 25, 2012  |
| <b>Assessment Identifier:</b>                               | NP2142ACA  |
| <b>Assessment Activity:<br/>(select one)</b>                | <input type="checkbox"/> Documentation Adequacy Review<br><input type="checkbox"/> Pre-decisional Assessment<br><input type="checkbox"/> Initial Assessment<br><input type="checkbox"/> Mid-Term Assessment<br><input type="checkbox"/> Renewal Assessment XXX<br><input type="checkbox"/> Corrective Action Review<br><input type="checkbox"/> Corrective Action Assessment<br><input type="checkbox"/> Other |
| Company Information   |  |
| <b>Name of Company:</b>                                     | New Jersey Department of Agriculture   |
| <b>Company Address:</b>                                     | 369 South Warren Street  |
| <b>City, State, Zip:</b>                                    | Trenton, NJ 08625  |
| <b>Contact Name:</b>  | Erich Bremer   |
| <b>Title:</b>   | Program Coordinator; Supervisor, Organic Certification Program   |
| <b>Phone #:</b>   | 609-984-2225   |
| <b>Email:</b>   | <a href="mailto:erich.bremer@ag.state.nj.us">erich.bremer@ag.state.nj.us</a>   |
| <b>Location(s) of Program Activities:</b>                   | Trenton, New Jersey  |
| <b>Standards Applied:</b>                                   | 7 CFR Part 205 National Organic Program (NOP), Final Rule, dated December 21, 2000; as amended March 15, 2012  |
| <b>Scope of Program Activities:</b>                         | Crops, Wild Crops, Livestock and Handling  |
| <b>Countries of Operations:</b>                             | United States (NJ and PA)  |
| Assessment Team   |  |
| <b>Team Leader:</b>   | David J. Hildreth  |
| <b>Second Auditor:</b>                                      | Betsy Rakola   |
| <b>Other (Identify Role):</b>                               | N/A  |





## PLANNING AND SCHEDULING OF THE ASSESSMENT

- ☒ Send email using the appropriate template to schedule the on-site assessment. This should be conducted as early as possible. Planning of foreign assessments should start at least 6 months prior to the anticipated assessment date. Scheduling of domestic assessments should commence no later than 3 months prior to the anticipated assessment date.
- ☒ Once assessment date is scheduled with the ACA, select satellite offices and witness audit sites to be visited during the assessment.
- ☒ After assessment sites and on-site schedule has been finalized, complete the audit plan, cost estimate, and appropriate letter regarding the assessment.
- ☒ Send the above information via email using the appropriate template. *Remember to include attachments in the email and CC all of the personnel listed on the "Letter".*

## PRE-ASSESSMENT ACTIVITIES

- ☒ Verify that LS-313 Application for Service is on file and is the current version; not applicable for the pre-decisional assessment.
- ☒ Obtain & review the most recent copy of program documentation from the company.

|  |  |
|--|--|
| <b>Title of documentation:</b>                   | <b>General Procedures for NJDA Organic Certification</b> |
| <b>Date or revision number of documentation:</b> | <b>February 2012</b>                                     |

- ☒ Review previous audit report.  
NP8217OOA NC Report NJDA Trenton NJ 08 14 08
- ☒ Review previous corrective actions report, as applicable.  
NP8217OOA CA Report NJDA Trenton NJ 02 03 09
- ☒ Review previous notices of noncompliance issued to the ACA. **Yes**
- ☒ Receive approval to conduct the assessment activity by obtaining a signed copy of the audit plan and cost estimate from the client. **Yes**



## ON-SITE ASSESSMENT ACTIVITIES

### OPENING MEETING

The purpose of the opening meeting is to confirm the assessment plan, provide a short summary of how the assessment activities will be undertaken, confirm communication channels, and provide an opportunity for the client to ask questions.

- ☒ Introduction of participants and their roles.
- ☒ Confirmation of assessment objectives, scope, and criteria.
- ☒ Confirmation of assessment timetable and other relevant arrangement.
- ☒ Review the assessment plan. Have there been any changes since it was approved?  
No Yes - What are the changes?
- ☒ Review program documentation. Have there been any changes since the last assessment?  
No Yes - What are the changes?
- ☒ Have findings from previous assessments been addressed? (if applicable)  
Yes No *see report*
- ☒ Methods and procedures to be used to conduct the assessment.
- ☒ Confirmation of formal communication channels.
- ☒ Confirmation that auditee will be kept informed of assessment process during the assessment.
- ☒ Confirmation that the resources and facilities needed by the assessment team are available.
- ☒ Confirmation of confidentiality matters.
- ☒ Confirmation of relevant work safety, emergency, and security procedures for the assessment team.
- ☒ Confirmation of the availability, roles, and identities of guides.
- ☒ The method of reporting, and explain that non-compliances (if any are identified) will not be classified as to severity.
- ☒ Provide an opportunity for the client to ask questions.



☐ *Complete the following Attendance List:*

| Name              | Title or Position                        | Opening | Closing |
|-------------------|--|---------|---------|
| David J. Hildreth | GVD Lead Auditor                         | XX      | XX      |
| Betsy Rakola      | NOP Auditor                              | XX      | XX      |
| Erich V. Bremer   | Supervisor Organic Certification Program | XX      | XX      |
|                   |  |         |         |
|                   |  |         |         |
|                   |  |         |         |
|                   |  |         |         |
|                   |  |         |         |



| CHECKLIST SECTION I – General Information on Certification Process |  |  |
|--|--|--|
| 1  | List locations of offices where key activities occur including key activities performed.                               | New Jersey Department of Agriculture, 369 South Warren St., Trenton, NJ 08625 All certification operations are conducted at this site.   |
| 2  | Note the number of operations certified to the NOP at the time of the assessment.                                      | Total: 82 NOP certified operations<br>Crop: 50<br>Wild-crop: 3<br>Livestock: 3<br>Handlers: 21<br>Grower Groups: 0<br>Approximate Handler Types:<br>Processors: 20<br>Distributors: 1<br>Traders:<br>Retailers:  |
| 3  | What does the ACA submit to applicants on initial application?   | Reviewed the packet that is sent; Organic checklist application and updates, Application Instructions and Tips for Producers, Operator Information Cover Sheet, Fee schedule, and Processed Product Record Form. |
| 4  | How is the information, documents and or forms provided to those inquiring about certification (hard copy/electronic)? | Hard Copy  |
| 5  | Who (job title/position description) conducts the initial review for completeness and ability to comply?               | Supervisor Organic Certification Program   |
| 6  | Who (job title/position description) reviews labels and material inputs?   | Supervisor Organic Certification Program   |
| 7  | How are inspectors selected / assigned for inspections?  | Scope qualification, availability, selected by the Supervisor of the Organic Certification Program   |
| 8  | Are they staff inspectors or subcontracted?  | Subcontracted  |
| 9  | Who (job title/position description) makes the certification decision?   | New Jersey Secretary of Agriculture  |
| 10   | Provide a brief description of the annual update process.  | Update paperwork is sent out 8 weeks prior to update due, reviewed by admin assistant for completeness and the Supervisor for compliance.  |



| CHECKLIST SECTION I – General Information on Certification Process |  |   |
|--|--|---|
| 11   | Who (job title/position description) reviews the inspection report, results of analysis conducted (as applicable), and information requested from and provided by the applicant? | Supervisor Organic Certification Program and the Program Manager  |
| 12   | Who (job title/position description) makes the determination on whether to issue a notice of non-compliance?   | Recommendation is made by Supervisor Organic Certification Program and referred to the Manager of the Organic Program |
| 13   | When operations submit corrective actions or a rebuttal, who (job title/position description) reviews the materials and makes the determination if they are adequate?            | Supervisor Organic Certification Program  |
| 14   | Are there any operations certified or undergoing the certification process which were re-instated after having been suspended or revoked?  | No  |
| 15   | Does the ACA have a material evaluation program for liquid nitrogen fertilizers (LNF) with a nitrogen content greater than 3%?   | No, Product that is used by certified operations is approved by one of three certifiers.                              |
| 16   | Does the ACA certify grower groups?  | No  |

## PROGRAM REQUIREMENTS

- <sup>(1)</sup> Complies: For each requirement, identify whether the certifying agent complies, does not comply, or that a requirement is not applicable with an "X".
- <sup>(2)</sup> Remarks: Provide explanations and/or comments to present evidence of compliance or non-compliance, as applicable. If a requirement is not applicable include why it does not apply.

| <b><u>Exclusions:</u> Sections not included or addressed in checklist</b>   |
|---|
| <p>§205.502 Applying for Accreditation – procedural requirements not addressed by auditors.</p> <p>§205.505 Statement of Agreement – Reference only. If requirements are not met, cite to the appropriate section(s) of §205.501.</p> <p>§205.510(c) – (e) NOP Administrator procedural requirements not addressed by auditors.</p> |

| §§205.400, 205.401 & 205.402 General Requirements, Application, and Review  |                         |    |     |                        |
|---|-------------------------|----|-----|------------------------|
| For audit purposes, §205.400 or §205.401 are to be referenced, as applicable. These are requirements for certified operations and not the ACA. If requirements are not met, cite to the appropriate section §205.402(a)(1) or (3) and <u>reference</u> this section. The application requirements are reviewed when completing the Certification File Review Worksheets. An overall assessment based on all files reviewed, information gathered during review of certification process, interviews, and Witness Audit Checklists should be made, then identify findings under appropriate requirement. |                         |    |     |                        |
| CHECKLIST SECTION II  | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup> |
|   | Yes                     | No | N/A |                        |





## §§205.400, 205.401 & 205.402 General Requirements, Application, and Review

For audit purposes, §205.400 or §205.401 are to be referenced, as applicable. These are requirements for certified operations and not the ACA. If requirements are not met, cite to the appropriate section §205.402(a)(1) or (3) and reference this section. The application requirements are reviewed when completing the Certification File Review Worksheets. An overall assessment based on all files reviewed, information gathered during review of certification process, interviews, and Witness Audit Checklists should be made, then identify findings under appropriate requirement.

| CHECKLIST SECTION II  | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup>   |
|---|-------------------------|----|-----|--|
|   | Yes                     | No | N/A |  |
| References:<br>NOP 2605 Reinstating Suspended Organic Operations<br>NOP Policy Memo 11-4 Verification of Materials  |                         |    |     |  |
| <b>§§205.400(c) and 205.670(a)</b><br>Is there any evidence that a certified operation denied access to a representative of the Administrator, State, or ACA? | XX                      |    |     | Records reviewed did not indicate that any certified operation denied access to a representative of the Administrator, State or ACA  |
| <b>§205.401</b><br>Are all applications complete and do the OSPs meet the requirements for an OSP?  | XX                      |    |     | Applications are complete and OSPs meet the requirements   |
| <b>§205.402(a)(1)</b><br>Upon accepting applications does the ACA review the application for completeness?  | XX                      |    |     | ACA's checklist indicate that a review is conducted for completeness of the submitted application  |
| <b>§205.402(a)(2)</b><br>Does the review include making a determination if the applicant is in compliance or can comply with the requirements?                |                         | XX |     | Overall NJDA is conducting thorough reviews to determine compliance or ability to comply.<br><br>See NC8 Two labels were not compliant with §205.303(b)(1) and with §205.303(b)(2).<br>* A product with only a single ingredient was labeled "95% organic"<br>* Another product had the "certified organic by ****" statement to the left of the distributor name.<br><br>In addition, there was no record to show that the labels had been approved by NJDA |



### §§205.400, 205.401 & 205.402 General Requirements, Application, and Review

For audit purposes, §205.400 or §205.401 are to be referenced, as applicable. These are requirements for certified operations and not the ACA. If requirements are not met, cite to the appropriate section §205.402(a)(1) or (3) and reference this section. The application requirements are reviewed when completing the Certification File Review Worksheets. An overall assessment based on all files reviewed, information gathered during review of certification process, interviews, and Witness Audit Checklists should be made, then identify findings under appropriate requirement.

| CHECKLIST SECTION II  | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup>  |
|---|-------------------------|----|-----|---|
|   | Yes                     | No | N/A |   |
| <b>§205.402(a)(3)</b><br>Does the ACA verify that an applicant, who previously applied to another certifying agent and received a notification of noncompliance or denial of certification, has submitted documentation to support the correction of any noncompliances identified in the notification of noncompliance or denial of certification? | XX                      |    |     | Interviews with ACA stated that verification is done to ensure that an applicant who has previously applied for certification from another ACA has or has not received a notification of NC or denial of certification. ACA stated that no applicants had previously had an NC or was denied certification. |
| <b>§205.402(b)(1)</b><br>Is the time from receiving the application materials and the review reasonable?  | XX                      |    |     | Records reviewed indicated that this was done in a reasonable time  |
| <b>§205.402(b)(1)</b> Is the time between receiving an application and communicating the results of the review to an applicant reasonable?  |                         | XX |     | Six of eleven files reviewed indicated a time lasp of more than six months from the date of initial application and the final certification date (Outstanding NC1 - See 205.404 (a))  |
| <b>§§205.402(b)(2) and 205.403(e)(2)</b><br>Is a copy of the inspection report as approved by the ACA provided to that operation by the ACA?  | XX                      |    |     | Records reviewed and observations made indicated that a copy of the approved report is sent to the client   |
| <b>§205.402(c)</b><br>Do any clients withdraw their application and if so, was the process in accordance with the requirements?   |                         |    | XX  | No withdrawal of applications have occurred since last audit  |

### §205.403 Inspection

Based on review of Certification File Review Worksheets, information gathered during review of certification process, interviews, and Witness Audit Checklists.

| CHECKLIST SECTION III | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup> |
|-----------------------|-------------------------|----|-----|------------------------|
|                       | Yes                     | No | N/A |                        |



### §205.403 Inspection

Based on review of Certification File Review Worksheets, information gathered during review of certification process, interviews, and Witness Audit Checklists.

| CHECKLIST SECTION III  | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup>  |
|--|-------------------------|----|-----|---|
|  | Yes                     | No | N/A |   |
| <b>§205.403(a)(1)</b><br>Does the ACA conduct initial on-site inspections of each production unit, facility, and site that produces or handles organic products and that is included in the operation for which certification is requested, on all applicants?   | XX                      |    |     | Files reviewed indicated that all required inspections are performed as necessary on all applicants   |
| <b>§205.403(b)(1)</b><br>Are all inspections conducted within a reasonable time after the determination that the applicant appears to comply or can comply with the requirements?  | XX                      |    |     | Records reviewed indicated that all inspections are conducted within a reasonable time after determined that the applicant appears to comply or can comply with the requirements of the NOP   |
| <b>§205.403(b)(2)</b><br>Are all inspections conducted when an authorized representative of the operation who is <u>knowledgeable</u> about the operation was present <u>and</u> at a time when land, facilities, and activities that demonstrate the operation's compliance with or capability to comply with the applicable provisions of subpart C could be observed? | XX                      |    |     | Records reviewed indicated that inspections were conducted with a knowledgeable representative of the operation. Observations made during the witness audits verified that the inspections were conducted within the requirements of 205.403 (b)(2) |
| <b>§205.403(c)(1)</b><br>Do all inspections verify the operation's compliance or capability to comply with the Act and the regulations?  | XX                      |    |     | Yes, overall the inspections are very thorough and verify the operations compliance or capability to comply. Records reviewed indicated that the inspectors verified the operation's compliance with the act and the regulations.                   |
| <b>§205.403(c)(2)</b><br>Do all inspections verify that the information (including the OSP), provided in accordance with §§205.401, 205.406, and 205.200, accurately reflect the practices used or to be used by the applicant or certified operation?   | XX                      |    |     | Observations made during the witness audits indicate that the inspector verified the information provided by the applicant accurately reflect the practices used or to be used by the applicant or  |





### §205.403 Inspection

Based on review of Certification File Review Worksheets, information gathered during review of certification process, interviews, and Witness Audit Checklists.

| CHECKLIST SECTION III   | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup>   |
|---|-------------------------|----|-----|--|
|   | Yes                     | No | N/A |  |
|   |                         |    |     | certified operation  |
| <b>§205.403(c)(3)</b><br>Do all inspections verify that prohibited substances had not been and were not being applied to the operation?   | XX                      |    |     | Observations made during the witness audit indicated that the inspector did verify that no prohibited substances had not been applied to the operation.  |
| <b>§205.403(d)</b><br>Do inspectors conduct an exit interview with an authorized representative of the operation, who is knowledgeable about the inspected operation, <u>to confirm the accuracy and completeness</u> of inspection observations and information gathered during the on-site inspection?<br><br>Does the exit interview(s) address the need for any <u>additional information</u> as well as any <u>issues of concern</u> ? | XX                      |    |     | Observations of witness inspections indicated that an exit interview was conducted with an authorized representative of the operation and any need for additional information as well as any issues of concern were addressed. |
| <b>§205.403(e)(1)</b><br>Do inspectors provide the operation's authorized representative with a receipt for any samples taken during the inspections?   | XX                      |    |     | IAW NJDA General Procedures, Testing and Monitoring of Organic Products and Inputs states that an inspector will leave receipts for samples taken.   |

### §205.404 Granting Certification

Based on review of Certification File Review Worksheets, information gathered during review of certification process, interviews, and Witness Audit Checklists.

| CHECKLIST SECTION IV  | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup>  |
|---|-------------------------|----|-----|---|
|   | Yes                     | No | N/A |   |
| References:<br>NOP 2603 Organic Certificates<br>NOP 2605 Reinstating Suspended Organic Operations<br>NOP Policy Memo 11-4 Verification of Materials |                         |    |     |   |
| §205.404(a)<br>Does the ACA meet the requirements of 205.404(a) by:   |                         | XX |     | Outstanding NC1 – Review of records indicate that the ACA meets the requirements of 205.404 (a) |



### §205.404 Granting Certification

Based on review of Certification File Review Worksheets, information gathered during review of certification process, interviews, and Witness Audit Checklists.

| CHECKLIST SECTION IV   | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup>   |
|--|-------------------------|----|-----|--|
|  | Yes                     | No | N/A |  |
| <p>reviewing the inspection report, sample results, and any additional information within a <u>reasonable time</u> after the inspection;</p> <p>granting certification in all cases where it is determined that the OSP and the applicant's operation are in compliance and is able to conduct operations in accordance with the plan; and</p> <p>(If the certification is granted and included requirements for the correction of minor noncompliances) <u>indicating</u> they have to be addressed within a specified time period as a condition of continued certification?</p> |                         |    |     | <p>except that six of eleven files reviewed indicated that more than six months had elapsed from the time the initial application had been received and the final certification decision was made.</p>                         |
| <p><b>§205.404(b)</b><br/>Does the ACA issue a certificate of organic operation in all cases where certification was granted?</p>  | XX                      |    |     | <p>Records reviewed indicate that NJDA issues a certificate of organic operation.</p> <p>Additional certificates are issued only if certification scope has changed since last inspection or additional products are added</p> |
| <p><b>§205.404(b)(1) – (4)</b><br/>Do certificates issued by the ACA contain the required information?</p> <p>Do certificates issued by the ACA contain the additional information and statements recommended by NOP 2603?</p>   | XX                      |    |     | <p>Certificates issued were reviewed all have the required information as specified under 205.404 (b)(1)-(4).</p> <p>See NC7 – 205.501(a)(21)</p>  |

### §205.405 Denial of Certification

Based on review of Certification File Review Worksheets (including Table 5a - Notice of Noncompliance/Adverse Action Worksheet).

| CHECKLIST SECTION V | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup> |
|---------------------|-------------------------|----|-----|------------------------|
|                     | Yes                     | No | N/A |                        |

References:

NOP 2607 Disclosure of Information concerning USDA Accredited Certifying Agents and Certified Operations to the NOP



### §205.405 Denial of Certification

Based on review of Certification File Review Worksheets (including Table 5a - Notice of Noncompliance/Adverse Action Worksheet).

| CHECKLIST SECTION V  | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup>  |
|--|-------------------------|----|-----|---|
|  | Yes                     | No | N/A |   |
| NOP 4002 Enforcement Policy<br>NOP Policy Memo 11-4 Verification of Materials  |                         |    |     |   |
| <b>§205.405(a)</b><br>Does the ACA <u>provide a written notification of noncompliance</u> to all applicants in cases where there was a reason to believe, based on the review, that the applicant was not able to comply or was not in compliance with the requirements?   | XX                      |    |     | Records reviewed indicate that written notification of non-compliance was issued as required.                               |
| <b>§205.405(a)</b><br>If the ACA issued any <u>combined notice</u> of noncompliance and denial of certification, does it meet the requirements for both notifications?   |                         |    | XX  | NJDA did not issue any combined notices since the last assesement.  |
| <b>§205.405(a)(1) – (3)</b><br>Do all notices of noncompliance that were issued contain the required information in accordance with §205.405(a)(1) – (3)?  | XX                      |    |     | Review of NC’s issued indicate that all requirements of the rule are being followed   |
| <b>§205.405(c)(1)</b><br>In cases when the applicant provided corrective actions or a rebuttal, does the ACA:<br><br>evaluate the rebuttal or corrective actions taken and supporting documentation;<br><br>issue the applicant an approval of certification if the corrective action or rebuttal is sufficient for the applicant to qualify for certification; or<br><br>issue the applicant a written notice of denial of certification when the corrective action or rebuttal, <u>is not</u> sufficient for the applicant to qualify for certification? | XX                      |    |     | Records reviewed indicated that the ACA does evaluate the CA’s submitted by the certified operation.                        |
| <b>§205.405(c)(2)</b><br>Does the ACA issue a written notice of denial of certification to all applicants that failed to respond to the notification of noncompliance?   | XX                      |    |     | Records indicate that the ACA does issue written notice of denial of certification to all applicants that failed to respond |



### §205.405 Denial of Certification

Based on review of Certification File Review Worksheets (including Table 5a - Notice of Noncompliance/Adverse Action Worksheet).

| CHECKLIST SECTION V  | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup>  |
|--|-------------------------|----|-----|---|
|  | Yes                     | No | N/A |   |
| <b>§205.405(c)(3)</b><br>Does the ACA provide all notices of approval or denials to the Administrator?   | XX                      |    |     | Records reviewed and interviews conducted indicated that the ACA does notify the Administrator of all approvals and denials |
| <b>§§205.405(d) and 205.405(d)(1) – (3)</b><br>Do all issued denials of certification contain the required information in accordance with 205.405(d), and 205.405(d)(1) – (3)?   |                         |    | XX  | No denials  |
| <b>§205.405(f)</b><br>If the ACA received new applications for certification, which included a notification of noncompliance or a notice of denial of certification, does the ACA <u>treat the application as a new application</u> and begin a new application process? |                         |    | XX  | No new applications in this situation.<br><br>Procedures in place to address appropriately                                  |



### §205.406 Continuation of Certification

Based on review of Certification File Review Worksheets, information gathered during review of certification process, interviews, and Witness Audit Checklists. Describe the annual update process under “General information on Certification Process”, Checklist Section I. Document requirement evaluations on the Certification File Review Worksheets and “Table 5a - Notice of Noncompliance/Adverse Action Worksheet” as applicable.

| CHECKLIST SECTION VI   | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup>  |
|--|-------------------------|----|-----|---|
|  | Yes                     | No | N/A |   |
| References:<br>NOP 2607 Disclosure of Information concerning USDA Accredited Certifying Agents and Certified Operations to the NOP<br>NOP 4002 Enforcement Policy<br>NOP Policy Memo 11-4 Verification of Materials  |                         |    |     |   |
| §205.406(a)(1) – (4)<br>Do all certified operations submit an updated OSP and pay the annual certification fees as required by §205.406(a)(1) – (4)?   | XX                      |    |     | Records reviewed indicated that all operations are required and do submit an updated OSP and pay fees as required by rule |
| §205.406(b)<br>Following the receipt of an updated OSP does the ACA review it to see if the requirements of §205.406(a) have been met?   | XX                      |    |     | Records reviewed indicate compliance  |
| §§205.406(b) and 205.403(a)(1)<br>Following the receipt of an updated OSP does the ACA within a reasonable time arrange and conduct an on-site inspection?   | XX                      |    |     | Records reviewed indicate compliance  |
| §205.406(c)<br>Does the ACA provide a written notification of noncompliance to all operations in accordance with §205.662 if the ACA had reason to believe, based on the on-site inspection and a review of the information specified in §205.404, that a certified operation is not complying with the requirements of the Act and the regulations? |                         | XX |     | See NC1<br><br>Records indicate that NJDA provides a notice of concern instead of noncompliances.                         |
| §205.406(d)<br>Does the ACA issue an updated certificate for all certified operations that were in compliance with the Act and the regulations if any information specified on the previous certificate changed?   | XX                      |    |     | New certificates are issued when changes to previous certificates are needed.   |





| §205.501 General Requirements for Accreditation  |                         |    |     |  |
|--|-------------------------|----|-----|--|
| CHECKLIST SECTION VII  | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup>   |
|  | Yes                     | No | N/A |  |
| References:<br>NOP 2000 General Accreditation Policies and Procedures<br>NOP 2026 Submitting Annual Lists of Certified Operations<br>NOP 2606 Processing Requests for Temporary Variances<br>NOP Appeals Procedure: Adverse Action Appeal Process – Certified Operation or Applicant for Certification<br>Policy Memo 11-8 California State Organic Program, Additional Requirements Granted |                         |    |     |  |
| §205.501(a)(1)<br>Does the ACA have <u>sufficient expertise</u> in organic production or handling techniques to fully comply with and implement the terms and conditions of the organic certification program?   |                         | XX |     | See NC2<br>Back up reviewer has no qualifications to be a reviewer.  |
| §205.501(a)(2)<br>Does the ACA <u>demonstrate the ability</u> to fully comply with the requirements for accreditation?   | XX                      |    |     | Except as indicated in the findings section of the report  |
| §205.501(a)(3)<br>Does the ACA <u>carry out the provisions</u> of the Act and the regulations, including the provisions of §§205.402 through 205.406 and §205.670?   |                         | XX |     | Three files reviewed and two witness audits observed showed evidence of purchases of non-organic seed and/or planting stock. There was no documentation of commercial unavailability of organic seeds or planting stock. None of the operations received a noncompliance from NJDA for failure to comply with §205.204 |
| §205.501(a)(4)<br>Does the ACA use a <u>sufficient number of adequately trained personnel</u> , including inspectors and certification review personnel, to comply with and implement the organic certification program?   | XX                      |    |     | NJDA has hired a new part time administrative person to screen all requests for certification and other jobs related to the NOP application  |
| §205.501(a)(5)<br>Does the ACA ensure certification personnel <u>have sufficient expertise</u> in organic production or handling techniques to successfully perform the duties assigned?   | XX                      |    |     | Records indicate that ACA only uses personnel involved with the sufficient expertise to perform the duties assigned<br><br>However, see NC2-205.501(a)(1)  |
| §205.501(a)(6)   |                         | XX |     | See outstanding NC3  |



| §205.501 General Requirements for Accreditation  |                         |     |     |  |
|--|-------------------------|-----|-----|--|
| CHECKLIST SECTION VII  | Complies <sup>(1)</sup> |     |     | Remarks <sup>(2)</sup>   |
|  | Yes                     | No  | N/A |  |
| Does the ACA conduct annual <u>performance evaluations</u> of all certification personnel in accordance with §205.501(a)(6)?   |                         |     |     | No current performance evaluation on file for the Program Supervisor or the contract inspectors used.  |
| <p><b>§205.501(a)(7)</b><br/>Does the ACA have <u>an annual program review</u> of its certification activities conducted by someone who has expertise to conduct the reviews?</p> <p>Does the ACA <u>implement measures to correct</u> any noncompliances that are identified in the evaluation?</p> |                         | XX  |     | <p><b>See outstanding NC4</b></p> <p>An annual program review was conducted by an outside party during 2009; however, no annual program review has been conducted since.</p> |
| <p><b>§205.501(a)(8)</b><br/>Does the ACA <u>provide sufficient information</u> to persons seeking certification to enable them to comply with the Act and the regulations?</p>  | XX                      |     |     | Information sent by the ACA to prospective clients appears to provide sufficient information for persons seeking certification   |
| <p><b>§205.501(a)(9)</b><br/>Does the ACA <u>maintain all records</u> pursuant to §205.510(b) and make all such records available for inspection and copying during normal business hours?</p>   | XX                      |     |     | All records were available   |
| <p><b>§205.501(a)(10)</b><br/>Does the ACA <u>maintain strict confidentiality</u> with respect to its clients and not disclose to third parties any business-related information concerning any client obtained while implementing the regulations, except as provided for in §205.504(b)(5)?</p>    | XX                      |     |     | Records indicate compliance  |
| <i>Does the ACA prevent conflicts of interest by:</i>  | ---                     | --- | --- | ---  |
| <p><b>§205.501(a)(11)(i)</b><br/>Not certifying a production or handling operation if the ACA or a <u>responsibly connected party</u> of such ACA has or has held a commercial interest in the production or handling operation?</p>   | XX                      |     |     | Records indicate compliance  |
| <p><b>§205.501(a)(11)(ii)</b><br/><u>Excluding any person, including contractors,</u> with</p>   | XX                      |     |     | Records indicate compliance  |



| §205.501 General Requirements for Accreditation  |                         |     |     |  |
|--|-------------------------|-----|-----|--|
| CHECKLIST SECTION VII  | Complies <sup>(1)</sup> |     |     | Remarks <sup>(2)</sup>   |
|  | Yes                     | No  | N/A |  |
| conflicts of interest from work, discussions, and decisions in all stages of the certification process and the monitoring of certified operations for all entities in which such person has or has held a commercial interest. |                         |     |     |  |
| <b>§205.501(a)(11)(iii)</b><br>Not permitting any employee, inspector, contractor, or other personnel <u>to accept payment</u> , gifts, or favors of any kind, other than prescribed fees, from any business inspected.        | XX                      |     |     | Records indicate compliance  |
| <b>§205.501(a)(11)(iv)</b><br><u>Not giving advice or providing consultancy</u> services, to certification applicants or certified operations, for overcoming identified barriers to certification.                            |                         | XX  |     | <b>See NC6</b><br><br>It was observed during the witness audits that the inspector crossed the line in giving advice to clients on Corrective Actions that should be done, etc.  |
| <b>§205.501(a)(11)(v)</b><br>Requiring all certification personnel and responsibly connected parties to complete an <u>annual conflict of interest disclosure report</u> .   |                         | XX  |     | All personnel with certification responsibility have current conflicts of interest on file with the exception of the Secretary of Agriculture who makes the final certification decision (See outstanding NC5).  |
| <b>§205.501(a)(11)(vi)</b><br>Ensuring that the <u>decision to certify</u> an operation is made by a person different from those who conducted the review of documents and on-site inspection.                                 | XX                      |     |     | Final certification is made by the Secretary of Ag; the initial review is made by the Supervisor of the Organic Program; then the inspection is accomplished by a qualified contract inspector; the final review is done by the Organic Program Manager. |
| <i>A private or governmental entity accredited as a certifying agent (ACA) under this subpart must:</i>  | ---                     | --- | --- | ---  |
| <b>§205.501(a)(12)(i)</b><br><u>Reconsider a certified operation's application</u> for   | XX                      |     |     | Procedure in place   |





| §205.501 General Requirements for Accreditation   |                         |    |     |   |
|---|-------------------------|----|-----|---|
| CHECKLIST SECTION VII   | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup>  |
|   | Yes                     | No | N/A |   |
| certification and, if necessary, perform a new on-site inspection when it is determined, within 12 months of certifying the operation, that any person participating in the certification process and covered under §205.501(a)(11)(ii) has or <u>had a conflict of interest</u> involving the applicant.   |                         |    |     |   |
| <b>§205.501(a)(12)(ii)</b><br><u>Refer a certified operation</u> to a different ACA for recertification and reimburse the operation for the cost of the recertification when it is determined that any person covered under §205.501(a)(11)(i) at the time of certification of the applicant <u>had a conflict of interest</u> involving the applicant. | XX                      |    |     | Procedure in place  |
| <b>§205.501(a)(13)</b><br><u>Accept the certification decisions</u> made by another ACA accredited or accepted by USDA.   | XX                      |    |     | Procedure in place  |
| <b>§205.501(a)(14)</b><br><u>Refrain from making false or misleading claims</u> about its accreditation status, the USDA accreditation program for ACAs, or the nature or qualities of products labeled as organically produced.  | XX                      |    |     | Interviews conducted and procedure in place indicate compliance   |
| <b>§205.501(a)(15)(i)</b><br><u>Submit to the Administrator a copy of:</u> Any notice of denial of certification (§205.405), notification of noncompliance, notification of noncompliance correction, notification of proposed suspension or revocation, and notification of suspension or revocation (§205.662) simultaneously with its issuance.      | XX                      |    |     | Reviewed emails from administrative assistance that notice of noncompliances were in fact sent to the NOP |
| <b>§205.501(a)(15)(ii)</b><br><u>Submit to the Administrator</u> a list, on January 2 of each year, including the name, address, and telephone number of each operation granted certification during the preceding year.  | XX                      |    |     | Confirmed email from administrative assistance to NOP   |
| <b>§205.501(a)(16)</b><br><u>Charge applicants</u> for certification and certified production and handling operations only those fees and charges for certification activities that it has filed  | XX                      |    |     | Per invoices reviewed, charges to applicants & certified applicants are only charged those fees that have |



| §205.501 General Requirements for Accreditation  |                         |    |     |  |
|--|-------------------------|----|-----|--|
| CHECKLIST SECTION VII  | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup>   |
|  | Yes                     | No | N/A |  |
| with the Administrator.  |                         |    |     | been filed with the Administrator  |
| <b>§205.501(a)(17)</b><br>Pay and submit fees to AMS in accordance with §205.640.  | XX                      |    |     | Verified that fees are paid to AMS as required   |
| <b>§205.501(a)(18)</b><br><u>Provide the inspector</u> , prior to each on-site inspection, with previous on-site inspection reports and <u>notify the inspector</u> of its decision regarding certification of the operation site inspected by the inspector and of any requirements for the correction of minor noncompliances. | XX                      |    |     | Verified that inspector is provided with all material as required by this section  |
| <b>§205.501(a)(19)</b><br><u>Accept all production or handling applications</u> that fall within its area(s) of accreditation and certify all qualified applicants, to the extent of its administrative capacity to do so without regard to size or membership in any association or group;                                      | XX                      |    |     | Per interview, the ACA is in compliance with this portion of the rule  |
| <b>§205.501(a)(20)</b><br>Demonstrate its ability to <u>comply with a State's organic program</u> to certify organic production or handling operations within the State.   |                         |    | XX  |  |
| <b>§205.501(a)(21)</b><br>Comply with, implement, and <u>carry out any other terms and conditions</u> determined by the Administrator to be necessary.   |                         | XX |     | Records reviewed and interviewed conducted indicate that NJDA is complying with the requirement except as noted in NC7 One certificate did not specify the specific crops produced and another certificate did not specify Blackberries as one of the products produced. |
| <b>§205.501(b)(1)</b><br>A private or governmental entity accredited as a certifying agent under this subpart may establish a seal, logo, or other identifying mark to be used by  | XX                      |    |     | Policy indicates use of the seal is not mandatory  |



| §205.501 General Requirements for Accreditation   |                         |     |     |  |
|---|-------------------------|-----|-----|--|
| CHECKLIST SECTION VII   | Complies <sup>(1)</sup> |     |     | Remarks <sup>(2)</sup>   |
|   | Yes                     | No  | N/A |  |
| production and handling operations certified by the certifying agent to indicate affiliation with the certifying agent. <i>Provided</i> , That, the certifying agent:<br><br><u>Does not require use of</u> its seal, logo, or other identifying mark on any product sold, labeled, or represented as organically produced as a condition of certification. |                         |     |     |  |
| <b>§205.501(b)(2)</b><br><i>Provided</i> , That, the certifying agent: <u>Does not require compliance</u> with any production or handling practices <u>other than those provided</u> for in the Act and the regulations in this part as a condition of use of its identifying mark.   | XX                      |     |     | Records reviewed and interviews conducted indicate that the ACA does not require compliance with other practices for the NOP |
| <b><i>A private entity accredited as a certifying agent must:</i></b>   | ---                     | --- | --- | ---  |
| <b>§205.501(c)(1)</b><br>Hold the Secretary harmless for any failure on the part of the certifying agent to carry out the provisions of the Act and the regulations in this part.   | XX                      |     |     | Policy in place  |
| <b>§205.501(c)(2)</b><br>Furnish reasonable security, in an amount and according to such terms as the Administrator may by regulation prescribe, for the purpose of protecting the rights of operations certified by the ACA under the Act and the regulations.   | XX                      |     |     | Policy in place  |
| <b>§205.501(c)(3)</b><br>Transfer to the Administrator and make available to any applicable State organic program's governing State official all records or copies of records concerning the person's certification activities in the event that the certifying agent dissolves or loses its accreditation.   | XX                      |     |     | Policy in place  |
| <b>§205.501(c)(d)</b><br>No private or governmental entity accredited as a certifying agent under this subpart shall exclude from participation in or deny the benefits of the National Organic Program to any person due to discrimination because of race, color, national origin, gender,  | XX                      |     |     | Policy in place, State Law   |



| §205.501 General Requirements for Accreditation  |                         |    |     |                        |
|--|-------------------------|----|-----|------------------------|
| CHECKLIST SECTION VII  | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup> |
|  | Yes                     | No | N/A |                        |
| religion, age, disability, political beliefs, sexual orientation, or marital or family status. |                         |    |     |                        |

| §205.503 Applicant Information  |                         |     |     |  |
|---|-------------------------|-----|-----|--|
| This section of the checklist should be completed <u>only</u> if conducting an initial assessment, annual update assessment or renewal assessment. If during any on-site assessment there is objective evidence that required information was not submitted then cite under the appropriate requirement.  |                         |     |     |  |
| CHECKLIST SECTION VIII  | Complies <sup>(1)</sup> |     |     | Remarks <sup>(2)</sup>                 |
|   | Yes                     | No  | N/A |  |
| References:<br>NOP 2000 General Accreditation Policies and Procedures<br>NOP Appeals Procedure: Adverse Action Appeal Process – Certified Operation or Applicant for Certification  |                         |     |     |  |
| A private or governmental entity seeking accreditation as a certifying agent must submit the following information:   | ---                     | --- | --- | ---                                    |
| §205.503(a)<br>The business name, primary office location, mailing address, name of the person(s) responsible for the certifying agent's day-to-day operations, contact numbers (telephone, facsimile, and Internet address) of the applicant, and, for an applicant who is a private person, the entity's taxpayer identification number;                      | XX                      |     |     | Supplied to USDA annually              |
| §205.503(b)<br>The name, office location, mailing address, and contact numbers (telephone, facsimile, and Internet address) for each of its organizational units, such as chapters or subsidiary offices, and the name of a contact person for each unit;   | XX                      |     |     | Supplied to USDA annually              |
| §205.503(c)<br>Each area of operation (crops, wild crops, livestock, or handling) for which accreditation is requested and the estimated number of each type of operation anticipated to be certified annually by the applicant along with a copy of the applicant's schedule of fees for all services to be provided under these regulations by the applicant; | XX                      |     |     | crops, wild crops, livestock, handling |





### §205.503 Applicant Information

This section of the checklist should be completed only if conducting an initial assessment, annual update assessment or renewal assessment. If during any on-site assessment there is objective evidence that required information was not submitted then cite under the appropriate requirement.

| CHECKLIST SECTION VIII   | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup>                   |
|--|-------------------------|----|-----|--|
|  | Yes                     | No | N/A |  |
| <b>§205.503(d)(1)</b><br>The type of entity the applicant is (e.g., government agricultural office, for-profit business, not-for-profit membership association) and for: A governmental entity, a copy of the official's authority to conduct certification activities under the Act and the regulations in this part,   | XX                      |    |     | Supplied to USDA annually                |
| <b>§205.503(d)(2)</b><br>The type of entity the applicant is (e.g., government agricultural office, for-profit business, not-for-profit membership association) and for: A private entity, documentation showing the entity's status and organizational purpose, such as articles of incorporation and by-laws or ownership or membership provisions, and its date of establishment; | XX                      |    |     | State Government                         |
| <b>§205.503(e)</b><br>A list of each State or foreign country in which the applicant currently certifies production and handling operations and a list of each State or foreign country in which the applicant intends to certify production or handling operations.   | XX                      |    |     | NJDA only certifies clients in NJ and PA |

### §205.504 Evidence of Expertise and Ability

This section of the checklist should be completed only if conducting an initial assessment, annual update assessment or renewal assessment. If during any on-site assessment there is objective evidence that required information was not submitted then cite under the appropriate requirement.

| CHECKLIST SECTION IX   | Complies <sup>(1)</sup> |     |     | Remarks <sup>(2)</sup> |
|--|-------------------------|-----|-----|------------------------|
|  | Yes                     | No  | N/A |                        |
| References:<br><i>NOP 2000 General Accreditation Policies and Procedures</i><br><i>NOP Appeals Procedure: Adverse Action Appeal Process – Certified Operation or Applicant for Certification</i> |                         |     |     |                        |
|  |                         |     |     |                        |
| <i>Personnel</i>   | ---                     | --- | --- | ---                    |



### §205.504 Evidence of Expertise and Ability

This section of the checklist should be completed only if conducting an initial assessment, annual update assessment or renewal assessment. If during any on-site assessment there is objective evidence that required information was not submitted then cite under the appropriate requirement.

| CHECKLIST SECTION IX  | Complies <sup>(1)</sup> |     |     | Remarks <sup>(2)</sup>   |
|---|-------------------------|-----|-----|--|
|   | Yes                     | No  | N/A |  |
| <b>§205.504(a)(1)</b><br>A copy of the applicant's policies and procedures for training, evaluating, and supervising personnel;   | XX                      |     |     | Reviewed policy  |
| <b>§205.504(a)(2)</b><br>The name and position description of all personnel to be used in the certification operation, including administrative staff, certification inspectors, members of any certification review and evaluation committees, contractors, and all parties responsibly connected to the certifying agent; | XX                      |     |     | Reviewed lists of all personnel used in the certification operation                |
| <b>§205.504(a)(3)(i)</b><br>A description of the qualifications, including experience, training, and education in agriculture, organic production, and organic handling, for each <b>inspector</b> to be used by the applicant:   | XX                      |     |     | Resumes and training records are on file and were reviewed.                        |
| <b>§205.504(a)(3)(ii)</b><br>and for Each person to be designated by the applicant to review or evaluate applications for certification:  | XX                      |     |     | Each person that reviews and or evaluates applications for certification is listed |
| <b>§205.504 (a) (4)</b><br>A description of any training that the applicant has provided or intends to provide to personnel to ensure that they comply with and implement the requirements of the Act and the regulations in this part.   | XX                      |     |     | Resumes and training records are on file   |
| <b>Administrative Policies and Procedures</b>   | ---                     | --- | --- | ---  |
| <b>§205.504(b)(1)</b><br>A copy of the procedures to be used to evaluate certification applicants, make certification decisions, and issue certification certificates;  | XX                      |     |     | Reviewed procedures  |
| <b>§205.504(b)(2)</b><br>A copy of the procedures to be used for reviewing and investigating certified operation compliance with the Act and the regulations in this part and the reporting of violations of the Act and the regulations  | XX                      |     |     | Reviewed procedures  |



