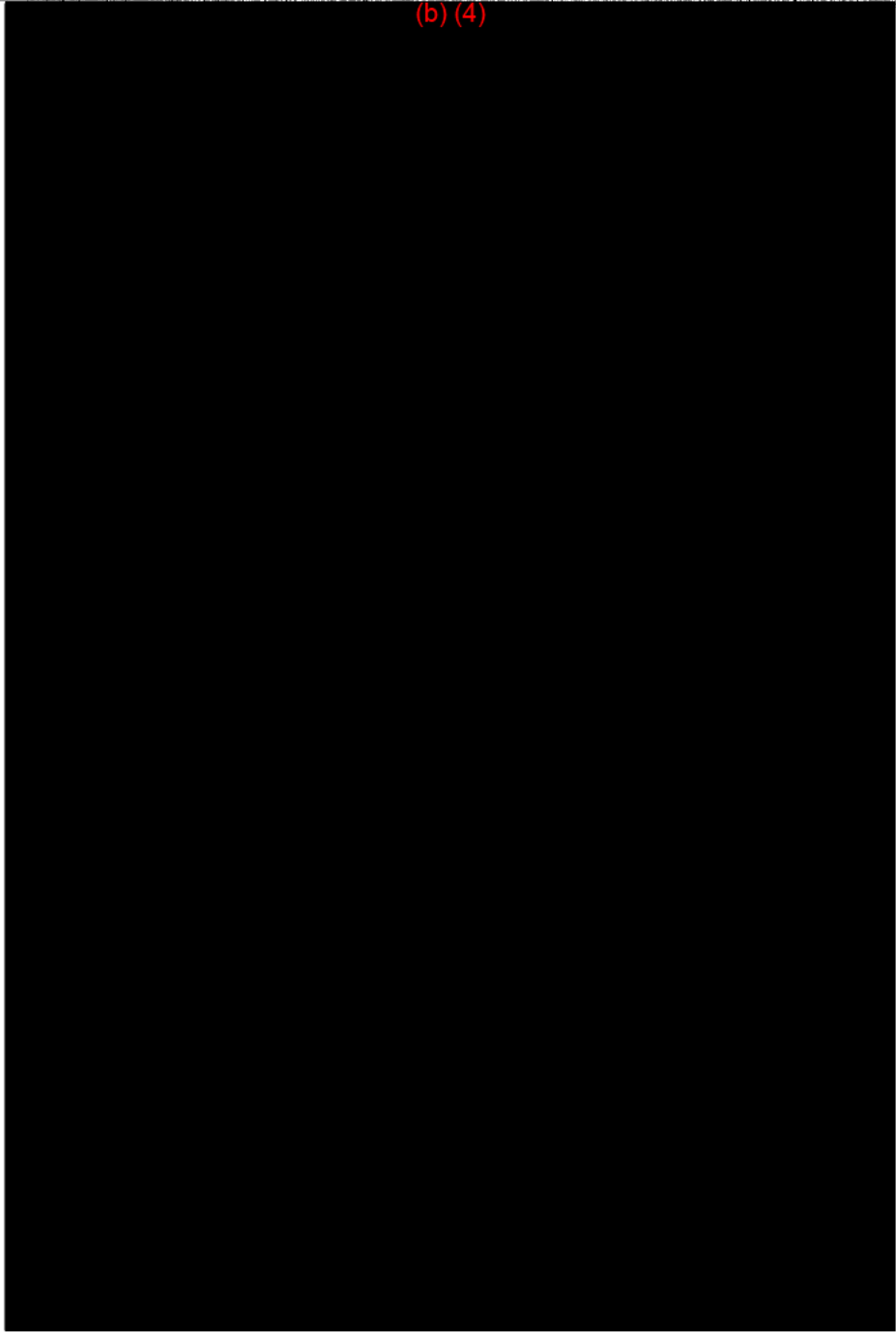


(b) (4)

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12/3/2010

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8/10/2010

9:11:34 AM

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(b) (4)



(b) (4)

XI ↑

(b) (4)

REDLAND DAIRY, LLC.

DESCRIPTION OF FLOW CHART OF FEED

(b) (4)



REDLAND DAIRY, LLC.

FEED STORAGE PRACTICES

(b) (4)



(b) (4)

REDLAND DAIRY

FEED QUALITY CONTROL

DATE: _____



Texas Department of Agriculture
Organic Inspection Findings

ROR-660

Todd Staples, Commissioner

SECTION A	VERIFICATION INFORMATION	
	Client Name REDLAND DAIRY LLC	TDA Client No. (b) (4)
	Facility Name REDLAND DAIRY, LLC	TDA Account No. (b) (4)

SECTION B	INSPECTION INFORMATION				
	Inspection Type Routine			Inspection ID No. (b) (4)	
	Inspector ID 07575	Inspector Name (b) (6)	Region <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5		
	Date 3/6/2012 <small>Enter as MM/DD/YYYY</small>	Time 1:57 <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM	County Code 369	County PARMER	

SECTION C	FINDINGS	
	Certification Type: (b) (4)	
	(b) (4)	

TDA License No. 0507262

Inspector ID No. 07575

Inspection Date 3/6/2012

SUMMARY FOR PRODUCER

Person present at time of inspection: Travis Price

These findings and all comments were discussed with the inspection observer during the exit interview.

COMMENTS

(b) (4)

SECTION D

TEXAS DEPARTMENT OF AGRICULTURE

TODD STAPLES
COMMISSIONER

September 6, 2011

Mr. Brian Boehning
690 CR 45
Earth, TX 79031

Boehning Dairy LLC
TDA Client No: (b) (4)
Land Production Certificate No: (b) (4)
Livestock Production Certificate No: (b) (4)

Hilltop Dairy LLC
TDA Client No: (b) (4)
Certificate No: (b) (4)

Dear Mr. Boehning:

(b) (4)

If you have any questions or concerns about the contents of this letter or your organic certification, please feel free to contact me directly by calling (512) 463-7513 or sending an email to Organic@TexasAgriculture.gov.

Sincerely yours,

(b) (6)

(b) (6)

Coordinator for Organic Certification

(b) (6)





Texas Department of Agriculture
Organic Inspection Findings

ROR-660

Todd Staples, Commissioner

SECTION A	VERIFICATION INFORMATION	
	Client Name BRIAN BOEHNING	TDA Client No. (b) (4)
	Facility Name BOEHNING DAIRY FARM (LIVESTOCK)	TDA Account No. (b) (4)

SECTION B	INSPECTION INFORMATION			
	Inspection Type (b) (4)		Inspection ID No. (b) (4)	
	Inspector ID 07575	Inspector Name (b) (6)	Region <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5	
	Date 8/11/2011 <small>Enter as MM/DD/YYYY</small>	Time 10:57 <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM	County Code 279	County LAMB

SECTION C	FINDINGS	
	Certification Type: (b) (4) (b) (4)	

TDA License No. **(b) (4)** Inspector ID No. 07575 Inspection Date 8/11/2011

SUMMARY FOR PRODUCER

Person present at time of inspection: **Brian Boehning**

These findings and all comments were discussed with the inspection observer during the exit interview.