### §205.504 Evidence of Expertise and Ability

This section of the checklist should be completed only if conducting an initial assessment, annual update assessment or renewal assessment. If during any on-site assessment there is objective evidence that required information was not submitted then cite under the appropriate requirement.

| CHECKLIST SECTION IX   | Complies <sup>(1)</sup> |     |     | Remarks <sup>(2)</sup>   |
|--|-------------------------|-----|-----|--|
|  | Yes                     | No  | N/A |  |
| in this part to the Administrator;   |                         |     |     |  |
| <b>§205.504(b)(3)</b><br>A copy of the procedures to be used for complying with the recordkeeping requirements set forth in §205.501(a)(9);  | XX                      |     |     | Reviewed procedures  |
| <b>§205.504(b)(4)</b><br>A copy of the procedures to be used for maintaining the confidentiality of any business-related information as set forth in §205.501(a)(10);  | XX                      |     |     | Reviewed procedures  |
| <b>§205.504(b)(5)</b><br>A copy of the procedures to be used, including any fees to be assessed, for making the information required under this clause available to any member of the public upon request;   |                         | XX  |     | <b>See NC3</b><br><b>205.504(b)(5)(i)</b><br><br>NJDA does not provide copies of certification certificates to members of the public via email & postal mail – must view copies by visiting NJDA office. |
| <b>§205.504(b)(6)</b><br>A copy of the procedures to be used for sampling and residue testing pursuant to §205.670.  | XX                      |     |     | Sampling procedure reviewed  |
| <b>Conflicts of Interest</b>   | ---                     | --- | --- | ---  |
| <b>§205.504(c)(1)</b><br>A copy of procedures intended to be implemented to prevent the occurrence of conflicts of interest, as described in §205.501(a)(11)   | XX                      |     |     | Procedure in place and reviewed  |
| <b>§205.504(c)(2)</b><br>A conflict of interest disclosure report, identifying any food- or agriculture-related business interests, including business interests of immediate family members, that cause a conflict of interest for all personnel required by this section and §205.501(a)(11)(v). |                         | XX  |     | <b>See Outstanding NC5 – requirement</b><br><b>205.501(a)(11)(v)</b><br><br>No COI on file for the Secretary of Agriculture who makes the final certification decision                                   |
| <b>An applicant who currently certifies production or handling operations must submit:</b>   | ---                     | --- | --- | ---  |



### §205.504 Evidence of Expertise and Ability

This section of the checklist should be completed only if conducting an initial assessment, annual update assessment or renewal assessment. If during any on-site assessment there is objective evidence that required information was not submitted then cite under the appropriate requirement.

| CHECKLIST SECTION IX   | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup>  |
|--|-------------------------|----|-----|---|
|  | Yes                     | No | N/A |   |
| <b>§205.504(d)(1)</b><br>A list of all production and handling operations currently certified by the applicant   | XX                      |    |     | Information submitted to the administrator as required verified email sent to NOP |
| <b>§205.504(d)(2)</b><br>Copies of at least 3 different inspection reports and certification evaluation documents for production or handling operations certified by the applicant during the previous year for each area of operation for which accreditation is requested. | XX                      |    |     | Verified with NOP   |
| <b>§205.504(d)(3)</b><br>The results of any accreditation process of the applicant's operation by an accrediting body during the previous year for the purpose of evaluating its certification activities.   | XX                      |    |     | Verified with NOP   |
| <b>§205.504(e)</b><br>Any other information the applicant believes may assist in the Administrator's evaluation of the applicant's expertise and ability.  | XX                      |    |     | Verified with NOP   |

### §205.510 Annual Report, Recordkeeping, and Renewal of Accreditation

| CHECKLIST SECTION X  | Complies <sup>(1)</sup> |     |     | Remarks <sup>(2)</sup> |
|--|-------------------------|-----|-----|------------------------|
|  | Yes                     | No  | N/A |                        |
| <i>An accredited certifying agent must submit annually to the Administrator, on or before the anniversary date of the issuance of the notification of accreditation, the following reports and fees:</i> | ---                     | --- | --- | ---                    |
| <b>§205.510(a)(1)</b><br>A complete and accurate update of information submitted pursuant to §§205.503 and 205.504;  | XX                      |     |     | Verified with the NOP  |
| <b>§205.510(a)(2)</b><br>Information supporting any changes being requested in the areas of accreditation described in §205.500;   |                         |     | XX  |                        |





### §205.510 Annual Report, Recordkeeping, and Renewal of Accreditation

| CHECKLIST SECTION X   | Complies <sup>(1)</sup> |     |     | Remarks <sup>(2)</sup>  |
|---|-------------------------|-----|-----|---|
|   | Yes                     | No  | N/A |   |
| <b>§205.510(a)(3)</b><br>A description of the measures implemented in the previous year and any measures to be implemented in the coming year to satisfy any terms and conditions determined by the Administrator to be necessary, as specified in the most recent notification of accreditation or notice of renewal of accreditation; | XX                      |     |     | Corrective actions were submitted to address previous non-compliances.  |
| <b>§205.510(a)(4)</b><br>The results of the most recent performance evaluations and annual program review and a description of adjustments to the certifying agent's operation and procedures implemented or to be implemented in response to the performance evaluations and program review; and                                       |                         | XX  |     | <b>See outstanding NC3 &amp; requirement 205.501(a)(6)</b><br><br>No performance evaluations were on file for seven of eleven personnel for the past year |
| <b>§205.510(a)(5)</b><br>The fees required in §205.640(a).  | XX                      |     |     | Verified with the NOP   |
| <i>Certifying agents must maintain records according to the following schedule:</i>   | ---                     | --- | --- | ---   |
| <b>§205.510(b)(1)</b><br>Records <u>obtained from</u> applicants for certification and certified operations must be maintained for <u>not less than 5 years</u> beyond their receipt;   | XX                      |     |     | Verified that records are kept as required, reviewed record storage area  |
| <b>§205.510(b)(2)</b><br>Records <u>created by</u> the ACA regarding applicants for certification and certified operations must be maintained for <u>not less than 10 years beyond</u> their creation; and  | XX                      |     |     | Verified that records are kept as required, reviewed record storage area  |
| <b>§205.510(b)(3)</b><br>Records <u>created or received</u> by the ACA pursuant to the <u>accreditation requirements</u> of subpart F, <u>excluding</u> any records covered by §205.510(b)(2), must be maintained for <u>not less than 5 years</u> beyond their creation or receipt.  | XX                      |     |     | Verified that records are kept as required, reviewed record storage area  |
| <b>Amending Accreditation</b>   | ---                     | --- | --- | ---   |
| <b>§205.510(f)</b><br>Amendment to scope of an accreditation may be   |                         |     | XX  |   |



### §205.510 Annual Report, Recordkeeping, and Renewal of Accreditation

| CHECKLIST SECTION X   | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup> |
|---|-------------------------|----|-----|------------------------|
|   | Yes                     | No | N/A |                        |
| requested at any time. The application for amendment shall be sent to the Administrator and shall contain information applicable to the requested change in accreditation, a complete and accurate update of the information submitted pursuant to §§205.503 and 205.504, and the applicable fees required in §205.640. |                         |    |     |                        |

### §205.642 Fee Schedule

Document on Certification File Review Checklist and Certification File Review Worksheets.

| CHECKLIST SECTION XI  | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup>   |
|---|-------------------------|----|-----|--|
|   | Yes                     | No | N/A |  |
| <b>§205.642</b><br>Are the fees charged reasonable?   | XX                      |    |     | Fee schedule reviewed and fees appear to be reasonable                             |
| <b>§205.642</b><br>Is the fee schedule that was submitted to applicants the same as the one provided to the Administrator?  | XX                      |    |     | Review indicates same  |
| <b>§§205.501(a)(16) and 205.642</b><br>Are the fees charged to operations for certification consistent with the fee schedule filed with the Administrator?                              | XX                      |    |     | Reviewed charges to applicants against fee schedule submitted to the administrator |
| <b>§205.642</b><br>Are all applicants provided with an estimate of the total cost of certification and an estimate of the annual cost of updating the certification?                    | XX                      |    |     | Records reviewed indicate compliance   |
| <b>§205.642</b><br>Are the nonrefundable portions of certification fees and the stages at which they become nonrefundable explained in the fee schedule submitted to the Administrator? | XX                      |    |     | Reviewed and found compliant   |
| <b>§205.642</b><br>Does the ACA provide a copy of the fee schedule to anyone inquiring about the application process?   | XX                      |    |     | When requested a copy is provided to prospective applicants                        |



| <b>§205.661 Investigation of Certified Operations</b><br><b>§205.662 Noncompliance Procedure for Certified Operations</b><br>Document on Certification File Review Worksheet, "Table 5a - Notice of Noncompliance/Adverse Action Worksheet".   |                         |    |     |  |
|--|-------------------------|----|-----|--|
| CHECKLIST SECTION XII  | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup>   |
|  | Yes                     | No | N/A |  |
| References:<br>NOP 2607 Disclosure of Information concerning USDA Accredited Certifying Agents and Certified Operations to the NOP<br>NOP 4001 Complaint Handling Procedure<br>NOP 4002 Enforcement Policy<br>NOP Appeals Procedure: Adverse Action Appeal Process – Certified Operation or Applicant for Certification                              |                         |    |     |  |
| <b>§205.661(a)</b><br>If the ACA conducts any investigations of complaints of noncompliance concerning production and handling operations certified as organic by the ACA, does the ACA notify the Program Manager of all compliance proceedings and actions taken?  | XX                      |    |     | Procedure in place   |
| <b>§205.662(a)</b><br>In all cases when an inspection, review, or investigation of a certified operation by the ACA or a State organic program reveals any noncompliance with the Act or regulations, is a written notification of noncompliance sent to the certified operation?  | XX                      |    |     | The files reviewed verified NJDA issues NONC.<br><br>See NC1 cited against 205.406(c)            |
| <b>§205.662(a)(1) – (3)</b><br>Does all Notifications of Noncompliance include:<br>A description of each noncompliance; The facts upon which the notification of noncompliance is based; and<br>The date by which the certified operation must rebut or correct each noncompliance and submit supporting documentation?                              | XX                      |    |     | Records reviewed where NC's were issued indicate that all requirements are being met as required |
| <b>§205.662(b)</b><br>Does the ACA send the certified operation a written notification of noncompliance <b>resolution</b> after the certified operation demonstrates that each noncompliance is resolved?  | XX                      |    |     | One record reviewed indicated that the Notice of Resolution was issued as required               |
| <b>§205.662(c)</b><br>If rebuttal is unsuccessful or the correction of the noncompliance is not completed in the prescribed time period, does the ACA send the certified operation a written notice of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the noncompliance? | XX                      |    |     | Records reviewed indicate that the section of the rule is being followed                         |



| <b>§205.661 Investigation of Certified Operations</b><br><b>§205.662 Noncompliance Procedure for Certified Operations</b><br>Document on Certification File Review Worksheet, "Table 5a - Notice of Noncompliance/Adverse Action Worksheet".  |                         |    |     |  |
|---|-------------------------|----|-----|--|
| CHECKLIST SECTION XII   | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup>   |
|   | Yes                     | No | N/A |  |
| <b>§205.662(c)(1) – (4)</b><br>Does all Notifications of Proposed Suspension / Proposed Revocations include:<br>The reasons for the proposed suspension or revocation; The proposed effective date of such suspension or revocation; The impact of a suspension or revocation on future eligibility for certification; and The right to request mediation pursuant to §205.663 or to file an appeal pursuant to §205.681? |                         | XX |     | <b>See NC4</b><br><br>Two Notices of Proposed Suspension did not include the address of NOP Appeals. The explanation of mediation and appeal rights in both letters implied that an appeal could only occur after a request for mediation had been rejected by the certifying agent. One did state that the length of the proposed suspension would be indefinite. |
| <b>§205.662(d)</b><br>If the ACA or State organic program has reason to believe that a certified operation willfully violated the Act or regulations, the ACA or State organic program shall send the certified operation a notification of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the noncompliance.                                 | XX                      |    |     | Policy and Procedure in place and reviewed   |
| <b>§205.662(e)(1)</b><br>Does the ACA or State program send the certified operation a written notification of suspension or revocation in all cases that a certified operation failed to correct the noncompliance, to resolve the issue through rebuttal or mediation, or to file an appeal of the proposed suspension or revocation of certification?   | XX                      |    |     | Policy and Procedure in place and reviewed   |
| <b>§205.662(e)(2)</b><br>Has the ACA or State program sent a notice of Suspension / Revocation during the time a final resolution of either mediation or appeal is pending for a certified operation which requested either one?  | XX                      |    |     | Records indicate no notice of Suspension/Revocation was issued during the period indicated   |
| <b>§205.662(g)</b>  |                         |    | XX  | NJDA has not fined any   |





| <b>§205.661 Investigation of Certified Operations</b><br><b>§205.662 Noncompliance Procedure for Certified Operations</b><br>Document on Certification File Review Worksheet, "Table 5a - Notice of Noncompliance/Adverse Action Worksheet".  |                         |    |     |  |
|---|-------------------------|----|-----|--|
| CHECKLIST SECTION XII   | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup>   |
|   | Yes                     | No | N/A |  |
| Violations of Act<br>Has the ACA fined operations as a result of any noncompliance issues?  |                         |    |     | operations   |
| <b>§205.660(d)</b><br>Are all notifications of noncompliance, noncompliance resolutions, proposed suspensions or revocations, and suspensions or revocations issued and each response to such notification sent to the recipient's place of business via a delivery service which provides dated return receipts? | XX                      |    |     | Records and files reviewed indicate that all notices are sent via return receipt methods |

| <b>§205.663 Mediation</b><br>Mediation procedures are applicable to certified operations that have received a denial of certification, notification of proposed suspension, a notification of proposed revocation or a notification of noncompliance <u>that is combined with</u> a denial, proposed suspension, or proposed revocation. Mediation procedures <u>do not apply</u> to operations that have received a notification of noncompliance with no adverse action. |                         |    |     |  |
|--|-------------------------|----|-----|--|
| CHECKLIST SECTION XIII   | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup>   |
|  | Yes                     | No | N/A |  |
| <b>§205.663</b><br>In all instances where mediation is requested, is the request from the applicant or certified operation in writing?   |                         |    | XX  | No mediation has been requested since the last NOP audit                                       |
| <b>§205.663</b><br>If the ACA rejects the request, is the notification to reject the request of mediation sent to the operation in writing?  |                         |    | XX  | Policy in place reviewed   |
| <b>§205.663</b><br>Does the notification to reject the request of mediation advise the operation of their right to request an appeal pursuant to 205.681?  |                         |    | XX  | Policy in place reviewed   |
| <b>§205.663</b><br>Does the notification to reject the request of mediation advise the operation that an appeal must be requested within 30 days of the date of the written rejection of mediation?  |                         |    | XX  | Procedure in place interviews conducted indicate that certification staff is aware of NOP Rule |
| <b>§205.660(d)</b>   |                         |    | XX  | Procedure in place interviews  |



### §205.663 Mediation

Mediation procedures are applicable to certified operations that have received a denial of certification, notification of proposed suspension, a notification of proposed revocation or a notification of noncompliance that is combined with a denial, proposed suspension, or proposed revocation. Mediation procedures do not apply to operations that have received a notification of noncompliance with no adverse action.

| CHECKLIST SECTION XIII   | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup>   |
|--|-------------------------|----|-----|--|
|  | Yes                     | No | N/A |  |
| Is the notification to reject the request of mediation and each response to such notification sent to the recipient's place of business via a delivery service which provides dated return receipts? |                         |    |     | conducted indicate that certification staff is aware of NOP Rule                               |
| <b>§205.663</b><br>If mediation was accepted by the ACA, is the mediation conducted by a qualified mediator mutually agreed upon by the parties to the mediation?                                    |                         |    | XX  | Procedure in place interviews conducted indicate that certification staff is aware of NOP Rule |
| <b>§205.663</b><br>Is an agreement reached no more than 30 days following the mediation session?   |                         |    | XX  | Procedure in place interviews conducted indicate that certification staff is aware of NOP Rule |
| <b>§205.663</b><br>If mediation is unsuccessful, is the operation informed they have 30 days from termination of mediation to appeal the certifying agent's decision pursuant to §205.681?           |                         |    | XX  | Procedure in place interviews conducted indicate that certification staff is aware of NOP Rule |

### §205.670 Inspection and Testing

#### §205.671 Exclusion from Organic Sale

§205.504(b)(6) requires that the ACA have procedures for sampling and residue testing. Procedures should address the requirements of §205.670. Evaluate procedures under §205.504(b)(6); Checklist Section IX.

| CHECKLIST SECTION XIV   | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup>                             |
|---|-------------------------|----|-----|--|
|   | Yes                     | No | N/A |  |
| References:<br>NOP 2610 Sampling Procedures for Residue Testing<br>NOP 2611 Laboratory Selection Criteria For Pesticide Residue Testing<br>NOP 2611-1 Prohibited Pesticides for NOP Residue Testing |                         |    |     |  |
| §205.670(c)<br>Are samples collected by an inspector representing the ACA, State, or Administrator as applicable?   | XX                      |    |     | No samples have been collected, policy is in place |
| §205.403(e)(1)<br>Does the inspector provide the operation with a receipt for the samples taken at the time of the inspection?  | XX                      |    |     | No samples have been collected, policy is in place |



| <b>§205.670 Inspection and Testing</b><br><b>§205.671 Exclusion from Organic Sale</b><br>§205.504(b)(6) requires that the ACA have procedures for sampling and residue testing. Procedures should address the requirements of §205.670. Evaluate procedures under §205.504(b)(6); Checklist Section IX. |                         |    |     |  |
|---|-------------------------|----|-----|--|
| CHECKLIST SECTION XIV   | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup>   |
|   | Yes                     | No | N/A |  |
| <b>§205.403(e)(1)</b><br>Is there any objective evidence that inspectors were charged for the samples taken?  | XX                      |    |     | No samples have been collected, policy is in place                                     |
| <b>§205.670(c)</b><br>Is chain of custody maintained?   | XX                      |    |     | No samples have been collected, policy is in place                                     |
| <b>§205.670(c)</b><br>Is the sample submitted to an accredited lab?   | XX                      |    |     | No samples have been collected, policy is in place                                     |
| <b>§205.670(c)</b><br>Is the sample tested in accordance with the methods described in the most current edition of the <i>Official Methods of Analysis of the AOAC International</i> or other current applicable validated methodology?   | XX                      |    |     | No samples have been collected, policy is in place                                     |
| <b>§§205.670(d)(2) and 205.504(b)(5)(iii)</b><br>Are test results available for public access?  | XX                      |    |     | No samples have been collected, policy is in place                                     |
| <b>§§205.402(b)(3) and 205.403(e)(2)</b><br>Is a copy of the test results provided to the applicant or certified operation?   | XX                      |    |     | No samples have been collected, policy is in place                                     |
| <b>§205.670(d)(1)</b><br>Are test results promptly provided to the Administrator or governing State official if applicable?   | XX                      |    |     | No samples have been collected, policy is in place                                     |
| <b>§205.670(b)</b><br>Was the testing paid for by the requesting official (Administrator or State) or the ACA?  | XX                      |    |     | Policy indicates that ACA will pay for all expenses incurred with sampling and testing |
| <b>§205.403(c)(3)</b><br>Are results compared against the National List and the Act?  | XX                      |    |     | Policy in place and Lab and ACA will compare with National List and Rule               |
| <b>§205.670(e)</b><br>Do the results exceed the FDA or EPA regulatory   |                         |    | XX  |  |



| <b>§205.670 Inspection and Testing</b><br><b>§205.671 Exclusion from Organic Sale</b><br>§205.504(b)(6) requires that the ACA have procedures for sampling and residue testing. Procedures should address the requirements of §205.670. Evaluate procedures under §205.504(b)(6); Checklist Section IX. |                         |    |     |  |
|---|-------------------------|----|-----|--|
| CHECKLIST SECTION XIV   | Complies <sup>(1)</sup> |    |     | Remarks <sup>(2)</sup>                   |
|   | Yes                     | No | N/A |  |
| tolerance (if there is an applicable tolerance)?  |                         |    |     |  |
| <b>§205.670(e)</b><br>If the regulatory tolerance was exceeded is it reported to the applicable agency?   |                         |    | XX  |  |
| <b>§205.671</b><br>Is there a prohibited substance detected that is greater than 5% of the EPA tolerance for the residue or greater than the unavoidable residual environmental contamination (UREC) level and is the product allowed to be represented as organic?                                     |                         |    | XX  |  |
| <b>§205.671</b><br>Are investigations conducted to determine the cause of the prohibited substance?   | XX                      |    |     | Policy in place to perform investigation |

| <b>§205.672 Emergency Pest or Disease Treatment</b><br>If there is no instance of a prohibited substance applied due to a Federal or State emergency pest or disease treatment program identify with an "X" in NA column; and include a statement in Remarks column.<br>These requirements only apply in the United States and not to other countries. |                         |     |     |  |
|--|-------------------------|-----|-----|--|
| CHECKLIST SECTION XV   | Complies <sup>(1)</sup> |     |     | Remarks <sup>(2)</sup>                             |
|  | Yes                     | No  | N/A |  |
| <b>§205.672</b><br>Is there any instance where a prohibited substance was applied to a certified operation due to a Federal or State emergency pest or disease treatment program?  |                         |     | XX  |  |
| <i>If a prohibited substance is applied to a certified operation...the certification status of the operation shall not be affected as a result of the application of the prohibited substance: Provided, That:</i>   | ---                     | --- | --- | ---  |
| <b>§205.672(a)</b><br>Any harvested crop or plant part to be harvested that has contact with a prohibited substance, cannot be sold, labeled, or represented as organically produced.  | XX                      |     |     | Policy reviewed and compliance can be accomplished |
| <b>§205.672(b)</b>   | XX                      |     |     | Policy reviewed and                                |





### §205.672 Emergency Pest or Disease Treatment

If there is no instance of a prohibited substance applied due to a Federal or State emergency pest or disease treatment program identify with an "X" in NA column; and include a statement in Remarks column.

These requirements only apply in the United States and not to other countries.

| CHECKLIST SECTION XV  | Complies <sup>(1)</sup> |     |     | Remarks <sup>(2)</sup>                             |
|---|-------------------------|-----|-----|--|
|   | Yes                     | No  | N/A |  |
| Any livestock that are treated with a prohibited substance or product derived from treated livestock, cannot be sold, labeled, or represented as organically produced.  |                         |     |     | compliance can be accomplished                     |
| <i>Except that:</i>   | ---                     | --- | --- | ---  |
| §205.672(b)(1)<br>Milk or milk products may be sold, labeled, or represented as organically produced beginning 12 months following the last date that the dairy animal was treated with the prohibited substance; and   | XX                      |     |     | Policy reviewed and compliance can be accomplished |
| §205.672(b)(2)<br>The offspring of gestating mammalian breeder stock treated with a prohibited substance may be considered organic: <i>Provided that</i> , the breeder stock was not in the last third of gestation on the date that the breeder stock was treated with the prohibited substance. | XX                      |     |     | Policy reviewed and compliance can be accomplished |

### CLOSING MEETING

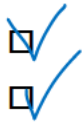
The purpose of the closing meeting is to present the assessment findings and conclusions in such a manner that they are understood and acknowledged by the client.

- ☒ Sign out on attendance list (at beginning of checklist). [Done](#)
- ☒ Present positive aspects of the certification program. [Done](#)
- ☒ Present any items that are pending a determination by the NOP AIA Division.  
[None](#)
- ☒ Present the assessment findings. For each finding, cite the specific requirement of the assessment criteria. [Done](#)
- ☒ Discuss the next steps in the process: [All explained to ACA during closing meeting](#)
  - 1) The report is written and sent to Headquarters for review.



2) The NOP reviews the report and determines the compliance / noncompliance of the program and makes all decisions concerning the accreditation. The NOP has the discretion to modify the assessment findings.

3) The report is issued to the client by the NOP.



Provide information about the NOP appeals process (§205.681(b)). [Done](#)



Encourage feedback. Clients can submit feedback to [AIAInBox@ams.usda.gov](mailto:AIAInBox@ams.usda.gov).

## POSITIVE ASPECTS OF ACA's CERTIFICATION PROGRAM

☐ Positive Aspect (1) – [Program Supervisor is very knowledgeable in the rule, super, cheerful, professional attitude, very cooperative](#)

☐ Positive Aspect (2) – [Inspector is very thorough, knowledgeable and professional](#)

☐ Positive Aspect (3) –

## ITEMS PENDING A DETERMINATION BY NOP

☐ Pending Item (1) –

☐ Pending Item (2) –

## FINDINGS:

NP8217OOA.NC2 – **Cleared** - NOP §205.501(a)(4) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Use a sufficient number of adequately trained personnel, including inspectors and certification review personnel, to comply with and implement the organic certification program established under the Act and the regulations in subpart E of this part.” *The certification agency does not have enough personnel to adequately complete all of the requirements of the NOP Rule (See non-compliances listed below).*

**Corrective Action:** NJDA has added a part-time person to assist in maintaining the data base and expedite work flow. This has freed up time for the other personnel to enable them to concentrate on the duties they are responsible for.

**Verification of Corrective Action** – Interviews conducted showed that the part time person added to assist the Program Supervisor was knowledgeable in her duties of fielding calls from persons requesting information on NOP certification and the person sends out the requested material and does a preliminary review of packets received from applicants to ensure all material is filled out before sending the packet on to the Program Supervisor.



NP8217OOA.NC6 – **Cleared** - – NOP §205.504 states, “A private or governmental entity seeking accreditation as a certifying agent must submit the following documents and information to demonstrate its expertise in organic production or handling techniques... (b)(1) A copy of the procedures to be used to evaluate certification applicants, make certification decisions, and issue certification certificates.” *Chapter 78 of the NJDA regulations, Subchapter 4, section 4.2(b) references the use of TRANSITIONAL SUSTAINABLE certification marks. Section 4.2 (d) indicates the penalty for the improper use of this mark is subject to the non-compliance procedure in 7 CFR 205.660 through 205.665. Transitional Sustainable is not subject to the NOP non-compliance procedures.* **Corrective Action:** NJDA agrees that the language within section 4.2 of N.J.A.C. 2:78 is incorrect and needs to be changed. NJDA will attempt to make the necessary revisions to N.J.D.A. 2:78 according to the following schedule: PROPOSAL: Revisions to the NJ State Board of Agriculture by March 25, 2009; to the Office of Administrative Law on April 30, 2009; and to Publication in the NJ Register on June 1, 2009; and comment period closes July 31, 2009. ADOPTION: Final to the NJ State Board of Agriculture by August 26, 2009; to the Office of Administrative Law on August 27, 2009; to the Publication in the NJ Register on September 11, 2009 or to the Office of Administrative Law on September 11, 2009 and Publication in the NJ Register on October 5, 2009.

**Verification of Corrective Actions** – A review of section 4.2 of N.J.D.A. 2:78 reviewed the law was changed to remove any language having to do with transitional certificates.

NP8217OOA.NC7 – **Cleared** - NOP §205.510 (a) states, “An accredited certifying agent must submit annually to the Administrator, on or before the anniversary date of the issuance of the notification of accreditation, the following reports and fees: (1) a complete and accurate update of information submitted pursuant to....” *NJDA anniversary for accreditation is April. At the time of this audit, the annual report and fees had not been submitted to the Administrator.* **Corrective Action:** NJDA submitted the annual report on January 27, 2009, to the NOP.

**Verification of Corrective Action** - Discussions with the NOP indicated that NJDA did submit the annual reports and fees for 2010, 2011, and 2012.

NP8217OOA.NC8 – **Cleared** - NOP §205.602 (g) states, “The following nonsynthetic substances may not be used in organic crop production: Sodium nitrate—unless use is restricted to no more than 20% of the crop's total nitrogen requirement” *Input usage for the Atlantic Blueberry Company indicated the use of sodium nitrate (Chilean nitrate). There was no indication in the organic system plan, the inspection report, or the final review that calculations were made to ensure that no more than 20% of the crops nitrogen requirement was obtained from this source. Soil test recommendations indicated that 60 pounds of actual nitrogen per acre should be applied. The 2007 application rate indicated that the rate of sodium nitrate exceeded the 20% limit by 4 pounds of actual nitrogen per acre.* **Corrective Action:** The Producer submitted additional information that verified he was in compliance to the NOP Rule for use of sodium nitrate. NJDA has revised the Organic Farm Plan and the Organic Farm Plan Update to address the use of sodium nitrate.



**Verification of Corrective Action** – File was reviewed for Atlantic Blueberry Company and review indicates that the OSP has been updated and was up to date as of the audit.

NP8217OOA.NC1 – **Outstanding** – NOP §205.404 (a) states, “Within a reasonable time after completion of the initial on-site inspection, a certifying agent must review the on-site inspection report, the results of any analyses for substances conducted, and any additional information requested from or supplied by the applicant. If the certifying agent determines that the organic system plan and all procedures and activities of the applicant's operation are in compliance with the requirements of this part and that the applicant is able to conduct operations in accordance with the plan, the agent shall grant certification.” *The files reviewed indicated that the reviews of the onsite inspections and issuance of the certificates were being conducted as late as 6 months after the completion of the onsite evaluation. There was no indication that these files were being held for additional information.* **Corrective Action:** NJDA has added a part-time person to assist in maintaining the data base and expedite work flow which will free up time for the other personnel enabling them to more efficiently execute the certification duties. A matrix was submitted showing the time frames in which certifications are being done. These all indicate certifications are being done in a timely manner.

**Verification of Corrective Action:** Files reviewed during the renewal assessment audit indicated that the same problem exists. The time elapsed between the initial application date and the final certification decision was more than six months for six of the eleven files reviewed.

NP8217OOA.NC3 – **Outstanding** – NOP §205.501(a)(6) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Conduct an annual performance evaluation of all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and implement measures to correct any deficiencies in certification services.” *Annual performance evaluations have not been conducted within the last year for the inspectors.* **Corrective Actions:** NJDA has conducted the annual performance evaluations for 2007 for the inspectors. These were submitted for review and it was verified that all were satisfactorily performing their duties.

**Verification of Corrective Action:** Records reviewed indicated that seven of eleven personnel had no current performance evaluations on file.

NP8217OOA.NC4 – **Outstanding** – NOP §205.501(a)(7) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Have an annual program review of its certification activities conducted by the certifying agent's staff, an outside auditor, or a consultant who has expertise to conduct such reviews and implement measures to correct any non-compliances with the Act and the regulations in this part that are identified in the evaluation.” *There is no procedure for conducting a program review. An annual program review has not been conducted.* **Corrective Action:** NJDA General Procedures for Organic Certification has been revised to include an annual program review procedure. The program review may be performed by NJDA staff or a contracted auditor. Currently, NJDA is in the process of acquiring the services of a third party to complete the first internal program review.





NJDA has been provided with a cost estimate and plans from the third party and plans to have the audit in August of 2009.

**Verification of Corrective Action** – An annual program review was conducted by an outside party during 2009; however no annual program review has been conducted since.

**NP821700A.NC5 – Outstanding** – NOP §205.501(a)(11)(v) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Prevent conflicts of interest by: Requiring all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and all parties responsibly connected to the certifying agent to complete an annual conflict of interest disclosure report.” *There are no current conflict of interest disclosure reports signed by inspectors involved in the certification process except for the newest inspector.* **Corrective Action:** Current conflict of interest disclosure reports were submitted for review. The NJDA Conflict of Interest procedure has been revised to have all conflict of interest disclosure reports completed by January 1<sup>st</sup> of each year.

**Verification of Corrective Action** – Records reviewed indicated that all personnel who review applications for certification perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and all parties responsibly connected to the certifying agent to complete an annual conflict of interest disclosure report. *There was no current conflict of interest disclosure report signed by the Secretary of Agriculture who makes the final certification decision.*

**NP2142ACA.NC1** – NOP § 205.406 (c) states, If the certifying agent has reason to believe, based on the on-site inspection and a review of the information specified in §205.404, that a certified operation is not complying with the requirements of the Act and the regulations in this part, the certifying agent shall provide a written notification of noncompliance to the operation in accordance with §205.662. In two cases, NJDA issued a certification decision letter with a notice of concern instead of noncompliances. One letter was issued to an operation that failed to conduct an organic seed search, and another was issued to an operation that did not keep records of manure spreading or harvest dates. The letters stated that the information would be reviewed at the next annual inspection.

**NP2142ACA.NC2** – NOP§ 205.501 (a) (1) states, A private or governmental entity accredited as a certifying agent under this subpart must: (1) Have sufficient expertise in organic production or handling techniques to fully comply with and implement the terms and conditions of the organic certification program established under the Act and the regulation in this part; Qualifications reviewed for the secondary reviewer indicated that the individual had no expertise in organic production or handling techniques.



NP2142ACA.NC3 – NOP § 205.504 (b)(5)(i) states, A copy of the procedures to be used, including any fees to be assessed, for making the following information available to any member of the public upon request: Certification certificates issued during the current and 3 preceding calendar years. Interviews with staff revealed that NJDA will not provide copies of certificates to members of the public via email or postal mail. Members of the public may only view copies of certificates by visiting the NJDA office in Trenton and reviewing hard copies that are on file with the organic certification program.

NP2142ACA.NC4 - NOP § 205.662 (c)(1-4) states, When rebuttal is unsuccessful or correction of the noncompliance is not completed within the prescribed time period, the certifying agent or State organic program's governing State official shall send the certified operation a written notification of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the noncompliance. When correction of a noncompliance is not possible, the notification of noncompliance and the proposed suspension or revocation of certification may be combined in one notification. The notification of proposed suspension or revocation of certification shall state: the reasons for the proposed suspension or revocation; the proposed effective date of such suspension or revocation; the impact of a suspension or revocation on future eligibility for certification; and the right to request mediation pursuant to §205.663 or to file an appeal pursuant to §205.681. Two Notices of Proposed Suspension did not include the address of NOP Appeals. The explanation of mediation and appeal rights in both letters implied that an appeal could only occur after a request for mediation had been rejected by the certifying agent. One did state that the length of the proposed suspension would be indefinite.

NP2142ACA.NC5 - NOP§ 205.503 (a)(3) states, A private or governmental entity accredited as a certifying agent under this subpart must: carry out the provisions of the Act and the regulations in this part, including the provisions of §205.402 through 205.406 and §205.670. Three files reviewed and two witness audits showed evidence of purchases of non-organic seed and/or planting stock. There was no documentation of commercial unavailability of organic seeds or planting stock. None of these operations received a noncompliance from NJDA for failure to comply with § 205.204.

NP2142ACA.NC6 – NOP § 205.501 (a)(11)(iv) states, A private or governmental entity accredited as a certifying agent under this subpart must: Prevent conflicts of interest by: not giving advice or providing consultancy services, to certification applicants or certified operations, for overcoming identified barriers to certification. During two witness audits, the inspector advised farmers of documentation required to demonstrate compliance with the USDA organic regulations for organic seed searches, use of municipal compost, use of manure, planting stock, and organic feed suppliers. The inspector also instructed the farmers to submit written corrective actions to the New Jersey Department of Agriculture and set a date by which the corrective actions were required.

NP2142ACA.NC7 – NOP § 205.501 (a) (21) states, a private or governmental entity accredited as a certifying agent under this subpart must: comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary. NOP guidance document



2603, Organic Certificates, states that certifications must include the certified organic products covered under the organic certification. One certificate did not specify the specific crops produced. The certification decision letter stated (for the operation), that the organic products were hay and pasture. The Producer Operation Information Form listed only vegetables, herbs, and hay. None of the documentation listed the specific vegetables grown by the operation. A certificate for another operation did not specify Blackberries as one of the products produced however a label for organic Blackberries was in the file and Blackberries were listed on the OSP and the inspection report.

NP2142ACA.NC8 – NOP § 205.402 (a) (2) states, upon acceptance of an application for certification, a certifying agent must: Determine by a review of the application materials whether the applicant appears to comply or may be able to comply with the applicable requirements of subpart C of this part. Two labels reviewed did not comply with regulatory requirements. A product with only a single ingredient was labeled “95% organic.” §205.303 (b) (2), states, “On the information panel, below the information identifying the handler or distributor of the product and preceded by the statement, “Certified organic by \*\*\*,” or similar phrase, identify the name of the certifying agent that certified the handler of the finished product...” Another product had the “certified organic by” statement to the left of the distributor name. In addition, the files did not record whether the labels had been approved by NJDA.



## **National Organic Program Certification File Review Worksheets**

Tables 1 - 3 are used to record information gathered from full certification file reviews. Tables 4 - 7 are used to record information gathered from partial certification file reviews. All of the certification file review worksheets are separated into tables as described below.

|  |
|--|
| <b>Certification File Review Worksheets</b>  |
| Table 1 - General Certification File Review Information ( <i>only for full file reviews</i> )    |
| Table 2 – Summary of Certification File Review Information ( <i>only for full file reviews</i> ) |
| Table 3 – Grower Group Information ( <i>only for full file reviews</i> )                         |
| Table 4 – Personnel Worksheet  |
| Table 5a – Notice of Noncompliance / Adverse Action Worksheet                                    |
| Table 5b – Notice of Noncompliance / Denial of Certification Worksheet                           |
| Table 6a - Label Review Worksheet - Products labeled as “100% Organic” or “Organic”              |
| Table 6b - Label Review Worksheet - Packaged Products labeled as “Made with Organic”             |
| Table 6c - Label Review Worksheet - All other labels reviewed                                    |
| Table 7a – Sample Worksheet – General Information  |
| Table 7b – Sample Worksheet - Sample Testing and Reporting Information                           |





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Agricultural Marketing Service  
National Organic Program

1400 Independence Avenue S.W.  
Room 2646-South Building  
Washington, DC 20250

NOP 2005-1  
Effective Date: January 18, 2012  
Page 2 of 16

**Table 1 - General Certification File Review Information**

| File # | Name of applicant/certified operation sampled | A<br>Date application received | B<br>Date of review        | C<br>Review conducted by | D<br>Inspection date | E<br>Inspection conducted by | F<br>Date of final review | G<br>Final review conducted by | H<br>Date certification decision made | I<br>Certification decision made by | J<br>Date findings sent to operation<br>205 402(b)(1) |
|--------|---|--------------------------------|----------------------------|--------------------------|----------------------|------------------------------|---------------------------|--------------------------------|---------------------------------------|-------------------------------------|---|
| 1      | Snyder Research Farm                          | SEE                            | 2 <sup>nd</sup><br>Auditor | File<br>Review<br>Table  |                      |                              |                           |                                |                                       |                                     |   |
| 2      | Stone Hollow Farm                             |                                |                            |                          |                      |                              |                           |                                |                                       |                                     |   |
| 3      | Spruce Ridge Farm                             |                                |                            |                          |                      |                              |                           |                                |                                       |                                     |   |
| 4      | Cherry Grove Farm                             |                                |                            |                          |                      |                              |                           |                                |                                       |                                     |   |
| 5      | Mariposa Farm                                 |                                |                            |                          |                      |                              |                           |                                |                                       |                                     |   |
| 6      | Wuhl Shafman Lieberman                        |                                |                            |                          |                      |                              |                           |                                |                                       |                                     |   |
| 7      | Templar Food Products                         |                                |                            |                          |                      |                              |                           |                                |                                       |                                     |   |
| 8      | Kaffee Magnum Opus                            |                                |                            |                          |                      |                              |                           |                                |                                       |                                     |   |
| 9      | Stephens Farm                                 |                                |                            |                          |                      |                              |                           |                                |                                       |                                     |   |
| 10     | Rosedale Blueberry Farm                       |                                |                            |                          |                      |                              |                           |                                |                                       |                                     |   |
| 11     |   |                                |                            |                          |                      |                              |                           |                                |                                       |                                     |   |
| 12     |   |                                |                            |                          |                      |                              |                           |                                |                                       |                                     |   |
| 13     |   |                                |                            |                          |                      |                              |                           |                                |                                       |                                     |   |
| 14     |   |                                |                            |                          |                      |                              |                           |                                |                                       |                                     |   |
| 15     |   |                                |                            |                          |                      |                              |                           |                                |                                       |                                     |   |
| 16     |   |                                |                            |                          |                      |                              |                           |                                |                                       |                                     |   |
| 17     |   |                                |                            |                          |                      |                              |                           |                                |                                       |                                     |   |

**Instructions:** Enter dates in the mm/dd/yy format.



**TABLE 2 - Summary of Certification File Review Information**

| File # | A<br>Scope<br>requested | B<br>Scope granted (L, C, WC, H)                  | C<br>IA/UA | D<br>Sample<br>(Y/N) | E<br>Labels<br>(Y/N) |
|--------|-------------------------|---|------------|----------------------|----------------------|
| 1      |                         | See 2 <sup>nd</sup> auditor file review checklist |            |                      |                      |
| 2      |                         |   |            |                      |                      |
| 3      |                         |   |            |                      |                      |
| 4      |                         |   |            |                      |                      |
| 5      |                         |   |            |                      |                      |
| 6      |                         |   |            |                      |                      |
| 7      |                         |   |            |                      |                      |
| 8      |                         |   |            |                      |                      |
| 9      |                         |   |            |                      |                      |
| 10     |                         |   |            |                      |                      |
| 11     |                         |   |            |                      |                      |
| 12     |                         |   |            |                      |                      |
| 13     |                         |   |            |                      |                      |
| 14     |                         |   |            |                      |                      |
| 15     |                         |   |            |                      |                      |

**Instructions:** For each requirement (A-E), enter the appropriate information into **Table 2**. Make sure the information provided in Table 2 is entered into the corresponding File # in Table 1.