COMMENTS

(b) (4)



SECTION D



**Texas Department of
Agriculture**
*Organic Land Producer Inspection
Report*

ROR-650

Todd Staples, Commissioner

SECTION A	VERIFICATION INFORMATION	
	Client Name BRIAN BOEHNING	TDA Client No. (b) (4)
	Facility Name BOEHNING DAIRY FARM (LIVESTOCK)	TDA Account No. (b) (4)

SECTION B	INSPECTION INFORMATION			
	Inspection Type (b) (4)	Inspection ID No. (b) (4)		
	Inspector ID 07575	Inspector Name (b) (6)	Region <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5	
	Date 08/11/2011 <small>Enter as MM/DD/YYYY</small>	Time 09:07 <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM	County Code 279	County LAMB

SECTION C	FARM AND LAND INFORMATION			
	Total farm acres: (b) (4)	Certified farm acres:	Organic: (b) (4)	Transitional: (b) (4)
		In crop production:	Organic: (b) (4)	Transitional: (b) (4)
		Not in crop production:	Organic: (b) (4)	Transitional: (b) (4)
		Certified Greenhouse area (sq. ft.):	Organic: (b) (4)	Transitional: (b) (4)
	1) Is the information regarding on and off-farm processing under Section B of the ROR-607 accurate?			<input type="checkbox"/> Yes <input type="checkbox"/> No ¹
	2) Is the information regarding on-farm storage under Section B of the ROR-607 accurate?			<input type="checkbox"/> Yes <input type="checkbox"/> No ¹
	3) Is the information under Section C of the ROR-607 regarding the general farm map accurate?			<input type="checkbox"/> Yes <input type="checkbox"/> No ¹
	4) Is the information under Section D of the ROR-607 regarding the listing of fields, greenhouses/indoor production areas accurate?			<input type="checkbox"/> Yes <input type="checkbox"/> No ¹
	5) Is the information under Section E of the ROR-607 regarding field crop/greenhouse plan for the one-year certification period accurate?			<input type="checkbox"/> Yes <input type="checkbox"/> No ¹
	¹ If No, the producer must submit changes directly to the Organic Certification Program.			
	6) Is the information under Section F of the ROR-607 regarding preceding three-year material use accurate?			<input type="checkbox"/> Yes <input type="checkbox"/> No ²
	² If No, possible noncompliance.			
	7) Is this business currently in operation? (b) (4) Yes (b) (4) No (inspection complete)			
	(b) (4) In compliance at time of inspection	(b) (4) Area(s) of concern	(b) (4) Possible Noncompliance	
	Write comments under comments section.			

TDA License No. (b) (4) Inspector ID No. 07575 Inspection Date 08/11/2011

SECTION D		A (if all in-door production)	
7) Are conventional crops grown on farm?		(b) (4) Yes ¹	(b) (4) No
¹ If Yes, describe how boundaries of field units are marked:			
8) Is the information under Section G of the ROR-607 regarding the location, type, width, and adjoining land use accurate?		Yes	No ²
9) Is the information under Section G of the ROR-607 regarding adjacent roadways accurate?		Yes (b) (4)	No ² (b) (4) N/A
10) Is the information under Section G of the ROR-607 regarding flood waters accurate?		Yes	(b) (4) No ²
² If No, possible noncompliance.			
11) Do any fields have a potential for contamination from drift or run-off?		Yes ³	(b) (4) No
³ If Yes, list the information below:			
Field(s) at Risk	Additional Steps Taken to Prevent Contamination		
(b) (4)	(b) (4)		
(b) (4)	In compliance at time of inspection	(b) (4) Area(s) of concern	(b) (4) Possible Noncompliance
Write comments under comments section.			

SECTION E		NA (if all out-door production)	
12) Is the information regarding production systems under Section H Subsection 2 of the ROR-607 accurate?		(b) (4) Yes	(b) (4) No ¹
13) Are all input products used or intended for use in greenhouse/indoor unit production listed in Section H of the ROR-607?		(b) (4) Yes	(b) (4) No ²
² If No, area(s) of concern and list the information below:			
Product	Brand Name or Source	No. of Applications Per Year	Reason for use
(b) (4)	(b) (4)	(b) (4)	(b) (4)
14) Is all of the information in Section H Subsections 3, 4, and 5 of the ROR-607 accurate?		(b) (4) Yes	(b) (4) No ¹
¹ If No, area(s) of concern and explain under comments section.			
(b) (4)	In compliance at time of inspection	(b) (4) Area(s) of concern	(b) (4) Possible Noncompliance
Write comments under comments section.			

TDA License No. (b) (4) Inspector ID No. 07575 Inspection Date 08/11/2011

SOIL AND CROP FERTILITY MANAGEMENT (b) NA (if all in-door production)

Soil Type: (b) Sandy (b) Sandy Loam (b) Loam (b) Clay Loam (b) Clay

15) Is the information under Section J Subsection 1 of the ROR-607 regarding the monitoring of fertility management accurate? (b) Yes (b) No¹

16) Is the information under Section J Subsection 1 of the ROR-607 regarding the components of soil and crop fertility plan accurate? (b) Yes (b) No¹

17) Is the list of all soil and crop inputs used or intended for use under Section J Subsection 2 of the ROR-607 accurate? (b) Yes (b) No²

²If No, and if any additional soil or crop inputs are verified that were not included in the application, list the information below:

Product	Brand Name or Source	No. of Applications Per Year	Reason for use
(b) (4)			

SECTION F

18) Is all of the information under Section J Subsection 2 of the ROR-607 regarding compost use accurate? (b) Yes (b) No¹

19) Are all copies of labels or lists of ingredients and their source available at the time of inspection?² (b) Yes (b) No¹

²If any additional soil or crop input labels are verified during the inspection that were not included with the application, list them in the above table and attach copies of them with this worksheet.

20) Is all of the information under Section J Subsection 3 of the ROR-607 regarding manure use accurate? (b) Yes (b) No¹

¹ If No, area(s) of concern and explain under comments section.

(b) In compliance at time of inspection (b) Area(s) of concern (b) Possible Noncompliance
Write comments under comments section.

TDA License No. (b) (4) Inspector ID No. 07575 Inspection Date 08/11/2011

SECTION G		SOIL AND WATER CONSERVATION		(b) (4) NA (if all in-door production)
	21) Are annual rainfall records maintained?	(b) (4) Yes	(b) (4) No	
	22) Is the information under Section K Subsection 1 of the ROR-607 regarding the soil and water conservation methods of production and non-production areas accurate?	(b) (4) Yes	(b) (4) No ¹	
	23) Is there any evidence of soil erosion?	(b) (4) Yes ²	(b) (4) No	
	² If Yes, what is the cause of erosion and what practices are in place to prevent further erosion?			
	24) Is the information under Section K Subsection 1 of the ROR-607 regarding the uses of water, the sources of water, and irrigation systems accurate?	(b) (4) Yes	(b) (4) No ¹	
	25) Is the information under Section K Subsection 1 of the ROR-607 regarding practices used to protect water quality accurate?	(b) (4) Yes	(b) (4) No ¹	
	¹ If No, area(s) of concern and explain under comments section.			
	(b) (4) In compliance at time of inspection	(b) (4) Area(s) of concern	(b) (4) Possible Noncompliance	
	Write comments under comments section.			

SECTION H		PROPAGATION MATERIALS		
	26) Is the information under Section L Subsection 1 of the ROR-607 regarding the types of propagation materials used accurate?	(b) (4) Yes	(b) (4) No ¹	
	27) Is the information under Section L Subsections 2 and 3 of the ROR-607 regarding the sources of propagation materials accurate?	(b) (4) Yes	(b) (4) No ²	
	² If No, and if any additional propagation materials are verified that were not included in the application, list the information below:			
Product	Brand Name or Source	No. of Applications Per Year	Reason for use	
(b) (4)	(b) (4)	(b) (4)	(b) (4)	
*If any additional propagation material labels are verified during the inspection that were <u>not</u> included with the application, attach copies of them with this worksheet.				
¹ If No, possible noncompliance and list any discrepancies under the comments section.				
(b) (4)	(b) (4) In compliance at time of inspection	(b) (4) Area(s) of concern	(b) (4) Possible Noncompliance	
Write comments under comments section.				

TDA License No. **(b) (4)** Inspector ID No. 07575 Inspection Date 08/11/2011

PEST, DISEASE, AND WEED MANAGEMENT

- 28) Is the information under Section M Subsection 2 of the ROR-607 regarding pest problems and methods used to control pests accurate? **(b) (4)** Yes **(b) (4)** No
- 29) Are all materials used to control pest problems listed under Section M Subsection 2 of the ROR-607 accurate? **(b) (4)** Yes **(b) (4)** No¹
- 30) Is the information under Section M Subsection 3 of the ROR-607 regarding disease prevention strategies accurate? **(b) (4)** Yes **(b) (4)** No
- 31) Are all materials used to control disease problems listed under Section M Subsection 3 of the ROR-607 accurate? **(b) (4)** Yes **(b) (4)** No¹
- 32) Is all of the information under Section M Subsection 4 of the ROR-607 regarding weed management accurate? **(b) (4)** Yes **(b) (4)** No¹

¹ If No, possible noncompliance. List all materials not listed in the ROR-607 below and attach any labels or source information if available.

SECTION I

Product	Brand Name or Source	No. of Applications Per Year	Reason for use
(b) (4)			

(b) (4) In compliance at time of inspection **(b) (4)** Area(s) of concern **(b) (4)** Possible Noncompliance
Write comments under comments section.

MAINTENANCE OF ORGANIC INTEGRITY

- 33) Are any crops grown conventionally on farm? **(b) (4)** Yes **(b) (4)** No
- 34) Is all of the information under Section N Subsection 1 of the ROR-607 regarding conventional or transitional crops accurate? **(b) (4)** Yes **(b) (4)** No¹
- 35) Is all of the information under Section N Subsection 2 of the ROR-607 regarding equipment used in organic production accurate? **(b) (4)** Yes **(b) (4)** No¹
- 36) Is all of the information under Section N Subsection 3 of the ROR-607 regarding harvest practices of organic crops accurate? **(b) (4)** Yes **(b) (4)** No¹
- 37) Is all of the information under Section N Subsection 4 of the ROR-607 regarding post-harvest practices accurate? **(b) (4)** Yes **(b) (4)** No¹
- 38) Is all of the information under Section N Subsection 5 of the ROR-607 regarding crop storage practices accurate? **(b) (4)** Yes **(b) (4)** No¹
- 39) Is all of the information under Section N Subsection 6 of the ROR-607 regarding the transportation of crops accurate? **(b) (4)** Yes **(b) (4)** No **(b) (4)** N/A

¹ If No, possible noncompliance. List any discrepancies under the comments section.

SECTION J

(b) (4) In compliance at time of inspection **(b) (4)** Area(s) of concern **(b) (4)** Possible Noncompliance
Write comments under comments section.

TDA License No. (b) (4) Inspector ID No. 07575 Inspection Date 08/11/2011

RECORD KEEPING		Records Maintained?		Complete & Current? ¹	
40) Select all records maintained and if they are complete and current:					
Field Activity Log ²	(b) (4)	Yes	(b) (4) No	(b) (4) Yes	(b) (4) No ¹
Harvest Records ²		Yes	No	Yes	No ¹
Previous Land Use ² (3 previous years for new applicants)		Yes	No	Yes	No ¹
Material Storage Records ²		Yes	No	Yes	No ¹
Sales Records ²		Yes	No	Yes	No ¹
Seed Source Documentation ²		Yes	No	Yes	No ¹
Complaint Log ²		Yes	No	Yes	No ¹
Applied Material Records ²		Yes	No	Yes	No ¹
Documentation of Seed and/or Seedling Production		Yes	No	Yes	No
Equipment Records		Yes	No	Yes	No
Manure and/or Compost Records		Yes	No	Yes	No
Labor Records		Yes	No	Yes	No
Other (specify):		Yes	No	Yes	No
41) Does record keeping system adequately provide for auditing the organic production?		(b) (4) Yes	(b) (4) No ³		
<p>¹Verify that the records were found to be complete and current at time of inspection. <i>If No, possible noncompliance.</i></p> <p>²This type of record keeping is required to demonstrate compliance. <i>If these records are not in place or if the information is insufficient to communicate the applicable information, then this is a possible noncompliance.</i></p> <p>³ <i>If No, possible noncompliance.</i></p> <p><i>*Note, all records must be maintained for 5 years.</i></p>					
(b) (4) In compliance at time of inspection		(b) (4) Area(s) of concern		(b) (4) Possible Noncompliance	
Write comments under comments section.					

SECTION K

TDA License No. (b) (4)

Inspector ID No. 07575

Inspection Date 08/11/2011

RESIDUE SAMPLE COLLECTION LOG

42) Total number of samples collected:

Inspector Sample Number	Reason for Residue Sampling	Sample Source	Sample Type	Field Numbers/ Greenhouse Units Sampled:
(b) (4)	Initial Inspection	(b) (4) Soil	(b) (4) Composite Sample	(b) (4)
(b) (4)	Routine Inspection	(b) (4) Tissue	(b) (4) Individual Sample	(b) (4)
(b) (4)	Re-inspection	(b) (4) Compost	(b) (4) Individual Sample	(b) (4)
(b) (4)	Complaint/Violation	(b) (4) Other	(b) (4) Individual Sample	(b) (4)
(b) (4)	Initial Inspection	(b) (4) Soil	(b) (4) Composite Sample	(b) (4)
(b) (4)	Routine Inspection	(b) (4) Tissue	(b) (4) Individual Sample	(b) (4)
(b) (4)	Re-inspection	(b) (4) Compost	(b) (4) Individual Sample	(b) (4)
(b) (4)	Complaint/Violation	(b) (4) Other	(b) (4) Individual Sample	(b) (4)
(b) (4)	Initial Inspection	(b) (4) Soil	(b) (4) Composite Sample	(b) (4)
(b) (4)	Routine Inspection	(b) (4) Tissue	(b) (4) Individual Sample	(b) (4)
(b) (4)	Re-inspection	(b) (4) Compost	(b) (4) Individual Sample	(b) (4)
(b) (4)	Complaint/Violation	(b) (4) Other	(b) (4) Individual Sample	(b) (4)
(b) (4)	Initial Inspection	(b) (4) Soil	(b) (4) Composite Sample	(b) (4)
(b) (4)	Routine Inspection	(b) (4) Tissue	(b) (4) Individual Sample	(b) (4)
(b) (4)	Re-inspection	(b) (4) Compost	(b) (4) Individual Sample	(b) (4)
(b) (4)	Complaint/Violation	(b) (4) Other	(b) (4) Individual Sample	(b) (4)
(b) (4)	Initial Inspection	(b) (4) Soil	(b) (4) Composite Sample	(b) (4)
(b) (4)	Routine Inspection	(b) (4) Tissue	(b) (4) Individual Sample	(b) (4)
(b) (4)	Re-inspection	(b) (4) Compost	(b) (4) Individual Sample	(b) (4)
(b) (4)	Complaint/Violation	(b) (4) Other	(b) (4) Individual Sample	(b) (4)
(b) (4)	Initial Inspection	(b) (4) Soil	(b) (4) Composite Sample	(b) (4)
(b) (4)	Routine Inspection	(b) (4) Tissue	(b) (4) Individual Sample	(b) (4)
(b) (4)	Re-inspection	(b) (4) Compost	(b) (4) Individual Sample	(b) (4)
(b) (4)	Complaint/Violation	(b) (4) Other	(b) (4) Individual Sample	(b) (4)
(b) (4)	Initial Inspection	(b) (4) Soil	(b) (4) Composite Sample	(b) (4)
(b) (4)	Routine Inspection	(b) (4) Tissue	(b) (4) Individual Sample	(b) (4)
(b) (4)	Re-inspection	(b) (4) Compost	(b) (4) Individual Sample	(b) (4)
(b) (4)	Complaint/Violation	(b) (4) Other	(b) (4) Individual Sample	(b) (4)

TDA License No. (b) (4) Inspector ID No. 07575 Inspection Date 08/11/2011

SUMMARY FOR PRODUCER

43) Person present at time of inspection: Brian Boehning

These findings and all comments were discussed with the inspection observer during the exit interview.