- A.** Scope requested (L, C, WC, H)
- B.** Scope granted (L, C, WC, H): *For crop operations, include a description about the type of crop and operation such as single crop, parallel production, split production, etc. For livestock operations, include a description about the type of livestock and operation. For handling operations, include a description of the type of products and operation such as single ingredient product, multi ingredient products, trader, distributor, etc. For wild crop operations, include a description of the type of products and operation such as single products, organic and non-organic of same product in collection area, single harvester or multiple harvesters, collection areas, staging areas, production areas, and management and oversight of harvester.*
- C.** Initial application (IA) or updated application (UA)
- D.** Was a sample pulled during the inspection? (Y/N) *If samples were pulled, include information in Table 7b. Sampling Worksheet - Sample and Reporting Information*
- E.** Are any labels used by the operation? (Y/N) *If there are labels, include information in Table 6a, 6b, or 6c Label Review Worksheet.*



| File #  | Table 3 - Grower Group Information                    |
|---|---|
| 1   | NJDOA does not certify any grower groups at this time |
| 2   |   |
| 3   |   |
| 4   |   |
| 5   |   |
| <b>Instructions:</b> For each grower group Certification file reviewed, provide a description on the type and scope of the grower group (Crops harvested; organic and non-organic of same crops grown by producers or processed by handling operations; collection areas; staging areas and production areas; and management and oversight of ICS). This information must be entered into <b>Table 3</b> . Make sure the information provided in Table 3 is entered into the corresponding File # in Table 1. |   |



**Table 4 - Personnel Information Worksheet**

| Name               | Status – Employee / Contractor | Title / Position               | Scopes Approved | Education                | Training                       | Experience  | Job Description?  | COI?         | Confidentiality? | Perf Eval?   |
|--------------------|--------------------------------|--------------------------------|-----------------|--------------------------|--------------------------------|---|---|--------------|------------------|--------------|
| Douglas Fisher     | Employee                       | Secretary of Agriculture, NJDA | All             | No resume                | On file                        | Secretary of Ag   | Secretary of Ag   | None on file | None on file     | None on file |
| Larry Hardwick     | Employee                       | Manager of Organic Program     | All             |                          | IOIA, USDA NOP classes         | Has worked with the NJDA since the inception of the NJDA Organic program, overseas the Supervisor | NJDA Chief, Bureau of Commodity, Inspection and Grading | 2/10/12      | 2/10/12          | Current      |
| Erich Bremer       | Employee                       | Supervisor                     | All             | BS Environmental science | IOIA, NOP, Independent studies | ACA NOFA-NJ NJDOA   | Supervisor Organic Certification Program                | 2/9/12       | 2/9/12           | Not Current  |
| Debra Moscattiello | Employee                       | Clerical support               | None            | ADMIN                    | ASSIST                         |   | Clerical Support/Admin                                  | 2/9/12       | 2/9/12           | Current      |
| Sebastian Reist    | Employee                       | NJDA, Div of Animal            | Livestock       | DVM                      | DVM, only consults             |   | Vet consultant  | 2/9/12       | 2/9/12           | Current      |



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National Organic Program

1400 Independence Avenue S.W.  
Room 2646-South Building  
Washington, DC 20250

NOP 2005-1  
Effective Date: January 18, 2012  
Page 6 of 16

|                   |            |                     |                           |   |   |   |                   |         |         |                          |
|-------------------|------------|---------------------|---------------------------|---|---|---|-------------------|---------|---------|--------------------------|
|                   |            | Health              |                           |   |   |   |                   |         |         |                          |
| Daniel Wunderlich | Employer   | NJDA, Dairy Program | Livestock                 | BS Agriculture, Post Grad work also             | Dairy Consultant for Organic program                                |   | Consultant        | 2/9/12  | 2/9/12  | Current                  |
| (b) (6)           | Contractor | Inspector           | Processors handlers crops | BS and MS degrees and Agriculture Teaching Cert | IOIA training Advance Inspector, Basic, Crops and Processing        | Organic inspection since 1990 currently contracts to several ACA's to conduct Organic Inspections | Organic Inspector | 2/10/12 | 2/10/12 | No performance eval done |
| (b) (6)           | Contractor | Inspector           | All                       | RN Nursing, Biology,                            | IOIA training, Livestock Processor Basic Inspector Training Pasture | Organic Inspector since inception of the NOP rule   | Organic Inspector | 1/26/12 | 1/26/12 | No performance eval done |
| (b) (6)           | Contractor | Inspector           | All                       | BS Anthropology                                 | IOIA Training – Process, Livestock, and Crop                        | Shadow audits with other IOIA certified inspectors, Several                                       | Organic Inspector | 1/26/12 | 1/26/12 | No performance eval done |



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Room 2646-South Building  
Washington, DC 20250

NOP 2005-1  
Effective Date: January 18, 2012  
Page 7 of 16

|         |            |           |                                   |   |   |  |                      |             |         |   |
|---------|------------|-----------|-----------------------------------|---|---|--|----------------------|-------------|---------|---|
|         |            |           |                                   |   | training,<br>Several<br>trainings<br>sponsored<br>by<br>several<br>ACA's  | actual<br>organic<br>audits  |                      |             |         |   |
| (b) (6) | Contractor | Inspector | Was not<br>used<br>during<br>last | Portion of<br>2011 and<br>will not be<br>used | For 2012  |  | Organic<br>Inspector |             |         |   |
| (b) (6) | Contractor | Inspector | Processor<br>/Handler             | BS  | Sanitarian<br>for the<br>New<br>jersey<br>Departme<br>nt of<br>Health   | Trained<br>by other<br>inspectors,<br>shadow<br>audits   | Organic<br>Inspector | 2/10/<br>12 | 2/10/12 | No<br>perf<br>orma<br>nce<br>eval<br>done |
| (b) (6) | Contractor | Inspector | All                               | BA, MBA                                       | IOIA,<br>Process<br>Inspectio<br>n,<br>Livestock<br>, Crop,<br>NOP<br>Pasture<br>Rule,<br>Non<br>GMO<br>Project<br>verificati<br>on | NOFA-NJ<br>President,<br>Sussex<br>County<br>Board of<br>Agricultur<br>e, Owner<br>150 acre<br>organic<br>farm,<br>worked<br>and<br>owned<br>farm with | Organic<br>Inspector | 2/10/<br>12 | 2/10/12 | No<br>perf<br>orma<br>nce<br>eval<br>done |



United States Department of Agriculture  
Agricultural Marketing Service  
National Organic Program

1400 Independence Avenue S.W.  
Room 2646-South Building  
Washington, DC 20250

NOP 2005-1  
Effective Date: January 18, 2012  
Page 8 of 16

|  |  |  |  |  |  |                        |  |  |  |  |
|--|--|--|--|--|--|------------------------|--|--|--|--|
|  |  |  |  |  |  | livestock<br>and crops |  |  |  |  |
|  |  |  |  |  |  |                        |  |  |  |  |
|  |  |  |  |  |  |                        |  |  |  |  |
|  |  |  |  |  |  |                        |  |  |  |  |

**Below please provide number of personnel, divided into categories and / or job titles.**

*EX: Administrative Staff (3), Technical Staff [including inspectors, reviewers] (7), etc.*

Administrative Staff – (1), Technical Staff (8)





**Table 5a – Notice of Noncompliance / Adverse Action Worksheet §205.662**

| Name of Client           | Scope | Notification of Noncompliance<br><i>Enter Yes, No, or NA as applicable</i> |                                 |   |                                       | Type of Proposed Adverse Action:  | Notification of Proposed Adverse Action    |                                   |  |   | Adverse Action Taken:   | Request for Mediation or Appeal and Remarks  |
|--------------------------|-------|--|---------------------------------|---|---------------------------------------|---|--|-----------------------------------|--|---|---|--|
|                          |       | Description of NC §205.662(a)(1)   | Facts of Each NC §205.662(a)(2) | Date to Rebut or Correct §205.662(a)(3) | Resolution Notice Sent §205.662(a)(1) | Proposed Suspension (PS)<br><br>Proposed Revocation (PR)<br><br>NA – none sent<br>Enter PS, PR, or NA as applicable | Reasons for proposed action §205.662(c)(1) | Proposed Eff. Date §205.662(c)(2) | Impact of proposed action §205.662(c)(3) | Right of Mediation or appeal §205.662(c)(4) | Suspension (Susp)<br><br>Revocation (Rev)<br><br>205.662(e)(1)<br>Enter<br>Revocation or suspension if applicable | Did the certified operation request mediation or file an appeal?<br><br>If so did the ACA or State send the notice of Suspension / Revocation while final resolution of either mediation or appeal was pending?<br>205.662(e)(2)<br><br>Enter Remarks as appropriate.<br><u>Document:</u> 1) when Notices were submitted to the client and method used; 2) when and if the notices were sent to the Administrator. |
| Honey Brook Organic Farm | Crops | Y  | Y                               | Y                                       | Y                                     | PS  | Y  | Y                                 | Y  | Y   | None Client corrected NC  | N – N – Notice of Non-Compliance an Proposed Suspension – 12/8/11  |
|                          |       |  |                                 |   |                                       |   |  |                                   |  |   |   |  |
|                          |       |  |                                 |   |                                       |   |  |                                   |  |   |   |  |
|                          |       |  |                                 |   |                                       |   |  |                                   |  |   |   |  |
|                          |       |  |                                 |   |                                       |   |  |                                   |  |   |   |  |





**Table 5a – Notice of Noncompliance / Adverse Action Worksheet §205.662**

| Name of Client | Scope | Notification of Noncompliance<br><i>Enter Yes, No, or NA as applicable</i> |                                 |   |                                       | Type of Proposed Adverse Action:  | Notification of Proposed Adverse Action    |                                   |  |   | Adverse Action Taken:   | Request for Mediation or Appeal and Remarks  |
|----------------|-------|--|---------------------------------|---|---------------------------------------|---|--|-----------------------------------|--|---|---|--|
|                |       | Description of NC §205.662(a)(1)   | Facts of Each NC §205.662(a)(2) | Date to Rebut or Correct §205.662(a)(3) | Resolution Notice Sent §205.662(a)(1) | Proposed Suspension (PS)<br><br>Proposed Revocation (PR)<br><br>NA – none sent<br>Enter PS, PR, or NA as applicable | Reasons for proposed action §205.662(c)(1) | Proposed Eff. Date §205.662(c)(2) | Impact of proposed action §205.662(c)(3) | Right of Mediation or appeal §205.662(c)(4) | Suspension (Susp)<br><br>Revocation (Rev)<br><br>205.662(e)(1)<br>Enter<br>Revocation or suspension if applicable | Did the certified operation request mediation or file an appeal?<br><br>If so did the ACA or State send the notice of Suspension / Revocation while final resolution of either mediation or appeal was pending? 205.662(e)(2)<br><br><i>Enter Remarks as appropriate. Document: 1) when Notices were submitted to the client and method used; 2) when and if the notices were sent to the Administrator.</i> |

**Instructions:**

- For livestock clients, **identify** the type of livestock (poultry, dairy, beef cattle, sheep, etc)
- Start with Notifications of Noncompliance (NC) and then move on to Adverse Actions (proposed suspension or revocation; and Actual suspension or revocation)
- Notifications of NC **without** Adverse Actions would have “NA” in the “Type of Proposed Adverse Action” column; all other columns after could remain blank if NA
- For Notifications of NC the response **must** be “Yes” for the first 3 columns. If the certified operation demonstrates that each NC has been resolved the response for the 4<sup>th</sup> column **must** also be “Yes”.
- For Notifications of Proposed Adverse Actions the response **must** be “Yes” for all 4 columns.



**Table 5b – Notice of Noncompliance / Denial of Certification §205.405**

| A.             | B.    | C.  | D.                             | E.                           | F.                                | G.   |
|----------------|-------|---|--------------------------------|------------------------------|-----------------------------------|--|
| Name of Client | Scope | Notification of Noncompliance Included: §205.405(a) | Applicant Response §205.405(b) | ACA Action Taken §205.405(c) | Denial of Certification included: | Identify if any of the two denial methods were used and if they were appropriate |
|                |       |   |                                |                              |                                   |  |
|                |       |   |                                |                              |                                   |  |
|                |       |   |                                |                              |                                   |  |
|                |       |   |                                |                              |                                   |  |
|                |       |   |                                |                              |                                   |  |

**Instructions:**

**C.** Enter **Yes** if all 3 requirements met. (1) A description of each NC, (2) Facts upon which the notification of NC is based, and (3) Date for rebuttal or CA for each NC with supporting documentation.

**D.** Enter the applicant's response: (1) Corrected NC – submitted CA; (2) Corrected NC – applied to another ACA; (3) Rebutted NC; (4) No Response provided.

**E.** Enter action taken by ACA: (1) Reviewed CA/Rebuttal and conducted inspection if necessary; (2) CA/Rebuttal accepted, issued cert; (3) CA/Rebuttal not accepted, issued Denial of certification; (4) No Response by Applicant – issued Denial of certification.

**F.** Enter **Yes** if all 4 requirements met. If any is missing indicate which one and identify NC on main checklist. The reason(s) for denial §205.405(d); (1) right to **Reapply for Certification** §205.405(d)(1); (2) right to **Request mediation** §205.405(d)(2); (3) right to **File an Appeal** §205.405(d)(3).

**G.** See main checklist for guidance notes Section V. (1) ACA issued **combined** notice of NC and Denial of certification §205.405(a), if correction of NC is not possible. Combined notice must include requirements of §§205.405(a) and 205.405(d); (2) ACA **denied** certification without issuing a notification of noncompliance §205.405(g), if ACA had reason to believe applicant **willfully** made a false statement or **purposefully** misrepresented the applicant's operation.



### Tables 6a - Label Review Worksheet – “100% Organic” or “Organic” §205.303

| Client File | Product | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | Complies |    |
|-------------|---------|---|---|---|---|---|---|---|---|---|----|----|----|----------|----|
|             |         |   |   |   |   |   |   |   |   |   |    |    |    | Yes      | No |
|             |         |   |   |   |   |   |   |   |   |   |    |    |    |          |    |
|             |         |   |   |   |   |   |   |   |   |   |    |    |    |          |    |
|             |         |   |   |   |   |   |   |   |   |   |    |    |    |          |    |
|             |         |   |   |   |   |   |   |   |   |   |    |    |    |          |    |
|             |         |   |   |   |   |   |   |   |   |   |    |    |    |          |    |
|             |         |   |   |   |   |   |   |   |   |   |    |    |    |          |    |
|             |         |   |   |   |   |   |   |   |   |   |    |    |    |          |    |
|             |         |   |   |   |   |   |   |   |   |   |    |    |    |          |    |
|             |         |   |   |   |   |   |   |   |   |   |    |    |    |          |    |

**Instructions:** For products labeled as “100% Organic” or “Organic”, review against the requirements and record on table using “Y”, “N”, or “NA” as applicable (Y = Yes / N = No). Indicate for each label if it complied with requirements. Insert more rows as needed.

**1. For products labeled as “Organic”, does label contain the percentage of organic ingredients in the product? §205.303(a)(2) (if no, put NA for 2 and 3)**

**2. Does the percentage statement exceed one-half the size of the largest type size on the panel on which the statement is displayed? §205.303(a)(2)**

**3. Does the percentage statement appear in its entirety in the same type size, style, and color without highlighting? §205.303(a)(2)**

**4. Is this a multi-ingredient Product labeled as 100% Organic? §205.303(a)(3)**

**5. If product is labeled organic does it identify each organic ingredient in the ingredient statement? §205.303(b)(1)**

**6. Does it identify water or salt as organic? §205.303(b)(1)**

**7. Does the label (on the information panel) identify the name of the ACA that certified the handler of the finished product preceded by the statement, “Certified organic by \* \* \*,” or similar phrase? §205.303(b)(2)**

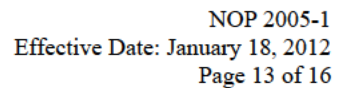
**8. Is the ACA identifying statement (#7 above) on the information panel and below the information identifying the handler or distributor of the product? §205.303(b)(2)**

**9. Does the label use the ACA’s seal or logo? §205.303(a)(5)**

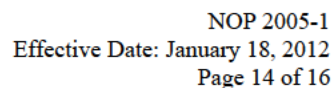
**10. Is the ACA seal or logo individually displayed more prominently than the USDA seal? §205.303(a)(5)**

**11. Does it contain the USDA Seal? §205.311(a)**

**12. Does the Seal replicate the form and design of figure 1, is printed legibly and conspicuously, and meets all requirements of §205.311(b)?**







| <b>Client File</b> | <b>Product Label Type</b> | <b>Requirements</b> | <b>Remarks</b> | <b>Complies</b> |           |
|--------------------|---------------------------|---------------------|----------------|-----------------|-----------|
|                    |                           |                     |                | <b>Yes</b>      | <b>No</b> |
|                    |                           |                     |                |                 |           |
|                    |                           |                     |                |                 |           |
|                    |                           |                     |                |                 |           |
|                    |                           |                     |                |                 |           |
|                    |                           |                     |                |                 |           |
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|                    |                           |                     |                |                 |           |
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|                    |                           |                     |                |                 |           |
|                    |                           |                     |                |                 |           |
|                    |                           |                     |                |                 |           |
|                    |                           |                     |                |                 |           |

**Instructions:** For labels reviewed that are not “100% Organic”, “Organic”, or “Made with organic” enter review information below. Insert more rows as needed.

**Requirements:** Enter the NOP requirement (§205.305, etc.) being assessed.

**Remarks:** Enter general information regarding the review or specific information if label is noncompliant.



**Table 7a - Sample Testing Worksheet – General Information**

Provide information on sampling conducted by the ACA since the previous assessment.  
(# of operations with samples pulled; number of samples pulled overall; types of samples (soil, tissue, product, water, etc...))

XXX

**Table 7b – Sample Testing and Reporting Information**

| File # | Name of applicant / certified operation sampled    | A | B | C | D | E | F | G | H | I | J | K | L                     | M                           | N                          | O                            | P                                      | Complies |    |
|--------|--|---|---|---|---|---|---|---|---|---|---|---|-----------------------|-----------------------------|----------------------------|------------------------------|--|----------|----|
|        |  |   |   |   |   |   |   |   |   |   |   |   | Type of Sample Pulled | What was sample tested for? | Why was the sample pulled? | Provide info on test results | Provide info on ACA decision & outcome | Yes      | No |
| 1      | No sampling has been conducted to date by the NJDA |   |   |   |   |   |   |   |   |   |   |   |                       |                             |                            |                              |  |          |    |
| 2      |  |   |   |   |   |   |   |   |   |   |   |   |                       |                             |                            |                              |  |          |    |
| 3      |  |   |   |   |   |   |   |   |   |   |   |   |                       |                             |                            |                              |  |          |    |
| 4      |  |   |   |   |   |   |   |   |   |   |   |   |                       |                             |                            |                              |  |          |    |
| 5      |  |   |   |   |   |   |   |   |   |   |   |   |                       |                             |                            |                              |  |          |    |
| 6      |  |   |   |   |   |   |   |   |   |   |   |   |                       |                             |                            |                              |  |          |    |
| 7      |  |   |   |   |   |   |   |   |   |   |   |   |                       |                             |                            |                              |  |          |    |
| 8      |  |   |   |   |   |   |   |   |   |   |   |   |                       |                             |                            |                              |  |          |    |
| 9      |  |   |   |   |   |   |   |   |   |   |   |   |                       |                             |                            |                              |  |          |    |
| 10     |  |   |   |   |   |   |   |   |   |   |   |   |                       |                             |                            |                              |  |          |    |

**Instructions:** Review the procedures and processes that describe how the sample was pulled and the reporting requirements. For requirements A – K, enter “Y” for “Yes” or “N” for “No”, as appropriate. Make an assessment on whether or not the requirements are met by entering an “X” under the appropriate response of the “Complies” column. If any requirement is not met, identify on Checklist Section XIV (§§205.670 & 205.671). For requirements L through P, enter the appropriate response.

A. Was the sample collected by an inspector representing the ACA, Administrator, or State? §205.670(c)

B. Was a receipt provided to the operation by the inspector? §205.403(e)(1)

C. Was the chain of custody maintained? §205.670(c)

D. Was an accredited lab used? §205.670(c)



**Table 7b – Sample Testing and Reporting Information**

| File #   | Name of applicant / certified operation sampled | A | B | C | D | E | F | G | H | I | J | K | L<br>Type of Sample Pulled | M<br>What was sample tested for? | N<br>Why was the sample pulled? | O<br>Provide info on test results | P<br>Provide info on ACA decision & outcome | Complies |    |  |  |
|--|---|---|---|---|---|---|---|---|---|---|---|---|----------------------------|----------------------------------|---------------------------------|-----------------------------------|---|----------|----|--|--|
|  |   |   |   |   |   |   |   |   |   |   |   |   |                            |                                  |                                 |                                   |   | Yes      | No |  |  |
| <p><b>E.</b> Was an approved AOAC or Validated Method used? §205.670(c)</p> <p><b>F.</b> Were results sent to the operation? §§205.402(b)(3) and 205.403(e)(2)</p> <p><b>G.</b> Were results sent to the Administrator or State, as applicable? §205.670(d)(1)</p> <p><b>H.</b> Was the operation charged for testing? §205.670(b)</p> <p><b>I.</b> Did results exceed FDA or EPA tolerances? §205.670(e)</p> <p><b>J.</b> Was the applicable agency notified if “I” above is “Yes”? §205.670(e)</p> <p><b>K.</b> Were any prohibited substances greater than 5% of EPA tolerance or higher than UREC? §205.671</p> <p><b>L.</b> What type of sample was pulled? (Soil, tissue, product, water, etc...)</p> <p><b>M.</b> What was the sample tested for? (Specific pesticide name or classification)</p> <p><b>N.</b> Why was the sample pulled? (Directed by ACA or NOP? Inspector decision)</p> <p><b>O.</b> Provide information on test results. (Positive, negative, etc.)</p> <p><b>P.</b> Provide information on ACA decision and outcome. (Was there an investigation?)</p> |   |   |   |   |   |   |   |   |   |   |   |   |                            |                                  |                                 |                                   |   |          |    |  |  |



## **National Organic Program Certification File Review Worksheets**

Tables 1 - 3 are used to record information gathered from full certification file reviews. Tables 4 - 7 are used to record information gathered from partial certification file reviews. All of the certification file review worksheets are separated into tables as described below.

| <b>Certification File Review Worksheets</b>  |
|--|
| Table 1 - General Certification File Review Information <i>(only for full file reviews)</i>    |
| Table 2 – Summary of Certification File Review Information <i>(only for full file reviews)</i> |
| Table 3 – Grower Group Information <i>(only for full file reviews)</i>                         |
| Table 4 – Personnel Worksheet  |
| Table 5a – Notice of Noncompliance / Adverse Action Worksheet                                  |
| Table 5b – Notice of Noncompliance / Denial of Certification Worksheet                         |
| Table 6a - Label Review Worksheet - Products labeled as “100% Organic” or “Organic”            |
| Table 6b - Label Review Worksheet - Packaged Products labeled as “Made with Organic”           |
| Table 6c - Label Review Worksheet - All other labels reviewed                                  |
| Table 7a – Sample Worksheet – General Information  |
| Table 7b – Sample Worksheet - Sample Testing and Reporting Information                         |





**Table 1 - General Certification File Review Information**

| File # | Name of applicant/certified operation sampled | A<br>Date application received | B<br>Date of review (Special Instructions) | C<br>Review conducted by | D<br>Inspection date | E<br>Inspection conducted by | F<br>Date of final review | G<br>Final review conducted by | H<br>Date certification decision made       | I<br>Certification decision made by | J<br>Date findings sent to operation 205 402(b)(1) |
|--------|---|--------------------------------|--|--------------------------|----------------------|------------------------------|---------------------------|--------------------------------|---|-------------------------------------|--|
| 1      | Snyder Research Farm                          | 02/28/11                       | 03/03/11                                   | Erich Bremer             | 04/27/11             | (b) (6)                      | 11/29/11                  | E. Bremer, Larry Hardwick      | Date of certification decision not recorded | Douglas Fisher                      | 11/28/11   |
| 2      | Stone Hollow Farm                             | 11/30/11                       | 12/20/11                                   | Erich Bremer             | 01/26/12             |                              | 05/01/12                  | Bremer, Hardwick               |   | Douglas Fisher                      | 05/03/12   |
| 3      | Spruce Ridge Farm                             | 02/22/11                       | 05/10/11                                   | Erich Bremer             | 05/17/11             |                              | 11/30/11                  | Bremer, Hardwick               |   | Douglas Fisher                      | 11/30/11   |
| 4      | Cherry Grove Farm                             | 10/04/11                       | 10/04/11                                   | Erich Bremer             | 11/29/11             |                              | 04/26/12                  | Bremer, Hardwick               |   | Douglas Fisher                      | 04/26/12   |
| 5      | Mariposa Farm                                 | 06/01/11                       | 06/30/11                                   | Erich Bremer             | 07/26/11             |                              | 12/07/11                  | Bremer, Hardwick               |   | Douglas Fisher                      | 12/07/11   |
| 6      | Wuhl Shafman Lieberman                        | 09/08/11                       | 09/15/11                                   | Erich Bremer             | 10/20/11             |                              | 11/01/11                  | Bremer, Hardwick               |   | Douglas Fisher                      | 11/14/11   |
| 7      | Templar Food Products                         | 12/27/11                       | 01/23/12                                   | Erich Bremer             | 02/28/12             |                              | 04/26/12                  | Bremer, Hardwick               |   | Douglas Fisher                      | 04/26/12   |
| 8      | Kaffee Magnum Opus                            | 09/07/11                       | 01/14/11                                   | Erich Bremer             | 02/15/11             |                              | 04/30/12                  | Bremer, Hardwick               |   | Douglas Fisher                      | 04/30/12   |
| 9      | Stephens Farm                                 | 01/24/12                       | 01/31/12                                   | Erich Bremer             | 3/22/12??<br>?       |                              | 5/1/12                    | Bremer, Hardwick               |   | Douglas Fisher                      | 5/1/12   |
| 10     | Rosedale Blueberry Farm                       | 07/01/11                       | 08/04/11                                   | Erich Bremer             | 08/29/11             |                              | 12/30/11                  | Bremer, Hardwick               |   | Douglas Fisher                      | 12/30/11   |
| 11     | Walnut Grove Farm                             | 07/22/11                       | 10/11/11                                   | Erich Bremer             | 10/19/11             |                              | 01/09/12                  | Bremer, Hardwick               |   | Douglas Fisher                      | 01/09/12   |
| 12     |   |                                |  |                          |                      |                              |                           |                                |   |                                     |  |
| 13     |   |                                |  |                          |                      |                              |                           |                                |   |                                     |  |
| 14     |   |                                |  |                          |                      |                              |                           |                                |   |                                     |  |

**Instructions:** Enter dates in the mm/dd/yy format.



**TABLE 2 - Summary of Certification File Review Information**

| File # | A<br>Scope requested         | B<br>Scope granted (L, C, WC, H) | C<br>IA/UA | D<br>Sample<br>(Y/N) | E<br>Labels<br>(Y/N) |
|--------|------------------------------|----------------------------------|------------|----------------------|----------------------|
| 1      | Crops                        | C                                | UA         | N                    | N                    |
| 2      | Livestock, Crops, Wild Crops | C, L                             | UA         | N                    | N                    |
| 3      | Livestock, Crops             | C, L                             | UA         | N                    | N                    |
| 4      | Crops                        | C                                | UA         | N                    | N                    |
| 5      | Crops                        | C                                | UA         | N                    | N                    |
| 6      | Handling                     | H                                | IA         | N                    | Y                    |
| 7      | Handling                     | H                                | UA         | N                    | Y                    |
| 8      | Handling                     | H                                | UA         | N                    | Y                    |
| 9      | Crops                        | C                                | UA         | N                    | N                    |
| 10     | Crops                        | C                                | UA         | N                    | Y                    |
| 11     | Crops, wild crops            | C, WC                            | UA         | N                    | N                    |
| 12     |                              |                                  |            |                      |                      |
| 13     |                              |                                  |            |                      |                      |
| 14     |                              |                                  |            |                      |                      |
| 15     |                              |                                  |            |                      |                      |

**Instructions:** For each requirement (A-E), enter the appropriate information into **Table 2**. Make sure the information provided in Table 2 is entered into the corresponding File # in Table 1.

- A.** Scope requested (L, C, WC, H)
- B.** Scope granted (L, C, WC, H): *For crop operations, include a description about the type of crop and operation such as single crop, parallel production, split production, etc. For livestock operations, include a description about the type of livestock and operation. For handling operations, include a description of the type of products and operation such as single ingredient product, multi ingredient products, trader, distributor, etc. For wild crop operations, include a description of the type of products and operation such as single products, organic and non-organic of same product in collection area, single harvester or multiple harvesters, collection areas, staging areas, production areas, and management and oversight of harvester.*
- C.** Initial application (IA) or updated application (UA)
- D.** Was a sample pulled during the inspection? (Y/N) *If samples were pulled, include information in Table 7b. Sampling Worksheet - Sample and Reporting Information*
- E.** Are any labels used by the operation? (Y/N) *If there are labels, include information in Table 6a, 6b, or 6c Label Review Worksheet.*



| File #  | Table 3 - Grower Group Information                    |
|---|---|
| 1   | NJDOA does not certify any grower groups at this time |
| 2   |   |
| 3   |   |
| 4   |   |
| 5   |   |
| <b>Instructions:</b> For each grower group Certification file reviewed, provide a description on the type and scope of the grower group (Crops harvested; organic and non-organic of same crops grown by producers or processed by handling operations; collection areas; staging areas and production areas; and management and oversight of ICS). This information must be entered into <b>Table 3</b> . Make sure the information provided in Table 3 is entered into the corresponding File # in Table 1. |   |





**Table 5a – Notice of Noncompliance / Adverse Action Worksheet §205.662**

| Name of Client    | Scope | Notification of Noncompliance<br><i>Enter Yes, No, or NA as applicable</i> |                                 |   |                                       | Type of Proposed Adverse Action:  | Notification of Proposed Adverse Action    |                                   |  |   | Adverse Action Taken:   | Request for Mediation or Appeal and Remarks  |
|-------------------|-------|--|---------------------------------|---|---------------------------------------|---|--|-----------------------------------|--|---|---|--|
|                   |       | Description of NC §205.662(a)(1)   | Facts of Each NC §205.662(a)(2) | Date to Rebut or Correct §205.662(a)(3) | Resolution Notice Sent §205.662(a)(1) | Proposed Suspension (PS)<br><br>Proposed Revocation (PR)<br><br>NA – none sent<br>Enter PS, PR, or NA as applicable | Reasons for proposed action §205.662(c)(1) | Proposed Eff. Date §205.662(c)(2) | Impact of proposed action §205.662(c)(3) | Right of Mediation or appeal §205.662(c)(4) | Suspension (Susp)<br><br>Revocation (Rev)<br><br>205.662(e)(1)<br>Enter<br>Revocation or suspension if applicable | Did the certified operation request mediation or file an appeal?<br><br>If so did the ACA or State send the notice of Suspension / Revocation while final resolution of either mediation or appeal was pending? 205.662(e)(2)<br><br><i>Enter Remarks as appropriate. Document: 1) when Notices were submitted to the client and method used; 2) when and if the notices were sent to the Administrator.</i> |
| Cherry Grove Farm | Crops | Y  | Y                               | Y                                       | Y                                     | PS  | Y  | N                                 | Y  | N   | None- resolved  | Notice of NC Resolution issued   |
| Mariposa Farms    | Crops | Y  | Y                               | Y                                       | Y                                     | N/A   | N/A  | N/A                               | N/A                                      | N/A   | N/A   | N/A  |
| Stephens Farm     | Crops | Y  | Y                               | Y                                       | N/A                                   | PS  | N  | Y                                 | Y  | Y   | N/A   | N/A  |
|                   |       |  |                                 |   |                                       |   |  |                                   |  |   |   |  |





**Table 5a – Notice of Noncompliance / Adverse Action Worksheet §205.662**

| Name of Client | Scope | Notification of Noncompliance<br><i>Enter Yes, No, or NA as applicable</i> |                                 |   |                                       | Type of Proposed Adverse Action:  | Notification of Proposed Adverse Action       |                                   |   |  | Adverse Action Taken:   | Request for Mediation or Appeal and Remarks  |
|----------------|-------|--|---------------------------------|---|---------------------------------------|---|---|-----------------------------------|---|--|---|--|
|                |       | Description of NC §205.662(a)(1)   | Facts of Each NC §205.662(a)(2) | Date to Rebut or Correct §205.662(a)(3) | Resolution Notice Sent §205.662(a)(1) | Proposed Suspension (PS)<br><br>Proposed Revocation (PR)<br><br>NA – none sent<br>Enter PS, PR, or NA as applicable | Reasons for proposed action<br>§205.662(c)(1) | Proposed Eff. Date §205.662(c)(2) | Impact of proposed action<br>§205.662(c)(3) | Right of Mediation or appeal<br>§205.662(c)(4) | Suspension (Susp)<br><br>Revocation (Rev)<br><br>205.662(e)(1)<br>Enter<br>Revocation or suspension if applicable | Did the certified operation request mediation or file an appeal?<br><br>If so did the ACA or State send the notice of Suspension / Revocation while final resolution of either mediation or appeal was pending?<br><b>205.662(e)(2)</b><br><br><i>Enter Remarks as appropriate. Document: 1) when Notices were submitted to the client and method used; 2) when and if the notices were sent to the Administrator.</i> |
|                |       |  |                                 |   |                                       |   |   |                                   |   |  |   |  |

**Instructions:**

- For livestock clients, **identify** the type of livestock (poultry, dairy, beef cattle, sheep, etc)
- Start with Notifications of Noncompliance (NC) and then move on to Adverse Actions (proposed suspension or revocation; and Actual suspension or revocation)
- Notifications of NC **without** Adverse Actions would have “NA” in the “Type of Proposed Adverse Action” column; all other columns after could remain blank if NA
- For Notifications of NC the response **must** be “Yes” for the first 3 columns. If the certified operation demonstrates that each NC has been resolved the response for the 4<sup>th</sup> column **must** also be “Yes”.
- For Notifications of Proposed Adverse Actions the response **must** be “Yes” for all 4 columns.



**Table 5b – Notice of Noncompliance / Denial of Certification §205.405**

| A.   | B.    | C.  | D.                             | E.                           | F.                                | G.   |
|--|-------|---|--------------------------------|------------------------------|-----------------------------------|--|
| Name of Client   | Scope | Notification of Noncompliance Included: §205.405(a) | Applicant Response §205.405(b) | ACA Action Taken §205.405(c) | Denial of Certification included: | Identify if any of the two denial methods were used and if they were appropriate |
| None issued  |       |   |                                |                              |                                   |  |
| Interviews indicated that NJDA ha 3-4 applications on file which are incomplete. Additional information was requested, but the applicant operations never replied. No noncompliance or denial of certification was issued. |       |   |                                |                              |                                   |  |
|  |       |   |                                |                              |                                   |  |
|  |       |   |                                |                              |                                   |  |
|  |       |   |                                |                              |                                   |  |

**Instructions:**

**C.** Enter **Yes** if all 3 requirements met. (1) A description of each NC, (2) Facts upon which the notification of NC is based, and (3) Date for rebuttal or CA for each NC with supporting documentation.

**D.** Enter the applicant's response: (1) Corrected NC – submitted CA; (2) Corrected NC – applied to another ACA; (3) Rebutted NC; (4) No Response provided.

**E.** Enter action taken by ACA: (1) Reviewed CA/Rebuttal and conducted inspection if necessary; (2) CA/Rebuttal accepted, issued cert; (3) CA/Rebuttal not accepted, issued Denial of certification; (4) No Response by Applicant – issued Denial of certification.

**F.** Enter **Yes** if all 4 requirements met. If any is missing indicate which one and identify NC on main checklist. The reason(s) for denial §205.405(d); (1) right to **Reapply for Certification** §205.405(d)(1); (2) right to **Request mediation** §205.405(d)(2); (3) right to **File an Appeal** §205.405(d)(3).

**G.** See main checklist for guidance notes Section V. (1) ACA issued **combined** notice of NC and Denial of certification §205.405(a), if correction of NC is not possible. Combined notice must include requirements of §§205.405(a) and 205.405(d); (2) ACA **denied** certification without issuing a notification of noncompliance §205.405(g), if ACA had reason to believe applicant **willfully** made a false statement or **purposefully** misrepresented the applicant's operation.



| Tables 6a - Label Review Worksheet – “100% Organic” or “Organic” §205.303 |                           |   |   |   |   |   |   |   |  |   |    |    |                          |          |    |
|---|---------------------------|---|---|---|---|---|---|---|--|---|----|----|--------------------------|----------|----|
| Client File   | Product                   | 1 | 2 | 3 | 4 | 5   | 6 | 7 | 8  | 9 | 10 | 11 | 12                       | Complies |    |
|   |                           |   |   |   |   |   |   |   |  |   |    |    |                          | Yes      | No |
| Mariposa Farms  | 100% Organic Blueberries  | Y | N | Y | N | ?? Not avail.                                   | N | Y | Y  | Y | N  | Y  | Y                        | Y        |    |
| Wuhl Schafman Lieberman   | Organic Grape Tomatoes    | N | N | N | N | Y   | N | Y | N – statement to the left of distrib. info | N | N  | Y  | ¿? Color copy not avail. |          | N  |
| Templar   | Organic Black Tea         | Y | N | Y | N | Y   | N | Y | Y  | Y | N  | Y  | Y                        | Y        |    |
| Sweet Leaf  | 95% Organic Raspberry Tea | Y | N | Y | N | N Single ingredient product labeled 95% organic | N | Y | Y  | Y | N  | Y  | Y                        |          | N  |
|   |                           |   |   |   |   |   |   |   |  |   |    |    |                          |          |    |
|   |                           |   |   |   |   |   |   |   |  |   |    |    |                          |          |    |

**Instructions:** For products labeled as “100% Organic” or “Organic”, review against the requirements and record on table using “Y”, “N”, or “NA” as applicable (Y = Yes / N = No). Indicate for each label if it complied with requirements. Insert more rows as needed.

- For products labeled as “Organic”, does label contain the percentage of organic ingredients in the product? §205.303(a)(2) (if no, put NA for 2 and 3)
- Does the percentage statement exceed one-half the size of the largest type size on the panel on which the statement is displayed? §205.303(a)(2)
- Does the percentage statement appear in its entirety in the same type size, style, and color without highlighting? §205.303(a)(2)
- Is this a multi-ingredient Product labeled as 100% Organic? §205.303(a)(3)
- If product is labeled organic does it identify each organic ingredient in the ingredient statement? §205.303(b)(1)
- Does it identify water or salt as organic? §205.303(b)(1)
- Does the label (on the information panel) identify the name of the ACA that certified the handler of the finished product preceded by the statement, “Certified organic by \* \* \*,” or similar phrase? §205.303(b)(2)
- Is the ACA identifying statement (#7 above) on the information panel and below the information identifying the handler or distributor of the product? §205.303(b)(2)
- Does the label use the ACA’s seal or logo? §205.303(a)(5)
- Is the ACA seal or logo individually displayed more prominently than the USDA seal? §205.303(a)(5)
- Does it contain the USDA Seal? §205.311(a)
- Does the Seal replicate the form and design of figure 1, is printed legibly and conspicuously, and meets all requirements of §205.311(b)?



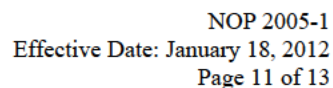


**Table 6b - Label Review Worksheet – “Made with Organic”** (specified ingredients or food group(s))  
 §205.303

| Client File | Product          | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | Complies |    |
|-------------|------------------|---|---|---|---|---|---|---|---|---|----|----|----------|----|
|             |                  |   |   |   |   |   |   |   |   |   |    |    | Yes      | No |
| Templar Tea | Green Tea Premix | N | N | N | N | N | Y | N | Y | Y | N  | N  | Y        |    |
|             |                  |   |   |   |   |   |   |   |   |   |    |    |          |    |
|             |                  |   |   |   |   |   |   |   |   |   |    |    |          |    |
|             |                  |   |   |   |   |   |   |   |   |   |    |    |          |    |
|             |                  |   |   |   |   |   |   |   |   |   |    |    |          |    |
|             |                  |   |   |   |   |   |   |   |   |   |    |    |          |    |
|             |                  |   |   |   |   |   |   |   |   |   |    |    |          |    |
|             |                  |   |   |   |   |   |   |   |   |   |    |    |          |    |
|             |                  |   |   |   |   |   |   |   |   |   |    |    |          |    |
|             |                  |   |   |   |   |   |   |   |   |   |    |    |          |    |
|             |                  |   |   |   |   |   |   |   |   |   |    |    |          |    |
|             |                  |   |   |   |   |   |   |   |   |   |    |    |          |    |
|             |                  |   |   |   |   |   |   |   |   |   |    |    |          |    |
|             |                  |   |   |   |   |   |   |   |   |   |    |    |          |    |

**Instructions:** For products labeled as “*Made with organic* (specified ingredients)” review against the requirements and record on table using “Y”, “N”, or “NA” as applicable (Y = Yes / N = No). Indicate for each label if it complied with requirements. Insert more rows as needed.

1. Does the “Made with organic (specified ingredients)” statement list more than three organically produced ingredients? §205.304 (a) (1) (i)
2. Does the “Made with organic (specified ingredients)” statement list more than three of the following food groups: beans, fish, fruits, grains, herbs, meats, nuts, oils, poultry, seeds, spices, sweeteners, and vegetables or processed milk products? §205.304 (a) (1) (ii)
3. Does the “Made with organic (specified ingredients)” statement appear in letters that does not exceed one-half the size of the largest type size on the panel of which it appears and does it appear in its entirety in the same type size, style, and color without highlighting? §205.304 (a) (1) (iii)
4. Does the percentage of organic ingredients statement exceed one-half the size of the largest type size on the panel on which the statement is displayed? §205.304 (a) (2)
5. Does the percentage of organic ingredients statement appear in its entirety in the same type size, style, and color without highlighting? §205.304 (a) (2)
6. Does the label identify each organic ingredient in the ingredient statement? §205.304 (b) (1)
7. Does it identify water or salt as organic? §205.304 (b) (1)
8. Does the label (on the information panel) identify the name of the ACA that certified the handler of the finished product preceded by the statement, “Certified organic by \* \* \*,” or similar phrase? §205.304 (b) (2)
9. Is the ACA identifying statement (#7 above) on the information panel and below the information identifying the handler or distributor of the product? §205.304 (b) (2)
10. Does the label use the ACA’s seal or logo? §205.304 (a) (3)
11. Does it contain the USDA Seal? §205.304 (c)

[illegible]



**Table 7a - Sample Testing Worksheet – General Information**

Provide information on sampling conducted by the ACA since the previous assessment.  
(# of operations with samples pulled; number of samples pulled overall; types of samples (soil, tissue, product, water, etc...))