COMMENTS

(b) (4)

SECTION M

SUMMARY FOR ORGANIC CERTIFICATION PROGRAM STAFF

COMMENTS

(b) (4)

SECTION N

Checklist

Please use this checklist to ensure you are sending and/or completing all of the necessary information and documents.

- Organic Land Producer Inspection Report
- Organic Land Producer Inspection Findings
- Residue Sample Collection Receipt
- PI-518 Official Sample Chain of Custody
- Additional Attachments (specify):

PHOTOGRAPHIC DOCUMENTATION OF INSPECTION

Inspector Name: (b) (6)

Inspection Date (mm/dd/yyyy): 08/11/2011

TDA Client Number (b) (4)

Client Name: Boehning Dairy LLC

TDA Account Number (b) (4)

Facility Name: Boehning Dairy LLC

Facility Address: 690 CR 45, Earth, Texas 79031

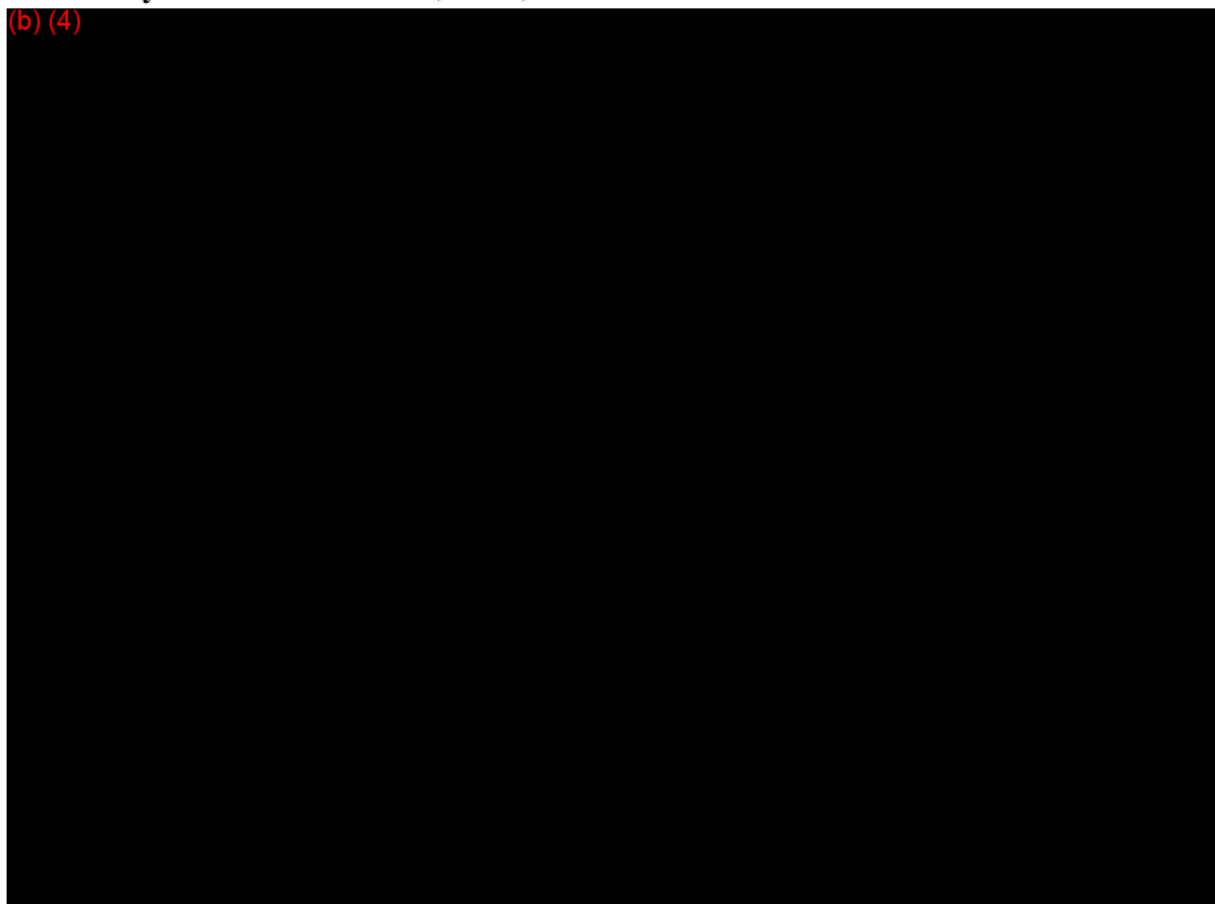


Photo Number: 1 (IMG_0132.jpg)

Comment: (b) (4)

(b) (4)

(b) (4) [redacted] notes (b) (6) [redacted]

(b) (4), (b) (6) [redacted]

RECEIVED JUL 28 2011

Entities:

Boehning Dairy

Hill Top Dairy

RECEIVED

AUG 01 2011

REGULATORY

(b) (4)

(b) (4)



**Texas Department of
Agriculture**
*Organic Land Producer Inspection
Report*

ROR-650

Todd Staples, Commissioner

SECTION A	VERIFICATION INFORMATION	
	Client Name <i>BOEHNING DAIRY FARM</i>	TDA Client No. (b) (4)
	Facility Name <i>BOEHNING DAIRY FARM</i>	TDA Account No. (b) (4)

SECTION B	INSPECTION INFORMATION			
	Inspection Type <i>ROUTINE</i>	Inspection ID No. (b) (4)		
	Inspector ID <i>7575</i>	Inspector Name (b) (6)	Region <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5	
	Date <i>06/06/2011</i> <small>Enter as MM/DD/YYYY</small>	Time <i>1:10</i> <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM	County Code <i>279</i>	County <i>LAMB</i>

SECTION C	FARM AND LAND INFORMATION			
	Total farm acres: (b) (4)	Certified farm acres:	Organic: (b) (4)	Transitional: (b) (4)
		In crop production:	Organic: (b) (4)	Transitional: (b) (4)
		Not in crop production:	Organic: (b) (4)	Transitional: (b) (4)
		Certified Greenhouse area (sq. ft.):	Organic: (b) (4)	Transitional: (b) (4)
	1) Is the information regarding on and off-farm processing under Section B of the ROR-607 accurate?		(b) (4) Yes	(b) (4) No ¹
	2) Is the information regarding on-farm storage under Section B of the ROR-607 accurate?		(b) (4) Yes	(b) (4) No ¹
	3) Is the information under Section C of the ROR-607 regarding the general farm map accurate?		(b) (4) Yes	(b) (4) No ¹
4) Is the information under Section D of the ROR-607 regarding the listing of fields, greenhouses/indoor production areas accurate?		(b) (4) Yes	(b) (4) No ¹	
5) Is the information under Section E of the ROR-607 regarding field crop/greenhouse plan for the one-year certification period accurate?		(b) (4) Yes	(b) (4) No ¹	
¹ If No, the producer must submit changes directly to the Organic Certification Program.				
6) Is the information under Section F of the ROR-607 regarding preceding three-year material use accurate?		(b) (4) Yes	(b) (4) No ²	
² If No, possible noncompliance.				
7) Is this business currently in operation?		(b) (4) Yes	(b) (4) No (inspection complete)	
(b) (4) In compliance at time of inspection (b) (4) Area(s) of concern (b) (4) Possible Noncompliance				
Write comments under comments section.				

*Reviewed
6/15/11*

RECEIVED

JUN 14 2011

REGULATORY

Revised 8/25/2010

TDA License No. (b) (4) Inspector ID No. 7525 Inspection Date 6-6-2011

SECTION D		NA (if all in-door production)
7) Are conventional crops grown on farm?		(b) (4) Yes ¹ (b) (4)
¹ If Yes, describe how boundaries of field units are marked:		(b) (4)
8) Is the information under Section G of the ROR-607 regarding the location, type, width, and adjoining land use accurate?		Yes (b) (4)
9) Is the information under Section G of the ROR-607 regarding adjacent roadways accurate?		Yes (b) (4) N/A
10) Is the information under Section G of the ROR-607 regarding flood waters accurate?		Yes (b) (4)
² If No, possible noncompliance.		
11) Do any fields have a potential for contamination from drift or run-off?		Yes ³ (b) (4)
³ If Yes, list the information below:		
Field(s) at Risk	Additional Steps Taken to Prevent Contamination	
(b) (4)		
(b) (4)	(b) (4) Area(s) of concern	(b) (4) Possible Noncompliance
Write comments under comments section.		

SECTION E		NA (if all out-door production)	
12) Is the information regarding production systems under Section H Subsection 2 of the ROR-607 accurate?		(b) (4) Yes (b) (4) No ¹	
13) Are all input products used or intended for use in greenhouse/indoor unit production listed in Section H of the ROR-607?		Yes (b) (4) No ²	
² If No, area(s) of concern and list the information below:			
Product	Brand Name or Source	No. of Applications Per Year	Reason for use
(b) (4)			
14) Is all of the information in Section H Subsections 3, 4, and 5 of the ROR-607 accurate?		(b) (4) Yes (b) (4) No ¹	
¹ If No, area(s) of concern and explain under comments section.			
(b) (4)	(b) (4) Area(s) of concern	(b) (4) Possible Noncompliance	
Write comments under comments section.			

TDA License No. (b) (4)

Inspector ID No. 7575

Inspection Date 6-6-2011

SOIL AND CROP FERTILITY MANAGEMENT

(b) (4) NA (if all in-door production)

Soil Type: (b) (4) Sandy (b) (4) Sandy Loam (b) (4) Loam (b) (4) Clay Loam (b) (4) Clay

15) Is the information under Section J Subsection 1 of the ROR-607 regarding the monitoring of fertility management accurate? (b) (4) Yes (b) (4) No¹

16) Is the information under Section J Subsection 1 of the ROR-607 regarding the components of soil and crop fertility plan accurate? (b) (4) Yes (b) (4) No¹

17) Is the list of all soil and crop inputs used or intended for use under Section J Subsection 2 of the ROR-607 accurate? (b) (4) Yes (b) (4) No²

²If No, and if any additional soil or crop inputs are verified that were not included in the application, list the information below:

Product	Brand Name or Source	No. of Applications Per Year	Reason for use
(b) (4)			

SECTION F

18) Is all of the information under Section J Subsection 2 of the ROR-607 regarding compost use accurate? (b) (4) Yes (b) (4) No¹

19) Are all copies of labels or lists of ingredients and their source available at the time of inspection?² (b) (4) Yes (b) (4) No¹

²If any additional soil or crop input labels are verified during the inspection that were not included with the application, list them in the above table and attach copies of them with this worksheet.

20) Is all of the information under Section J Subsection 3 of the ROR-607 regarding manure use accurate? (b) (4) Yes (b) (4) No¹

¹ If No, area(s) of concern and explain under comments section.

(b) (4) In compliance at time of inspection (b) (4) Area(s) of concern (b) (4) Possible Noncompliance
Write comments under comments section.

TDA License No. (b) (4) Inspector ID No. 7575 Inspection Date 6-6-2011

SECTION G		SOIL AND WATER CONSERVATION		(b) (4) NA (if all in-door production)
	21) Are annual rainfall records maintained?	(b) (4)	Yes	(b) (4) No
	22) Is the information under Section K Subsection 1 of the ROR-607 regarding the soil and water conservation methods of production and non-production areas accurate?	(b) (4)	Yes	(b) (4) No ¹
	23) Is there any evidence of soil erosion?	(b) (4)	Yes ²	(b) (4) No
	² If Yes, what is the cause of erosion and what practices are in place to prevent further erosion?			
	24) Is the information under Section K Subsection 1 of the ROR-607 regarding the uses of water, the sources of water, and irrigation systems accurate?	(b) (4)	Yes	(b) (4) No ¹
	25) Is the information under Section K Subsection 1 of the ROR-607 regarding practices used to protect water quality accurate?	(b) (4)	Yes	(b) (4) No ¹
	¹ If No, area(s) of concern and explain under comments section.			
	(b) (4)	(b) (4)	(b) (4)	(b) (4)
	In compliance at time of inspection Area(s) of concern Possible Noncompliance			
	Write comments under comments section.			

SECTION H		PROPAGATION MATERIALS		
	26) Is the information under Section L Subsection 1 of the ROR-607 regarding the types of propagation materials used accurate?	(b) (4)	Yes	(b) (4) No ¹
	27) Is the information under Section L Subsections 2 and 3 of the ROR-607 regarding the sources of propagation materials accurate?	(b) (4)	Yes	(b) (4) No ²
	² If No, and if any additional propagation materials are verified that were not included in the application, list the information below:			
	(b) (4)	(b) (4)	(b) (4)	(b) (4)
	(b) (4)	(b) (4)	(b) (4)	(b) (4)
	Product Brand Name or Source No. of Applications Per Year Reason for use			
	*If any additional propagation material labels are verified during the inspection that were <u>not</u> included with the application, attach copies of them with this worksheet.			
	¹ If No, possible noncompliance and list any discrepancies under the comments section.			
	(b) (4)	(b) (4)	(b) (4)	(b) (4)
	In compliance at time of inspection Area(s) of concern Possible Noncompliance			
	Write comments under comments section.			

TDA License No. (b) (4)

Inspector ID No. 7575

Inspection Date 6-6-2011

PEST, DISEASE, AND WEED MANAGEMENT

- 28) Is the information under Section M Subsection 2 of the ROR-607 regarding pest problems and methods used to control pests accurate? (b) (4) Yes (b) (4) No
- 29) Are all materials used to control pest problems listed under Section M Subsection 2 of the ROR-607 accurate? Yes No¹
- 30) Is the information under Section M Subsection 3 of the ROR-607 regarding disease prevention strategies accurate? Yes No
- 31) Are all materials used to control disease problems listed under Section M Subsection 3 of the ROR-607 accurate? Yes No¹
- 32) Is all of the information under Section M Subsection 4 of the ROR-607 regarding weed management accurate? Yes No¹

¹ If No, possible noncompliance. List all materials not listed in the ROR-607 below and attach any labels or source information if available.

SECTION I

Product	Brand Name or Source	No. of Applications Per Year	Reason for use
(b) (4)			

(b) (4) In compliance at time of inspection (b) (4) Area(s) of concern (b) (4) Possible Noncompliance

Write comments under comments section.

MAINTENANCE OF ORGANIC INTEGRITY

- 33) Are any crops grown conventionally on farm? (b) (4) Yes (b) (4) No
- 34) Is all of the information under Section N Subsection 1 of the ROR-607 regarding conventional or transitional crops accurate? (b) (4) Yes (b) (4) No¹
- 35) Is all of the information under Section N Subsection 2 of the ROR-607 regarding equipment used in organic production accurate? Yes No¹
- 36) Is all of the information under Section N Subsection 3 of the ROR-607 regarding harvest practices of organic crops accurate? Yes No¹
- 37) Is all of the information under Section N Subsection 4 of the ROR-607 regarding post-harvest practices accurate? Yes No¹
- 38) Is all of the information under Section N Subsection 5 of the ROR-607 regarding crop storage practices accurate? Yes No¹
- 39) Is all of the information under Section N Subsection 6 of the ROR-607 regarding the transportation of crops accurate? Yes (b) (4) No (b) (4) N/A

¹ If No, possible noncompliance. List any discrepancies under the comments section.

SECTION J

(b) (4) In compliance at time of inspection (b) (4) Area(s) of concern (b) (4) Possible Noncompliance

Write comments under comments section.