**NJDA does not conduct its own samples. However, as a part of the application, NJDA requests that new and renewal applicants include any soil, water, or nutrient tests that they may have on file.**

**Table 7b – Sample Testing and Reporting Information**

| File # | Name of applicant / certified operation sampled | A | B | C | D | E | F | G | H | I | J | K | L                     | M                           | N                          | O                            | P                                      | Complies |    |
|--------|---|---|---|---|---|---|---|---|---|---|---|---|-----------------------|-----------------------------|----------------------------|------------------------------|--|----------|----|
|        |   |   |   |   |   |   |   |   |   |   |   |   | Type of Sample Pulled | What was sample tested for? | Why was the sample pulled? | Provide info on test results | Provide info on ACA decision & outcome | Yes      | No |
| 1      |   |   |   |   |   |   |   |   |   |   |   |   |                       |                             |                            |                              |  |          |    |
| 2      |   |   |   |   |   |   |   |   |   |   |   |   |                       |                             |                            |                              |  |          |    |
| 3      |   |   |   |   |   |   |   |   |   |   |   |   |                       |                             |                            |                              |  |          |    |
| 4      |   |   |   |   |   |   |   |   |   |   |   |   |                       |                             |                            |                              |  |          |    |
| 5      |   |   |   |   |   |   |   |   |   |   |   |   |                       |                             |                            |                              |  |          |    |
| 6      |   |   |   |   |   |   |   |   |   |   |   |   |                       |                             |                            |                              |  |          |    |
| 7      |   |   |   |   |   |   |   |   |   |   |   |   |                       |                             |                            |                              |  |          |    |
| 8      |   |   |   |   |   |   |   |   |   |   |   |   |                       |                             |                            |                              |  |          |    |
| 9      |   |   |   |   |   |   |   |   |   |   |   |   |                       |                             |                            |                              |  |          |    |
| 10     |   |   |   |   |   |   |   |   |   |   |   |   |                       |                             |                            |                              |  |          |    |

**Instructions:** Review the procedures and processes that describe how the sample was pulled and the reporting requirements. For requirements A – K, enter “Y” for “Yes” or “N” for “No”, as appropriate. Make an assessment on whether or not the requirements are met by entering an “X” under the appropriate response of the “Complies” column. If any requirement is not met, identify on Checklist Section XIV (§§205.670 & 205.671). For requirements L through P, enter the appropriate response.

A. Was the sample collected by an inspector representing the ACA, Administrator, or State? §205.670(c)

B. Was a receipt provided to the operation by the inspector? §205.403(e)(1)

C. Was the chain of custody maintained? §205.670(c)

D. Was an accredited lab used? §205.670(c)

E. Was an approved AOAC or Validated Method used? §205.670(c)



**Table 7b – Sample Testing and Reporting Information**

| File #   | Name of applicant / certified operation sampled | A | B | C | D | E | F | G | H | I | J | K | L<br>Type of Sample Pulled | M<br>What was sample tested for? | N<br>Why was the sample pulled? | O<br>Provide info on test results | P<br>Provide info on ACA decision & outcome | Complies |    |  |  |
|--|---|---|---|---|---|---|---|---|---|---|---|---|----------------------------|----------------------------------|---------------------------------|-----------------------------------|---|----------|----|--|--|
|  |   |   |   |   |   |   |   |   |   |   |   |   |                            |                                  |                                 |                                   |   | Yes      | No |  |  |
| F. Were results sent to the operation? §§205.402(b)(3) and 205.403(e)(2)                         |   |   |   |   |   |   |   |   |   |   |   |   |                            |                                  |                                 |                                   |   |          |    |  |  |
| G. Were results sent to the Administrator or State, as applicable? §205.670(d)(1)                |   |   |   |   |   |   |   |   |   |   |   |   |                            |                                  |                                 |                                   |   |          |    |  |  |
| H. Was the operation charged for testing? §205.670(b)  |   |   |   |   |   |   |   |   |   |   |   |   |                            |                                  |                                 |                                   |   |          |    |  |  |
| I. Did results exceed FDA or EPA tolerances? §205.670(e)   |   |   |   |   |   |   |   |   |   |   |   |   |                            |                                  |                                 |                                   |   |          |    |  |  |
| J. Was the applicable agency notified if “I” above is “Yes”? §205.670(e)                         |   |   |   |   |   |   |   |   |   |   |   |   |                            |                                  |                                 |                                   |   |          |    |  |  |
| K. Were any prohibited substances greater than 5% of EPA tolerance or higher than UREC? §205.671 |   |   |   |   |   |   |   |   |   |   |   |   |                            |                                  |                                 |                                   |   |          |    |  |  |
| L. What type of sample was pulled? (Soil, tissue, product, water, etc...)                        |   |   |   |   |   |   |   |   |   |   |   |   |                            |                                  |                                 |                                   |   |          |    |  |  |
| M. What was the sample tested for? (Specific pesticide name or classification)                   |   |   |   |   |   |   |   |   |   |   |   |   |                            |                                  |                                 |                                   |   |          |    |  |  |
| N. Why was the sample pulled? (Directed by ACA or NOP? Inspector decision)                       |   |   |   |   |   |   |   |   |   |   |   |   |                            |                                  |                                 |                                   |   |          |    |  |  |
| O. Provide information on test results. (Positive, negative, etc.)                               |   |   |   |   |   |   |   |   |   |   |   |   |                            |                                  |                                 |                                   |   |          |    |  |  |
| P. Provide information on ACA decision and outcome. (Was there an investigation?)                |   |   |   |   |   |   |   |   |   |   |   |   |                            |                                  |                                 |                                   |   |          |    |  |  |



## National Organic Program Certification File Review Checklist

**Instructions:** This Checklist is used in conjunction with Tables 1 - 3 of the Certification File Review Worksheet. The Checklist is used only to record the overall evaluation of files where a full file review was conducted.

Use the certification file number as recorded in the Certification File Review Worksheet to identify the certification file(s). If a requirement is not applicable, include relevant information in the "Remarks" for that section.

This Checklist is not used to record the overall evaluation of full file reviews for Grower Groups. Instead, the Certification File Review Checklist—Supplement for Grower Groups must be used.

### Fees and other charges for certification §205.642

|   | Yes | No | Certification File Number(s) |
|---|-----|----|------------------------------|
| Is the operation provided with an estimate?   | XX  |    | 1 to 11                      |
| Are the fees charged consistent with the Fee Schedule submitted to the Administrator? | XX  |    | 1 to 11                      |

### Certificate §205.404(b)

| Does the certificate include:   | Yes | No | Certification File Number(s) |
|---|-----|----|------------------------------|
| Name and address of the certified operation? §205.404(b)(1)   | XX  |    | 1 to 11                      |
| "Effective date of certification"? §205.404(b)(2)<br>(Date operation was initially certified to NOP Regulations)  | XX  |    | 1 to 11                      |
| Scope -- Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation? §205.404(b)(3)         | XX  |    | 1 to 11                      |
| Name, address, internet address, and telephone number of the certifying agent? §205.404(b)(4)   | XX  |    | 1 to 11                      |
| Issue date of the certificate?  | XX  |    | 1 to 11                      |
| Anniversary date?<br>(Date when certified operation is required to submit their next annual update)   | XX  |    | 1 to 11                      |
| Label classification for processed organic products?<br>(100% Organic, Organic, or Made with Organic (specified ingredients or food groups))                        | XX  |    | 1 to 11                      |
| The statement "Certified Organic under the US National Organic Program 7 CFR Part 205"?   | XX  |    | 1 to 11                      |
| The statement "Once certified, a production or handling operation's organic certification continues in effect until surrendered, suspended or revoked"? §205.404(c) | XX  |    | 1 to 11                      |
| Are certificates issued in English?   | XX  |    | 1 to 11                      |

### Remarks:

XXX





| Application §205.401  |     |    |                              |
|---|-----|----|------------------------------|
| Does the application include:   | Yes | No | Certification File Number(s) |
| The name of person completing the application?  | XX  |    | 1 - 11                       |
| Applicant's business name?  | XX  |    |                              |
| Applicant's address?  | XX  |    |                              |
| Applicant's telephone number?   | XX  |    |                              |
| If a corporation, the name, address, and telephone number of the person authorized to act on the applicant's behalf?  | XX  |    |                              |
| Information on previous certifications?   | XX  |    |                              |
| Other information deemed necessary by the ACA to determine compliance with the ACT?   | XX  |    |                              |
| <b>Remarks:</b>   |     |    |                              |
| XXX   |     |    |                              |
| Organic System Plan (OSP) §205.401(a) and §205.406(a)   |     |    |                              |
| Does the OSP include:   | Yes | No | Certification File Number(s) |
| A <b>description of practices and procedures</b> to be performed and maintained, including the frequency with which they will be performed? §§205.202 - 205.207; 205.236 – 205.240; and 205.270 – 205.272   | XX  |    | 1 to 11                      |
| A <b>list of each substance</b> to be used as a production input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable?   | XX  |    | 1 to 11                      |
| A <b>description of the monitoring practices and procedures</b> to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented?  | XX  |    | 1 to 11                      |
| A <b>description of the recordkeeping</b> system implemented to comply with the requirements established in §205.103?   | XX  |    | 1 to 11                      |
| Does the OSP include a description of the <b>management practices and physical barriers</b> established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and products with prohibited substances | XX  |    | 1 to 11                      |
| <b>Additional information</b> deemed necessary by the certifying agent to evaluate compliance with the regulations?   | XX  |    | 1 to 11                      |



| Continuing Certification: Did the certified operation submit an updated OSP which includes:   | Yes        | No        | Certification File Number(s)        |
|---|------------|-----------|-------------------------------------|
| A summary statement, supported by documentation, detailing any deviations from, changes to, modifications to, or other amendments made to the previous year's organic system plan during the previous year?   | XX         |           | 1 to 11                             |
| Any additions or deletions to the previous year's organic system plan, intended to be undertaken in the coming year, detailed pursuant to §205.200?   | XX         |           | 1 to 11                             |
| Any additions to or deletions from the information required pursuant to §205.401(b)?  | XX         |           | 1 to 11                             |
| An update on the correction of minor noncompliance's previously identified by the certifying agent as requiring correction for continued certification?   | XX         |           | 1 to 11                             |
| Other information as deemed necessary by the certifying agent to determine compliance with the Act and the regulations  | XX         |           | 1 to 11                             |
| <b>Remarks:</b><br>XXX  |            |           |                                     |
| <b>General Assessments:</b>   | <b>Yes</b> | <b>No</b> | <b>Certification File Number(s)</b> |
| Are the materials and inputs used in compliance with the NL and annotations?  | XX         |           | 1 to 11                             |
| Is the application and OSP complete?  | XX         |           | 1 to 11                             |
| Is there evidence that an exit interview was conducted?   | XX         |           | 1 to 11                             |
| Information on issues of concern identified by inspector.   | XX         |           | 1 to 11                             |
| Were there any notices of non-compliance, or adverse actions by the ACA and was the correct process followed?   | XX         |           | 4, 5, 9                             |
| If this was a continuation of certification review and any information on the certificate changed, did the ACA provide the operation with an updated certificate? §205.406 (d)  | XX         |           | 1 to 11                             |
| <b>Remarks:</b><br>XXX  |            |           |                                     |
| <b>Overall Determination Statement:</b><br><b>Include</b> a statement based on an overall determination on whether the operation meets the following as applicable: the crop production standards (§§205.200 through 205.206); wild crop production standards (§205.207); livestock production standards (§§205.236 through 205.240); handling production standards (§§205.270 through 205.272); and applicable guidance documents of the NOP Handbook.<br><br><b>Include</b> a statement on whether the initial review, inspection, and final decisions were in compliance with the requirements.<br>XXX |            |           |                                     |



## National Organic Program Witness Audit Checklist

| Witness Audit - General Information   |   |
|---|---|
| This Checklist is used in conjunction with Tables 1 through 3 of the Certification File Review Worksheets. The Certification File Review Worksheets and a full file review shall be completed prior to conducting the witness audit. This Checklist is used to record evaluation information for each witness audit with exception to Grower Groups. The Witness Audit Checklist for Grower Groups shall be used when witnessing Grower Groups. |   |
| Witness audit date:   | May 23, 2012  |
| Name of operation:  | Stephens Farm   |
| Location of operation:  | Sussex, NJ  |
| Scope of certification requested:   | Crops, Livestock  |
| Scope of certification granted:   | Crops, Livestock  |
| Actual or Demonstration inspection:   | Actual  |
| Inspector's Name:   | (b) (6)   |
| Subcontracted or staff inspector:   | Subcontracted   |
| Verify conflict of interest and confidentiality status of inspector:  | Verified  |
| Name of knowledgeable representative of the operation:  | Ted Stephens  |
| Names of anyone else present during the inspection:   | Sons  |
| Time Inspection started:  | 1100  |
| Time Inspection completed:  | 1630  |
| Was there enough time allocated for the inspection?   | Yes   |
| Did the inspector verify the corrective actions on previous non-compliances as applicable?  | Minimally, Farmer has still not read or understood compost guidance   |
| General information on operation to include: <b>crops</b> grown, acreage, fields, where fields are located (1 site or 2 or more); <b>wild-crops</b> collected, training of collectors; type of <b>livestock</b> operation, number of animals, identification methods; type of <b>handling</b> operation, products processed, etc...   | Cows and Chickens certified – Swine not. Greenhouse in place for vegetables, sold thru CSA (only 2 shares at this time) |
| General information on materials and inputs used and are they in compliance with the National List (NL) and annotations.  | (b) (5), (b) (4) NJDA disallowed use of Sea Plus  |

Material had been approved, then wasn't. Farmer didn't understand why. (Sea Plus)





| As appropriate did the OSP adequately address the requirements for:                   |  |
|---|--|
| <b>Crops</b>  |  |
| Land requirements §205.202  | Yes, No proof of commercial unavailability, Berry bushes purchases conventional            |
| Soil fertility and crop nutrient management practice standard §205.203                | Yes, Seems OK planning to meet with NRCS & review prog. Handbook                           |
| Seeds and planting stock practice standard §205.204                                   | 99% organic Tom & peanut not, dozens of organic seeds purchased. Receipts, no certificates |
| Crop rotation practice standard §205.205  | Yes, cover crop, compost tea   |
| Crop pest, weed, and disease management practice standard §205.206                    | Yes, size limits crop rotation, does 2 year rotation, planning cover crop                  |
| <b>Wild-Crops</b>   |  |
| Wild crop harvesting practice standard §205.207                                       | NA   |
| <b>Livestock</b>  |  |
| Origin of livestock §205.236  | Yes  |
| Livestock feed §205.237   | Yes  |
| Livestock health care practice standard §205.238                                      | Yes  |
| Livestock living conditions §205.239  | Yes  |
| Pasture Practice Standard §205.240  | Yes  |
| <b>Handler</b>  |  |
| Organic handling requirements §205.270  | Eggs & veg washing only, doesn't add chlorine  |
| Facility pest management practice standard §205.271                                   | Y  |
| Commingle and contact with prohibited substance prevention practice standard §205.272 | Y  |

| Sampling  |                   |
|---|-------------------|
| Was a sample pulled during the inspection? §205.670                                       | No samples pulled |
| What was sampled and why?   | NA                |
| Verify sampling procedures, chain of control, etc. §205.670(c)                            | NA                |
| Did the inspector provide the applicant with a receipt for any samples taken? §205.403(e) | NA                |
| Did the sampling process follow the ACA's sampling procedure?                             | NA                |
| Was the inspector charged for the samples? §205.403(e)                                    | NA                |
| Did the ACA pay for the testing? §205.670(b)  | NA                |



| Labels  |                           |
|---|---------------------------|
| Were labels verified during the on-site inspection?<br>§205.403(c)(2)     | None available at present |
| Were the labels being used the same as those approved by the ACA?         | NA                        |
| How was the inspector made aware of which labels are approved by the ACA? | NA                        |

| Exit Interview §205.403(d)<br>Document information addressed by the inspector during the exit interview |  |
|---|--|
| XXX   |  |
| Was the exit interview conducted with a knowledgeable representative?                                   | Yes  |
| Did the exit interview address the accuracy and completeness of the inspection observations?            | Yes  |
| Did the exit interview address the need for additional information?                                     | Yes  |
| Did the exit interview address issues of concern identified during the inspection?                      | Y/N Transplant stock addressed, seeds not. Harvest records not addressed |

| Questions for the inspector:<br>As the inspection progresses insert additional questions to ask the inspector on areas of the inspection/operation that need clarification. |   |
|---|---|
| What did the inspector receive from the ACA in order to conduct the inspection?   | OSP, previous inspection report, special instructions from NJDA                         |
| Does the Inspector have a copy of the NOP Standards?  | Yes   |
| If applicable was the inspector knowledgeable of recent updates to the standards or policy clarifications?  | Yes   |
| How is the inspector informed of the ACA's policies and procedures and changes to them?   | Email, Mail   |
| Does the inspector provide consulting services of any kind?<br><br>If so, how is this information provided to the ACA?  | Information given to applicant during inspection constituted consulting                 |
| What is the inspector's background (experience, training, and education) in relation to the operation being inspected?  | IOIA training, Animal Welfare Auditor (See personnel worksheet for further information) |

**Questions for the Applicant / Certified Operation:**

As the inspection progresses insert additional questions to ask the operation's representative on areas of the operation that need clarification

|  |     |
|--|-----|
| Did the certified operation receive a copy of the previous inspection report, if applicable? | Yes |
| Did the operation receive a certificate from the ACA?  | Yes |
| Does the client have a current copy of the NOP Standards?                                    | Yes |
| If applicable, how did the operation receive information on temporary variances?             | NA  |
| Selling Vegetables as Organic?   | Yes |

**Overall did the inspection verify:**

|   |        |
|---|--------|
| That the operation was in compliance or was able to comply with the ACT? §205.403(c)(1)             | Mostly |
| That the OSP accurately reflected the practices used by the operation? §205.403(c)(2)               | Yes    |
| That prohibited substances had not been and were not being applied to the operation? §205.403(c)(3) | Yes    |

**Additional Notes from USDA Auditor:**

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(b) (5)



United States Department of Agriculture  
Agricultural Marketing Service  
National Organic Program

1400 Independence Avenue S.W.  
Room 2646-South Building  
Washington, DC 20250

NOP 2005-4  
Effective Date: January 18, 2012  
Page 5 of 5

(b) (5)

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**From:** [Crail, Lars - AMS](#)  
**To:** [Michael, Matthew - FSIS](#)  
**Cc:** [Courtney, Cheri - AMS](#)  
**Subject:** FW: QAI/NOP meeting follow-up  
**Date:** Wednesday, October 03, 2012 1:18:08 PM  
**Importance:** Low

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Mathew, I am following up on some questions from QAI. Can you provide me some information for point number 2, the Aurora visit? Thanks.

Lars Crail

USDA-AMS-NOP-AIA

Direct: 202.205.5536

BB: 202.631.2105

*Organic Integrity from Farm to Table, Consumers Trust the Organic Label*



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**From:** Allen, Carey [<mailto:callen@nsf.org>]  
**Sent:** Monday, September 17, 2012 3:37 PM  
**To:** Crail, Lars - AMS  
**Cc:** Bowen, Jaclyn  
**Subject:** FW: QAI/NOP meeting follow-up  
**Importance:** Low

Hi Lars,

I hope you are well and anticipating the coming autumn weather! I know I am!

I just wanted to follow up on these notes summarized by Jackie below from your meeting in August. Do you have anything further regarding this topics I've highlighted? The other items have either been addressed.

- Lars to send QAI resources for identifying commodity-specific analytes to test for once new testing guidance is issued

- Lars to send QAI feedback on the Texas Aurora visit, if applicable

- Lars to research requirements/expectations of ACAs around health and safety violations (PM 11-6).

If you need anything from us regarding the notes below, please let me know.

Thanks, this is low urgency.

*Carey Allen*

Quality Specialist

NSF International

Quality Assurance International (QAI)

734 214 6261

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**From:** Bowen, Jaclyn  
**Sent:** Monday, August 13, 2012 11:01 AM  
**To:** 'Crail, Lars - AMS'  
**Cc:** Allen, Carey  
**Subject:** QAI/NOP meeting follow-up

Good Morning Lars,

Thank you for taking the time to meet with me on Thursday afternoon.

Below are the notes and action items discussed:

- QAI NOP audit NCs- Thank you!
- Given that Country Life has decided to reformulate and add the non-organic products to their certificate, QAI to 1) proceed with going through the process of having Country Life add those products 2) Conduct an abbreviated onsite inspection to look at those particular products and manufacturing process 3) Upon completion of this, submit another reinstatement request to the NOP.
- QAI to send Lars formal letter indicating change in QAI leadership
- Lars to send QAI resources for identifying commodity-specific analytes to test for once new testing guidance is issued
- Lars to send QAI feedback on the Texas Aurora visit, if applicable
- Lars to research requirements/expectations of ACAs around health and safety violations (PM 11-6).
- With regard to Lars request for specific training topics, here is a list of suggestions:
  - o Mock Recall/traceback expectations
  - o Suspension time periods
  - o Reinstatements – review the updated Handbook Policy
  - o Corrective Action responses – containment vs corrective action vs preventative measures
  - o Incidental versus systemic non-compliances and the appropriate adverse action (correctable vs non-correctable)
  - o 3-4 case studies of good examples of logical steps to follow in conducting an investigation. Some examples include:
    - You receive a complaint from your client's customer about pesticide residues on an herb your client imports. Your client does parallel processing.
    - You receive word from another ACA who co-certifies your client for products other than those you certify and they found out that a prohibited input was used in products that were under your certification. You had recently conducted an inspection and not found any evidence of this.
    -

You receive an anonymous complaint for the third year running that one of your clients is using roundup. You found no issues on your first two investigations of this client.

- You received a complaint about an incorrect label on one of your client's websites
- You discover your client has low level pesticide residues (below the 5% of EPA limit that would exclude them from organic sale) that persist on a product even after you have worked with them to address potential sources of incidental contamination.

Thank you!

Jackie

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# Organic Handling/Processing Inspection Report for Natural Food Certifiers

(b) (6)

Organic Certification Inspector

**Company** – Pelleh Farms dba Bethel Livestock Farm dba Bethel Creamery

**Owner/Manager** – Robert Franklin (Rabbi Bob)

**Contact** – Robert Franklin

**Address** – 522 Happy Avenue, Swan Lake, NY 12783

**Telephone** – 845-583-6059

**Fax** – 845-583-0007

**E-mail** – bethellivestock@yahoo.com

**Date of Inspection** – November 2, 2011

**Certification Number** – 770092010

## Background

Bethel Livestock Farm/Bethel Creamery is a small dairy farm with a small dairy process plant to process the milk from this farm only. At this time the organic milk is bottled on the farm 1 or 2 days a week. The remainder of the organic milk being produced is sold to Organic Valley and is picked up by the milk haulers.

The milk is bottled in plastic 1/2 gallon jugs as whole milk.

The plant is in the same building as the milk house and barn. The rooms were completely renovated and the equipment set up for this process.

When at this location for the first inspection the equipment was not all set up. I found it to be as described to me now that the plant is in operation. It is a pretty simple operation. Other than that they are not processing all the milk from the farm there is no change to the milk processing operation.

Rabbi Bob is experimenting with making yogurt. This may be a future addition to the organic program.

## Management

Robert Franklin (Rabbi Bob) is the owner and manager.

## Certification History

This is a renewal application for organic certification with Natural Food Certifiers (NFC). Last year there were not many records for the farm and none for the processing plant which had not begun operation. The overall record keeping is much improved but as noted in my Exit Interview more detail in some areas would be good.

## Permits, Registrations and Inspections

Bethel Creamery has a license with the New York State Department of Agriculture and Markets. The milk is Kosher certified. There are inspections by NY Dept. of Agriculture and Markets of the facility.

## Organic Plan Verification

The OSP was verified as accurate. No changes to the process flow or cleaning materials used. Again the only change of note is that not all the milk is being bottled. Much of the organic milk is being shipped to Organic Valley.

## Products, Ingredients and Processing Aid

There is one product. This is whole milk from the cows on the farm. Culinary steam is used as a processing aid, see the Water section for description.

## Product Flow and Equipment

There is an accurate product flow diagram in the OSP.

The milk is transferred from the raw bulk tank in the milk room to the milk process room.

The raw milk enters the Vat pasteurizer which uses jacketed steam to heat the milk. Culinary steam is also used as needed to bring the temperature of the milk up. I spoke with the person who sold the equipment and was installing it when I was there last year. He stated at the time that there are no chemical additives used in the



# Organic Handling/Processing Inspection Report for Natural Food Certifiers

(b) (6)

Organic Certification Inspector

system.

The milk is heated for the required time at the temperature needed and is then partly chilled right in the pasteurizer. The pasteurized milk now goes into the chiller to cool the milk. From the chiller the milk goes into the pasteurized product tank and from there into the 2 Valve Semi-Automatic bottler where the milk is put into 1/2 gallon bottles.

The bottles of milk are date coded, placed in plastic cases and put in the refrigerator to stay cold until loaded into a refrigerated truck for delivery.

## Waste Management

There is minimal waste from this process. Waste milk will be fed to calves. Other waste will be sent down the drain if liquid and into dumpsters if bulky.

## Water

The water on site comes from an on-site well. The water is filtered with a simple cartridge filter.

Steam is used as jacketed steam and as direct contact culinary steam used in the pasteurization process. The vendor states no chemicals used in the steam boiler and there are none to be used. As part of the licensing with the New York Department of Agriculture and Markets the well water is tested. It has been found to be potable.

## Quality Assurance

Quality Control here will be by Rabbi Bob and his helpers. This is a very small operation. There is not any written QC/QA plan. There is no written HACCP plan. Milk sold to Organic Valley is tested by Organic Valley. The State also inspects and tests.

## Storage Equipment and Facilities

The raw milk tank is in a room adjacent to the milk process area. This tank is locked at all times. The processing room will not have storage except short term in the system during processing and the bottled milk which is kept in a 300 - 1/2 gallon bottle capacity reefer unit in the processing area.

## Pest Management

The applicant claims there are no issues with pests. They have dogs and cats on the farm. Barn lime is used in the barn for fly control. A bug zapper is used in the barn as needed in season for flying insects.

In the processing area sanitation and exclusion will be the pest control. The milk remains contained in the system at all times which protects it from pests and outside contaminants.

This area has been renovated when the processing equipment was installed so the area is well sealed at all doors and windows.

## Sanitation

Cleaning and sanitation will take place after each processing/bottling run. The system is cleaned with a CIP set-up that runs automatically with the chemicals metered out. There is a sink for COP items that need to be cleaned and sanitized.

There are MSDS sheets for the products used in the OSP. These chemicals are unchanged from last year.

The caustic cleaner is Meck PF from Safeway Industries, Inc. This product contains Potassium Hydroxide and Sodium Hypochlorite.

The acid sanitizer used is Superior Acid Cleaner Plus from Safeway Industries, Inc. This product contains Phosphoric acid and Sulfuric acid. Clean water is used to rinse.

## Transportation

The outbound bottled milk is shipped in a Bethel Livestock Farm refrigerated truck.

## Packaging

The package used is a standard food grade 1/2 gallon plastic milk bottle. The bottles are placed in plastic crates for transport.

## Labeling

The label approved last year is the one in use. Each bottle is date coded.

# Organic Handling/Processing Inspection Report for Natural Food Certifiers

(b) (6)

Organic Certification Inspector

## Audit Trail

There is a minimal paper trail here but much improved from last year. Much of the milk is being shipped to Organic Valley. There are milk tickets and documentation from Organic Valley verifying the amount of milk sold to them. In the processing operation the date and number of gallons made is recorded for each production. There are sales records for the bottled milk.

## Inspector's Sample Audit

There are good records of the milk being sold to Organic Valley. There are records of each production of bottled milk. I verified the production amounts listed in the application. They are in line with the number of milkers on the farm. These records were all reviewed and found to be in order.

## Sampling

None requested

## Other Considerations/Summary

The milk plant is run just once or twice a week. This is enough to meet the sales at this time. It is hoped that more sales will mean more production of the bottled product and less milk being shipped to Organic Valley.

## Exit Interview

- 1- Good progress from last year. Record keeping is much improved. Still can add more detail.
- 2 - Hay production down this year from last. Farmer may have to buy some organic hay. Plenty of organic hay available
- 3 - Animals have been very healthy this year.

## List of Attachments

none

The information contained in this report is confidential between the Inspector, the inspected party and the certification agent. This report does not constitute certification or consultation, nor should it be used for promotional purposes. All compliance assessments are made in reference to the standards and policies of the Certification Body, and are based on the inspector's observations, review of documents and operator interview.

(b) (6)

# Organic Farm and Livestock Certification Report

(b) (6)

, Independent Organic Certification Inspector

**Operation Name** - Pelleh Farms dba Bethel Livestock Farm dba Bethel Creamery

**Operator Name(s)** - Robert Franklin (Rabbi Bob)

**Phone** - 845-583-6059

**Fax** - 845-583-0007

**Certification Agency** - Natural Food Certifiers

**Certification Number** - 770092010

**Inspector** - (b) (6)

**Inspection Date** - November 2, 2011

## Introduction/Background

Bethel Livestock Farm (BLF) is a small Kosher Organic dairy operation located in the heart of the Catskill Mountains of New York. Robert Franklin (Rabbi Bob) is the operator of this farm. This is a renewal application with Natural Food Certifiers (NFC) for BLF's Dairy operation as well as a small on farm milk processing plant (Bethel Creamery) to handle and bottle milk from the farm cows.

The milk processing (Bethel Creamery) is a separate Handling application and will be covered in a separate report.

The farmer has owned this farm since 1981. The main farm is 88 acres. There is a Kosher chicken processing plant on the farm across from the dairy operation. They are processing around 4,000 to 5,000 birds a week.. The poultry operation is run by Rabbi Bob's son. They were raising veal calves with the excess males from the dairy. This part of the operation has been discontinued for now. The chicken, veal and dairy operations are all Kosher compliant.

There are some leased fields that are not going to continue in the program after this season. There are 3 new options for fields all more or less adjacent to or very near the main farm. Rabbi Bob will decide soon on at least some of these fields being added to the organic program. He is aware of what needs to be sent to NFC as far as history of the fields and maps, etc to include any new fields in the plan.

The hay harvest was much less then last year due to the poor hay weather this past season. Rabbi Bob will have to buy some organic hay this year. He has plenty of possible sources for organic hay.

## Certification History/Previous Non-compliance

This is a renewal application for certification. There are no outstanding compliance issues from the previous year.

Last years non-compliances were as follows;

1 - Record keeping

A - Inputs (manure spreading). This is now recorded on a calender. The number of loads per field are recorded. The amount of manure per load is the roughly the same each load.

B - Feed receipts - These are now kept in a file.

C - Hay production records - The bale counter on the balers (round and square) is now used to keep track of hay production.

## Farm/Field History

(b) (6)

, Independent Organic Certification Inspector (b) (6)

# Organic Farm and Livestock Certification Report

(b) (6), Independent Organic Certification Inspector

There is a Farm History document filled out as part of the Organic Farm Plan (OFP). There are maps of the fields. I found the maps and written field history to be accurate. We visited all the fields in the OSP. I did not find any changes other than one residence has new owners, still no concerns for the farmer there.

The main farm of 88 acres has been in the applicants control since 1981. Prior to that the farm was a dairy and vegetable farm until 1969 when the dairy went out and 1976 was the end of the vegetable operations.

This owner/farmer has used only manure and minerals on the land since 1981.

Fields 1-13 are the fields on the main farm. Field 8 is a new field created by logging the woods, removing the stumps and building the land.

Fields 14-21 are on leased land all under the applicants control since 2007 or before, most of them for many, many years.

As mentioned above there are a couple fields that will be dropped from the program and there may be additional fields added.

The other component of the farm is a chicken processing plant processing 4-5 thousand Kosher birds a week. The chickens are brought in for slaughter, not raised here.

The conventional veal calf operation has been discontinued for now.

## Crop Profile

The only crop raised here is pasture/hay.

The hay is processed as baled hay (square and round) and haylage. This was a poor season for hay making. The supply is far less than last year but the late warm fall has enabled more late season hay/haylage. Nonetheless some organic hay will have to be purchased. There are many sources of organic hay in the region.

The hay fields are in permanent sod.

Many of the fields serve both as pasture and for hay.

In the spring and fall when the drying of the grass is a real challenge they make most of the haylage. Dry squares and rounds are made mid-season and when possible in spring and fall.

The 2010 hay harvest was 504 round bales. One third of these were dry bales and two thirds were haylage. There were 6112 square bales made in 2010. For 2011 so far there are 281 round bales, 160 in haylage. There have been 5274 square bales made so far in 2011. The mild weather this fall has enabled later harvests so there will be a bit more in the total production by the end of the season.

## Organic Plan Verification

The Farm and Livestock short forms were used this year for the renewal. The short form was verified and the long form was reviewed to assure no changes to it.

As is always the case with dairy farms a change in the number of milkers has occurred since the application. There are now 24 milkers up from 21 listed on the application. This number is always changing as cows are dried off and others come back into milk.

## Seeds, Seedlings, Perennial Planting Stock

The only seed purchased in many years was the seed purchased for field 8 after it was cleared of trees and stumps and made into a field prior to last year's inspection. A Timothy/clover mix was used. The seed was from Ampac Seed. It was not treated with mold inhibitor. It is not certified organic seed.

There has not been any other reseeding of the hayfields.

Depending on the which options for new fields are used, there may be some reseeding of

# Organic Farm and Livestock Certification Report

(b) (6)

, Independent Organic Certification Inspector

some of the new fields.

## **Fertility and Nutrient Management**

The fields have been managed by the farmer with just manure applied and at times limestone. Timely mowing is done to eliminate weeds. All fields were inspected and found to be in good health.

There are adequate pasture/fields for grazing and hay in a normal year. This season was unusual. The hay crop was less than normal due to weather conditions this year. Some organic hay will need to be purchased. The farmer rotates the cows in large areas (not intensive rotation) and hays the pastures when they get high if the cows can't keep up with growth.

The manures used on the fields are cow, duck and chicken.

The applicant still has not had soil tests done. As I said above the fields all appear to be in good health.

At the time of the first inspection records of inputs had not been kept. NFC asked the farmer to do so. A calendar is used to record the inputs. The constant is that the cow manure is spread in a Gehl spreader which holds 1200 gallons. The duck manure is spread with a 3000 gallon spreader. There was no chicken manure used this year. So the farmer records the number of loads, type of manure and fields applied to. This is a great improvement.

## **Manure Management**

The manure produced on the farm is spread on the fields year round except the dead of winter. The farmer tries to get the manure out on the fields right away to avoid stockpiling.

Hay is used for bedding and barn lime is used for insect/odor control.

A large cement pad was installed last year for loafing near the barn for the cows. Part of this pad was being installed the day of the inspection in 2010. This addition has made the cleaning of the barn and areas around it much easier.

The calf pens and milker stanchion area is cleaned once or twice a day. The other areas are cleaned as needed at least once a week.

## **Compost/ Bulk Organic Matter**

Only manure is used. No Bulk organic matter or compost used.

## **Pest, Weed and Disease Control**

There are no pest or disease problems with the hay fields or pastures. Some perennial weeds (golden rod, milk weed, rag weed, etc) can be found in the fields but not of any quantity. Timely mowing of the areas where the weeds are trying to invade is done.

I looked at all the fields in the program. I would rate them as very good to excellent as far as good sod with minimal weeds and strong healthy grass for late fall.

The barn stanchions and calf pens are cleaned daily and barn lime is used in the barn to reduce flies.

The cows are rotated in the fields which helps with fly control.

## **Harvest/Storage**

The hay is harvested as small square bales, big round bales both dry and as haylage/balage. The square bales are stored in a barn. The round bales are stored some inside and some out of the various barns and sheds. The haylage/balage is in the barnyard in the standard plastic wrap tubes.

The harvest equipment is all owned by the farmer and is used only on this farm.

(b) (6)

, Independent Organic Certification Inspector (b) (6)

# Organic Farm and Livestock Certification Report

(b) (6)

, Independent Organic Certification Inspector

## Water

The water used is from the on-farm well. A simple cartridge filter is used to filter the well water. There is water available at all times for the animals at the barn and in the pastures. In addition to the well there is a spring in field #10 where the heifers can drink. The access to this area is limited and is a solid area with tree roots and rocks which prevent erosion.

A water test is done as part of the milk process plant licensing. The water is potable.

## Adjoining Land Use/Buffer

There are no agricultural uses on the borders of this operation. The primary border is woods for most fields other than the farm fields in organic production. There are a couple residential homes which adjoin small areas of borders. There are new owners of one home. There do not appear to be any issues with these properties at this time. They all have at least between 10-25' or more between the lawn and plantings and the field. The farmer understands he needs to monitor activities on these borders and tries to maintain good communications with the neighbors.

## Split or Parallel Production

The dairy operation is all organic. It is a closed herd with only a new bull bought in as needed to maintain herd integrity

In the past veal calves were raised on the farm in the dairy barn. These were not raised as organic. The surplus males from the dairy operation are used in this veal operation. The veal calves were fed organic milk, pasture and the same hay as the organic cows but were not raised as organic. Antibiotics were used at times on these animals. This activity has been discontinued at this time.

Across the street from the cow barn is a chicken processing (4-5 thousand a week) facility which is part of the farm complex and is run by Rabbi Bob's son. These are Kosher certified processed birds.

## Equipment

The farmer has adequate farm equipment to meet and exceed the needs of the farm. The equipment appeared to be in good condition. Much of the equipment is stored under cover.

The equipment is used only on this farm.

The only equipment contracted is the trucks that spread the liquid manure on the fields and the lime spreader truck.

## Livestock Profile

This closed herd is a mix of Jersey, Holstein and crosses of the two. A Jersey bull is used. On the day of the inspection the wet milk cows numbered 24. One dry cow and 13 bred heifers. There are 12 heifer yearling calves and 21 heifer calves under a year. There are two bulls.

There was one cow with an injured foot. This cow will be sold out of the herd.

## Origin Of Livestock

This is a closed herd. The only new animal is when a new bull is brought in to keep the genetics strong. There are two Jersey bulls.

The herd started out as Holstein and Jerseys and has become an interesting blend of the two breeds.

The animals of all ages appeared in good condition and health. They had good coats for

(b) (6)

Independent Organic Certification Inspector (b) (6)



# Organic Farm and Livestock Certification Report

(b) (6), Independent Organic Certification Inspector

the coming winter and were engaged in normal activity on pasture when observed.

## Living Conditions

The barns and surrounding areas are well maintained and kept pretty clean. There was not much fly activity observed. The cows were all out on pasture. The pastures are large with adequate areas for shade and shelter. There is adequate roofed shelter for all animals when needed in severe weather. Chopped mulch hay from the farm is used as bedding in the barns. Sawdust from a local mill has at times been used as bedding.

The cows have access to the outdoors at all times except in the most extreme weather.

There is a large concrete pad near the barn for a loafing area that is easy to clean.

Barn lime is used after daily cleaning of the barn for fly control.

All young stock was on pasture by the barn.

The larger heifers and milk cows were all on pasture.

There are stanchions for the milkers and many additional pens in the main barn. There are a number of other buildings (run in sheds) used for housing/shelter for the animals as needed.

## Feed and Feed Supplements

The primary feed for all animals is hay grown on the farm fields. This is eaten fresh in season and as conserved forage in the winter.

The grazing season here runs from early May to near the end of November. This 7 months would be the maximum. The time when there is adequate graze may be closer to 6 months most years. It is well above the 120 day minimum required.

The milkers get 4-5 pounds of mixed grains and minerals a day. In the summer this amount is often reduced or eliminated altogether when there is so much good pasture.

The cows eat a couple pounds of dry hay while in for their milking.

The heifers are fed grain for about 1 month after weaning. They are on pasture from very young.

The conserved hay is in the form of small square bales, large round bales and as haylage stored in plastic wrap tubes.

The organic grain mix used is from Cold Spring Farm. The farm usually buys 6 tons at a time. This mix contains grains and supplements (dairy minerals, Redmond salt, kelp meal, feed grade lime/calcium carbonate, organic molasses).

All feed tickets from Cold Spring were ready for review. I found them to be in order and that enough organic grain has been purchased to meet the stated rations used for the animals.

The heifers are fed grain for about a month after they are weaned from milk at about 3 months. After that they are on straight hay until they are ready to birth their first calf. The milkers get a ration of 4-5 pounds of grain a day.

In late summer and fall if the pastures are running out, sometimes the cows are kept in smaller lots ( 1 and 2 acre) near the barnyard for the night after milking and let back to pasture after the morning milking. At these times the cows are fed additional conserved forage as needed while in these areas. The main pastures were still pretty strong with plenty of feed at the time of my visit in early November.

The only other feed supplement used are mineral blocks, OMRI listed (product #red-0214) Redmond Natural Mineral Salt Block. The OMRI certificate is in the OLP.

## Pasture

The farmer has completed his DMI calculations and sent records with his application.

# Organic Farm and Livestock Certification Report

(b) (6)

, Independent Organic Certification Inspector

There is no question that these animals more than meet the requirements of the NOP for DMI and pasture access.

The pasture for the milkers (24 at this time) consists of 3 main fields of 5, 8 and 10 acres plus smaller lots of 1 and 2 acres around the barn area. The total of these pastures is over 30 acres.

The farmer uses a rotation that is not intensive. He believes the larger lots for grazing are more suited to the cows natural life. These 3 main lots often have to be hayed to remove excess forage that the cows can not keep up with. This year even though there was not enough hay harvest it was due mainly to overly wet conditions. The pastures have been growing well this year.

The heifers have about 55 acres that they are moved around on. The remainder of the 55 acres is hayed.

The small heifer calves are put on pasture before 3 months in a 2 acre lot near the barn. Attachment 1 is a copy of the Organic Valley Pasture Audit.

## Animal Health

The farmer has started to keep better records all around including health records.

There was one cow culled because she had mastitis. Another stepped on her udder causing permanent damage so she was culled. Then there is the cow mentioned that has a permanently injured foot so she can't stand or walk. She is to be culled. Other than that there have not been any issues of animal health requiring medications or any other medical attention.

For most cases of mastitis, the farmer milks the mastitis affected cow or the affected quarters of the cow and separate it from the good milk.

The medications on hand at the time of inspection were Durvet Iodine 7%, Durvet Dextrose 50%, Isopropyl alcohol, Blue Kote, Durvet Calcium Glucotomate, Vedco Veda Sorb Bolus.

The animals are de-horned with a steel clipper. This is to prevent injury to each other and to the people working with them.

The farmer says he has not had any issues with internal parasites with the cows.

Right after the inspection last year the teat dip was changed per request of the certifier. A complaint iodine teat dip is used. It is Bova Pro 110 Teat Dip with 1% iodine.

## Breeding/Reproduction

The breeding is natural for this closed herd. The only animal added is a bull as needed.

There are 2 bulls at this time, both Jersey.

The herd is composed of Jersey and Holstein breeds and crosses between the two.

Many of the females are kept for replacements.