TDA License No. (b) (4)

Inspector ID No. 7575

Inspection Date 6-6-2011

RECORD KEEPING									
40) Select all records maintained and if they are complete and current:		Records Maintained?		Complete & Current? ¹					
SECTION K	Field Activity Log ²	(b) (4)	(b) (4)	Yes	No	(b) (4)	(b) (4)	Yes	No ¹
	Harvest Records ²			Yes	No			Yes	No ¹
	Previous Land Use ² (3 previous years for new applicants)			Yes	No			Yes	No ¹
	Material Storage Records ²			Yes	No			Yes	No ¹
	Sales Records ²			Yes	No			Yes	No ¹
	Seed Source Documentation ²			Yes	No			Yes	No ¹
	Complaint Log ²			Yes	No			Yes	No ¹
	Applied Material Records ²			Yes	No			Yes	No ¹
	Documentation of Seed and/or Seedling Production			Yes	No			Yes	No
	Equipment Records			Yes	No			Yes	No
	Manure and/or Compost Records			Yes	No			Yes	No
	Labor Records			Yes	No			Yes	No
	Other (specify):			Yes	No			Yes	No
41) Does record keeping system adequately provide for auditing the organic production?		(b) (4)	(b) (4)	Yes	No ³	(b) (4)	(b) (4)		
¹ Verify that the records were found to be complete and current at time of inspection. <i>If No, possible noncompliance.</i> ² This type of record keeping is required to demonstrate compliance. <i>If these records are not in place or if the information is insufficient to communicate the applicable information, then this is a possible noncompliance.</i> ³ <i>If No, possible noncompliance.</i> *Note, all records must be maintained for 5 years.									
(b) (4) In compliance at time of inspection		(b) (4) Area(s) of concern			(b) (4) Possible Noncompliance				
Write comments under comments section.									

TDA License No. **(b) (4)**

Inspector ID No. 7575

Inspection Date 6-6-2011

RESIDUE SAMPLE COLLECTION LOG

42) Total number of samples collected:

SECTION I

Inspector Sample Number	Reason for Residue Sampling	Sample Source	Sample Type	Field Numbers/ Greenhouse Units Sampled:
(b) (4)	Initial Inspection	(b) (4) Soil	(b) (4)	(b) (4)
	Routine Inspection	(b) (4) Tissue	(b) (4) Composite Sample	
	Re-inspection	(b) (4) Compost	(b) (4) Individual Sample	
	Complaint/Violation	(b) (4) Other	(b) (4)	
(b) (4)	Initial Inspection	(b) (4) Soil	(b) (4)	(b) (4)
	Routine Inspection	(b) (4) Tissue	(b) (4) Composite Sample	
	Re-inspection	(b) (4) Compost	(b) (4) Individual Sample	
	Complaint/Violation	(b) (4) Other	(b) (4)	
(b) (4)	Initial Inspection	(b) (4) Soil	(b) (4)	(b) (4)
	Routine Inspection	(b) (4) Tissue	(b) (4) Composite Sample	
	Re-inspection	(b) (4) Compost	(b) (4) Individual Sample	
	Complaint/Violation	(b) (4) Other	(b) (4)	
(b) (4)	Initial Inspection	(b) (4) Soil	(b) (4)	(b) (4)
	Routine Inspection	(b) (4) Tissue	(b) (4) Composite Sample	
	Re-inspection	(b) (4) Compost	(b) (4) Individual Sample	
	Complaint/Violation	(b) (4) Other	(b) (4)	
(b) (4)	Initial Inspection	(b) (4) Soil	(b) (4)	(b) (4)
	Routine Inspection	(b) (4) Tissue	(b) (4) Composite Sample	
	Re-inspection	(b) (4) Compost	(b) (4) Individual Sample	
	Complaint/Violation	(b) (4) Other	(b) (4)	
(b) (4)	Initial Inspection	(b) (4) Soil	(b) (4)	(b) (4)
	Routine Inspection	(b) (4) Tissue	(b) (4) Composite Sample	
	Re-inspection	(b) (4) Compost	(b) (4) Individual Sample	
	Complaint/Violation	(b) (4) Other	(b) (4)	
(b) (4)	Initial Inspection	(b) (4) Soil	(b) (4)	(b) (4)
	Routine Inspection	(b) (4) Tissue	(b) (4) Composite Sample	
	Re-inspection	(b) (4) Compost	(b) (4) Individual Sample	
	Complaint/Violation	(b) (4) Other	(b) (4)	
(b) (4)	Initial Inspection	(b) (4) Soil	(b) (4)	(b) (4)
	Routine Inspection	(b) (4) Tissue	(b) (4) Composite Sample	
	Re-inspection	(b) (4) Compost	(b) (4) Individual Sample	
	Complaint/Violation	(b) (4) Other	(b) (4)	

TDA License No. (b) (4)

Inspector ID No. 7575 Inspection Date 6-6-2011

SECTION M

SUMMARY FOR PRODUCER

43) Person present at time of inspection: BRIAN BOEHNING

These findings and all comments were discussed with the inspection observer during the exit interview.

COMMENTS

(b) (4)

SUMMARY FOR ORGANIC CERTIFICATION PROGRAM STAFF

COMMENTS

(b) (4)

SECTION N

Checklist

Please use this checklist to ensure you are sending and/or completing all of the necessary information and documents.

- Organic Land Producer Inspection Report
- Organic Land Producer Inspection Findings
- Residue Sample Collection Receipt
- PI-518 Official Sample Chain of Custody
- Additional Attachments (specify):

(b) (4)



Texas Department of Agriculture
Organic Inspection Findings

ROR-660

Todd Staples, Commissioner

SECTION A		VERIFICATION INFORMATION	
SECTION A	Client Name Boehning Dairy Farm	TDA Client No. (b) (4)	
	Facility Name Boehning Dairy Farm	TDA Account No. (b) (4)	

SECTION B		INSPECTION INFORMATION	
SECTION B	Inspection Type Routine	Inspection ID No. (b) (4)	
	Inspector ID 7575	Inspector Name (b) (6)	Region <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5
	Date 6 / 6 / 2011 month day year	Time 1 : 10 <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM	County Code County 279 Lamb

SECTION C		FINDINGS	
SECTION C	Certification Type	(b) (4)	
	(b) (4)		

TDA License No. (b) (4) Inspector ID No. 7575 Inspection Date 6-6-2011

SUMMARY

Person present at time of inspection: Brian Boehning

- These findings and all comments were discussed with the inspection observer during the exit interview.

COMMENTS

(b) (4)

SECTION D

Boehning Organic Production Farm Map


Field Number	Acres	Org/Trans end date
(b) (4)		

Field Number	Acres	Org/Trans end date
(b) (4)		

Boehning Organic Production Farm Map

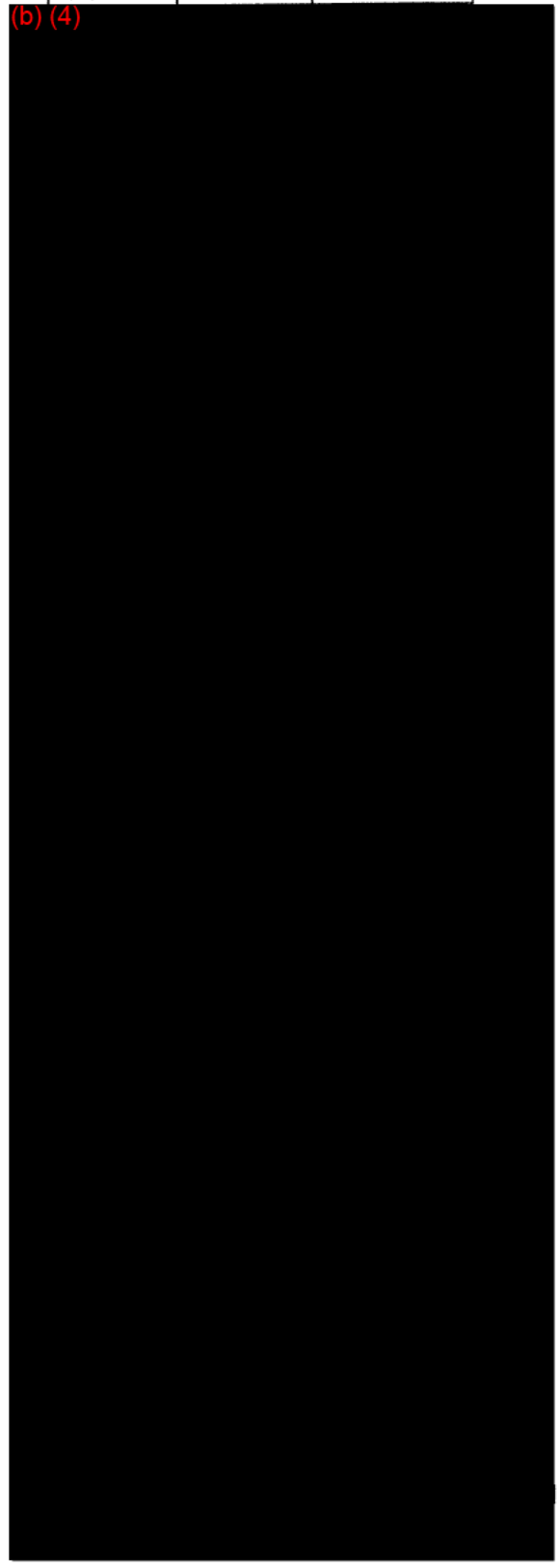
Field Number	Acres	Org/Trans end date
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(b) (4)



Field Number	Acres	Org/Trans end date
--------------	-------	--------------------

(b) (4)



TEXAS DEPARTMENT OF AGRICULTURE

TODD STAPLES
COMMISSIONER

January 09, 2012

BRIAN BOEHNING
BRIAN BOEHNING
690 COUNTRY ROAD 45
EARTH TX 79031

Account No: (b) (4)
Client No: [REDACTED]

Dear BRIAN BOEHNING:

Your Organic Certification for BOEHNING DAIRY FARM (LIVESTOCK) located at 690 COUNTRY ROAD 45, EARTH TX 79031 has been updated and is enclosed. The certification is effective as of January 04, 2012. You must submit your next annual update and certification fees by March 1, 2012. Please review the information printed above and on your certificate carefully. You are required to notify the Texas Department of Agriculture (TDA) within 30 days of any change in the information you provided in the update of this certification.

An ORGANIC LIVESTOCK PRODUCER certificate authorizes you to represent the products of the portions of your operation described in your 2011 organic system plan as organic, provided that they comply with all National Organic Program (NOP) Regulations related to production and handling of organic products.

A client number, referenced above, has been printed on your certificate. This number will be used to provide you with more efficient service by acting as a cross-reference to all TDA certificates you may obtain, as well as any other contacts you may have with TDA.

An annual update notice will be mailed to you each year prior to the due date listed above. Failure to update this certificate in a timely manner in the future may result in the suspension of your certification. Therefore, please respond promptly to the update notice. Continued certification is dependent on continued compliance with the NOP Regulations and successful completion of all TDA inspection processes and certification evaluations. Please note that the NOP Regulations permit unannounced inspections and residue testing by the department.

Regulations and statutory provisions governing various department regulatory programs are located in Title 4 of the Texas Administrative Code. The NOP Regulations are located in the Code of Federal Regulations Title 7, Part 205. The TDA website provides convenient links to these laws. Failure to comply with these laws may result in suspension or revocation of your certification and/or assessment of monetary administrative penalties.

If you have any questions regarding your certification or believe that the information concerning your certificate is incorrect in some respect, please contact our Austin headquarters at (512) 936-4178, email us at Organic@TexasAgriculture.gov, or visit our web site at www.TexasAgriculture.gov. For the hearing impaired, you may call Relay Texas 1-800-735-2988 (voice) or 1-800-735-2989 (TDD) or visit our web site.



P.O. Box 12847 Austin, Texas 78711 (512) 463-7476 Fax: (888) 223-8861

www.TexasAgriculture.gov

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P.O. Box 12847 Austin, Texas 78711 Voice (800) 835-5832 (512) 463-7476
Hearing impaired: (800) 735-2988 www.TexasAgriculture.gov



Texas Department of Agriculture Organic Certificate

TODD STAPLES, COMMISSIONER

This is to certify that

BOEHNING DAIRY FARM (LIVESTOCK)
690 COUNTRY ROAD 45
EARTH TX 79031

is certified organic by the Texas Department of Agriculture (TDA).

Certification Class: ORGANIC LIVESTOCK PRODUCER

Certificate Number (b) (4)

TDA Client Number: [REDACTED]

This operation is certified Organic under the US National Organic Program 7 CFR Part 205, and the provisions of Chapter 18 of the Texas Agriculture Code.

Organic Products:

DAIRY CATTLE, BEEF CATTLE, DAIRY REPLACEMENT HEIFERS

Once certified, a production or handling operation's organic certification continues in effect until surrendered, suspended or revoked. This certificate is non-transferable.

Certificate issue date:	01/04/2012
NOP effective date:	07/03/2007
Next update due:	03/01/2012

TEXAS DEPARTMENT OF AGRICULTURE
TODD STAPLES, COMMISSIONER



May 4, 2012

BRIAN BOEHNING
BRIAN BOEHNING
690 CR 45
EARTH TX 79031

Account No: (b) (4)
Client No: [REDACTED]

Dear BRIAN BOEHNING,

Thank you for submitting your annual update for continued certification as an ORGANIC LIVESTOCK PRODUCER with the Texas Department of Agriculture (TDA). This is to inform you that the Department has received and initially reviewed your update for completeness.

In accordance with Section 205.406(4)(b) of the United States Department of Agriculture (USDA), National Organic Program (NOP) Regulations, the certifying agent must conduct an on-site inspection of the certified operation pursuant to Section 205.403. An inspector from our LUBBOCK Regional office will conduct an annual inspection of your operation prior to updating your certification.

During this update process, your certification continues to be in good standing under the provisions of Section 205.404(c) of the NOP Regulations.

Your update inspection will be reviewed in the order of receipt and you will be notified of the status once the review is complete.

If you have any questions, please contact me at Organic@TexasAgriculture.gov or by calling our Austin headquarters at (512) 936-4178.



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:	09/11/12
Name of operation:	Bethel Livestock Farm
Location of operation:	Swan Lake, NY
Scope of certification requested:	Livestock / Crops
Scope of certification granted:	
Actual or Demonstration inspection:	Actual
Inspector's Name:	(b) (6)
Subcontracted or staff inspector:	N/A
Verify conflict of interest and confidentiality status of inspector:	No COI
Name of knowledgeable representative of the operation:	Robert Franklin, owner
Names of anyone else present during the inspection:	(b) (6)
Time Inspection started:	9:00 am
Time Inspection completed:	1:30 pm
Was there enough time allocated for the inspection?	yes
Did the inspector verify the corrective actions on previous non-compliances as applicable?	yes
General information on operation to include: crops grown, acreage, fields, where fields are located (1 site or 2 or more); wild-crops collected, training of collectors; type of livestock operation, number of animals, identification methods; type of handling operation, products processed, etc...	(b) (4) (b) (4)
General information on materials and inputs used and are they in compliance with the National List (NL) and annotations.	Few inputs used. Manure management, no pest control



As appropriate did the OSP adequately address the requirements for:	
Crops	
Land requirements §205.202	Yes, hay / pasture production
Soil fertility and crop nutrient management practice standard §205.203	Yes, manure management
Seeds and planting stock practice standard §205.204	Grass seed sources could not be verified by inspector
Crop rotation practice standard §205.205	n/a
Crop pest, weed, and disease management practice standard §205.206	No pest controls
Wild-Crops	
Wild crop harvesting practice standard §205.207	n/a
Livestock	
Origin of livestock §205.236	Closed herd, compliant
Livestock feed §205.237	Grass fed herd, closed system
Livestock health care practice standard §205.238	Yes, minimal
Livestock living conditions §205.239	Yes, animals have access to pasture
Pasture Practice Standard §205.240	Yes, 30% / 120 day compliant
Handler	
Organic handling requirements §205.270	Small bottling operation, not inspected
Facility pest management practice standard §205.271	yes
Commingling and contact with prohibited substance prevention practice standard §205.272	Only organic milk is bottled