## Milk Handling

The cows are milked twice a day in stanchions by machine. The milk travels by pipe to the milk tank. The milk tank is kept locked per the Rabbi for Kosher.

The pipelines and tank are cleaned with 140F water. There is a rinse cycle then detergent cycle and rinse after milking. Just before milking, chlorine bleach sanitizer is used.

Some of the organic milk is processed on farm. The milk process is covered in the Handling report. The rest of the milk is picked up, sold to Organic Valley.

## Transportation

Hay is brought from the field to the storage by tractors, wagons and trucks. Milk trucks pick up the milk sold to Organic Valley. Bottled milk is delivered in a refrigerated truck.

(b) (6)

, Independent Organic Certification Inspector (b) (6)



# Organic Farm and Livestock Certification Report

(b) (6), Independent Organic Certification Inspector

## Audit Trail

The record keeping is improved from last year. A calender is being used to record inputs (amounts, day and field) and health issues. Also records of the amount of hay harvested are being kept. The feed slips were all in one place for easy review.

The newly required pasture access, DMI records are being kept.

Milk production records are kept.

The animals have both a number and a name for ID.

## Summary/Issues

I did not find any issues of concern. This is a well-run farm. The lack of many records were the main issue last year. This year the records are much improved though I note that more detail could be added.

## Exit Interview

1- Good progress from last year. Record keeping is much improved. Still can add more detail.

2 - Hay production down this year from last. Farmer may have to but some organic hay. Plenty of organic hay available

3 - Animals have been very healthy this year.

## Attachments

1 - Organic Valley Pasture Audit

(b) (6)

Date

The information in this report is confidential between the Inspector, the Inspected Party and the Certification Agent. The findings of this report do not constitute certification or consultation, nor should it be used for promotional purposes. This is an evaluation of the applicant's operation in reference to the standards and policies of the Certification Agent. All recommendations contained in this report are intended to be subject to review by the Certification Agent who will be responsible for final certification decisions regarding the

## Bethel Livestock Farm- Organic Milk

We purchased our farm 29 years ago in 1981. Our 88 acres was previously operated as a conventional dairy and vegetable farm. The dairy retired in 1969, and the vegetable farm closed in 1976. The last farm adjacent to our owned or leased fields went out of business 8 years ago. As our farm developed over the years, starting with beef and sheep, now mostly dairy cows, we brought back one field after another to hay and pasture production. Our system was a simple one, of aggressive mowing and application of cow, chicken and/or duck manure. None of the old fields were plowed or reseeded. More recently, 2 years ago, we logged off 8 acres and cleared the sumps in preparation for seeding. Besides cow and chicken manure, we applied about 5 tons per acre of purchased ground limestone to the soil to adjust the pH. After disking, we seeded the field with timothy/alsike clover pasture mix and a cover crop of annual winter rye.

As is indicated in our application forms, our milking cows graze the fields during the growing season which are accessible from the dairy barn. There are three main fields of 5, 8, and 10 acres between which the cows are rotated. Depending on the season and weather, one field might be mowed for hay while the cows graze another field. A typical scenario would then be for the cows to move to the third field while the mowed field grows back and the previously grazed field is clipped to control weeds and generate a fresh growth of grass for hay or grazing. This rotation continues throughout the growing season (May-November), though mowing for hay on these fields is normally done only before June 15<sup>th</sup>. The number of days the herd spends on one field depends on the season, but rarely exceeds more than 10 days.

There are also 2-acre and 1-acre lots adjacent to the milking barn. Toward fall when the grass replenishes itself more slowly, the milking cows spend the night in these lots. This places less stress on the late season fields. Here they have free access to fresh water, hay, some grass and run-in sheds. After morning milking they're back to the regular fields.

We specifically do not use an intensive grazing system. My opinion, partially based on my experience as a professional wildlife biologist, partially based on observation, is that the intensive system adds considerable stress on wildlife populations. It may be a more efficient use of available grass to be converted to milk, but the disruption of bird and wildlife nesting and movement is not worth it to me. I believe the cows also prefer their favorite resting and grazing patterns in the larger fields that they get to know and recognize year after year, resulting in less stress on the cows as well.

Heifers are out on pasture from May through November. They are divided into three groups according to age and size. We try to get new heifers on pasture before three months of age in a 2 acre lot in front of our house where we can keep an eye on them. The other larger heifers have about 55 acres alternating between hay making and grazing divided into 8 separate fields. The ones that are old enough to breed are kept with a bull on a 2 acre lot and a run-in shed. They have free access to hay, grass, water and the outdoors.



During the winter when our livestock is eating exclusively hay and haylage, the heifers and dry cows are kept outside with free access to come in out of the weather. The milking cows are also managed like this with two exceptions; they come into the stanchion barn twice a day for milking and are kept inside only in extremely cold and windy weather for their own comfort and to prevent the pipes from freezing.

We produce all our own hay for the cows. Manure is spread on the fields closest to the barn during the winter. Otherwise we usually spread manure immediately after hay is harvested to keep the soil productivity higher at a time when we are removing crops from it. This usually allows us to harvest 3 or 4 cuttings of highly nutritious hay from most of our fields.

Most of the mid-summer second and third cutting hay is dried and stored as square or round bales. Early and late season hay, when it is difficult to dry due to shorter day lengths, we make round bales of damp hay stored and fermented in plastic tubes which are fed to the cows and heifers outside during the winter.

Trace mineral salt blocks are made available to the cows and heifers at all times.

Grain is fed on a very limited basis. We purchase this feed in bulk form from Cold Springs Farm in Sharon Springs, NY. They are a NOFA certified grower and processor of organic animal feeds. Our milking cows get about 5 lbs. of this feed twice a day just before milking. Heifers get feed for about 1 month while they are being weaned from milk at about 3 months of age. Besides that, our heifers are raised only on high quality pasture or hay until they are ready to have their first calf.

We have never run short of hay. In fact we usually have enough to sell some. However, as a contingency plan we are in contact with other organic farms in neighboring counties that sell hay. The closest one is only 20 minutes away in Damascus, PA.

At this point we intend to market only pasteurized whole fluid milk. No ingredients will be added to this product. Included is a blueprint showing the layout of equipment and product flow.

If yes, how is equipment cleaned prior to processing organic feed to prevent contamination? \_\_\_\_\_

What is your plan for emergency feed supplies? ORGANIC HAY AVAILABLE FOR SALE IN  
NEIGHBORING COUNTIES. THERE ARE OTHER ORGANIC FEED MILLS IN PA. & N.Y. (KREMER, FOR EX.)

**B. FEED SUPPLEMENTS AND ADDITIVES:**

☐ No supplements used ☐ No Changes

List ALL feed supplements and additives used in the organic livestock operation:

| FEED SUPPLEMENT/<br>ADDITIVE | SOURCE               | SYNTHETIC INGREDIENTS<br>YES (Y) OR NO (N) | GEO?<br>YES (Y) OR NO (N) | REASON FOR<br>USE                             |
|------------------------------|----------------------|--|---------------------------|---|
| TRACE-MINERAL<br>SALT BLOCK  | LOCAL FEED<br>DEALER | N  | N                         | NECESSARY FOR <del>ANIMAL</del> ANIMAL HEALTH |
|                              |                      |  |                           |   |
|                              |                      |  |                           |   |
|                              |                      |  |                           |   |

**C. FEED STORAGE:**

Describe your feed storage locations:

| STORAGE<br>ID# | TYPE OF FEED<br>STORED | TYPE OF<br>STORAGE | CAPACITY | ORGANIC (O), TRANSITIONAL (T),<br>CONVENTIONAL (C), BUFFER (B) |
|----------------|------------------------|--------------------|----------|--|
| 1              | DAIRY RATION           | BULK BIN           | 6 TONS.  | O  |
|                |                        |                    |          |  |
|                |                        |                    |          |  |
|                |                        |                    |          |  |
|                |                        |                    |          |  |

How do you control rodents in organic feed storage areas?

☐ No rodent problems

CATS CLOSED METAL BIN

## SECTION 5: Water

What are your sources of water for livestock use?

☒ on-site well ☐ municipal ☐ river/creek/pond ☒ spring ☐ other \_\_\_\_\_

If you use additives in the water, list them and state reason for use:

☒ No additives used

Describe any water contamination problems in your region:

☒ No contamination problems

If livestock have access to a river, creek, or pond, how do you prevent bank erosion?

☒ No access

MOST RIPARIAN HABITAT IS FENCED OFF TO PREVENT EROSION.  
ONE PASTURE (#10) HAS LIMITED ACCESS FOR HEIFERS TO DRINK  
IN A PLACE WHERE DENSE TREE ROOTS, STONE AND SAND PREVENT  
SERIOUS EROSION PROBLEMS.



## SECTION 6: Housing

NOP Organic standards require that livestock living conditions provide reasonable freedom of movement, lack of crowding, proper sanitation, fresh air, sunshine, appropriate shelter and adequate bedding.

What type of housing do you use? CALVES FIRST 2-3 WEEKS INDIVIDUAL & GROUP ☐ No Changes  
PENS IN THE STATION BARN. ALL OTHERS RUN-IN SHEDS WITH FREE  
ACCESS TO THE OUTDOORS

Describe sizes (length x width) and number of animals per housing unit: VARIOUS BUILDING FROM 12x30  
TO 40x75, NUMBER OF ANIMALS FROM 8-20, GROUPED BY AGE AND SIZE

Describe type(s) of bedding: CHOPPED MULCH HAY, SAW DUST

How often is housing cleaned out? AT LEAST ONCE / WEEK  
CALF PENS AND MILKING STATIONS ONCE OR TWICE / DAY

How is housing cleaned? SMALLER PENS & STATIONS BY HAND (RAKE, SCRAPER)  
LARGER PENS WITH SKID LOADER

Describe sanitation or cleaning products used: HYDRATED LIME, CHLORINE BLEACH IF  
NECESSARY IN CALF PENS

What source(s) of light is used in animal housing? FLORECENT LIGHTS IN  
MILKING BARN

Is day length regulated using artificial light? ☐ yes ☒ no

What outdoor areas other than pasture do animals use? CONCRETE LOAFING AREA FOR  
MILKING COWS ADJACENT TO STATION BARN

How long are animals indoors (hours per day)? FREE CHOICE ☒ spring ☒ summer ☒ fall ☒ winter  
MILKIN COWS, BREEDING BULLS, LARGER HEIFERS INSIDE IN WINTER ONLY IN MOST  
EXTREME WEATHER

## SECTION 7: Health Management

### A. General Information:

Identify the general components of your animal health management program:

- ☒ selective breeding ☒ raise own replacement stock ☒ isolation for purchased/diseased animals ☒ culling  
☐ vaccinations ☒ good sanitation ☒ access to outdoors ☒ dry bedding ☒ good ventilation in housing  
☒ good quality feed ☒ pasture rotation ☒ nutritional supplements ☐ probiotics  
☐ other: \_\_\_\_\_

| A. List health or disease problems in the last 12 months, including vaccinations given or planned: |           |  |                 | <input type="checkbox"/> No problems             |
|--|-----------|--|-----------------|--|
| HEALTH PROBLEM/DISEASE   | ANIMAL ID | PREVENTION AND MANAGEMENT PRACTICES  | PRODUCT(S) USED | APPROVED (A)<br>RESTRICTED (R)<br>PROHIBITED (P) |
| TESTED FOR<br>POSITIVE FOR<br>STAFF AUREUS<br>MASTITIS   | 8         | NOW IN PROCESS   | NONE            |  |
|  | GOLDY     | CULLED OF CONSTRUCTION<br>CONCRETE LOADING<br>PAD FOR WINTER<br>& SPRING USE WHICH CAN MORE EASILY BE<br>CLEANED & SANITIZED TO PREVENT INFECTIONS |                 |  |
|  | ASIA      |  |                 |  |
|  | MOBY DICK |  |                 |  |
|  | RATSY     |  |                 |  |

If you use any hormones, list and state reason for use: ☒ Not used

---

If you use antibiotics, list in table above. ☒ Not used

If you use parasiticides, list in table above. ☒ Not used

If you use vaccinations, list in table above. ☒ Not used

**B. FLY CONTROL:** ☒ Not a problem

If flies are a problem in your operation, what do you do to prevent or control them?

STATION BARN IS KEPT CLEAN AND DRY.

IN FLY SEASON WE SOMETIMES KEEP AN ELECTRONIC "FLY ZAPPER"

HANGING IN THE BARN.

**C. PARASITE CONTROL:** ☒ Not a problem

If internal or external parasites are a problem in your operation, what are they and how do you prevent or control them?

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**D. PREDATOR CONTROL:** ☐ No Changes

Check which predators you have problems with: ☐ hawks ☐ feral cats ☐ raccoons/skunks, etc.

☐ dogs ☐ foxes ☐ coyotes ☐ other NOT A PROBLEM

Describe how you handle predator problems in this table:

| PREDATOR PROBLEM | CONTROLS USED | PRODUCTS USED | APPROVED (A)<br>RESTRICTED (R)<br>PROHIBITED (P) |
|------------------|---------------|---------------|--|
|                  |               |               |  |
|                  |               |               |  |
|                  |               |               |  |

If you use poison baits, list products in the table above. ☒ None used



E. SURGICAL PRACTICES:

☐ No Changes

Describe surgical practices you use:

☐ Not used

| SURGICAL PRACTICE      | WHY USED?  |
|------------------------|--|
| Castration <u>NO</u>   |  |
| Dehorning <u>YES</u>   | <u>STEEL CLIPPERS - TO PREVENT COWS FROM INJURING EACH OTHER OR US</u> |
| Tail docking <u>NO</u> |  |
| Other:                 |  |

**SECTION 8: Manure Management**

What forms of manure do you use: ☒ liquid ☒ semi-solid/piled ☒ fully composted ☐ No Changes

If manure from your livestock is used on your fields, describe how it is used:

☐ Not used

SPREAD WITH MANURE SPREADER

Acres/hectares of land available for manure application: \_\_\_\_\_

List ingredients/additives (example: bedding, barn lime, inoculants, preservatives) \_\_\_\_\_

BEDDING, BARN LIME

During what months do you apply manure/compost? YEAR ROUND

Describe your composting method(s):

☐ Composting not used

Estimated quantity of manure generated per year: \_\_\_\_\_ tons

**SECTION 9: Milk Handling**

What type of milk handling system do you use:

☐ No Changes ☐ We are not a dairy operation

☒ pipeline ☐ automated ☐ step saver ☐ hand milking ☐ parlor ☐ tie stalls ☒ stanchions ☐ other \_\_\_\_\_

How are you licensed? ☐ Grade A ☐ Grade B ☐ other NOT LICENSED YET

Describe cleaning cycle for milking equipment (water temperature, number of rinses, etc.):

WATER TEMP. 140° RINSE/DETERGENT CYCLE/RINSE AFTER MILKING  
SANITIZER JUST BEFORE MILKING

Name of detergent used: MECK PHOSPHATE-FREE NON-FOAMING CHLORINATED CLEANER

Name of acid cleaner used: NONE

Name of sanitizer used: CHLORINE BLEACH



List products used to clean animals:

☐ None used

Teat dips DON'S CHG TEAT TREATMENT (CHLORHEXIDINE SPRAY) PRE AND POST MILKING

Udder washes \_\_\_\_\_

How often do you change inflations? EVERY 2-3 MONTHS

How many animals do you currently milk? 21

Report production for the last six milkings:

| DATE  | POUNDS PRODUCED | DATE | POUNDS PRODUCED | DATE | POUNDS PRODUCED |
|---|-----------------|------|-----------------|------|-----------------|
| NO RECORDS ARE KEPT BECAUSE WE DON'T SHIP MILK, HOWEVER OUR |                 |      |                 |      |                 |
| HERD AVERAGE IS ABOUT 40 LB./DAY                            |                 |      |                 |      |                 |

### SECTION 10: Handling for Slaughter

☐ No Changes ☐ We don't slaughter

If you slaughter your livestock, describe slaughter and meat processing procedures:

Name, address, and phone number of facility where your animals are slaughtered: \_\_\_\_\_

Contact person \_\_\_\_\_ Is the facility certified organic? ☐ yes ☐ no By what agency? \_\_\_\_\_

How are animals loaded? \_\_\_\_\_

Do you use electric prods? ☐ yes ☐ no

What form of transportation is used? \_\_\_\_\_

How long does transportation take? \_\_\_\_\_

Are animals provided with food in transit? ☐ yes ☐ no Water? ☐ yes ☐ no

Where are animals kept after delivery to slaughter facility but before slaughter? \_\_\_\_\_

How many hours from loading until time of slaughter? \_\_\_\_\_

Are organic animals kept separate from non-organic animals? ☐ yes ☐ no

Describe the method of slaughter: \_\_\_\_\_

### SECTION 11: Animal Identification

Describe your identification system: EAR TAGS / NAMES ☐ No Changes

If animals are treated with prohibited materials, how are they identified and/or segregated? \_\_\_\_\_

## SECTION 12: Recordkeeping

*NOP standards require documentation of purchased animals and/or breeding records; purchased feed and feed supplements; health records; and sales/shipping records. Please have your records available for review by the inspector.*

Check types of records you keep:

☐ No Changes

- ☐ documentation of purchased animals ☒ breeding ☒ purchased feed/feed supplements ☐ feed labels  
☐ health ☐ somatic cell/plate count ☐ milk production ☒ sales ☐ feed storage ☒ shipping/transportation  
☐ slaughter ☐ other \_\_\_\_\_

## SECTION 13: Marketing

TYPE OF MARKETING:

☐ No Changes

- ☐ farmers market ☒ direct to retail ☐ CSA/subscription service ☒ on-farm retail ☐ wholesale  
☐ wholesale to processor ☐ contract to buyer ☐ other \_\_\_\_\_

Do you plan to use the seal of this certification agency or of the USDA on organic product labels? ☒ yes ☐ no  
(Attach examples of all organic product labels.)

## SECTION 14: Certification Services

Rate services provided by this certification agency: ☐ excellent ☐ satisfactory ☐ needs improvement

Please comment \_\_\_\_\_

[ NFC holds the Secretary harmless [liable] for any failure on the part of NFC to carry out the provisions of the NOP regulations.]

## SECTION 15: Affirmation

I affirm that all statements made in this application are true and correct. I agree to comply with the USDA - National Organic Program Rules and Regulations. I understand that my company's facility may be subject to unannounced inspection and/or organic products may be sampled and tested for residues at any time. I agree to provide further information as required by the Natural Food Certifiers, the Administrator, or the state organic program in the area(s) of my operations.

Signature of Owner/Manager

Date

3/18/10

Signature of Operator

Date

3/18/10

I have attached the following additional documents:

- ☒ **Maps of the operation** (including pasture/rotational grazing areas and showing adjoining land use and identification)
- ☒ **Directions to farm/ranch**
- ☐ **Water test, if applicable**
- ☒ **Pasture History Sheet** (if applicable)
- ☐ **Organic product labels for your products** (if applicable)





\*

## NFC Organic Farm Certification Application

Please fill out this form if you are requesting organic certification of your agricultural production. For reference use the NOP standards, and the "NFC Procedural Outline for Organic Certification" manual that you received with your original application package.

You must submit an Organic farm system plan with this application. This is a written plan that sketches out the various plans you have for your organic operation for the next year See section 205.201 of the NOP standards for a detailed description what you should include.

Use additional sheets if necessary. Attachments required with questionnaire: Directions to your farm operation; farm map showing all fields, pasture areas and buildings and Pasture History Sheets.

For current NFC clients, use the NFC Short Form. Attach Poultry Pasture History sheets for new areas or changes in pastures, and applicable test results.

### SECTION 1: General Information

|  |   |   |  |   |                             |                       |
|--|---|---|--|---|-----------------------------|-----------------------|
| Name<br><b>ROBERT FRANKLIN</b>   |   | Farm<br><b>PELLEH FARMS DBA BETHEL LIVESTOCK FARM</b> |  | Type of Farm<br><b>DAIRY</b>  |                             |                       |
| Address<br><b>522 HAPPY AV</b>   |   | City<br><b>SWAN LAKE</b>                              |  | St./Prov<br><b>N.Y.</b>   | Postal Code<br><b>12783</b> | Country<br><b>USA</b> |
| Phone<br><b>845-583-6059</b>   |   | Fax<br><b>845-583-0007</b>                            |  | E-mail<br><b>BETHELLIVESTOCK@YAHOO.COM</b>  |                             |                       |
| Preferred dates and time for inspection visit:<br><input checked="" type="checkbox"/> morning <input checked="" type="checkbox"/> afternoon <input type="checkbox"/> evening     |   |   |  | Organic Certification No.   |                             |                       |
| Year first certified   | List previous organic certification by other agencies | List current organic certification by other agencies  |  | Do you understand current organic standards?<br><input checked="" type="checkbox"/> yes <input type="checkbox"/> no |                             |                       |
| Year when complete Organic Farm Plan Questionnaire was last submitted:   |   |   |  |   |                             |                       |
| List all crops or products requested for certification:<br><b>MILK AND <del>MILK PRODUCTS</del></b><br><b>HAY</b><br><input type="checkbox"/> No Changes                         |   |   |  |   |                             |                       |
| If you are a current client, how have you addressed conditions from last year's certification?<br>Applicable <input type="checkbox"/> No Conditions <input type="checkbox"/> Not |   |   |  |   |                             |                       |

Have you ever been denied, suspended, or had revoked your certification?

☐ yes ☒ no

If yes, describe the circumstances:

## SECTION 2: Farm Plan Information

Please complete the table below and attach updated field history sheets that show all fields, [organic (O), in transition (T) or conventional (C)], field numbers, acres/hectares, crops planted, projected yields and inputs applied.

| CROPS REQUESTED FOR CERTIFICATION | FIELD NUMBERS | TOTAL ACRES/ HECTARES PER CROP | PROJECTED YIELDS |
|-----------------------------------|---------------|--------------------------------|------------------|
| HAY / PASTURE                     | 1-21          | 155.4                          | 2 TONS / ACRE    |
|                                   |               |                                | PLUS GRAZING     |
|                                   |               |                                | YIELD            |
|                                   |               |                                |                  |
|                                   |               |                                |                  |
|                                   |               |                                |                  |
|                                   |               |                                |                  |
|                                   |               |                                |                  |
|                                   |               |                                |                  |

A. Are all fields requested for certification located at the main farm address listed above? ☐ yes ☒ no ☐ No Changes  
Complete this information for main farm address and each parcel that is in a separate location from the main farm address:

| FIELD NOS. | PARCEL ADDRESS/ LEGAL DESCRIPTION           | NO. ACRES/HECTARES<br>ORGANIC/<br>TRANSITIONAL/CONVENTIONAL<br>O T C |      |  | RENTED (R)/ OWNED (O)* |
|------------|---|--|------|--|------------------------|
| 1-13       | main farm address listed above              |  | 105  |  | O/R                    |
| 14         | 349 HAPPY AV                                |  | 8    |  | R                      |
| 15         | 311 HAPPY AV                                |  | 5.7  |  | R                      |
| 16-19      | 1/2 MI WEST ON WEST SHORE RD FROM HAPPY AV. |  | 25.2 |  | R                      |
| 20, 21     | 3/4 MI N. ON HAPPY AV FROM HOME FARM        |  | 11.5 |  | R                      |

\*If you have rented or owned the fields for less than three years, attach a signed statement from current or previous landowner regarding field history and application of prohibited materials.

### SECTION 3: Seed Treatments

LIST ANY SEEDS THAT HAVE BEEN TREATED OR GENETICALLY ENGINEERED (GEO): ☐ No seeds used ☐ No Changes

| SEED    | BRAND NAME/<br>TYPE OF TREATMENT | CHECK IF<br>GEO ( * ) | WHAT ATTEMPTS DID YOU MAKE TO USE<br>UNTREATED OR NON-GEO SEED? |
|---------|----------------------------------|-----------------------|---|
| TIMOTHY | AMPAC SEED CO.                   |                       |   |
| CLOVER  | NO MOLD INHIBITOR                |                       |   |
|         | USED, BUT NOT CERT. ORGANIC      |                       |   |
|         |                                  |                       |   |

### SECTION 4: Source of Seedlings and Perennial Stock

#### A. IF YOU PURCHASE ORGANIC SEEDLINGS:

☒ None purchased ☐ No Changes

Who is the supplier? \_\_\_\_\_

Certified by which agency? \_\_\_\_\_

#### B. IF YOU GROW ORGANIC SEEDLINGS ON-FARM:

☒ None grown ☐ No Changes

What type and size is your greenhouse? \_\_\_\_\_

If treated wood is used in any part of your greenhouse, where is it used? \_\_\_\_\_

What ingredients are in your soil mix? \_\_\_\_\_

What fertility products or foliar sprays do you use? \_\_\_\_\_

What inputs/equipment are used in your watering system? \_\_\_\_\_

How do you prevent seedling diseases? \_\_\_\_\_



C. IF YOU GROW BOTH ORGANIC AND NON-ORGANIC PLANTS IN YOUR GREENHOUSE: ☒ Not applicable ☐ No Changes

How do you separate and identify organic and non-organic growing areas? \_\_\_\_\_

How do you prevent co-mingling of organic and non-organic soil mixes during mixing and storage? \_\_\_\_\_

How do you label organic and non-organic seedlings/plants? \_\_\_\_\_

What inputs are used in your watering system? \_\_\_\_\_

How do you prevent drift of prohibited materials through ventilation and/or watering systems? \_\_\_\_\_

How do you clean seedling containers and equipment? \_\_\_\_\_

Where do you store inputs used for non-organic production? \_\_\_\_\_

D. PERENNIAL STOCK: (Use additional sheets if necessary)

☒ Not applicable ☐ No Changes

| DATE PLANTED | TYPE | TRANSPLANT SOURCE | EXPECTED HARVEST DATE |
|--------------|------|-------------------|-----------------------|
|              |      |                   |                       |
|              |      |                   |                       |
|              |      |                   |                       |

## SECTION 5: Soil Fertility Management

Organic standards require an active management plan to build soil fertility and prevent soil erosion.

### A. GENERAL INFORMATION

What are your soil types? LACKAWANNA CHANNERY LOAM, ORUAGA - ARNOT COMPLEX, WELLSBORO GRAVELLY LOAM, MORRIS LOAM

What are your soil/nutrient deficiencies? Attach copies of test results if available.

☐ No deficiencies

SELENIUM

What are the major components of your soil and crop fertility plan?

- ☐ crop rotation ☒ soil amendments\* ☐ side dressing\* ☐ foliar fertilizers\* ☐ compost\* ☐ soil inoculants  
☒ on-farm manure ☒ off-farm manure\* ☐ green manure plowdown/cover crops ☐ interplanting  
☐ biodynamic preparations ☐ summer fallow ☐ subsoiling ☐ soil testing ☐ microbiological testing  
☐ tissue testing ☐ conservation tillage ☐ strip cropping ☐ incorporation of crop residues  
☐ other \_\_\_\_\_

Describe each of the amendments starred (\*) above

☐ Not applicable

| PRODUCT                 | BRAND NAME OR SOURCE                | STATUS: APPROVED (A) RESTRICTED (R), PROHIBITED (P) | REASON FOR USE           |
|-------------------------|-------------------------------------|---|--------------------------|
| <u>GROUND LIMESTONE</u> | <u>COLLECTON MILLS 845-932-8282</u> |   | <u>BALANCING SOIL PH</u> |

AMS04328

|                |                                 |   |
|----------------|---------------------------------|---|
| DUCK MANURE    | AG.Y. DUCK FARM<br>845-292-2500 | INSUFFICIENT SUPPLY OF OWN MANURE,<br>FIELDS ARE NOT ADJACENT TO OUR BARN |
| CHICKEN MANURE | BELLA FARMS<br>845-295-0063     | "   |
|                |                                 |   |

If you are using any restricted (R) fertility inputs, describe your plan to reduce or eliminate their use: ☒ Not applicable

If you use fertilizers with high salt content (sodium nitrate, potassium sulfate, etc.), how do you prevent salt buildup?

☒ Not applicable

#### B. COMPOST/MANURE USE:

☐ No Changes

What forms of compost/manure do you use? ☒ liquid ☒ semi-solid ☒ piled ☐ fully composted ☐ pelleted ☐ none  
☐ other \_\_\_\_\_

How do you apply compost/manure? MANURE SPREADER

During what season(s) do you apply compost/manure? YEAR ROUND

If you use off-farm sources of manure/compost, what are the potential contaminants from these sources?

Attach residue analysis of off-farm manure/compost if available.

NO KNOWN CONTAMINANTS

List all sources of off-farm manure/compost AG.Y. 845-292-2500 BELLA FARMS 845-295-0063

If you use on-farm manure/compost:

List ingredients/additives COW MANURE, HAY RESIDUE, BARN LIME

Describe your composting method(s) \_\_\_\_\_

#### C. SOIL EROSION:

☐ No Changes

What soil erosion problems do you experience and where are they? NONE

How do you prevent soil erosion? ☐ terraces ☐ contour farming ☐ permanent waterways ☐ conservation tillage  
☐ windbreaks ☐ firebreaks ☐ tree lines ☐ retention ponds ☒ riparian management  
☐ other \_\_\_\_\_

D. Rate the effectiveness of your soil fertility management program: ☒ excellent ☐ satisfactory ☐ needs improvement

What changes do you anticipate? WE DO NOT PLOW. FIELDS ARE PERMANENT HAY FIELD AND/OR PASTURE



## SECTION 6: Crop Management

Organic standards require an active management plan to maximize soil and crop health, and to prevent weed, pest and disease problems.

### A. CROP ROTATION PLANS:

| CROP ROTATION PLAN | FIELD NOS. WHERE PLAN IS FOLLOWED | <input type="checkbox"/> No Changes<br>ANTICIPATED CHANGES |
|--------------------|-----------------------------------|--|
|                    |                                   |  |
|                    |                                   |  |
|                    |                                   |  |
|                    |                                   |  |

### B. WEED MANAGEMENT PLAN:

☐ No weed problems

☐ No Changes

What are your problem weeds? RAG WEED, GOLDEN ROD, MILKWEED

What weed control methods do you use?

- ☐ crop rotation ☐ field preparation ☒ prevention of weed seed set ☐ soil sterilization ☐ mechanical cultivation  
☐ use of hand tools ☐ hand weeding ☒ mowing ☐ restricted plastic mulch ☐ natural mulch ☐ flame weeding  
☐ steam weeding ☐ smother crops ☐ stale seedbed ☐ corn gluten ☐ other \_\_\_\_\_

If you use restricted weed control inputs, describe your plan to reduce or eliminate their use: \_\_\_\_\_

Rate the effectiveness of your weed management program: ☐ excellent ☒ satisfactory ☐ needs improvement

What changes do you anticipate? MORE ATTENTION TO MOWING AT THE APPROPRIATE TIME

### C. PEST MANAGEMENT PLAN:

☒ No pest problems

☐ No Changes

What are your problem pests?

- ☐ insects (list) \_\_\_\_\_  
☐ rodents ☐ gophers ☐ birds ☐ other animals: \_\_\_\_\_

Do you work with a pest control advisor? ☐ yes ☒ no If yes, give name \_\_\_\_\_

What strategies do you use to control pest damage to crops?

☒ None

- ☐ crop rotation ☐ use of approved products\* ☐ use of restricted products\* ☐ limited use of prohibited products\*  
☐ companion planting ☐ resistant varieties ☐ beneficial habitat ☐ timing of planting ☐ release of beneficials  
☐ frog ponds ☐ bat houses ☐ bird houses ☐ hand picking ☐ monitoring ☐ IPM\* ☐ trap crops ☐ traps  
☐ physical barriers ☐ physical removal ☐ other \_\_\_\_\_

Describe the pest management inputs or methods starred (\*) above: ☒ Not applicable

| PEST PROBLEM | CONTROL PRODUCT | STATUS: APPROVED (A)<br>RESTRICTED (R)<br>PROHIBITED (P) | IF RESTRICTED,<br>HOW DO YOU PLAN TO<br>REDUCE/ELIMINATE USE? | CHECK<br>IF<br>GEO (☼) |
|--------------|-----------------|--|---|------------------------|
|              |                 |  |   |                        |
|              |                 |  |   |                        |
|              |                 |  |   |                        |

If you use restricted pest management control inputs, describe your plan to reduce or eliminate their use: \_\_\_\_\_

Rate the effectiveness of your pest management program: ☐ excellent ☐ satisfactory ☐ needs improvement

What changes do you anticipate? \_\_\_\_\_

D. DISEASE MANAGEMENT PLAN: ☒ No disease problems

What are your problem crop diseases? \_\_\_\_\_

What disease prevention strategies do you use? ☐ None ☐ No Changes

- ☐ crop rotation ☐ field sanitation ☐ resistant varieties ☐ timing of planting/cultivating ☐ plant spacing  
☐ vector management ☐ use of approved materials\* ☐ use of restricted materials\* ☐ use of prohibited materials\*  
☐ soil balancing ☐ solarization ☐ companion planting ☐ compost/tea use ☐ other \_\_\_\_\_

Describe the disease management inputs or methods starred (\*) above: ☐ Not applicable

| DISEASE PROBLEM | CONTROL PRODUCT | STATUS: APPROVED (A)<br>RESTRICTED (R)<br>PROHIBITED (P) | IF RESTRICTED,<br>HOW DO YOU PLAN TO<br>REDUCE/ELIMINATE USE? | CHECK<br>IF<br>GEO (☼) |
|-----------------|-----------------|--|---|------------------------|
|                 |                 |  |   |                        |
|                 |                 |  |   |                        |

If you use restricted disease prevention inputs, describe your plan to reduce or eliminate their use: \_\_\_\_\_

Rate the effectiveness of your disease management program: ☐ excellent ☐ satisfactory ☐ needs improvement

What changes do you anticipate? \_\_\_\_\_

## SECTION 7: Water Source and Irrigation

A. TYPE OF WATER USE: ☐ irrigation ☐ greenhouse ☐ foliar sprays ☐ washing crops ☒ none ☐ other \_\_\_\_\_  
☐ No Changes

A. SOURCE OF WATER: ☐ on-site well ☐ river/creek/pond ☐ spring ☐ municipal/county \* ☐ irrigation district\*  
☐ other \_\_\_\_\_ Name of municipal/irrigation district \_\_\_\_\_



C. TYPE OF IRRIGATION SYSTEM: ☒ none ☐ drip ☐ flood ☐ center pivot ☐ other \_\_\_\_\_

What input products are applied through the irrigation system? \_\_\_\_\_ ☐ none

What products do you use to clean irrigation lines/nozzles? \_\_\_\_\_ ☐ none

How do you conserve irrigation water? ☐ scheduling ☐ tensiometer/monitoring ☐ laser leveling/land forming

☐ drip irrigation ☐ micro-spray ☐ other \_\_\_\_\_

Known contaminants in your irrigation water: (Attach residue analysis and/or salinity test results if available.)

## SECTION 8: Maintenance of Organic Integrity

A. ADJOINING LAND USE: ALL OUR HAY FIELDS AND PASTURE ARE ADJACENT TO FIELDS THAT WE OWN OR RENT, OR NEXT TO ABANDONED FARMS AND FOREST WHICH HAVE BEEN OUT OF PRODUCTION FOR MORE THAN 30 YEARS.

List specific buffer areas you maintain: (Show all adjoining land uses on your field maps.) ☒ Not applicable ☐ No Changes

| LOCATION/FIELD NO.S | TYPE OF BUFFER (I.E. TREELINE, HEDGEROW, WILDLIFE PLANTING, GRASS STRIP, CROPLAND*) |
|---------------------|---|
|                     |   |
|                     |   |
|                     |   |

\* If crops are harvested from the buffer zones, describe their harvest, storage and sales: \_\_\_\_\_

\_\_\_\_\_

What additional safeguards do you use to prevent accidental contamination? ☒ None ☐ No Changes

Written notification to: ☐ highway departments ☐ electric companies ☐ aerial spray companies/airports

☐ neighbors ☐ drainage commissions ☐ farm service office ☐ other \_\_\_\_\_

Have you posted signs along roadsides that adjoin organic fields? ☐ yes ☒ no

Do any fields or portions of fields flood frequently (more than once every ten years)? ☐ yes ☒ no

If yes, give field numbers: \_\_\_\_\_

# C. EQUIPMENT:

List equipment used for planting, spraying and harvesting:

☐ Not applicable

☐ No Changes

| EQUIPMENT NAME      | OWNED (O), RENTED (R), CUSTOM (C) | CHECK (*) IF USED ON BOTH ORGANIC & CONVENTIONAL | HOW IS EQUIPMENT CLEANED BEFORE USE ON ORGANIC FIELDS? |
|---------------------|-----------------------------------|--|--|
| TRACTOR NH 75       | <del>NH 75</del> O                |  | AIR PRESSURE   |
| TRACTOR NH 1400     | O                                 |  | "  |
| NH 1410 DISC BINE   | O                                 |  | "  |
| TEDDER              | O                                 |  | "  |
| RAKE                | O                                 |  | "  |
| NH 316 SQUARE BALER | O                                 |  | "  |
| NH 648 ROUND BALER  | O                                 |  | "  |
| IN LINE BALAGE TUBS | O                                 |  | "  |
| WAGONS              | O                                 |  | "  |
|                     |                                   |  |  |

Is your equipment maintained so that fuel, oil and hydraulic fluid do not leak?

☒ yes ☐ no

☐ Not applicable

If you use a sprayer ...

☒ Not applicable

Type \_\_\_\_\_ Did you purchase if new (N) or used (U)? \_\_\_\_\_

Other equipment: Could any equipment you use have been contaminated by previous uses? ☐ yes ☒ no

If yes, describe: \_\_\_\_\_

# D. HARVEST:

☐ No Changes

How are your organic crops harvested? ☒ mechanical ☐ by hand

What containers are used for harvesting? ☒ gravity wagons/boxes ☐ truck boxes ☐ cardboard/waxed boxes

☐ wooden totes ☐ plastic containers ☐ other HAY WAGONS

Are containers clean prior to organic crop harvesting? ☒ yes ☐ no

Are the containers used for organic crops only? ☒ yes ☐ no

What potential contamination or co-mingling problems do you have with harvest or transport of organic crops? ☒ None

**B. SPLIT AND PARALLEL PRODUCTION:**

**Which category best describes your current operation?**

☒ 100% organic   ☐ predominantly organic   ☐ in transition   ☐ predominantly conventional crop production

If you farm conventionally, do you plan to fully convert to 100% organic production? ☐ yes   ☐ no

**What is your plan and time frame for conversion to organic production?** TO OUR KNOWLEDGE WE ARE  
ALREADY FULLY ORGANIC, REQUIRING ONLY YOUR INSPECTION AND APPROVAL

**Do you grow the same crops organically, in transition and/or conventionally:** ☐ yes   ☐ no

If you grow any conventional or transitional crops, please fill out the following table:

☒ Not applicable

| SPECIFIC CROPS/<br>VARIETIES | FIELD NOS. | TRANSITIONAL (T)<br>OR<br>CONVENTIONAL (C) | TOTAL ACREAGE | PLANNED USE AND/OR STORAGE AREAS |
|------------------------------|------------|--|---------------|----------------------------------|
|                              |            |  |               |                                  |
|                              |            |  |               |                                  |
|                              |            |  |               |                                  |
|                              |            |  |               |                                  |

**Prohibited soil amendment use:**

| PRODUCT NAME | WHO APPLIES?<br>SELF (S) CUSTOM (C) | WHERE STORED?<br>(ON-FARM OR OFF-FARM; WHERE ON FARM?) |
|--------------|-------------------------------------|--|
|              |                                     |  |
|              |                                     |  |
|              |                                     |  |
|              |                                     |  |
|              |                                     |  |

**Prohibited herbicide/pesticide use:**

| PRODUCT NAME | WHO APPLIES?<br>SELF (S) CUSTOM (C) | WHERE STORED?<br>(ON-FARM OR OFF-FARM; WHERE ON FARM?) |
|--------------|-------------------------------------|--|
|              |                                     |  |
|              |                                     |  |
|              |                                     |  |
|              |                                     |  |
|              |                                     |  |



**E. POST-HARVEST HANDLING:**

☐ Not applicable

☐ No Changes

(Note: For on-farm processing, you may need to complete an Organic Processing/Handling Plan Questionnaire.)

Describe your post-harvest handling procedures and equipment: STORAGE OF DRY HAY IN HAY MOW  
OR SHEDS WITH HAY ELEVATOR OR ~~HAY~~ ROUND BALE FORKS.

Is the processing area and equipment used for organic products only? ☒ yes ☐ no

Does packaging present any contamination problems for your organic products? ☐ yes ☒ no

If yes, what are they? \_\_\_\_\_

Check types of packaging material used: ☐ bulk ☐ paper ☐ cardboard ☐ wood ☐ glass ☐ metal ☐ foil ☒ plastic  
☐ waxed paper ☐ aseptic ☐ natural fiber ☐ synthetic fiber ☐ other \_\_\_\_\_

In what form are finished products shipped? ☐ dry bulk ☐ liquid bulk ☐ tote bags ☐ tote boxes ☐ paper bags  
☐ foil bags ☐ metal drums ☐ mesh bags ☐ cardboard drums ☐ cardboard cases ☐ plastic crates  
☐ other NOT SHIPPED. ALL HAY IS FED TO COWS ON PREMISES

**F. CROP STORAGE:**

☐ No organic crop storage

☐ No Changes

Describe your storage locations:

| STORAGE ID# | TYPE OF CROPS STORED       | TYPE OF STORAGE | CAPACITY | ORGANIC (O), TRANSITIONAL (T), CONVENTIONAL (C), BUFFER (B) |
|-------------|----------------------------|-----------------|----------|---|
|             | HAY, SQUARE                | HAY MOW         |          | O   |
|             | HAY, ROUND                 | SHEDS           |          | O   |
|             | BALAGE (MOIST ROUND BALES) | PLASTIC TUBES   |          | O   |
|             |                            | OUTDOORS        |          |   |

Do you use the same storage areas for organic, transitional and conventional crops? ☐ yes ☒ no

If yes, how do you segregate organic crops from non-organic crops? \_\_\_\_\_

If yes, how do you clean storage units prior to storage of organic crops? \_\_\_\_\_

How do you prevent/control insect pests in stored crops? \_\_\_\_\_ ☒ No insect problems

How do you control rodents in organic crop storage areas? CATS ☐ No rodent problems

What stored crop inputs have you used in the last three years? ☒ None

☐ synthetic fumigants ☐ sprouting inhibitors ☐ ripeners ☐ growth regulators ☐ preservatives ☐ oils

☐ coloring agents ☐ waxes ☐ other \_\_\_\_\_

Are any stored crop inputs used for organic crops? ☐ yes ☒ no

If yes, list all inputs: \_\_\_\_\_

#### G. TRANSPORTATION:

☒ Not applicable ☐ No Changes

Who is responsible for arranging transportation of organic products:

☒ self ☐ buyer ☐ other \_\_\_\_\_

Describe how organic products are transported: REFRIGERATED TRUCK

What steps are taken to protect the integrity of organic products during transport?

☐ dedicated organic only ☐ inspecting transport units prior to loading ☐ cleaning transport units prior to loading

☐ use of Clean Truck Affidavits ☐ letter/contract with transport company stating organic requirements

☒ other OUR OWN TRUCK. ONLY OUR MILK IS BEING TRANSPORTED, IN BOTTLES, IN PLASTIC

#### SECTION 9: Record Keeping System

Which of the following records do you keep for organic production?

☐ No Changes

☒ field maps

☒ field history sheets (previous three years)

☐ input records that show soil amendments, manure, compost, foliar sprays and pest control product applications

☐ harvest records that show field numbers and harvest amounts

☒ labor records

☐ storage records that show storage location, ID numbers, and amounts stored

☒ sales records

☒ shipping records (such as bills of lading)

☐ other \_\_\_\_\_



Which of the following records do you keep for conventional production?

☒ Not applicable

- |   |   |
|---|---|
| <input type="checkbox"/> field maps           | <input type="checkbox"/> labor records    |
| <input type="checkbox"/> field history sheets | <input type="checkbox"/> storage records  |
| <input type="checkbox"/> input records        | <input type="checkbox"/> sales records    |
| <input type="checkbox"/> harvest records      | <input type="checkbox"/> shipping records |
| <input type="checkbox"/> other _____          |   |

TYPE OF MARKETING:

- ☐ farmers market ☒ direct to retail ☐ CSA/subscription service ☒ wholesale ☒ on-farm retail  
☐ bulk commodities to processor ☐ contract to buyer ☐ other \_\_\_\_\_

Do you use the seal of the NFC on organic product labels. ☐ yes ☒ no NOT YET CERTIFIED  
(Attach copies of all organic product labels.)

SECTION 10: Certification Services

Rate services provided by this certification agency: ☐ excellent ☐ satisfactory ☐ needs improvement

Please comment \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

NFC holds the Secretary harmless [liable] for any failure on the part of NFC to carry out the provisions of the NOP regulations.

SECTION 11: Affirmation

I affirm that all statements made in this application are true and correct. I agree to comply with the USDA - National Organic Program Rules and Regulations. I understand that my company may be subject to unannounced inspection and/or organic products may be sampled and tested for residues at any time. I agree to provide further information as required by the Natural Food Certifiers, the Administrator, or the (b) (6) area(s) of my operations.

Signature of Operator \_\_\_\_\_

Date March 7, 10

I have attached the following additional documents:

- ☐ Maps of all parcels/fields (showing adjoining land use and field identification)  
☐ Field history sheets (with letter of three-year history for fields owned or rented for less than three years)  
☐ Water test, if applicable  
☐ Soil, plant tissue and/or residue analyses, if applicable

## Organic Certification Growers Application FIELD HISTORY

Give the following information on each field under your management, including those requested for organic certification, fields in transition/conversion to organic production, and fields managed conventionally. *Transition in conversion* means that the fields are being managed in accordance with organic standards but has not yet met the standards as of yet.

Producer Name BETHEL LIVESTOCK FARM

| Code*<br>O/T/C | Field<br>No. | Acres/<br>Hectares | Year <u>07</u><br>Crop Inputs | Year <u>08</u><br>Crop Inputs | Year <u>09</u><br>Crop Inputs | Year<br>Crop Inputs |
|----------------|--------------|--------------------|-------------------------------|-------------------------------|-------------------------------|---------------------|
| 1              | <del>T</del> | 10                 | HAY DUCK MAN                  | HAY —                         | HAY COW MAN                   |                     |
| 2              | T            | 5                  | " COW MAN                     | —                             | —                             |                     |
| 3              | T            | 2.5                | " DUCK MAN                    | COW/CHICKEN MANURE            | COW MANURE                    |                     |
| 5              | T            | 4.7                | " —                           | COW MAN                       | CHICKEN MAN                   |                     |
| 6              | T            | 8                  | "                             |                               | CHICKEN MAN Limestone         |                     |
| 7              | T            | 6                  | " COW MAN                     | COW MAN                       | COW MAN                       |                     |
| 9              | T            | 12                 | " DUCK/COW MAN                | DUCK/COW MAN                  | DUCK/COW MAN                  |                     |
| 10             | T            | 14                 | " DUCK MAN                    | DUCK MAN                      | DUCK MAN                      |                     |
| 13             | T            | 5.3                | " COW MAN                     | DUCK MAN                      | CHICKEN MAN                   |                     |
| 14             | T            | 8                  | " DUCK MANURE                 | COW MAN                       | COW MAN                       |                     |
| 15             | T            | 4                  | " COW MAN                     | COW MAN                       | CHICKEN MAN                   |                     |
| 16             | T            | 17                 | " DUCK MAN                    | DUCK MAN                      | DUCK MAN                      |                     |
| 17             | T            | 11                 | " "                           | "                             | "                             |                     |
| 18             | T            |                    | " "                           | "                             | "                             |                     |
| 19             | T            |                    | " "                           | "                             | "                             |                     |
| 20             | T            | 6                  | " "                           | "                             | CHICKEN MAN                   |                     |
| 21             | T            | 5.5                | " "                           | "                             | "                             |                     |

BOB FRANKLIN  
845-866-1776

STANTION  
BARN

LOFT OVER  
PUMP ROOM  
FOR BOTTLE  
STORAGE

VAC. PUMP ROOM

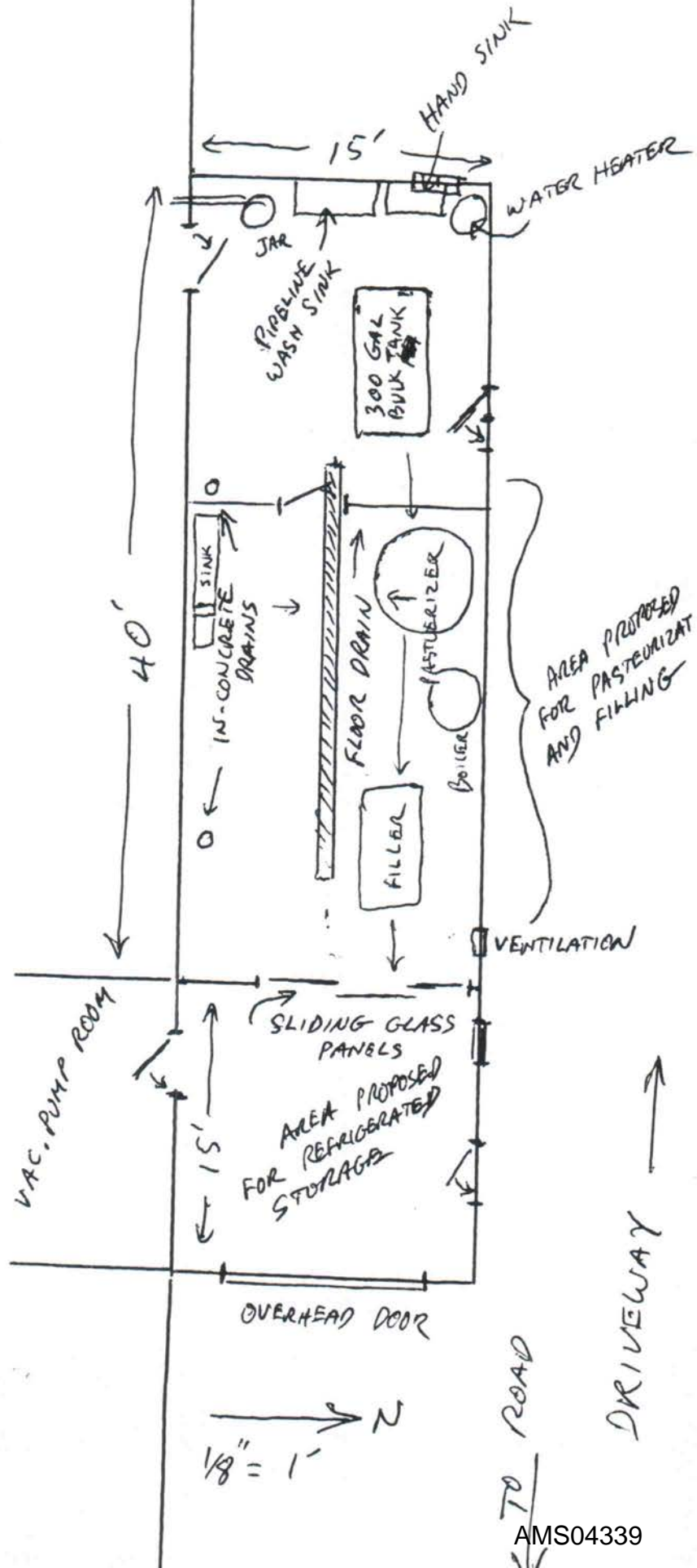
OVERHEAD DOOR

$\frac{1}{8}'' = 1'$

N

TO ROAD

DRIVEWAY



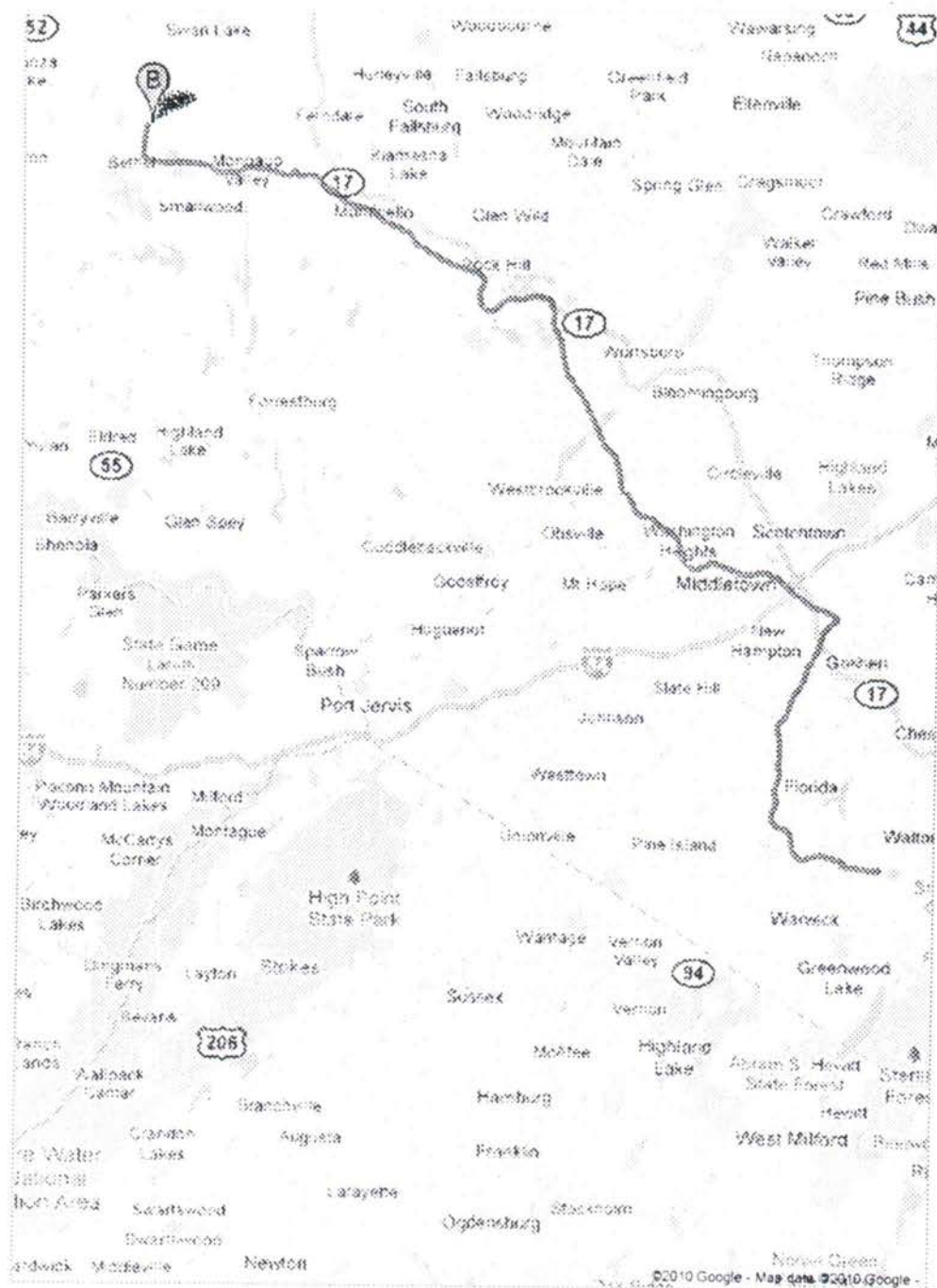


Google maps

Directions to 522 Happy Ave, Swan Lake, NY 12783  
75.9 mi - about 1 hour 27 mins

Save trees. Go green!

Download Google Maps on your phone at [google.com/gmm](http://google.com/gmm)





18 Augusta Ave, Monsey, NY 10952

- 1 Head **south** on **Augusta Ave** toward **NY-59 W**

go 0.1 mi  
total 0.1 mi



- 2 Turn **right** at **NY-59 W**  
About 6 mins

go 2.1 mi  
total 2.2 mi



- 3 Turn **right** at **N Airmont Rd/Co Rd 89**  
About 1 min

go 0.4 mi  
total 2.6 mi



- 4 Turn **left** to merge onto **I-287 W/I-87 N**  
Continue to follow I-87 N  
Partial toll road  
About 19 mins

go 17.1 mi  
total 19.7 mi



- 5 Take exit **16** to merge onto **NY-17 W** toward **US-6/Harriman**  
Toll road  
About 2 mins

go 2.1 mi  
total 21.9 mi



- 6 Continue onto **US-6 W**  
About 11 mins

go 12.2 mi  
total 34.0 mi



- 7 Continue onto **NY-17 W**  
About 28 mins

go 30.8 mi  
total 64.8 mi



- 8 Take the exit

go 0.3 mi  
total 65.1 mi



- 9 Slight **left** toward **New York 17B W**

go 0.1 mi  
total 65.2 mi

- 10 Continue straight onto **New York 17B W**  
About 14 mins

go 8.8 mi  
total 74.1 mi



- 11 Turn **right** at **Happy Ave**  
Destination will be on the left  
About 5 mins

go 1.8 mi  
total 75.9 mi

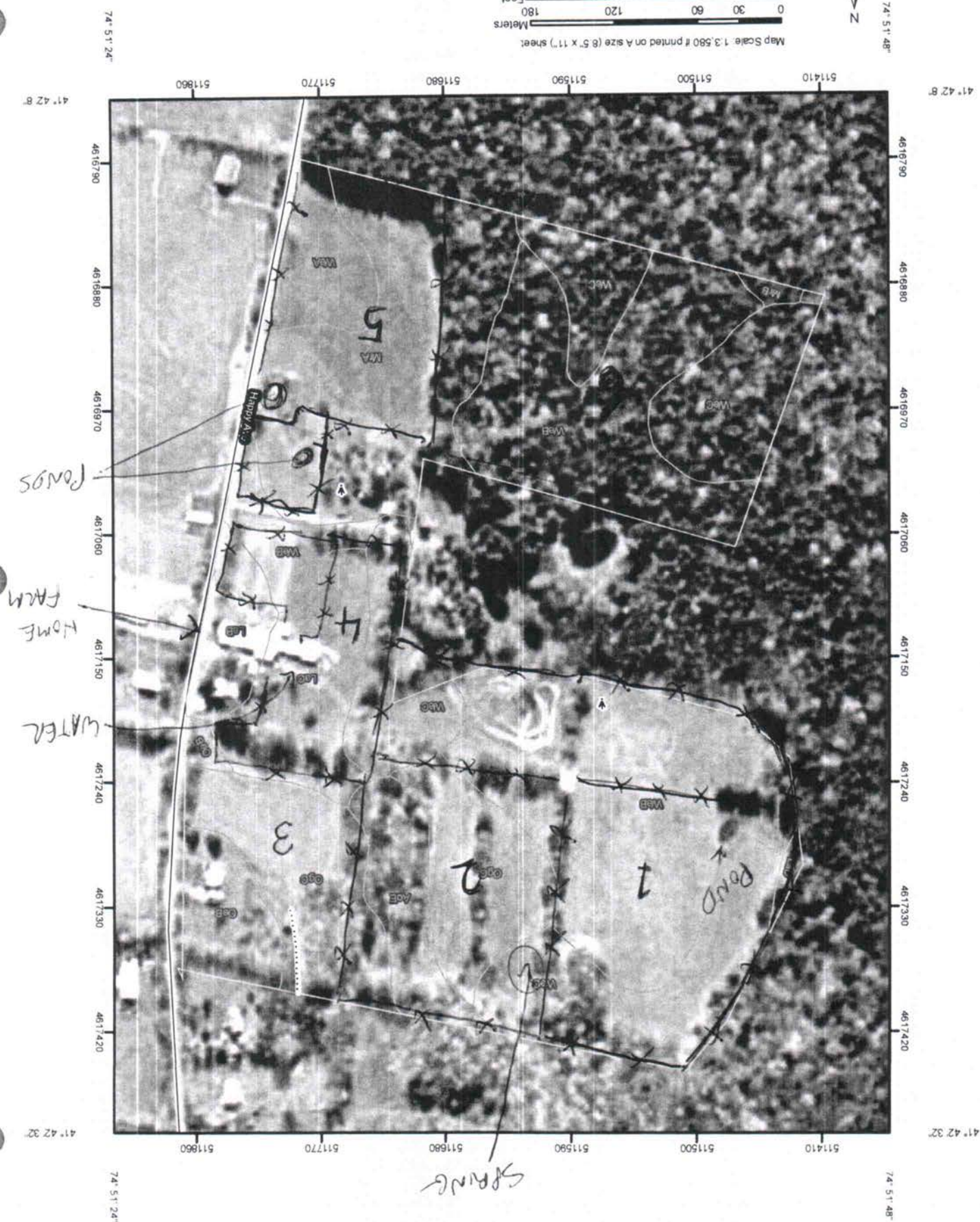
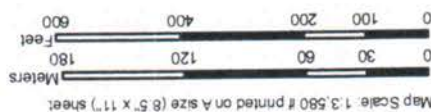


522 Happy Ave, Swan Lake, NY 12783

These directions are for planning purposes only. You may find that construction projects, traffic, weather, or other events may cause conditions to differ from the map results, and you should plan your route accordingly. You must obey all signs or notices regarding your route.

Map data ©2010 Google

Directions weren't right? Please find your route on [maps.google.com](http://maps.google.com) and click "Report a problem" at the bottom left.






## Map Unit Legend

| Sullivan County, New York (NY105)  |   |              |                |
|------------------------------------|---|--------------|----------------|
| Map Unit Symbol                    | Map Unit Name   | Acres in AOI | Percent of AOI |
| AoE                                | Arnot-Oquaga complex, 15 to 35 percent slopes, very rocky | 1.9          | 3.8%           |
| LaB                                | Lackawanna channery loam, 3 to 8 percent slopes           | 1.4          | 2.8%           |
| LaC                                | Lackawanna channery loam, 8 to 15 percent slopes          | 3.1          | 6.2%           |
| LaD                                | Lackawanna channery loam, 15 to 25 percent slopes         | 0.2          | 0.3%           |
| MrA                                | Morris loam, 0 to 3 percent slopes                        | 7.5          | 15.3%          |
| MrB                                | Morris loam, 3 to 8 percent slopes                        | 0.1          | 0.3%           |
| OeB                                | Oquaga very channery silt loam, 3 to 8 percent slopes     | 1.8          | 3.6%           |
| OgC                                | Oquaga-Arnot complex, 8 to 15 percent slopes              | 6.2          | 12.5%          |
| WeA                                | Wellsboro gravelly loam, 0 to 3 percent slopes            | 1.6          | 3.2%           |
| WeB                                | Wellsboro gravelly loam, 3 to 8 percent slopes            | 16.1         | 32.7%          |
| WeC                                | Wellsboro gravelly loam, 8 to 15 percent slopes           | 9.4          | 19.1%          |
| <b>Totals for Area of Interest</b> |   | <b>49.3</b>  | <b>100.0%</b>  |



## MAP LEGEND

|   |                        |   |                       |
|---|------------------------|---|-----------------------|
|  | Area of Interest (AOI) |  | Very Stony Spot       |
|  | Area of Interest (AOI) |  | Wet Spot              |
|  | Soils                  |  | Other                 |
|  | Soil Map Units         |  | Special Line Features |
|  | Special Point Features |  | Gully                 |
|  | Blowout                |  | Short Steep Slope     |
|  | Borrow Pit             |  | Other                 |
|  | Clay Spot              |  | Political Features    |
|  | Closed Depression      |  | Cities                |
|  | Gravel Pit             |  | Water Features        |
|    | Gravelly Spot          |    | Oceans                |
|    | Landfill               |    | Streams and Canals    |
|    | Lava Flow              |    | Transportation        |
|    | Marsh or swamp         |    | Rails                 |
|    | Mine or Quarry         |    | Interstate Highways   |
|    | Miscellaneous Water    |    | US Routes             |
|    | Perennial Water        |    | Major Roads           |
|    | Rock Outcrop           |    | Local Roads           |
|    | Saline Spot            |   |                       |
|    | Sandy Spot             |   |                       |
|    | Severely Eroded Spot   |   |                       |
|    | Sinkhole               |   |                       |
|    | Slide or Slip          |   |                       |
|    | Sodic Spot             |   |                       |
|    | Spoil Area             |   |                       |
|    | Stony Spot             |   |                       |

## MAP INFORMATION

Map Scale: 1:3,580 if printed on A size (8.5" x 11") sheet.  
 The soil surveys that comprise your AOI were mapped at 1:15,840.  
 Please rely on the bar scale on each map sheet for accurate map measurements.

Source of Map: Natural Resources Conservation Service  
 Web Soil Survey URL: <http://websoilsurvey.nrcs.usda.gov>  
 Coordinate System: UTM Zone 18N NAD83

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Sullivan County, New York  
 Survey Area Date: Version 8, Feb 5, 2010

Date(s) aerial images were photographed: 10/16/2006

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Soil Map—Sullivan County, New York



## MAP LEGEND

|   |                        |   |                       |
|---|------------------------|---|-----------------------|
|    | Area of Interest (AOI) |  | Very Stony Spot       |
|    | Soils                  |  | Wet Spot              |
|    | Soil Map Units         |  | Other                 |
|    | Special Point Features |  | Special Line Features |
|    | Blowout                |  | Gully                 |
|    | Borrow Pit             |  | Short Steep Slope     |
|    | Clay Spot              |  | Other                 |
|    | Closed Depression      |  | Political Features    |
|    | Gravel Pit             |  | Cities                |
|    | Gravelly Spot          |  | Water Features        |
|    | Landfill               |  | Oceans                |
|    | Lava Flow              |  | Streams and Canals    |
|    | Marsh or swamp         |  | Transportation        |
|    | Mine or Quarry         |  | Rails                 |
|    | Miscellaneous Water    |  | Interstate Highways   |
|    | Perennial Water        |  | US Routes             |
|    | Rock Outcrop           |  | Major Roads           |
|    | Saline Spot            |  | Local Roads           |
|    | Sandy Spot             |   |                       |
|    | Severely Eroded Spot   |   |                       |
|    | Sinkhole               |   |                       |
|    | Slide or Slip          |   |                       |
|    | Sodic Spot             |   |                       |
|   | Spoil Area             |   |                       |
|  | Stony Spot             |   |                       |

## MAP INFORMATION

Map Scale: 1:5,160 if printed on A size (8.5" x 11") sheet.

The soil surveys that comprise your AOI were mapped at 1:15,840.

Please rely on the bar scale on each map sheet for accurate map measurements.

Source of Map: Natural Resources Conservation Service  
 Web Soil Survey URL: <http://websoilsurvey.nrcs.usda.gov>  
 Coordinate System: UTM Zone 18N NAD83

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Sullivan County, New York  
 Survey Area Data: Version 8, Feb 5, 2010

Date(s) aerial images were photographed: 10/16/2006

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.





## Organic Handling Plan Questionnaire

Please fill out this questionnaire if you are requesting organic handling certification. This form or an NFC recertification form may be used for continuation of certification. You must submit an Organic system plan with this application. (This is a written plan that sketches out the various plans you have for your organic operation for the next year. See section 205.201 of the NOP standards for a detailed description what you should include). Attach an Organic Product Profile sheet for each product requested for certification, a current schematic product flow chart, an organic handling and facility map for each facility which will handle organic products. Use additional sheets if necessary.

|  |                                 |  |  |
|--|---------------------------------|--|--|
| Applicant/company name<br><b>BETHEL LIVESTOCK FARM</b>   |                                 | Telephone/Fax Number<br><b>FA- 845 583-6059 583 0007</b>   |  |
| Owner/manager<br><b>ROBERT FRANKLIN</b>  |                                 | Primary contact person<br><b>SELF</b>  |  |
| Address<br><b>522 HAPPY AV</b>   |                                 | Date received  |  |
| City<br><b>SWAN LAKE</b>   |                                 | Date reviewed  |  |
| State/province<br><b>N.Y.</b>  |                                 | Reviewer initials  |  |
| Postal/zip code<br><b>12783</b>  |                                 | Fees received  |  |
| Country<br><b>USA</b>  |                                 | Inspector  |  |
| Legal status: Sole proprietorship <input checked="" type="checkbox"/> Corporation <input checked="" type="checkbox"/> Cooperative <input type="checkbox"/> Trust or non-profit <input type="checkbox"/><br>Legal partnership (federal form 1065) <input type="checkbox"/> Other (specify) <input type="checkbox"/> |                                 |  |  |
| Year company began   | Number of employees<br><b>0</b> | Name of person overseeing organic production<br><b>ROBERT FRANKLIN</b>   | Government permits/licenses<br><b>NYSAG &amp; MKT MILK DEALER LIC. PENDING</b> |
| Do you have a copy of current organic standards? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No   |                                 | Do you understand the current organic standards? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |  |
| What type(s) of organic products are manufactured or planned to be manufactured? Provide a complete list of products requested for certification in Section 2: Product Composition and Labeling.<br><b>FLUID MILK, <del>YOGURT</del>, <del>MOZZARELLA</del>, <del>CHOCOLATE</del></b>                              |                                 |  |  |
| List all noncompliances from last year's certification and state how the noncompliances have been addressed. <input checked="" type="checkbox"/> Not applicable  |                                 |  |  |
| List previous years certified organic and name of certifying agent.<br><b>N/A</b>  |                                 | List current organic certification by other agents.<br><b>N/A</b>  |  |
| Has certification ever been denied, suspended, or revoked? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No<br>If yes, describe the circumstances. Attach a description of the actions taken to correct noncompliances.   |                                 |  |  |
| Preferred time for inspection visit: <input checked="" type="checkbox"/> Morning <input checked="" type="checkbox"/> Afternoon<br>Give directions to the processing facility.  |                                 |  |  |
| Type of processing/handling  | Primary Contract vendor         | Estimated annual total production<br>% organic % nonorganic  |  |
| Contract vendor<br><b>NO</b>   | Address                         | Phone no.  | Certified by   |
|  |                                 |  |  |
|  |                                 |  |  |
|  |                                 |  |  |



List or attach a list of all nonorganic products produced by your company.

MILK FED VEAL CALVES

The NOP Rule has 4 categories of products which can use the word "organic". These are "100% organic", "organic", "made with organic (specified ingredients or food group(s))", and products with less than 70% organic ingredients. The % of organic ingredients is calculated by dividing the total net weight or volume (excluding salt and water) of combined organic ingredients by the total weight or volume of all ingredients.

Products labeled "100% organic" must contain 100% organic ingredients, including processing aids. Products labeled "organic" must contain at least 95% organic ingredients; nonorganic ingredients must not be commercially available in an organic form; must not include organic and nonorganic forms of the same ingredient; and all synthetic ingredients and processing aids must be on the National List. Products labeled "made with organic (specified ingredients or food group(s))" must contain at least 70% organic ingredients. For "100% organic," "organic," and "made with organic..." products, both organic and nonorganic ingredients must not be produced using excluded methods, sewage sludge, or ionizing radiation. Products with less than 70% organic ingredients can only identify the organic ingredients in the information panel. Refer to the National List, Section 205.605 and 205.606, to determine which nonagricultural substances and nonorganically produced agricultural ingredients are allowed in products labeled "organic" or "made with organic (ingredients or food group(s))."

The NOP Rule has specific requirements for principal display panel information relating to the use of the term "organic", depending on the % of organic ingredients in the finished product. For all products, the organic ingredients must be identified in the ingredient information panel. Up to three ingredients or food groups can be listed on the principal display panel for products labeled as "made with organic (ingredients or food group(s))". The term "organic" cannot be used to describe a nonorganic ingredient in a product name. Water and salt cannot be identified as "organic". The name of the certifying agent must be identified on the information panel below than name of the handler or distributor, preceded by the statement, "Certified organic by..." or similar phrase. The address and telephone number of the certifying agent may be displayed.

The USDA seal can be used on "100% organic" or "organic" products, but not on products labeled "made with organic...". A certifying agent's seal, logo or other identifying mark can be used on "100% organic," "organic" or "made with organic...". Products with less than 70% organic ingredients cannot use either the USDA seal or the certifying agent's name, seal or logo. The certifying agent's seal cannot be displayed more prominently than the USDA seal.

Attach an Organic Product Profile sheet and examples of all labels used for each product requested for certification.

**A. PRODUCTS LABELED AS "100% ORGANIC"** (All ingredients are certified organic, including processing aids.)

List all products labeled or planned to be labeled as "100 % Organic" and check appropriate boxes.

None

| Label information<br>name of product | Organic ingredients<br>identified in<br>information panel ( ) | NFC name identified on<br>label ( ) | Use USDA seal<br>on label ( ) | Use NFC seal/logo<br>on label ( ) |
|--------------------------------------|---|-------------------------------------|-------------------------------|-----------------------------------|
|                                      |   |                                     |                               |                                   |
|                                      |   |                                     |                               |                                   |
|                                      |   |                                     |                               |                                   |
|                                      |   |                                     |                               |                                   |
|                                      |   |                                     |                               |                                   |
|                                      |   |                                     |                               |                                   |

Are processing aids used?

Yes ☒ No

If yes, list all organic products manufactured using processing aids and give name of processing aid used.

Are all processing aids certified organic?

Yes ☐ No

**B. Products labeled as "Organic" (at least 95% certified organic ingredients)**

List all products labeled or planned to be labeled as "Organic" and check appropriate boxes.

None

| Name of product        | Organic ingredients identified in information panel (I) | NFC name identified on label (I) | Use USDA seal on label (I) | Use NFC seal/logo on label (I) |
|------------------------|---|----------------------------------|----------------------------|--------------------------------|
| WHOLE PASTEURIZED MILK |   | YES                              | YES                        |                                |
|                        |   |                                  |                            |                                |
|                        |   |                                  |                            |                                |
|                        |   |                                  |                            |                                |
|                        |   |                                  |                            |                                |
|                        |   |                                  |                            |                                |

**B. Products labeled as "Organic" (continued)****Are any nonorganic agricultural ingredients used?**Yes ☐ No ☒

If yes, list all organic products which contain nonorganic agricultural ingredients.

If yes, describe your attempts to source organic ingredients.

**Are any nonagricultural ingredients used?**Yes ☐ No ☒

If yes, list all organic products which contain non-agricultural ingredients.

**Are any ingredients produced using excluded methods, i.e., genetic engineering?**Yes ☐ No ☒

If yes, list all organic products containing ingredients produced using excluded methods.

**Are any ingredients produced using sewage sludge?**Yes ☐ No ☒

If yes, list all organic products containing ingredients produced using sewage sludge.

**Are any ingredients produced using ionizing radiation?**Yes ☐ No ☒

If yes, list all organic products containing ingredients produced using ionizing radiation.

**Are processing aids used?**Yes ☐ No ☒

If yes, list all organic products manufactured using processing aids.

**Are sulfites, nitrates, or nitrites added during the production or handling process?**Yes ☐ No ☒

If yes, list all organic products produced with sulfites, nitrates, or nitrites.

**Are any organic products produced using organic and nonorganic forms of the same ingredients?**Yes ☐ No ☒

If yes, list all organic products using organic and nonorganic forms of the same ingredients.

**Do any products labeled "organic" show the percentage of organic ingredients on the label?**Yes ☐ No ☒

If yes, list all products so labeled.

Does the size of the percentage statement exceed one-half the size of the largest type size on the panel on which the statement is displayed?

Yes ☐ No ☐

Does the percentage statement appear in its entirety in the same type size, style, and color without highlighting?

Yes ☐ No ☐



**C. Products labeled as "Made with Organic (specified ingredients or food groups(s))" (At least 70%**

Certified organic ingredients; up to 3 ingredients or food groups can be listed)

List all products to be labeled "Made with organic (ingredients or food group(s))" and check appropriate boxes.

None

| Name of product | How many ingredients or food groups are listed on the label? | List each ingredient and/or food group listed on the principal display panel | Organic ingredients identified in information panel (I) | NFC name identified on label (I) | NFC seal/logo on label (I) |
|-----------------|--|--|---|----------------------------------|----------------------------|
|                 |  |  |   |                                  |                            |
|                 |  |  |   |                                  |                            |
|                 |  |  |   |                                  |                            |
|                 |  |  |   |                                  |                            |
|                 |  |  |   |                                  |                            |
|                 |  |  |   |                                  |                            |
|                 |  |  |   |                                  |                            |

**C. Products labeled as "Made with Organic (specified ingredients or food groups(s))" (continued)**

Are any nonorganic agricultural ingredients used?

Yes No

If yes, list all products which contain nonorganic agricultural ingredients.

Are any non-agricultural ingredients used?

Yes No

If yes, list all products which contain non-agricultural ingredients.

Are any processing aids used?

Yes No

If yes, list all products manufactured using processing aids.

Are any ingredients produced using excluded methods, i.e., genetic engineering?

Yes No

If yes, list all products containing ingredients produced using excluded methods.

Are any ingredients produced using sewage sludge?

Yes No

If yes, list all products containing ingredients produced using sewage sludge.

Are any ingredients produced using ionizing radiation?

Yes No

If yes, list all products containing ingredients produced using ionizing radiation.

Do any products labeled "made with organic ingredients" show the percentage of organic ingredients in the product?

Yes No

If yes, list all products so labeled.

Does the size of the percentage statement exceed one-half the size of the largest type size on the panel on which the statement is displayed?

Yes No

Does the percentage statement appear in its entirety in the same type size, style, and color without highlighting?

Yes No

**D. PRODUCTS WITH LESS THAN 70% ORGANIC INGREDIENTS (organic ingredients listed only on the information panel)**

List all products which contain less than 70% organic ingredients.

✓ None



PIPELINE BRINGING  
MILK FROM COWS

Stanchion Barn

Raw Room

Raw Tank

Glass Panel

Glass Panel

Processing Area

COP/CIP Vat

Vat Pasteurizer

Pasteurized Product Tank

AJ300 & Pasteurizer Control

Filler Control

Ventilation  
Opening

Refrigeration

Vacuum Pump Room

Piping Legend

- Raw Product Piping
- Pasteurized Product Piping
- CIP Piping

**E. WASTE PRODUCTS**

Will any wastes from certified organic products be sold as certified organic?

Yes ☐ No ☒

If yes, list all organic products manufactured from waste materials.

Attach an Organic Product Profile sheet for each product.

**F. WATER**

Check ways water is used in processing:

ingredient processing aid cooking ☒ cooling product transport cleaning organic products None used

☒ Cleaning equipment other (specify) HEATING THE PASTEURIZER

Source of water: municipal ☒ on-site well other, specify

Does the water meet the Safe Drinking Water Act?

☒ Yes ☐ No

Attach copy of water test, if applicable.

List any known water contaminants.

☒ None

What on-site water treatment processes are used?

☒ None

Is steam used in the processing of organic products?

Yes ☐ No ☒

If yes, describe how steam is used in the manufacturing process.

If steam has direct contact with organic products, do you use:

☒ No direct contact

steam fillers condensate traps testing of condensate testing of finished products  
other (specify)

**F. WATER (continued)**

List products used as boiler additives.

☒ No boiler additives used

Attach MSDA and/or label information for boiler additives, if applicable.

Do you use water conservation strategies?

☒ Yes ☐ No

If yes, describe your water conservation program.

RECYCLING COOLING WATER FOR LIVESTOCK DRINKING

Describe how you monitor water quality.

TEST AT LAB

How often do you conduct water quality monitoring? weekly monthly ☒ annually as needed  
other (specify)

NOP Rule requires that handling procedures, processes, storage, and equipment present no contamination risk to organic products from commingling with nonorganic products or contamination with prohibited substances. Packaging materials, bins, and storage containers must not have contained synthetic fungicides, preservatives, or fumigants. Reusable bags or containers must be clean and pose no risk to the integrity of organic products. Procedures used to maintain organic integrity must be documented.

**A. PRODUCT FLOW**

Attach a complete written description or schematic product flow chart which shows the movement of all organic products, from incoming/receiving through production to outgoing/shipping. Indicate where ingredients are added and/or processing aids are used. All equipment and storage areas must be identified.

**B. MONITORING**

Product testing: (Check all that apply)

ingredients tested prior to purchase ingredients tested upon receipt products tested during production  
finished products tested other (specify)

How do you prevent the use of ingredients produced using excluded methods (genetic engineering), sewage sludge, or ionizing radiation? (Check all that apply)

GE testing      letters from manufacturers      other (specify)

Are ingredient samples retained?

Yes      No

If yes, how long?

Are finished product samples retained?

Yes      No

If yes, how long?

Do you have a product recall system in place?

Yes      No

#### D. EQUIPMENT

List all equipment used in processing.

| Equipment Name           | Capacity | Check if equipment is cleaned prior to organic production? (I) | Check if cleaning is documented? (I) | Check if the equipment is purged prior to organic production? (I) |
|--------------------------|----------|--|--------------------------------------|---|
| RAW MILK BULK TANK       | 300 GAL  | ✓  |                                      | ✓   |
| VAT PASTEURIZER          | 200 GAL  | ✓  | ✓                                    | ✓   |
| PASTEURIZED PRODUCT TANK | 200 GAL  | ✓  | ✓                                    | ✓   |
| SEMI-AUTOMATIC FILLER    |          | ✓  | ✓                                    | ✓   |
| CIP TANK                 |          |  |                                      |   |
|                          |          |  |                                      |   |
|                          |          |  |                                      |   |

If equipment is purged, list and describe purge procedures, quantities purged, and documentation.

#### E. SANITATION

Attach MSDS and/or label information for cleaning and sanitizing products, if applicable.

Check all cleaning methods used:

sweeping      scraping      vacuuming      compressed air      ✓ manual washing      ✓ clean in place (CIP)  
 steam cleaning      ✓ sanitizing      other (specify)

Provide information on your cleaning program and products used.

| Area                     | Type of cleaning | Cleaning equipment used | Products used | Freq | Check if cleaning is documented (I) |
|--------------------------|------------------|-------------------------|---------------|------|-------------------------------------|
| Receiving area           |                  |                         |               |      |                                     |
| Ingredient storage       |                  |                         |               |      |                                     |
| Product transfer         |                  |                         |               |      |                                     |
| Production area          |                  |                         |               |      |                                     |
| Production equipment     | CIP              | AUTOMATIC               |               |      | ✓                                   |
| Packaging area           | CIP              | SYSTEM                  |               |      | ✓                                   |
| Finished product storage |                  |                         |               |      |                                     |
| Loading dock             |                  |                         |               |      |                                     |
| Building exterior        |                  |                         |               |      |                                     |
| Accidental spills        |                  |                         |               |      |                                     |
| Other (specify)          |                  |                         |               |      |                                     |

AFTER EACH PROCESSING



Are all surfaces which contact organic products food grade? ☒ Yes ☐ No  
 Do you test food contact surfaces or rinse for cleaner/sanitizer residues? ☐ Yes ☐ No  
 Where are cleaning/sanitizing materials stored?  
STORAGE AREA IN REFRIGERATION ROOM

#### F. PACKAGING

Check types of packaging material used: bulk paper cardboard wood glass metal foil  
☒ plastic waxed paper aseptic natural fiber synthetic fiber other (specify)

Are all packaging materials food grade? ☒ Yes ☐ No

Where are packaging materials stored?

ATTIC OVER PROCESSING AREA

Are any fungicides, fumigants, or pest control products used in this storage area? ☐ Yes ☒ No

If yes, describe use and products.

Have any packaging materials been exposed to synthetic fungicides, preservatives, or fumigants? ☐ Yes ☒ No

If yes, describe exposure, including name of products used.

#### F. PACKAGING (continued)

Are packaging materials reused? ☐ Yes ☒ No

If yes, describe how reusable packaging materials are cleaned prior to use?

Are reusable packaging materials used for both organic and nonorganic products? ☐ Yes ☒ No

If yes, list specific nonorganic products packaged.

#### G. STORAGE

Provide information on your storage areas by completing the following table.

| Use                        | Location            | Type/capacity      | Identification name or number | Is storage unit dedicated organic ? (I) | Comments on potential for contamination or commingling problems |
|----------------------------|---------------------|--------------------|-------------------------------|---|---|
| Ingredient storage         |                     |                    |                               | C                                       |   |
| Packaging material storage | <u>ATTIC</u>        |                    |                               | C                                       | <u>NO OTHER ITEMS PRESENT</u>                                   |
| In-process storage         |                     |                    |                               | C                                       |   |
| Finished product storage   | <u>REFRIGERATOR</u> | <u>300 BOTTLES</u> |                               | C                                       | <u>NO OTHER ITEMS PRESENT</u>                                   |
| Off-site storage*          |                     |                    |                               | C                                       |   |
| Other (specify)            |                     |                    |                               | C                                       |   |

\*If there is off-site storage, give name, address, phone number, contact person and type of products stored at off-site facility.

## H. TRANSPORTATION OF ORGANIC PRODUCTS

### Incoming:

In what forms are incoming products received?

dry bulk   liquid bulk   tote bags   tote boxes   metal drums   cardboard drums   paper bags  
foil bags   other (specify)

How are incoming products transported?

Do you arrange incoming product transportation?

Yes   No

If yes, how do you insure that inbound transport units are cleaned prior to loading organic products?

Is the inspection/cleaning process documented?

Yes   No

Are transport units used to carry any prohibited substances?

Yes   No

Have transport companies been notified of organic handling requirements?

Yes   No

Are organic products shipped at the same time as nonorganic in the same transport units?

Yes   No

Check all steps take to segregate organic products:

dedicated organic only transport units   use of pallets   pallet tags identifying "organic"  
organic product shrink wrapped   separate area in transport unit   other (specify)

### In-Process:

How are in-process products transported?

How do you insure that in-process transport units are cleaned prior to loading organic products?

Is the inspection/cleaning process documented?

Yes   No

### Outgoing Finished Product:

In what form are finished products shipped?

dry bulk   liquid bulk   tote bags   tote boxes   paper bags   foil bags   metal drums  
mesh bags   cardboard drums   cardboard cases   plastic crates   other (specify)

How are outgoing products transported?

REFRIGERATED TRUCK

Do you arrange outgoing product transportation?

Yes   No

## H. TRANSPORTATION OF ORGANIC PRODUCTS, Outgoing Finished Product: (continued)

How do you insure that outgoing transport units are clean prior to loading organic products?

EXCLUSIVELY USED FOR OUR PRODUCT

Is the inspection/cleaning process documented?

Yes   No

Are transport units used to carry any prohibited materials?

Yes   No

Have transport companies been notified of organic handling requirements?

Yes   No

Are organic products shipped at the same time as nonorganic in the same transport units?

Yes   No

Check steps taken to segregate organic products:

dedicated organic only transport units   use of pallets   pallet tags identifying "organic"  
organic product shrink wrapped   separate area in transport unit   other (specify)

NOP Rule requires management practices to prevent pests, such as removal of pest habitat, food sources, and breeding areas, and prevention of access to handling facilities. Environmental factors, such as temperature, light, humidity, atmosphere, and air circulation, may be used to prevent pests. Pests may be controlled using mechanical or physical means, such as traps, light, or sound. Lures and repellents may be used if they do not contain prohibited substances or products produced using excluded methods (genetic engineered). If these measures are not effective, a prohibited synthetic substance not on the National List may be used provided the certifying agent approves of the substance, method of application, and measures taken to prevent contact with ingredients or organic products. Use of pest control products must be documented and included as part of the Organic Handling Plan.



Attach a facility map showing the location of traps and monitors, and MSDS and/or label information for substances used for pest control, if applicable.

**What type of pest management system do you use?**

- ☒ in-house: name of responsible person ROBERT FRANKLIN  
 contract pest control service: name, address, phone number

**Check all pest problems you generally have:**

- ☒ flying insects    crawling insects    rats    mice    ☒ spiders    birds    other (specify)

**Check all pest management practices you use:**

- ☒ good sanitation    ☒ removal of exterior habitat/food sources    ☒ cleanup of spilled product    ☒ exclusion  
☒ sealed doors and/or windows    ☒ repair of holes, cracks, etc.    ☒ screened windows, vents, etc.  
☒ physical barriers    sheet metal on sides of building exterior    ☒ mowing    air curtains    air showers  
 positive air pressure in facility    ☒ monitoring    incoming ingredient inspection for pests  
 inspection zones around interior perimeter    ☒ ultrasound/light devices    release of beneficials    sticky traps  
 electrocutors    pheromone traps    mechanical traps    scare eye balloons    freezing treatments  
 heat treatments    vacuum treatments    carbon dioxide    nitrogen    vitamin baits    pyrethrum  
 ryania    rotenone    boric acid    disodium octal tetrahydrate    diatomaceous earth  
 precipitated silica    fumigation    fogging    crack and crevice spray  
 other (specify)

**Are records kept of your monitoring activities?**

Yes ☒ No

**Check all aspects of your waste management system that apply:**

- ☒ on-site dumpster    ☒ material recycling    ☒ daily pick-up of waste    composting    ☒ field application of waste  
 other (specify)

**Does your waste management system provide habitat and/or food sources for pests?**

Yes ☒ No

If yes, please describe.

**SECTION 4: Pest Management (continued)**

**Pesticide use information for the last 12 months:**

| Substance | Target pest | Location where used | Method of application | Date of last application |
|-----------|-------------|---------------------|-----------------------|--------------------------|
|           |             |                     |                       |                          |
|           |             |                     |                       |                          |
|           |             |                     |                       |                          |
|           |             |                     |                       |                          |
|           |             |                     |                       |                          |
|           |             |                     |                       |                          |

**Are any substances used which are prohibited according to the National List?**

Yes ☒ No

If yes, did you contact the certifying agent for prior approval before using?

Yes ☐ No

**Are records kept of all pesticide applications?**

Yes ☐ No

If prohibited pest control substances were used, list all measures taken to prevent contact with organic products or ingredients.

If prohibited pest control products were used, what measures are you taking or planning to take to prevent their use in the future?

**Are there any substances intended for use which are not listed above?**

Yes ☒ No

If yes, list substances intended for use:

NOP Rule requires that records disclose all activities and transactions of the operation, be maintained for 5 years, and demonstrate compliance with the NOP Rule. Organic products must be tracked from sale of finished product to incoming ingredients. Organic ingredients must be verified as certified organic. Amounts of organic finished products must balance with certified organic ingredients purchased. All relevant documents must identify products as "organic". All records must be accessible to the inspector.

Can your record keeping system track the finished product back to all ingredients? ☒ Yes ☐ No

Can your record keeping system balance organic ingredients in and organic products out? ☒ Yes ☐ No

How long do you keep your records?

Which of the following records do you keep for organic processing/handling?

Incoming:

purchase orders contracts invoices receipts bills of lading Customs forms scale tickets  
 quality test results Certificates of Analysis Transaction Certificates  
 copies of Certificates of Organic Operation verification of non-GMO ingredients  
 verification of ingredients produced not using sewage sludge  
 verification of ingredients produced/handled without ionizing radiation  
 documentation of commercial availability of organic ingredients when using nonorganic ingredients for products labeled as "100% organic" and/or "organic"  
 receiving records receiving summary log (12 mos.) other (specify)

In-Process:

ingredient inspection forms blending reports production reports equipment clean-out logs  
 sanitation logs packaging reports QA reports production summary records (12 mos.)  
 other (specify)

Storage:

ingredient inventory reports finished product inventory reports other (specify)

**SECTION 5: Record Keeping (continued)**

Outgoing:

shipping log transport unit inspection/cleaning forms bills of lading scale tickets purchase orders  
☒ sales orders ☒ sales invoices phytosanitary certificates export declaration forms  
 Transaction Certificates copies of Certificates of Organic Operation shipping summary log  
 sales summary log audit control register complaint log other (specify)

Describe your lot numbering system.

STILL LOOKING FOR A SYSTEM THAT WILL WORK WITH OUR EQUIPMENT



# Bethel Creamery

Whole Pasteurized Milk

חלב ישראל

Produced and Bottled by

**BETHEL LIVESTOCK FARM**

**522 Happy Avenue, Swan Lake, NY 12783**

**USDA  
ORGANIC**

64 FL OZ

תחת השגחת

הרז דוד מיללער שולד

מאנס, נ.י.

THIS LABEL IS INCOMPLETE, NEEDS A FEW ADDITIONS  
FOR THE STATE AND YOU. (S SHOWN JUST AS  
A SAMPLE

AMS04358

I affirm that all statements made in this application are true and correct. I agree to comply with the USDA - National Organic Program Rules and Regulations. I understand that the facility may be subject to unannounced inspection and/or organic products may be sampled and tested for residues at any time. I agree to provide further information as required by the Natural Food Certifiers, the Administrator (b) (6) the area(s) of my operations.

Signature of Owner/Manager

Date

July 17, 10

I have attached the following additional documents:

- |  |   |   |
|--|---|---|
| <input checked="" type="checkbox"/> product flow chart   | <input type="checkbox"/> facility map                 | <input type="checkbox"/> Organic Product Profiles |
| <input type="checkbox"/> pest management map of traps and monitors                                     | <input type="checkbox"/> water test, if applicable    | <input type="checkbox"/> MSDS, if applicable      |
| <input checked="" type="checkbox"/> organic product labels   | <input type="checkbox"/> labels for minor ingredients |   |
| <input type="checkbox"/> labels for other substances used (boiler additives, cleansers, or pesticides) | <input type="checkbox"/> other (specify)              |   |

☒ I have made copies of this questionnaire and other supporting documents for my own records.

**Submit completed form, fees, and supporting documents to:**



## AMS04360

- 1 Calculate the percentage of organic ingredients by dividing the total net weight or volume of combined organic ingredients (excluding water and salt) by the total weight or volume of all ingredients.
- 2 All products labeled "100% organic" or "organic" and all ingredients identified as "organic" in an ingredient statement must not be produced using: excluded methods; sewage sludge; ionizing radiation; a processing aid not on the National List; or sulfites, nitrates or nitrites added during the production or handling process (except that wine containing added sulfites may be labeled "made with organic grapes").
- 3 Excluded methods include cell fusion, microencapsulation and macroencapsulation, and recombinant DNA technology. (gene deletion, gene doubling, introducing a foreign gene, and changing the positions of genes when achieved by recombinant DNA technology).
- 4 For products labeled as "100% organic" and "organic", handlers are required to source organic ingredients when commercially available. Commercial availability is determined by three factors: appropriate form, quality, or quantity. This is not required for products labeled as "made with..." or products containing <70% organic ingredients.
- 5 For products labeled as "100% organic" and "organic", handlers must not use organic and nonorganic forms of the same ingredients. This is not required for products labeled as "made with..." or products containing <70% organic ingredients.

NOFA-NY Certified Organic, LLC  
840 Upper Front Street - Binghamton, NY 13905  
(607) 724-9851

# ORGANIC CERTIFICATE

NOFA-NY Certified Organic, LLC Recognizes:

**Sumner Watson**

**Cold Springs Farm**

**379 Slate Hill Rd**

**Sharon Springs, NY 13459**

**Producer #: 200139**

As Certified Organic for the Following Items:

**Crops: Hay**  
**Handling: Feed**

*Please see attached addendum(s) for specific crops and /or products*

It has been determined that the production practices are in compliance with the USDA's  
National Organic Program's National Organic Standards- 7 CFR PART 205.

Certification and the right to use the designation "Certified Organic by : NOFA-NY Certified Organic, LLC" is not transferable  
to other producers, processors, manufacturers or packagers.

**THIS CERTIFICATE IS VALID UNTIL SURRENDERED, SUSPENDED OR REVOKED.**

*An updated organic management plan and on-site inspection visit are required annually.  
Please direct any questions regarding this certificate to NOFA-NY Certified Organic, LLC.*

**Current Certificate Effective Date: 09/21/2009**

**National Organic Program Certification Effective: 2002**



*Carol King*

**Carol King,**  
**Certification Director**  
**NOFA-NY Certified Organic, LLC**

**9/30/2009**

62.3  
49.3  
30.9  
11.5  
1000 SQ  
335 ROOMS  
11.4  
42.4  
155.4  
220 TONS  
1004



119A South Main Street, Spring Valley, NY 10977  
914-319-9040 Fax: 845 - 818-3598  
Email: nfccertification@gmail.com

***By email***

April 13, 2010

Mr. Robert Franklin  
Bethel Livestock Farm  
522 Happy Avenue  
Swan Lake, NY 12783

Dear Mr. Franklin,

Thank you for your application for organic certification for your livestock and dairy operations. NFC will review the application to confirm it is complete. You will be notified of any questions or issues that come up during this review process.

After the review is completed, and all, if any issues, have been resolved, NFC will schedule an inspector for a inspection visit. He or she will contact you to set up an appointment with you.

The following is an **estimate** of the expenses for your organic certification:

Application Fee: 450.00 (submitted)  
Inspection: \$800.00 (approximately)  
Yearly Fee: 1500.00 for livestock/dairy and farm Organic System Certification

The following is an **estimate** of the time frame to complete your organic certification (barring any non-compliances that may arise that can delay the final outcome of certification):

**Organic Inspection:** May- June

**Organic Inspection Report Received at NFC offices** 15 days after inspection (maximum)

**NFC review committee decision:** two week (maximum) after filing of inspection report

Should you have any further questions please feel free to call me.  
Thank you for choosing the organic services of Natural Food Certifiers. I wish you continued success and good health.

Sincerely,

(b) (6)

Administrator  
Natural Food Certifiers



119A South Main Street, Spring Valley, NY 10977  
914-319-9040 Fax: 845 – 818-3598  
Email: nfccertification@gmail.com

***By email***

August , 2010

Mr. Robert Franklin  
Bethel Livestock Farm  
522 Happy Avenue  
Swan Lake, NY 12783

Dear Mr. Franklin,

NFC received your response to our May 15<sup>th</sup> correspondence. There are a number of items that remain in need of your attention before the inspection next week. Please feel free to call me at your convenience at 914 – 319 – 9040 if you have any questions.

**NFC Request: Applicant should order soil tests on fields to determine state of soil at present and help set the plans for the future"**

Please arrange for the test. We would request that you arrange this before the inspection and have the soil test done as soon as possible .

**BEL Response : We have developed a log, keeping records of manure application.**

Please have the logs ready to be showed to the inspector.

- **BEL Response : Besides the small amount of organic feed the cows receive, the rest of their intake during the winter is haylage or dry hay produced on our farm.**

Based on our conversations NFC expects to be easily shown the amount of feed and hay is being used and the amount of time the animals spend out of the barn and in the pasture.

Bethel Livestock Farm  
***D.B.A. Bethel Creamery***

522 Happy Avenue  
Swan Lake, NY 12783  
845-583-6059 bethellivestock@yahoo.com

July 24, 2010

Reuvain Flamer  
Natural Food Certifiers  
119A South Main Street  
Spring Valley, NY 10977

Dear Mr. Flamer,

In regards to your letter of May 15<sup>th</sup> we have the following responses:

**"NFC Comment and Action Request:** Outside of Farm Feed Inputs: Spring Farms, Sharon MA. – Please send a certificate of these organic products  
Trace Mineral Block – Please send NFC documentation on this product"

**5.3 Mineral Block: Please send Certificate of Analysis and label**

- A certificate for feed from Cold Spring Farm has already been sent.
- We are now using Redmond Trace Mineral Salt Blocks which are universally used on organic dairy farms. OMRI documentation has been sent.

**"NFC Comment and Action Request: Is there a log that tracks when manure is received and applied to fields? Log should be developed.**

**Applicant should order soil tests on fields to determine state of soil at present and help set the plans for the future"**

- We have developed a log, keeping records of manure application.

**5.1 There is no information/ plan for preventative health care for your livestock filed. The NOP calls for protocols for maintenance for health care of animals: what if they are in need of anti biotics ( how will you identify these as non-organic) , Do your animals receive vaccinations? From where? Do you have a certificate of analysis?**

- We do have antibiotics to treat our veal calves if necessary. In an emergency these could be used on our cows. When we milk, the first milk goes into our regular bulk tank. The latter cows are milked through a separate line into a different tank used exclusively for feeding calves. Each cow is identified with a numbered ear tag or other distinguishing feature. If we have cows not to be used for organic milk production, they can be milked last through our second system and their milk fed to veal calves. This system can be shown upon inspection and will be readily recognized.
- Our cows have never been vaccinated.



Bethel Livestock Farm  
***D.B.A. Bethel Creamery***

522 Happy Avenue  
Swan Lake, NY 12783  
845-583-6059 bethellivestock@yahoo.com

**5.2 Feed Females ; You state that in the winter you feed the animals 20% organic feed and in the summer 10% feed. Please send certificate of organic feed. Please clarify what is the outstanding 80% ( haylage? Mineral mixture?)**

- Besides the small amount of organic feed the cows receive, the rest of their intake during the winter is haylage or dry hay produced on our farm.

**Feed Males ; You are not specific what you feed. Is there a difference between winter and summer? Do you feed the animals 20% organic feed and in the summer 10% feed as the females? Please send certificate of organic feeds. Please clarify what is the outstanding 80% ( haylage? Mineral mixture?)**

**Young Stock ; You state that in the winter you feed the animals 20% organic feed and in the summer no feed. Please send certificate of organic feed. Please clarify what is the outstanding 80% ( haylage? Mineral mixture?)**

- Our breeding bulls are fed the same as the cows, but they get little or no feed besides pasture, haylage, or dry hay. Young stock are also fed in this manor.

**5.4 Bedding: Can you attest that the saw dust used in your housing for bedding is not treated and allowed for organic use?**

- Sawdust which we have used in the past comes directly from a local sawmill. It is not treaded with any chemicals. Recently and presently we use chopped hay for bedding. This is lower quality dry hay produced on our farm and chopped by us with a bedding chopper.

**5.6 Issue: Mastitits: Is the only practice you have for this is culling? What treatment do you use, if any?**

- Jersey cows or Jersey crosses occasionally get milk fever after freshening. We keep calcium glutonate solution on hand which is administered intravenously if symptoms develop. This has happened once in the last 5 years.
- When mastitis occurs the milk is segregated to a separate tank used for feeding veal calves. The infected quarter is aggressively milked by hand which sometimes helps to cure some types of mastitis. The vet has advised me that drying that quarter up and just milking the other three quarters is a good option, which we have relied on.

Bethel Livestock Farm  
***D.B.A. Bethel Creamery***

522 Happy Avenue  
Swan Lake, NY 12783  
845-583-6059 bethellivestock@yahoo.com

**5.5 Hydrated Lime and Chlorine Bleach : Please send label and c of a.**

- Please refer to copies already faxed or soon to be faxed.

**5.7 Please send C of A and label for Don's CHG Teat Treatment**

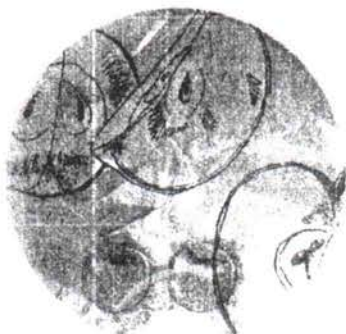
- Our secretary asked Don's CHG Teat Treatment to send requested materials to NFC week of July 26<sup>th</sup>. NFC should already have this in their possession.

We hope the above will be satisfactory to ensure timely procession of our application for organic certification.

Sincerely yours,

(b) (6)

Naomi Franklin  
Vice President, Bethel Livestock Farm



# OMRI Listed®

The following product is OMRI Listed. It may be used in certified organic production or food processing and handling according to the USDA National Organic Program Rule.

## Product

Redmond Natural Mineral Salt (Block)

## Company

Redmond Minerals, Inc.  
Mr. Neal Bosshardt  
P.O. Box 219  
Redmond, UT 84652

## Status

Allowed

## Category

Salt

## Issue date

12-Jan-2006

## Product number

red-0214

## Class

Livestock Feed Ingredients

## Expiration date

01-Jun-2011

## Restrictions

Not Applicable.

Executive Director

Product review is conducted according to the policies in the current *OMRI Policy Manual* and based on the standards in the current *OMRI Standards Manual*. To verify the current status of this or any OMRI Listed product, view the most current version of the *OMRI Products List* at [www.omri.org](http://www.omri.org). OMRI listing is not equivalent to organic certification and is not a product endorsement. It cannot be construed as such. Final decisions on the acceptability of a product for use in a certified organic system are the responsibility of a USDA accredited certification agent. It is the operator's responsibility to properly use the product, including following any restrictions.



Organic Materials Review Institute  
P.O. Box 11558, Eugene, OR 97440-3758, USA  
541.343.2600 • fax 541.343.8971 • [info@omri.org](mailto:info@omri.org) • [www.omri.org](http://www.omri.org)



**Deodorizes  
Whitens Clothes  
Removes Stains**

**CAUTION:**  
IRRITANT-KEEP OUT OF REACH OF CHILDREN  
SEE BACK OF LABEL FOR ADDITIONAL CAUTIONS

# STAINS RUN FROM 101 BLEACH

Regul

**STAINS RUN FROM 101**

## PRECAUTIONARY STATEMENTS

**CAUTION:** May cause severe skin irritation or chemical burns to broken skin. For prolonged use, wear rubber gloves when handling product. Wash after handling. Avoid breathing vapors. Vacate poorly ventilated areas as soon as possible. Do not return until strong odors have dissipated.

**FIRST AID:** If contact with eyes occurs, flush with water for at least 15 minutes. Get prompt medical attention. If contact with skin occurs, wash with plenty of soap and water. If swallowed, drink large amounts of water. Do not induce vomiting. Call a physician or poison control center immediately.

**PHYSICAL OR CHEMICAL HAZARDS:** Mixing this product with chemicals (e.g., Ammonia, Acids, Detergents, Vinegar, Bowl Cleaners, etc.) or organic matter, will release chlorine gas which is irritating to eyes, lungs, and mucous membranes, and in some cases can be fatal.

**ADDITIONAL CAUTIONS:** Do not use on copper, aluminum, iron, silverware, porcelain, or other metal objects.

**STORAGE AND DISPOSAL:** Store this product in a cool dry area, away from direct sunlight and heat to avoid deterioration. In case of spill, flood areas with water. Product or remaining solutions that cannot be used should be given away or diluted with water and disposed down the drain. Do not reuse empty container but place in trash collection or offer for recycling where facilities accept colored HDPE bottles.

**ACTIVE INGREDIENT:** Sodium Hypochlorite  
CAS# 7681-52-9 Contains No Phosphates

- This bottle is coded for recycling.
- Check with your recycling facility to see if they accept colored HDPE bottles.
- 101 Bleach (after use) rapidly breaks down almost entirely to salt water.
- 101 Bleach is safe for waste water treatment systems and septic tanks.

101 Bleach is specially designed to work with your favorite detergent in providing a whiter, brighter, and cleaner wash in a way that no other additive can.

**Enhances cold water washing:** 101 Bleach gives your favorite detergent extra boosting power in cold water, a temperature setting where most detergents need a little help.

**Separate your whites from colors:** Safe for most fabrics, however do not use 101 Bleach on silk, wool, mohair, leather, spandex and non-fast color fabrics. Always dilute 101 Bleach with water before using on any fabric.

**Bleach safety test for garments:** Combine 1 tablespoon of 101 Bleach and 1/4 cup of water to create a test solution. Use one drop from this solution on a hidden part of the fabric to check for any reactions to colors. Let the solution stand for 1 minute. If after blot drying there is no color change, then the article can be safely bleached.

**In the laundry:** Remove stains from food, soil, scorch or mildew by pretreating stained fabric with a solution of 1/4 cup of bleach to 1 gallon of warm water and soak for 5 minutes.

**At wash time,** add the right amount of 101 Bleach and detergent to the water before putting the laundry in. For best results, dilute 101 Bleach with a quart of water and add 5 minutes after the wash cycle has begun. Never pour bleach directly onto clothes. With automatic bleach dispensers, carefully follow the manufacturer's instructions.

**To hand wash,** combine 101 Bleach with 1 gallon of warm water, immerse for 15 minutes, wash then rinse.

101 Bleach is an effective deodorant and stain remover that enables you to use one product for many cleaning purposes.

**KITCHEN SINKS:** Add 2/3 gallon of water to the sink. Add 3/4 cup of 101 Bleach, let stand five minutes. Drain and rinse the sink.



**BASINS, TUBS and SHOWERS:** Applying a solution of 1 1/4 cups of 101 Bleach and 2 gallons of water, wash for at least two minutes. Let stand 5 minutes before rinsing.

**TOILET BOWLS:** Pour 1 3/4 cups of 101 Bleach into bowl. Brush solution over all inside surfaces, let stand for 10 minutes and flush.

**GARBAGE CANS:** Mix 1 1/2 cups 101 Bleach with 5 gallons of warm water and wash surfaces. Soak for 10 minutes and let dry. Do not rinse or soak overnight.

**OUTDOORS:** Mix 1 1/4 cups of 101 Bleach with 2 gallons of water to remove stains from mold and mildew on siding, brick, tile, shingles and wood decks. Spray or brush on, wait five minutes and rinse. Be careful not to apply to vegetation.

MADE BY: James Austin Company • Mars, PA 16046 • 724-625-1535

|   |   |
|---|---|
| <b>Regular</b>                                |   |
| Top Loading Washer add                        | 1 cup        |
| <b>Large</b>                                  |   |
| Top Loading Washer add                        | 1 1/2 cups   |
| <b>Front Loading Washer add</b>               | 3/4 cup      |
| <b>Hand Laundry</b><br>(2 gallons warm water) | add 1/2 cup  |





# Material Safety Data sheet

0211-14

SAFEWAY INDUSTRIES, INCORPORATED  
3372 NORTH HOLTON STREET  
MILWAUKEE, WISCONSIN 53212  
414.964.7627

## MATERIAL SAFETY DATA SHEET

EMERGENCY PHONE CHEMTREC 1.800.424.9300

### I. IDENTIFICATION

PRODUCT NAME: DONS CHG TEAT DIP  
PRODUCT CODE: T470B  
SYNONYMS: CHG TEAT DIP, CHLORHEXIDINE TEAT DIP  
CHEMICAL FAMILY: NA  
D.O.T. HAZARD CLASS: CLEANING, SCOURING OR WASHING COMPOUND, NOI LIQUID

### II. HAZARDOUS INGREDIENTS

HAZARDOUS COMPONENTS (Specific Chemical Identity)

|                                    | %    | TLV       |
|------------------------------------|------|-----------|
| CHLORHEXIDINE GLUCONATE            | 0.5% | 1.8 g/kg  |
| DIDECYL DIMETHYL AMMONIUM CHLORIDE | 0.3% | 450 mg/kg |

### III. PHYSICAL DATA

BOILING POINT: (Deg. F) 220  
FREEZING POINT: (Deg. F) NA  
SPECIFIC GRAVITY: 1.010-1.020  
SOLUBILITY IN WATER: Excellent  
EVAPORATION RATE: Varies with time and temperature.  
APPEARANCE AND ODOR: Blue liquid with medicine odor.

### IV. FIRE AND EXPLOSIVE HAZARD DATA

FLASH POINT (METHOD USED): NA  
FLAMMABLE LIMITS: LEL: NA  
EXTINGUISHING MEDIA: For fires in area use appropriate media - water spray, dry chemical or carbon dioxide foam.  
SPECIAL FIRE FIGHTING PROCEDURES: Keep containers cool by spraying with water if exposed to fire.  
UNUSUAL FIRE AND EXPLOSIVE HAZARDS: Non-flammable, but may emit, potentially harmful gasses if heated to decomposition.

**V. HEALTH HAZARDS**

THRESHOLD LIMIT VALUE: Not established

EYE CONTACT: Can cause irritation of eye tissues.

SKIN CONTACT: Prolonged contact can cause slight irritation of skin. Contact in open cuts or broken skin could cause burning.

INHALATION: No known effects.

---

**EMERGENCY AND FIRST AID PROCEDURES**

---

**EYE CONTACT:** Immediately flush eyes with plenty of water for at least 15 minutes or until irritation stops. Hold eyelids open during this flushing. If irritation persists, **consult a physician.**

**SKIN CONTACT:** If irritation develops, rinse with plenty of water.

**INGESTION:** If conscious, drink a quart of water and **take immediately to a hospital or a physician.** Do not give anything by mouth to an unconscious victim.

**INHALATION:** Remove victim to fresh air.

---

**VI. REACTIVITY DATA**

**STABILITY:** Stable

**CONDITIONS TO AVOID:** Do not mix with other materials. Excess heat, sparks, and flames.

**INCOMPATIBILITY (MATERIALS TO AVOID):** Acids, bases, strong oxidizing and reducing agents, and other reactive substances.

**HAZARDOUS DECOMPOSITION PRODUCTS:** Potentially harmful gases may form if reacted with incompatible materials.

**HAZARDOUS POLYMERIZATION:** Will not occur.

---

**VII. SPILL OR LEAK PROCEDURES**

**STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:**  
Contain spill with sand or earth and place into drums for proper disposal. Avoid discharge of large quantities into sewer.

**WASTE DISPOSAL METHOD:**  
Observe all Local, State and Federal Regulations.

---

**VIII. SPECIAL PROTECTIVE INFORMATION****CONSULT SAFETY EQUIPMENT DISTRIBUTOR**

RESPIRATORY PROTECTION: None should be necessary.

VENTILATION: Maintain adequate ventilation.

GLOVES: Latex or neoprene.

EYE PROTECTION: Safety glasses. Do not wear contact lenses.

OTHER PROTECTIVE EQUIPMENT: Eyewash station.

---

**IX. SPECIAL PRECAUTIONS****PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING:**

Store away from incompatible materials. Keep container closed when not in use. Store in cool, well-ventilated area away from all sources of ignition, heat and direct sunlight. **KEEP OUT OF REACH OF CHILDREN.**

**OTHER PRECAUTION:**

Avoid contact with eyes. Do not swallow.

\*\*\*\*\*

This material in this Material Safety Data Sheet relates only to the specific material designated and does not relate to its use in combination with any other material or process. The data contained is believed to be correct. However, since conditions of use are outside our control it should not be taken as warranty or representation for which Safeway Industries, Inc. assumes legal responsibility. This information is provided solely for your consideration, investigation and verification.

DATE

11/14/02

AUTHORIZED OFFICIAL

Wanda L. Loventud





CERTIFIED TO  
NSF/ANSI 60

**CARMEUSE LIME**  
3 CLEAR SPRING ROAD - ANNVILLE, PA 17003

818 3598

**Maximum use levels:**

**Hi Cal Hydrate Lime.....650 mg/liter**

**Agricultural Guarantee**  
**Type: Hydrated Lime**  
**Fine-Sized**

**Chemical:**

**Percentage Guaranteed**  
**Dry Weight Analysis**

|                               |     |
|-------------------------------|-----|
| <b>Total Calcium</b>          | 50  |
| <b>Total Magnesium</b>        | 0.4 |
| <b>CaO</b>                    | 70  |
| <b>MgO</b>                    | 0.7 |
| <b>Total Oxides CaO + MgO</b> | 71  |
| <b>CCE</b>                    | 128 |
| <b>ENV</b>                    | 127 |

**Fineness**

**Sieve:**

**Percentage Passing:**

|                 |      |
|-----------------|------|
| <b>20 Mesh</b>  | 99.9 |
| <b>60 Mesh</b>  | 99.7 |
| <b>100 Mesh</b> | 99   |

**Moisture (Free).....Max. 2.0%**

SAFEWAY INDUSTRIES, INC.  
3372 N. HOLTON ST.  
MILWAUKEE, WI 53212  
(414) 964-7627

MATERIAL SAFETY DATA SHEET

EMERGENCY PHONE: CHEMTREC 1-800-424-9300

I. IDENTIFICATION

PRODUCT NAME: SUPERIOR ACID CLEANER *PLUS*

SYNONYMS: C.I.P. CLEANER

CHEMICAL FAMILY: ACID

D.O.T. HAZARD CLASS: CORROSIVE LIQUID UN 1760

II. HAZARDOUS INGREDIENTS

| Hazardous Components (Specific Chemical Identity, Common names) |       | TLV                   |
|---|-------|-----------------------|
| PHOSPHORIC ACID   | < 30% | 1.0 mg/m <sup>3</sup> |
| SULFURIC ACID   | < 11% | 1.0 mg/m <sup>3</sup> |

III. PHYSICAL DATA

BOILING POINT: (deg. F): NA  
FREEZING POINT: (deg. F): NA  
SPECIFIC GRAVITY: 1.237  
SOLUBILITY IN WATER: Excellent  
EVAPORATION RATE: Varies with time and temperature  
APPEARANCE AND ODOR: Red liquid with an irritating odor

IV. FIRE AND EXPLOSIVE HAZARD DATA

FLASH POINT (METHOD USED): NA  
FLAMMABLE LIMITS: LEL: NA UEL: NA  
EXTINGUISHING MEDIA: For fires in area use appropriate media: Water Spray, Dry Chemical or Carbon Dioxide Foam.  
SPECIAL FIRE FIGHTING PROCEDURES: Keep containers cool by spraying with water if exposed to fire.  
UNUSUAL FIRE AND EXPLOSIVE HAZARDS: Not combustible, but substance may emit toxic fumes of phosphorous oxides and sulfur oxides if heated to decomposition. Reacts with most metals, releasing potentially explosive gasses.



## VII. SPILL OR LEAK PROCEDURES

### STEPS TO BE TAKEN IN CASE MATERIAL IS SPILLED OR RELEASED

Evacuate unprotected personnel from area. Maintain adequate ventilation. Use proper Safety Equipment. Contain spill with sand or earth, place into drums for proper disposal. Avoid direct discharge to sewers and surface waters. Notify authorities if entry occurs.

WASTE DISPOSAL METHOD: Observe all Local, State and Federal Regulations.

---

## VIII. SPECIAL PROTECTIVE INFORMATION

### CONSULT SAFETY EQUIPMENT DISTRIBUTOR

RESPIRATORY PROTECTION: Wear A NIOSH-approved respirator appropriate for the vapor, dust or mist concentration at point of use.

VENTILATION: Maintain adequate ventilation. Keep levels below recommended TLV. Avoid mist formation.

GLOVES: Rubber (Latex). Polyvinyl Chloride. Neoprene.

EYE PROTECTION: Chemical Safety Goggles. Safety Glasses. Face Shield. Do not wear contact lenses.

OTHER PROTECTIVE EQUIPMENT: Eye-wash station, Safety shower, Rubber apron, Chemically resistant boots and full protective clothing covering all exposed areas.

---

## IX. SPECIAL PRECAUTIONS

### PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING:

Store in cool, well-ventilated area away from all sources of ignition and out of direct sunlight. Keep containers tightly closed. Store away from incompatible materials. Do not freeze.

OTHER PRECAUTIONS: Avoid contact with skin and eyes. Do not swallow. Use with adequate ventilation. Avoid breathing of vapors. Wash thoroughly after handling. Avoid dust or mist formation.

\*\* \*\* \*

The data in this Material Safety Data Sheet relates only to the specific material designated and does not relate to its use in combination with any other material or process. The data contained is believed to be correct. However, since conditions of use are outside our control it should not be taken as a warranty or representation for which Safeway Industries, Inc. assumes legal responsibility. This information is provided solely for your consideration, investigation and verification.

DATE 11-14-91

AUTHORIZED OFFICIAL *[Signature]*

AMS04375



SAFeway INDUSTRIES, INC.  
3372 N. HOLTON ST.  
MILWAUKEE, WI 53212  
(414) 964-7627

MATERIAL SAFETY DATA SHEET

EMERGENCY PHONE: CHEMTREC 1-800-424-9300

I. IDENTIFICATION

PRODUCT NAME: SUPERIOR ACID CLEANER *PLUS*

SYNONYMS: C.I.P. CLEANER

CHEMICAL FAMILY: ACID

D.O.T. HAZARD CLASS: CORROSIVE LIQUID UN 1760

II. HAZARDOUS INGREDIENTS

| Hazardous Components (Specific Chemical Identity, Common names) |       | TLV       |
|---|-------|-----------|
| PHOSPHORIC ACID   | < 30% | 1.0 mg/m3 |
| SULFURIC ACID   | < 11% | 1.0 mg/m3 |

III. PHYSICAL DATA

BOILING POINT: (deg. F): NA  
FREEZING POINT: (deg. F): NA  
SPECIFIC GRAVITY: 1.237  
SOLUBILITY IN WATER: Excellent  
EVAPORATION RATE: Varies with time and temperature  
APPEARANCE AND ODOR: Red liquid with an irritating odor

IV. FIRE AND EXPLOSIVE HAZARD DATA

FLASH POINT (METHOD USED): NA  
FLAMMABLE LIMITS: LEL: NA UEL: NA  
EXTINGUISHING MEDIA: For fires in area use appropriate media: Water  
Spray, Dry Chemical or Carbon Dioxide Foam.  
SPECIAL FIRE FIGHTING PROCEDURES: Keep containers cool by spraying  
with water if exposed to fire.  
UNUSUAL FIRE AND EXPLOSIVE HAZARDS: Not combustible, but substance  
may emit toxic fumes of phos-  
phorous oxides and sulfur oxides  
if heated to decomposition.  
Reacts with most metals, releas-  
ing potentially explosive gasses.

## VII. SPILL OR LEAK PROCEDURES

### STEPS TO BE TAKEN IN CASE MATERIAL IS SPILLED OR RELEASED

Evacuate unprotected personnel from area. Maintain adequate ventilation. Use proper Safety Equipment. Contain spill with sand or earth, place into drums for proper disposal. Avoid direct discharge to sewers and surface waters. Notify authorities if entry occurs.

WASTE DISPOSAL METHOD: Observe all Local, State and Federal Regulations.

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## VIII. SPECIAL PROTECTIVE INFORMATION

### CONSULT SAFETY EQUIPMENT DISTRIBUTOR

RESPIRATORY PROTECTION: Wear A NIOSH-approved respirator appropriate for the vapor, dust or mist concentration at point of use.

VENTILATION: Maintain adequate ventilation. Keep levels below recommended TLV. Avoid mist formation.

GLOVES: Rubber (Latex). Polyvinyl Chloride. Neoprene.

EYE PROTECTION: Chemical Safety Goggles. Safety Glasses. Face Shield. Do not wear contact lenses.

OTHER PROTECTIVE EQUIPMENT: Eye-wash station, Safety shower, Rubber apron, Chemically resistant boots and full protective clothing covering all exposed areas.

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## IX. SPECIAL PRECAUTIONS

### PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING:

Store in cool, well-ventilated area away from all sources of ignition and out of direct sunlight. Keep containers tightly closed. Store away from incompatible materials. Do not freeze.

OTHER PRECAUTIONS: Avoid contact with skin and eyes. Do not swallow. Use with adequate ventilation. Avoid breathing of vapors. Wash thoroughly after handling. Avoid dust or mist formation.

\*\* \*\*

The data in this Material Safety Data Sheet relates only to the specific material designated and does not relate to its use in combination with any other material or process. The data contained is believed to be correct. However, since conditions of use are outside our control it should not be taken as a warranty or representation for which Safeway Industries, Inc. assumes legal responsibility. This information is provided solely for your consideration, investigation and verification.

DATE 11-14-91

AUTHORIZED OFFICIAL *[Signature]*

AMS04377

## Schurkamp, Lynnea - AMS

---

**From:** Wilson, Darrell - AMS  
**Sent:** Friday, September 07, 2012 2:08 PM  
**To:** Pooler, Bob - AMS  
**Subject:** Bethel #1  
**Attachments:** Bethel #01.pdf

*Darrell Wilson  
2111 East Market Street  
Logansport, IN 46947  
Phone: (574)735-3057  
Fax: (574)735-3038*

## Schurkamp, Lynnea - AMS

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**From:** Wilson, Darrell - AMS  
**Sent:** Friday, September 07, 2012 2:09 PM  
**To:** Pooler, Bob - AMS  
**Subject:** Bethel #2  
**Attachments:** Bethel #02.pdf

*Darrell Wilson  
2111 East Market Street  
Logansport, IN 46947  
Phone: (574)735-3057  
Fax: (574)735-3038*

## Schurkamp, Lynnea - AMS

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**From:** Wilson, Darrell - AMS  
**Sent:** Friday, September 07, 2012 2:13 PM  
**To:** Pooler, Bob - AMS  
**Subject:** Bethel #3  
**Attachments:** Bethel #03.pdf

*Darrell Wilson  
2111 East Market Street  
Logansport, IN 46947  
Phone: (574)735-3057  
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# Organic Handling/Processing Inspection Report for Natural Food Certifiers

(b) (6)

Organic Certification Inspector

**Company** – Pelleh Farms dba Bethel Livestock Farm dba Bethel Creamery

**Owner/Manager** – Robert Franklin

**Contact** – Robert Franklin

**Address** – 522 Happy Avenue, Swan Lake, NY 12783

**Telephone** – 845-583-6059

**Fax** – 845-583-0007

**E-mail** – bethellivestock@yahoo.com

**Date of Inspection** – August 11, 2010

**Certification Number** – Pending

*This inspection was part of an Audit by USDA/AMS of Natural Food Certifiers. In addition to the farmer/applicant I had the Natural Food Certifier's Administrator, Reuven Flamer and David Hildreth, Agricultural Marketing Specialist for the USDA/AMS both present for the inspection/audit.*

## Background

Bethel Livestock Farm is a small dairy operation which was inspected the same day and is covered in a separate report. This handling report covers the small dairy process plant that will operate to process the milk from this farm only. At the time of the inspection the equipment had not all been installed so the plant was not in operation. The license procedure with New York Dept. of Agriculture and Markets is in process.

The milk will be bottled as whole milk only in plastic half gallon jugs.

The plant is in the same building as the milk house and barn. The rooms have been renovated and as stated are being set up with the processing equipment.

## Management

Robert Franklin (Rabbi Bob) is the owner and manager.

## Certification History

This is a new application for certification. The applicant has not been certified organic before.

## Permits, Registrations and Inspections

A milk handlers license is in process with the New York State Department of Agriculture and Markets. The milk is Kosher certified. There will be inspections by NY Dept. of Agriculture and Markets of the facility.

## Organic Plan Verification

Overall the Plan is good. In the water section it was stated no steam used. The applicant was not aware at the time that his equipment will be using jacketed steam and direct culinary steam.

## Products, Ingredients and Processing Aid

There is one product. This is whole milk from the cows on the farm. Nothing is added to the milk. Culinary steam will be used as a processing aid, see the Water section for description.

## Product Flow and Equipment

There is a product flow diagram in the OHP. I found it to be accurate given the equipment installed and how the remaining equipment placement was described.

The milk is transferred from the raw bulk tank in the milk room to the milk process room.

The raw milk enters the Vat pasteurizer. This unit uses jacketed steam to heat the milk. Culinary steam is also used as needed to bring the temperature of the milk up. I spoke with the person who sold the equipment and is installing it. He states that there are no chemical additives used in the system. The milk is heated for the required time at the temperature needed and is then partly chilled right in the pasteurizer. The pasteurized milk



# Organic Handling/Processing Inspection Report for Natural Food Certifiers

(b) (6)

Organic Certification Inspector

now goes into the chiller. From the chiller the milk goes into the pasteurized product tank and from there into the 2 Valve Semi-Automatic bottler.

The bottled milk will be placed in plastic cases and put in the refrigerator to stay cold until loaded into a refrigerated truck for delivery.

## Waste Management

There is minimal waste from this process. Waste milk will be fed to the veal calves. Other waste will be sent down the drain if liquid and into dumpsters if bulky.

## Water

The water on site comes from an on-site well. The water is filtered with a simple cartridge filter.

Steam will be used as jacketed steam and as direct contact culinary steam used in the pasteurization process.

The vendor states no chemicals used in the steam boiler. The applicant was not aware of the direct steam use at the time he applied and so did not state this in the Organic Handling Plan (OHP).

For the milk license the applicant will need to get a water test. A copy should be sent to NFC for inclusion in the OHP.

## Quality Assurance

Quality control here will be by the applicant and any help he uses. This is a very small operation. There is not any written QC/QA plan. There is no written HACCP plan.

## Storage Equipment and Facilities

The raw milk tank is in a room adjacent to the milk process area. This tank is locked at all times. The processing room will not have storage except short term in the system during processing and the bottled milk which will be in a 300 - 1/2 gallon bottle capacity reefer unit in the processing area.

## Pest Management

The applicant claims there are no issues with pests. They have dogs and cats on the farm. Barn lime is used in the barn for fly control. A bug zapper is used in the barn as needed in season.

In the processing area sanitation and exclusion will be the pest control. The milk remains contained in the system at all times which protects it.

This area has been renovated so will be well sealed at doors and windows.

## Sanitation

Cleaning and sanitation will take place after each processing/bottling run. The system is cleaned with a CIP set-up that runs automatically with the chemicals metered out. There is a sink for COP items that need to be cleaned and sanitized.

There are MSDS sheets for the products used in the OHP.

The caustic cleaner is Meck PF from Safeway Industries, Inc. This product contains Potassium Hydroxide and Sodium Hypochlorite.

The acid sanitizer used is Superior Acid Cleaner Plus from Safeway Industries, Inc. This product contains Phosphoric acid and Sulfuric acid.

## Transportation

The outbound bottled milk will be shipped in a Bethel Livestock Farm refrigerated truck.

## Packaging

The applicant is going to use a standard food grade 1/2 gallon plastic milk bottle. The bottles will be placed in plastic crates for transport.

There were no bottle like the ones to used on hand yet. NFC may request information on the product to be used.

## Labeling

A copy of the label to be used was presented at the inspection and is Attachment #1. The certifier and AMS/USDA Auditor looked at the label as did I. The certifier approved the label. The label still has to go through State of NY approval.

# **Organic Handling/Processing Inspection Report for Natural Food Certifiers**

(b) (6)

**Organic Certification Inspector**

A date code will be used on the bottles. They are still looking for a coder that will work with their equipment.

## **Audit Trail**

There is a minimal paper trail here. There has not been any milk processing so there are no records of such. The record keeping on the farm side of this operation needs improvement and a number of additions. The system to be used to track the raw milk in and the process and bottling of same is yet to be seen. The applicant only checked off sales orders and sales invoices in the records kept section of the OHP.

I would recommend that the certifier ask for copies of working records of the milk processing/bottling once the organic milk process starts.

## **Inspector's Sample Audit**

There has not been any organic production so there is no product to audit.

## **Sampling**

None requested

## **Other Considerations/Summary**

This is a small process operation run by a very capable individual. I do not see any issue that will be of concern regarding the integrity of the organic milk. What does need to be demonstrated is in what way Rabbi Bob will maintain records of his operation.

## **Exit Interview**

Only Item 1 of the Exit interview is relevant to the Handling side of the operation;

1 - Record Keeping needs improvement. Applicant was informed of changes needed.

## **List of Attachments**

1 - Label for milk.

The information contained in this report is confidential between the Inspector, the inspected party and the certification agent. This report does not constitute certification or consultation, nor should it be used for promotional purposes. All compliance assessments are made in reference to the standards and policies of the Certification Body, and are based on the inspector's observations, review of documents and operator interview.

(b) (6)

**Independent Organic Certification Inspector**

# Organic Farm and Livestock Certification Report

(b) (6), Independent Organic Certification Inspector

**Operation Name** - Pelleh Farms dba Bethel Livestock Farm dba Bethel Creamery

**Operator Name(s)** - Robert Franklin aka Rabbi Bob

**Phone** - 845-583-6059

**Fax** - 845-583-0007

**Certification Agency** - Natural Food Certifiers

**Certification Number** - pending

**Inspector** - (b) (6)

**Inspection Date** - August 11, 2010

*This inspection was part of an Audit by USDA/AMS of Natural Food Certifiers. In addition to the farmer/applicant I had the Natural Food Certifier's Administrator, Reuven Flamer and David Hildreth, Agricultural Marketing Specialist for the USDA/AMS both present for the inspection/audit.*

## Introduction/Background

Bethel Livestock Farm (BLF) is a small dairy operation located in the heart of the Catskill Mountains of New York. Robert Franklin (Rabbi Bob) is the operator of this farm. The farm is seeking organic certification from Natural Food Certifiers (NFC) for their Dairy operation as well as a small on farm milk processing plant to handle the milk from the farm cows. The milk processing (Bethel Creamery) is a separate Handling application and will be covered in a separate report. The Franklin's bought this farm in 1981. The home farm is 88 acres. There is a chicken processing plant on the farm across from the dairy operation, processing between 4 and 5 thousand birds a week.. This operation is run by Rabbi Bob's son. The farmer raises veal calves with the excess males from the dairy. The chicken, veal and dairy operations are all Kosher compliant. There are number of improvements needed to meet to requirements of the NOP. Record keeping needs to be improved all around, including animal health, harvest and input records.

NFC has requested soil tests to establish a field nutrient baseline.

Organic feed invoices were not available for review. The 1 organic feed invoice on hand did not specify some of the grain ingredients as organic. As the vendor is certified organic and to my knowledge is not a split operation I am confident the grains are organic but the vendors certifier (NOFA/NY Certified Organic) should be notified to have their client use an invoice format that is compliant by using the word organic for all the organic ingredients.

Lastly the applicant was not aware of the details of the new pasture requirements. While I can plainly see that the animals are getting more then the 30% of feed from pasture during the grazing season, the fact has to be documented by the applicant so that it can be verified as part of the certification/inspection process. I was aware of the changes to the rule but I was not aware that, because of the date on the BLF application this farm is the first to have to meet the new requirement rather then as most, have a 2011 inception date. This fact was presented to me by Dave the AMS/USDA auditor The certifier Reuven Flamer was not aware of this nor was the farmer. Given that there has been only a short period when harvest records were kept and there are no records of pasture use, I was not

# Organic Farm and Livestock Certification Report

(b) (6), Independent Organic Certification Inspector

able to figure the DMI during the inspection. I will do my best to come up with numbers based on the information I have. The applicant is aware that it his responsibility to make these calculations and to keep the records needed to do so.

## **Certification History/Previous Non-compliance**

This is a new application for certification, no past history of certification.

## **Farm/Field History**

There is a completed Farm History document filled out as part of the Organic Farm Plan (OFP). There are maps of the fields with Map Unit Legends for fields 1-4.

My file did not contain maps of Fields 14-21. These may have just not gotten copied to my copy of the file. NFC should be sure that they have copies of maps for all fields.

I traveled to all the fields with the applicant and discussed each field. I found the maps and written field history to be accurate per my conversation with the applicant. I looked at the applicants copies of the maps I did not have at the tail end of the inspection to compare to the fields I had been to. The overall condition and growth of the fields was excellent given that it is mid-August and it has been a fairly dry summer overall.

The main farm of 88 acres has been in the applicants control since 1981. Prior to that the farm was a dairy and vegetable farm until 1969 for the dairy and 1976 for the vegetable operations. The current owner has used only manure and minerals on the land.

Fields 1-13 are the fields on the main farm. Field 8 is a new field created by logging the woods, removing the stumps and building the land.

Fields 14-21 are on leased land all under the applicants control since 2007 or before most of them for many, many years.

There may be additional fields added in the future.

The farm was producing veal calves with some raw milk sold as surplus. The farmer decided to make the milk component organic and is in the process of adding a small milk process plant to the farm.

The conventional veal operation will continue.

The other component of the farm is a chicken processing plant processing 4-5 thousand Kosher birds a week. The chickens are brought in not raised here.

The farmer said that they will be adding a duck production component to the farm across the street adjacent to the chicken plant run by the farmer's son.

## **Crop Profile**

The only crop raised here is pasture/hay. The hay is processed as baled hay (square and round) and haylage, which is used as conserved forage during the non-grazing season.

The hay fields are in permanent sod.

Many of the fields serve both as pasture and for hay. The applicant pointed out pastures that had been mowed because the cows can not keep up with the growth.

This year saw good crop growth early so 1st cut was a couple weeks earlier then normal and many fields are now near or past 3rd cutting.

Rabbi Bob makes dry bales with the mid-season. In the spring and fall when the drying of the grass is a real challenge he makes haylage. He had a good amount of hay and haylage already put up for the season. There was hay down the day of inspection to be baled the next day. From what is made and what I saw in the fields this farm will have plenty for the cows and should have a good surplus of conserved forage for the winter and spring months.

## **Organic Plan Verification**

# Organic Farm and Livestock Certification Report

Carlton C. Holcomb, Independent Organic Certification Inspector

The Farm and Livestock plans were pretty well done for a first time applicant. As stated above the file sent to me did not have maps for Fields 14-21.

NFC has requested soil tests be done and made part of the OFP.

When one is taken a copy of the water test (will have to get for the milk processing) needs to be sent to NFC to be included in the OFP.

## **Seeds, Seedlings, Perennial Planting Stock**

The only seed purchased in years was for the seeding of the new field 8 after it was cleared of trees and stumps and made into a field. A Timothy/clover mix was used. The seed was from Ampac Seed. It was not treated with mold inhibitor. It is not certified organic seed.

## **Fertility and Nutrient Management**

The fields have been managed for many years with just manure applied and at times limestone. Timely mowing is done to eliminate weeds. There is adequate pasture/fields for grazing and hay. The farmer rotates the cows and hays the pastures when they get high and there is more then the cows can eat.

The manures used on the fields are cow, duck and chicken.

The applicant has not had soil tests done. He has been asked to by NFC so that a baseline of where the fields are at from a health point of view can be established. Rabbi Bob will do this but feels he can tell what the fields need by looking at them. There is no question in my mind that these fields as a group are in good to great health.

In the past there have not been any records of input applications kept. NFC asked the farmer to do so and he had started a log by the time of the inspection. The amounts were not being recorded, just the day and the field. We had some discussion of how to judge the amounts of manure in a load, given that the liquid manure could have more or less solids in the loads. Bob needs to establish an average for the loads and use that as a number for his records. Same for the manure spreader.

## **Manure Management**

The manure produced on the farm is spread on the fields year round except the dead of winter. The farmer tries to get the manure out on the fields right away to avoid stockpiling.

Hay is used for bedding and barn lime is used for insect control so these will be present in the manure.

A large cement pad is being installed for loafing near the barn. Part of this pad was being installed the day of the inspection. This addition will make the cleaning of the barn and areas around it much easier and the cows will be cleaner.

The calf pens and milker stanchion area is cleaned once or twice a day. The other areas are cleaned as needed at least once a week.

As stated above the farmer has not been keeping input records until recently. He started recording what fields are manured when. However he was not recording the amounts. This will need to be done in the future.

## **Compost/ Bulk Organic Matter**

Only manure is used. No Bulk organic matter or compost used.

## **Pest, Weed and Disease Control**

There are no pest or disease problems with the hay fields or pastures. Perennial weeds such as golden rod, milk weed and rag weed can be found in the fields here and there. While not enough to be a problem, Rabbi Bob is trying to be more timely in mowing the

# Organic Farm and Livestock Certification Report

(b) (6)

Independent Organic Certification Inspector

areas where the weeds are trying to invade.

I looked at each field during the inspection. I would rate them as very good to excellent as far as good sod with minimal weeds and for the health of the grass in mid-August.

Barn lime is used in the barn to reduce flies.

The cows are rotated in the fields which helps with fly control.

## Harvest/Storage

The hay is harvested as small square bales, big round bales and haylage. The square bales are stored in a barn. The round bales are stored some inside and some out of the various barns and sheds. The haylage is in the barnyard in the standard plastic wrap tubes.

The harvest equipment is all owned by the farmer and is used only on this farm.

## Water

The water used is from the on-farm well. A simple cartridge filter is used to filter the well water. There is water available at all times for the animals.

In addition to the well there is a spring in field #10 where the heifers can drink. The area is limited and is a solid area with tree roots and rocks prevent erosion.

A water test will be taken as part of the milk process plant licensing. When done a copy should be sent to NFC for addition to the OFP/OLP

## Adjoining Land Use/Buffer

There are no agricultural uses on the borders of this operation. The primary border is woods. There are a couple residential homes which adjoin the borders. I looked at these fields with NFC certifier Reuven Flamer and the farmer. There do not appear to be any issues with these properties at this time. They all have at least between 10-25' or more between the lawn and plantings and the field. One of the homes is a show home for some TV show. There are flower beds and some fruit and ornamental trees. The buffers seem to be enough as they are now established.

The farmer understands he needs to monitor activities on these borders and that good communications with the neighbors is the best preventative to having any problems.

## Split or Parallel Production

The dairy operation is all organic. It is a closed herd with only a new bull bought as needed.

Veal calves are raised on the farm in the dairy barn. These are not raised as organic. The surplus males from the dairy operation are used in the veal operation. The veal calves are fed milk, pasture and the same hay as the organic cows but are not raised as organic.

Antibiotics are used at times on these animals. There were antibiotics on hand. There was a sick with pneumonia veal calf.

Across the street from the cow barn is a chicken processing (4-5 thousand a week) facility which is part of the farm complex and is run by Rabbi Bob's son. These are processed as Kosher birds. I mention this area because the applicant mentioned that the back part of the long building and adjacent areas will be used for duck production in the future. It was not stated if these birds will be raised organic or not.

## Equipment

The farmer has adequate equipment to meet and exceed the needs of the farm. The equipment appeared to be in good condition. Much of it is stored under cover.

The farmer states the equipment is used only on this farm.

The only equipment contracted is the trucks that spread the liquid manure on the fields and the lime spreader truck.

(b) (6)

, Independent Organic Certification Inspector (b) (6)



# Organic Farm and Livestock Certification Report

(b) (6)

Independent Organic Certification Inspector

## Livestock Profile

This closed herd is a mix of Jersey, Holstein and crosses of the two. The bull is a Jersey at this time.

On the day of the inspection the wet milk cows numbered 19. There were 15 cows ready to freshen. There were 20 heifers, 8 of them bred many of the rest small/young.

## Origin Of Livestock

This is a closed herd. A closed herd is maintained. The only new animal is when a new bull is brought in to keep the genetics strong. The bull is a Jersey now.

The herd started out as Holstein and Jerseys and is now some of each and many crosses. I looked at all the cows young and old. They all appeared in good condition and health.

## Living Conditions

The barns and surrounding areas were overall clean. There was a minimal amount of fly activity. The cows were all out on pasture. The pastures are large with adequate areas for shade and shelter. There is adequate roofed shelter for all animals when needed in severe weather. Chopped mulch hay from the farm is used as bedding. Sawdust from a local mill has been used as bedding in the past.

The cows have access to the outdoors at all times except in the most extreme weather.

A large concrete pad is being constructed near the barn to make the loafing area easier to clean and sanitize as needed. This will keep the cows cleaner as well.

Barn lime is used after daily cleaning of the barn for fly control.

The youngest heifer calves were on pasture by the barn. They had grass and trees for shade.

The bigger young were in a 2 acre lot.

The larger heifers and milk cows were all on pasture.

There are stanchions for the milkers and many additional pens in the main barn. There are a number of other buildings (run in sheds) used for housing/shelter for the animals as needed.

## Feed and Feed Supplements

The primary feed for all animals is hay grown on the farm fields. This is eaten fresh in season and as conserved forage in the winter.

The grazing season here runs from early May to near the end of November. This 7 months would be the maximum. The time when there is adequate graze may be more close to 6 months most years. It is well above the 120 day minimum required.

To be able to calculate if the dairy cows are getting at least 30% of their feed (DMI) from pasture I would need to know the moisture content and or dry weight of the mixed grain being fed. The farmer will have to get this from the supplier. The farmer should also have the haylage tested for moisture if any is being fed in the grazing season.

Using what I have I can make this calculation. These animals are a mix of Holstein, Jersey and crosses of the two.

Taking an average weight of 1300 pounds (this may be a bit higher then the herd average with the Jerseys) the lactating cows would require 44.46 pounds in DMI (from USDA/NOP worksheet) intake from the pasture.

The milkers are getting 5 pounds of mixed grains and minerals each day. Estimating a 10 percent moisture of the grain we would have 4.5 pound of DMI from the grain.

The farmer also stated that the cows eat a couple pounds of dry hay while in for milking. Going to the high side and saying they eat 5 pounds of dry hay a day would give us again

(b) (6)

, Independent Organic Certification Inspector (b) (6)

# Organic Farm and Livestock Certification Report

(b) (6), Independent Organic Certification Inspector

about 4.5 pound of hay in DMI. So taking 44 pounds of pasture and 9 pounds from other sources gives us 53 pounds of feed, DMI. This shows us that the lactating cows are getting about 83% of their DMI from pasture in the grazing season.

In the future the farmer is going to have to record the sizes of pasture, growth rates and amount of time the animals are on a given area.

The heifers are fed grain for about 1 month after weaning. They are on pasture from very young.

The conserved hay is in the form of small square bales, large round bales and as haylage stored in plastic wrap tubes.

The dry hay is taken in the middle of the season while the moist haylage is harvested in the spring and fall when drying can be a issue.

The organic grain mix used is from Cold Spring Farm. They buy 6 tons at a time. This mix contains grain (corn, roasted soybeans) and supplements (dairy minerals, Redmond salt, kelp meal, feed grade lime/calcium carbonate, organic molasses).

The heifers are fed grain for about a month after they are weaned from milk at about 3 months. After that they are on straight hay until they are ready to birth their first calf. The milkers get a ration of 5 pounds of grain a day.

In late summer and fall if the pastures are running out, sometimes the cows are kept in smaller lots ( 1 and 2 acre) near the barnyard for the night after milking and let back to pasture after the morning milking. At these times the cows are fed additional conserved forage as needed while in these areas. The main pastures were still pretty strong at the time of my visit.

The only other feed supplement used are mineral blocks. The product now being used is OMRI listed (product #red-0214) Redmond Natural Mineral Salt Block. The OMRI certificate is in the OLP.

## Pasture

The pasture for the milkers consists of 3 main fields of 5,8 and 10 acres plus smaller lots of 1 and 2 acres around the barn area. The farmer prefers a rotation that is not intensive. He believes the larger lots for grazing is more suited to the cows natural life. These 3 main lots are usually hays as well as grazed.

With the current herd of milkers at 19 and ready to freshen it gives us a maximum of under 30 cows using this amount of pasture.

Counting the smaller lots and rounding down to 30 acres and using the 30 cow number we have an acre a cow. Given the healthy nature of the pastures there is more then enough pasture for these animals during the grazing season.

The heifers have about 55 acres that they are moved around on. The remainder of the 55 acres is hayed. There are 20 heifers now so they have more then adequate pasture for the grazing season.

In addition the small heifer calves are put on pasture before 3 months in a 2 acre lot near the barn.

## Animal Health

There have not been any health records maintained. The farmer has been advised he needs to record all actions regarding the health care of the animals. In that he has the veal operation and had antibiotics on site, it is imperative he keep accurate records of the purchase and use of the antibiotics (lot # should be recorded).

The only health problem of note for the dairy herd seems to be mastitis. Some cows were

# Organic Farm and Livestock Certification Report

(b) (6)

Independent Organic Certification Inspector

culled due to mastitis in the recent past. The details of this are in the OLP.

The construction of the cement pad in the loafing area is part of the effort to reduce this problem through better cleaning and sanitation.

For most cases of mastitis, the farmer milks the mastitis affected cow or the affected quarters of the cow and is able to pipe it into a separate tank where it is used to feed the veal calves.

The medications on hand at the time of inspection were Durvet Iodine 7%, Durvet Dextrose 50%, Isopropyl alcohol, Blue Kote, Durvet Calcium Glucotomate, Vedco Veda Sorb Bolus.

There were also 2 antibiotics which the farmer states are used for the veal calves. There was a veal calf with Pneumonia at the time of the inspection.

The animals are de-horned with steel clipper. This is to prevent injury to each other and to the people working with them.

The farmer states not issues with internal parasites.

## **Breeding/Reproduction**

The breeding is natural for this closed herd. The only animal added is a bull as needed. The bull at this time is a Jersey. He will be replaced at some point to keep the genetics strong.

The herd is composed of Jersey and Holstein breeds and crosses between the two.

Many of the females are kept for replacement.

The males are used in the non-organic veal production.

## **Milk Handling**

The cows are milked twice a day in stanchions by machine. The milk travels by pipe to the milk tank. The milk tank is kept locked per the Rabbi for Kosher. There is a separate line and tank which is used for any milk that is from a mastitis cow. This milk is taken last through the separate pipeline into the separate tank which is used to feed the veal calves. Good milk is also used to feed the veal calves.

The pipelines and tank are cleaned with 140F water. There is a rinse cycle then detergent cycle and rinse after milking. Just before milking, chlorine bleach sanitizer is used.

The organic milk is to be processed on farm. Up to now the milk has been marketed only as raw. The process equipment was not fully installed and functional The milk process is covered in the Handling report.

The teat dip being used will have to be replaced. The farmer is aware of this. He will find a compliant product.

## **Transportation**

The milk stays on the farm to be processed. Hay is brought from the field to the storage by tractors, wagons and trucks.

## **Audit Trail**

The audit trail is not complete as of the day of the inspection.

There are many records that need to be kept.

Harvest records were kept for a short time but then were stopped.

Input record are starting to be kept but amounts are not being recorded.

There are no health care records being kept.

There was only 1 invoice for organic feed. This invoice had issues (missing word organic on line items) discussed elsewhere in this report. The other invoices were not on site for review.

(b) (6)

, Independent Organic Certification Inspector (b) (6)

# Organic Farm and Livestock Certification Report

(b) (6), Independent Organic Certification Inspector

There need to be outside access records kept from here forward. DMI and DMD worksheets will have to be used.

NFC has requested soil tests for all fields. None on file.

Milk production records need to be kept.

The animals have a number and a name for ID.

## Summary/Issues

The issues discussed herein needing attention include improvement of records (Input manure, harvest, health, pasture record). Water test and soil tests are needed. An MSDS for the bleach used in the milk house is needed.

The teat dip will have to be changed. The farmer is aware of this.

DMD and DMI calculations and records will have to be maintained.

## Exit Interview

- 1- Record keeping need improvement. Applicant was informed of changes needed.
- 2 - Some feed purchases invoices not available Records are required to be available
- 3 - Soil tests are needed to create a base line for nutrient management.
- 4 - Dry Matter Intake (DMI) calculations need to be completed and submitted to NFC.

## Attachments

- 1 - Feed slip from organic feed supplier.

(b) (6)

Date

The information in this report is confidential between the Inspector, the Inspected Party and the Certification Agent. The findings of this report do not constitute certification or consultation, nor should it be used for promotional purposes. This is an evaluation of the applicant's operation in reference to the standards and policies of the Certification Agent. All recommendations contained in this report are intended to be subject to review by the Certification Agent who will be responsible for final certification decisions regarding the applicant.

# **Bethel Livestock**

## **Dry Matter Intake from Pasture**

### **Introduction**

The Access to Pasture final rule (February 17, 2010) requires that ruminant animals be managed on pasture and graze daily throughout the grazing season. To ensure a pasture-based management system, the rule requires that ruminant animals derive not less than an average of 30 percent of their dry matter intake (DMI) from pasture during the grazing season (grazed from vegetation rooted in pasture or residual forage).

Bethel Livestock is fully compliant with the above rule for its entire dairy herd, as demonstrated by the calculations below.

### **Length of Grazing Season**

The grazing season at Bethel Livestock is from May 1 until November 1 of each year.<sup>i</sup>

For practical purposes of calculating Dry Matter Intake, we have divided the grazing season into two parts:

1. Early and Mid-Season: May 1 through August 15. Animals are outside in pasture 24 hours/day.
2. Late Season: August 15 through November 1. Animals are in pasture in the day time and inside at night (Lactating cows only; all other are pasture fed)

### **Herd Composition and Characteristics**

The dairy herd consists of 31 dairy cows among 57 animals total, divided as follows:

| <b>Animal Type</b>    | <b>#</b> |
|-----------------------|----------|
| Cows, Early Lactation | 8        |
| Cows, Mid-Lactation   | 13       |
| Dry Cows              | 7        |
| Heifers, Bred         | 3        |
| Heifers, Non-Bred     | 15       |
| Calves                | 11       |

The breed of the cows is 6 Jersey (small breed, average weight 900 lbs) and 7 Holstein (large breed, average weight 1100 lbs); the remainder are mixed breed Jersey-Holstein, with an average weight of 1000 lb; these will be considered small breed.

The cows average 40-45 lbs/day in milk production, and the average milk fat % is 3.8%. For the purposes of these calculations, these figures will be estimated at 44.09 lbs/day milk production and 4.0% milk fat.

## Dry Matter Demand

Dry Matter Demand has been determined by using published data.<sup>ii</sup>

| Animal Type                        | Avg. Wt. (lbs) | DMD (lbs.) |
|------------------------------------|----------------|------------|
| Cows, early lactation, small breed | 900            | 20.27      |
| Cows, mid lactation, small breed   | 900            | 35.27      |
| Cows, early lactation, large breed | 1100           | 26.46      |
| Cows, mid lactation, large breed   | 1100           | 28.10      |
| Dry Cows                           | 900            | 16.20      |
| Heifers, Bred                      | 1000           | 25.00      |
| Heifers, Non-Bred                  | 700            | 17.50      |
| Calves                             | 220            | 6.30       |

## Dry Matter Intake from Non-Pasture Sources

Early through Mid Grazing Season (also late season for dry cows, heifers, and calves)

| Feed Source      | Weight, as fed (lbs) | % Dry Matter | Weight, Dry Matter (lbs) |
|------------------|----------------------|--------------|--------------------------|
| Grain (corn/soy) | 5                    | 89%          | 4.45                     |

Late Grazing Season (Lactating cows only)

| Feed Source      | Weight, as fed (lbs) | % Dry Matter <sup>iii</sup> | Weight, Dry Matter (lbs) |
|------------------|----------------------|-----------------------------|--------------------------|
| Grain (corn/soy) | 5                    | 89%                         | 4.45                     |
| Hay              | 13.33 <sup>iv</sup>  | 90%                         | 12.00                    |

## Dry Matter Intake from Pasture

Cows, early lactation, small breed

| Grazing Season      | DMD (lbs.) | DMI, Non-Pasture (lbs) | DMI, Pasture (lbs) | DMI Pasture (%) |
|---------------------|------------|------------------------|--------------------|-----------------|
| Early to Mid-Season | 20.27      | 4.45                   | 15.82              | 78.05           |
| Late Season         | 20.27      | 16.45                  | 3.82               | 18.84           |
| Average             | 20.27      | 10.45                  | 9.82               | 48.45           |

Cows, mid lactation, small breed

| Grazing Season      | DMD (lbs.) | DMI, Non-Pasture (lbs) | DMI, Pasture (lbs) | DMI Pasture (%) |
|---------------------|------------|------------------------|--------------------|-----------------|
| Early to Mid-Season | 35.27      | 4.45                   | 30.82              | 87.38           |
| Late Season         | 35.27      | 16.45                  | 18.82              | 53.36           |
| Average             | 35.27      | 10.45                  | 24.82              | 70.37           |



Cows, early lactation, large breed

| <b>Grazing Season</b> | <b>DMD (lbs.)</b> | <b>DMI, Non-Pasture (lbs)</b> | <b>DMI, Pasture (lbs)</b> | <b>DMI Pasture (%)</b> |
|-----------------------|-------------------|-------------------------------|---------------------------|------------------------|
| Early to Mid-Season   | 26.46             | 4.45                          | 22.01                     | 83.18                  |
| Late Season           | 26.46             | 16.45                         | 10.01                     | 37.83                  |
| Average               | 26.46             | 10.45                         | 16.01                     | 60.50                  |

Cows, mid lactation, large breed

| <b>Grazing Season</b> | <b>DMD (lbs.)</b> | <b>DMI, Non-Pasture (lbs)</b> | <b>DMI, Pasture (lbs)</b> | <b>DMI Pasture (%)</b> |
|-----------------------|-------------------|-------------------------------|---------------------------|------------------------|
| Early to Mid-Season   | 28.1              | 4.45                          | 23.65                     | 84.16                  |
| Late Season           | 28.1              | 16.45                         | 11.65                     | 41.46                  |
| Average               | 28.1              | 10.45                         | 17.65                     | 62.81                  |

Dry Cows

| <b>Grazing Season</b> | <b>DMD (lbs.)</b> | <b>DMI, Non-Pasture (lbs)</b> | <b>DMI, Pasture (lbs)</b> | <b>% DMI Pasture</b> |
|-----------------------|-------------------|-------------------------------|---------------------------|----------------------|
| Entire season         | 16.20             | 4.45                          | 11.75                     | 72.53                |

Heifers, Bred

| <b>Grazing Season</b> | <b>DMD (lbs.)</b> | <b>DMI, Non-Pasture (lbs)</b> | <b>DMI, Pasture (lbs)</b> | <b>% DMI Pasture</b> |
|-----------------------|-------------------|-------------------------------|---------------------------|----------------------|
| Entire season         | 25.00             | 4.45                          | 20.55                     | 82.20                |

Heifers, Non-Bred

| <b>Grazing Season</b> | <b>DMD (lbs.)</b> | <b>DMI, Non-Pasture (lbs)</b> | <b>DMI, Pasture (lbs)</b> | <b>% DMI Pasture</b> |
|-----------------------|-------------------|-------------------------------|---------------------------|----------------------|
| Entire season         | 17.50             | 4.45                          | 13.05                     | 74.57                |

Calves

| <b>Grazing Season</b> | <b>DMD (lbs.)</b> | <b>DMI, Non-Pasture (lbs)</b> | <b>DMI, Pasture (lbs)</b> | <b>% DMI Pasture</b> |
|-----------------------|-------------------|-------------------------------|---------------------------|----------------------|
| Entire season         | 7.14              | 4.45                          | 2.69                      | 37.68                |

## Summary

| <b>Animal Type</b>                  | <b>% DMI Pasture</b> | <b>More than 30%?</b> | <b>Meets Requirement?</b> |
|-------------------------------------|----------------------|-----------------------|---------------------------|
| Cows, early lactation, small breed* | 48.45                | yes                   | yes                       |
| Cows, mid lactation, small breed*   | 78.37                | yes                   | yes                       |
| Cows, early lactation, large breed* | 60.50                | yes                   | yes                       |
| Cows, mid lactation, large breed*   | 62.81                | yes                   | yes                       |
| Dry Cows                            | 72.53                | yes                   | yes                       |
| Heifers, Bred                       | 82.20                | yes                   | yes                       |
| Heifers, Non-Bred                   | 74.57                | yes                   | yes                       |
| Calves                              | 37.68                | yes                   | yes                       |

## Conclusion

As all animals receive more than 30% of their Dry Matter Intake from Pasture during the grazing season as per the requirement of the Access to Pasture rule, Bethel Livestock is fully compliant with this requirement.

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## Notes

<sup>i</sup> Based on observation and the common practice of farms in Sullivan County, NY; can be substantiated by the Extension Service.

<sup>ii</sup> The source for lactating cows is from Tables 1-1 through 1-6 of the *NOP Dry Matter Demand Tables for Classes of Dairy Cattle*. The source for dry cows and heifers is from data published by the *Midwest Organic Services Association* calculating DMD as a percent of body weight. The NOP Tables listed DMD for calves only up 220.5 lb; as the calves at Bethel average 250 lb, the DMD was calculated as 2.5% of body weight. This was based on the known DMD for 220.5 lb calves listed in NOP Table 1-12 being between 2.2 – 2.8% of body weight and the DMD for heifers according the MOSA data as being 2.5% of body weight.

<sup>iii</sup> Based on data published in the *NOP Program Handbook* 2010.

<sup>iv</sup> The weight of the feed given to the animal; actual consumption is less. Leftover hay is not calculated, which would result in the final %DMI from pasture being even higher than is calculated.

## Schurkamp, Lynnea - AMS

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**From:** Mary Ellen Holliman <Mary.Holliman@TexasAgriculture.gov>  
**Sent:** Monday, July 16, 2012 4:08 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: Idea proposal

I don't know. That is around the end of the first milking for at least 1 dairyman so I will have to send out update emails to see what there schedules are.

Sincerely,  
*Mary Ellen Holliman*  
Coordinator for Organic Certification Program  
Texas Department of Agriculture

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**From:** Updike, Scott - AMS [mailto:Scott.Updike@ams.usda.gov]  
**Sent:** Monday, July 16, 2012 2:42 PM  
**To:** Mary Ellen Holliman  
**Subject:** RE: Idea proposal

Hi Mary Ellen,  
Unfortunately Miles' schedule has recently changed and the only time he has available on Thursday is 11-12:30 EST. Will that work?

Scott

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**From:** Mary Ellen Holliman [mailto:Mary.Holliman@TexasAgriculture.gov]  
**Sent:** Monday, July 16, 2012 1:30 PM  
**To:** Updike, Scott - AMS  
**Subject:** RE: Idea proposal

Good morning Scott:

I've received confirmation from all three dairymen that Thursday, July 19 from 11:00 -12:00 CST (1-2:00 EST) is the preferable date and time for the conference call please forward the call-in number, pass code,etc. and I will forward to my producers. I plan to mail the CD-ROMS with all the OSPs and inspection reports today via FedEx so you should receive them on Thursday.

Sincerely,  
*Mary Ellen Holliman*  
Coordinator for Organic Certification Program  
Texas Department of Agriculture

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**From:** Mary Ellen Holliman  
**Sent:** Tuesday, July 10, 2012 4:56 PM  
**To:** 'Updike, Scott - AMS'  
**Subject:** RE: Idea proposal

Hi Scott:

I will send an email to my producers requesting the date and time that they prefer. I'm pretty sure all four dairy operations have different morning and afternoon milking schedules and one dairyman has to travel across the New Mexico-Texas state line. Typically I get the best results in reaching the dairymen via telephone between 1 and 2:00 CST (2-3 EST).

I have been including copies of the inspection reports with the OSP but will double-check before mailing. Please note that all inspections were conducted prior to the variance request so there will be no mention of how the operations were handling the variance request at the time of inspection.

Also, can you give me a tentative agenda of when you plan to start/finish the tour of the TDA operations? I need to schedule my travel and the producers have requested tentative dates and times that we will be on-site at their operations. My suggestion would be to start with the smallest operation, Redland Dairy and then travel to Boehning Dairy and Hilltop Dairy (both owned and operated by Brian Boehning) and then finish with the largest operation (which is also the furthest distance), Natural Prairie Organic Dairy Farm.

Sincerely,

*Mary Ellen Holliman*

Coordinator for Organic Certification Program  
Texas Department of Agriculture

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**From:** Updike, Scott - AMS [\[mailto:Scott.Updike@ams.usda.gov\]](mailto:Scott.Updike@ams.usda.gov)

**Sent:** Tuesday, July 10, 2012 12:38 PM

**To:** Mary Ellen Holliman

**Subject:** RE: Idea proposal

Hi Mary Ellen,

I talked to Miles and he likes the idea of having a round table conference call. NOP could host the call on our teleconference line. Miles would have some time on Tuesday the 17<sup>th</sup> around noon eastern time or Thursday the 19<sup>th</sup> sometime between 11 and 2 eastern. Would any of those times work for you and the producers? Dairy and beef farmers I have worked with here in the east were amenable to teleconference calls around lunch time. Do Texas cattle farmers feel the same way?

I appreciate all of your thoughts on the why there is such a lack of organic slaughter capacity. That seems to be the biggest stumbling block to more US production of organic beef. I was in a high end grocery store here in the MD to look at organic meat prices and all of the organic beef was from South America.

Miles has also requested a copy of the most recent inspection reports for the farms. Would it be possible for you to send those as well?

Scott

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**From:** Mary Ellen Holliman [\[mailto:Mary.Holliman@TexasAgriculture.gov\]](mailto:Mary.Holliman@TexasAgriculture.gov)

**Sent:** Friday, July 06, 2012 5:40 PM

**To:** Updike, Scott - AMS

**Cc:** Organic

**Subject:** Idea proposal

Hi Scott:

I tried to leave a voice mail but my antiquated office phone was not cooperating. I've spoken with a couple of our livestock producers that will be part of the tour and if possible, they would like to have a round-table conference call. This would help decrease the chance of you and Miles hearing the same comments multiple times, and decrease the amount of time that the producers have to spend away from daily work activities. The operations I certify have at least 2 milking a day and

are in the early season of harvesting feed crops. The conference call system used by TDA would allow for several more producers and their ACAs to join in on the conference call so you would be able to get a good pool for addressing the issues mentioned in your previous email. I am currently in the process of finding available locations for that week that could host the conference call. Please let me know what if you and Miles would like for me to pursue this further.

Also, I received some help from an intern in scanning all the OSP files so those should be over-night mailed to you by next Tuesday at the latest.

Sincerely,

*Mary Ellen Holliman*

Coordinator for Organic Certification Program

Texas Department of Agriculture

Office: (512) 463-7513

Fax: (888) 215-5295

[Organic@TexasAgriculture.gov](mailto:Organic@TexasAgriculture.gov)

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## Schurkamp, Lynnea - AMS

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**From:** Updike, Scott - AMS </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=UPDIKE, SCOTT7C605C71-C931-40F9-B608-8C1626DB4D56BEA>  
**Sent:** Friday, June 22, 2012 3:43 PM  
**To:** Mary Ellen Holliman  
**Subject:** RE: TDA organic livestock operation tours the week of July 23 - 27

Dear Ms. Holliman,

Our trip is not to inspect or verify compliance of the farms or certifiers. We want to see how the farms used the pasture rule exemption and conditions that might lead to such exemptions in the future. We would like to see how the farms are sourcing replacement animals their suggestions on possible changes to the Origin of Livestock regulations. We know that the OIG audit involved inspections of dairies in Texas. We would like to talk to these farmers to get ideas for practical solutions to issues raised by OIG. We do not want to cause any problems or worry for the farms or certifiers.

We only would like a copy of an OSP from 1 year from each of the farms. A 2011 copy would be fine if you do not have 2012 copy yet.

I spoke to Miles and he would like to visit Natural Prairie. I did some checking and saw that NOP Compliance and Enforcement is working on that case, though I have no timeline for completion.

I was Beef Extension Specialist before coming to the USDA-NOP. I have spoken to many organic beef producers or beef producers who did not become organic due to the lack of organic slaughter plants. Do you have any insight into why packers across the country have not become certified?

Thank you for your help with this.

scott

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**From:** Mary Ellen Holliman [mailto:Mary.Holliman@TexasAgriculture.gov]  
**Sent:** Friday, June 22, 2012 12:49 PM  
**To:** Updike, Scott - AMS  
**Cc:** Organic; Randy Rivera  
**Subject:** RE: TDA organic livestock operation tours the week of July 23 - 27

Dear Mr. Updike:

Thank you for the notification. As several of these accounts are still in the renewal process, it may take time to complete the reviews and prepare the OSPs to send to you. Please be aware that these are extremely large files (each operation has at least 3 different certifications) so I must mail the files to you. For these reasons, please clarify if you just want the current OSP for each certification or if you need multiple years. Also, all of these locations were inspected as part of the organic milk audit conducted by the USDA/OIG, and the Boehning Dairy Livestock account was selected as the livestock witness audit in May 2012 as part of TDA's accreditation renewal audit. Therefore, it may be of little to no benefit in gaining new information. However, Natural Prairie has an outstanding complaint investigation with NOP that is approximately 2 years old and the owners would greatly appreciate NOP officials coming out to their facility to conduct an on-site inspection in order to complete the complaint investigation.

TDA does not currently certify any organic livestock slaughter facilities and to TDA's knowledge, there are no certified organic livestock slaughter facilities in Texas. The Texas organic producers certified by TDA do not have the resources to



ship their ruminant livestock long distances and must sell their product either on the hoof or labeled as produced without the use of hormones or antibiotics.

Sincerely,

*Mary Ellen Holliman*

Coordinator for Organic Certification Program

Texas Department of Agriculture

Office: (512) 463-7513

Fax: (888) 215-5295

[Organic@TexasAgriculture.gov](mailto:Organic@TexasAgriculture.gov)

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**From:** Updike, Scott - AMS [<mailto:Scott.Updike@ams.usda.gov>]

**Sent:** Friday, June 22, 2012 10:11 AM

**To:** Pooler, Bob - AMS

**Cc:** Mary Ellen Holliman

**Subject:** RE: Request for livestock contacts with certifiers

Hi Ms. Holliman,

Miles McEvoy asked me (the new livestock specialist for the NOP) to arrange a trip to Texas to assess the pasture rule exemption that was given to ruminant livestock producers in most Texas counties in 2011. We plan on going to Amarillo and then visiting some organic dairy and beef farms. While touring organic beef and dairy farms, we will also examine some other issues that have been raised to the attention of the NOP including how the farms are sourcing replacement females and breeder stock for potential revisions of the Origin of Livestock regulations, how farms and dairy processors coordinate sanitizer use of bulk milk trucks, and the availability of organic slaughter facilities for organic beef producers and culling of organic dairy cattle.

We would like to visit several farms which you TDA certifies the week of July 23 – 27.

Boehning Dairy Farm in Earth, TX

Hilltop Dairy, LLC in Earth, TX

Redland Dairy, LLC in Farwell, TX

Natural Prairie Dairy in Channing, TX

For each of these farms could you send us a copy of their Organic System Plan and the best contact person?

I was looking to see if there are any beef slaughter plants in the panhandle region of Texas which are certified organic. Do you know of any even if TDA does not certify them? Where do the organic beef cattle in Texas go for slaughter?

A representative from TDA would be welcome to join us.

Sincerely,

Scott Updike

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**From:** Pooler, Bob - AMS

**Sent:** Thursday, June 21, 2012 12:52 PM

**To:** Updike, Scott - AMS

**Cc:** Mary Ellen Holliman ([Mary.Holliman@texasagriculture.gov](mailto:Mary.Holliman@texasagriculture.gov))

**Subject:** RE: Request for livestock contacts with certifiers

TDA Contact: Mary Ellen Holliman

Phone: 512-463-7513

Email: [Mary.Holliman@texasagriculture.gov](mailto:Mary.Holliman@texasagriculture.gov)

---

**From:** Updike, Scott - AMS  
**Sent:** Thursday, June 21, 2012 12:49 PM  
**To:** Kuhn, Meg - AMS; Crail, Lars - AMS; Pooler, Bob - AMS  
**Subject:** Request for livestock contacts with certifiers

Hi,  
Miles has asked for me to set up a trip with him to the Texas panhandle to learn about a couple of different aspects of ruminant production (dairy and beef). I have identified several ruminant farms in the area and Miles suggested that I ask you who the appropriate livestock contact person is for each of these certifiers.

QAI  
QCS  
Texas DOA

On the ACA assignment sheet, I did not see who was responsible for New Mexico DOA. Who should I contact to ask about the livestock contact with NM DOA?

Scott

M. Scott Updike, PhD  
Agricultural Marketing Specialist  
Standards Division  
USDA-AMS-NOP  
1400 Independence Ave., S.W.  
Room 2646-S, STOP 0268  
Washington, D.C. 20250  
Phone 202-260-8076

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