Sampling	
Was a sample pulled during the inspection? §205.670	no
What was sampled and why?	
Verify sampling procedures, chain of control, etc. §205.670(c)	
Did the inspector provide the applicant with a receipt for any samples taken? §205.403(e)	
Did the sampling process follow the ACA's sampling procedure?	
Was the inspector charged for the samples? §205.403(e)	
Did the ACA pay for the testing? §205.670(b)	

Labels	
Were labels verified during the on-site inspection? §205.403(c)(2)	Yes,
Were the labels being used the same as those approved by the ACA?	yes



How was the inspector made aware of which labels are approved by the ACA?	Certifying agent included label in OSP, verified at inspection
---------------------------------------------------------------------------	----------------------------------------------------------------

Exit Interview §205.403(d) Document information addressed by the inspector during the exit interview	
Was the exit interview conducted with a knowledgeable representative?	Yes, (b) (6)
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, rye grass seed tags / tickets; field histories – new fields
Did the exit interview address issues of concern identified during the inspection?	(b) (5)

Questions for the inspector: 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 / 2011 inspection report
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?	Updates from NFC
Does the inspector provide consulting services of any kind?	no
If so, how is this information provided to the ACA?	
What is the inspector's background (experience, training, and education) in relation to the operation being inspected?	Livestock inspection experience / training; livestock owner

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?	Organic insider
----------------------------------------------------------------------------------	-----------------

Overall did the inspection verify:	
That the operation was in compliance or was able to comply with the ACT? §205.403(c)(1)	Yes, except as noted in the inspectors issues of concern
That the OSP accurately reflected the practices used by the operation? §205.403(c)(2)	Yes, except as noted
That prohibited substances had not been and were not being applied to the operation? §205.403(c)(3)	Yes

Comment: (b) (6) inspection of Bethel Livestock Farm was comprehensive and concise. The opening meeting was sufficient in describing how the inspection would be conducted. During the exit interview, (b) (6) provided a detailed summary of his findings. Also, (b) (6) did an excellent job managing the inspection process despite numerous interruptions.



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:	August 22, 2012
Name of operation:	Nature's Way Management
Location of operation:	Portales, New Mexico
Scope of certification requested:	Crop, Livestock
Scope of certification granted:	Crop, Livestock
Actual or Demonstration inspection:	Actual
Inspector's Name:	(b) (6)
Subcontracted or staff inspector:	Contract
Verify conflict of interest and confidentiality status of inspector:	Yes
Name of knowledgeable representative of the operation:	(b) (6)
Names of anyone else present during the inspection:	(b) (6)
Time Inspection started:	9:00 a.m.
Time Inspection completed:	1:00 p.m.
Was there enough time allocated for the inspection?	Yes
Did the inspector verify the corrective actions on previous non-compliances as applicable?	Yes, no corrective actions, but concerns were addressed
General information on operation to include: cro ps grown, acreage, fields, where fields are located (1 site or 2 or more); wild-crops collected, training of collectors; type of livestock operation, number of animals, identification methods; type of handling operation, products processed, etc...	(b) (4)
General information on materials and inputs used and are they in compliance with the National List (NL) and annotations.	Yes



As appropriate did the OSP adequately address the requirements for:	
General	
Maintain or improve natural resources §205.200	Yes; water from Ogallala aquifer – operation switching from growing corn to sorghum and milo (less water used to produce); buffers and unused pasture with natural cover to help prevent wind erosion
Crops	
Land requirements §205.202	Yes; buffers noted on map
Soil fertility and crop nutrient management practice standard §205.203	Yes; soil tests, visual, forage nutrient testing; use of recycled lagoon H ₂ O
Seeds and planting stock practice standard §205.204	Yes; documented seed search review
Crop rotation practice standard §205.205	Yes; rotates triticale, oats, sorghum, etc.
Crop pest, weed, and disease management practice standard §205.206	Yes; none or little pest and disease pressure; weed mgmt = cows and flame
Wild-Crops	
Wild crop harvesting practice standard §205.207	N/A
Livestock	
Origin of livestock §205.236	Yes; closed herd, possibility of purchasing in future; use of AI
Livestock feed §205.237	Yes; auditor performed trace-back audit on feed ingredient, reviewed current org certs; operation calculates daily usage
Livestock health care practice standard §205.238	Yes; reviewed health care materials on-site; use of predatory wasps against flies, harrowed pens daily to disrupt fly life cycles
Livestock living conditions §205.239	Yes;
Pasture Practice Standard §205.240	Yes; trace back of individual cow for pasture #'s; review of 2011 TV
Handler	
Organic handling requirements §205.270	N/A
Facility pest management practice standard §205.271	N/A
Commingling and contact with prohibited substance prevention practice standard §205.272	N/A

Sampling	
Was a sample pulled during the inspection? §205.670	N/A



What was sampled and why?	N/A
Verify sampling procedures, chain of control, etc. §205.670(c)	N/A
Did the inspector provide the applicant with a receipt for any samples taken? §205.403(e)	N/A
Did the sampling process follow the ACA's sampling procedure?	N/A
Was the inspector charged for the samples? §205.403(e)	N/A
Did the ACA pay for the testing? §205.670(b)	N/A

Labels	
Were labels verified during the on-site inspection? §205.403(c)(2)	N/A
Were the labels being used the same as those approved by the ACA?	N/A
How was the inspector made aware of which labels are approved by the ACA?	N/A

Exit Interview §205.403(d)	
Document information addressed by the inspector during the exit interview	
Was the exit interview conducted with a knowledgeable representative?	Yes; (b) (6)
Did the exit interview address the accuracy and completeness of the inspection observations?	Yes; reviewed observations as addressed during inspection
Did the exit interview address the need for additional information?	N/A
Did the exit interview address issues of concern identified during the inspection?	Yes; reviewed concerns as addressed during the inspection

Questions for the inspector:	
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?	Pre-inspection report, current operation application; inspector had prior year's report
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; NMDA sends updates
How is the inspector informed of the ACA's policies and procedures and changes to them?	NMDA sends updates
Does the inspector provide consulting services of any kind?	No



If so, how is this information provided to the ACA?	
What is the inspector's background (experience, training, and education) in relation to the operation being inspected?	M.S. Agriculture, training through NMDA, raised/worked on sheep farm; org. inspector 5+ years

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?	Certificate was reissued when NMDA name change occurred; received updated product list in June which is part of the certificate documents
Does the client have a current copy of the NOP Standards?	Yes; internet
If applicable, how did the operation receive information on temporary variances?	Organic Insider + NMDA; operation's TV notified by phone (NMDA) then letter

Overall did the inspection verify:	
That the operation was in compliance or was able to comply with the ACT? §205.403(c)(1)	Yes
That the OSP accurately reflected the practices used by the operation? §205.403(c)(2)	Yes; very thorough OSP
That prohibited substances had not been and were not being applied to the operation? §205.403(c)(3)	Yes

Witness Audit File

Nature's Way Mgmt, Postales New Mexico

Johnny Lieb / Stanley Jones - (b) (4)

Scope: Livestock Crop Handling

Renewal Application Fee \$200 01 Jun 2011, 01 May 2012

(b) (4)

8/22 Witness Audit

(b) (4)





National Organic Program Accreditation Assessment Checklist	
Date:	06/18/12 opening meeting; 06/20/12 (wild crop witness inspection); 06/21/12 (crop witness inspection); 7/16-19/12 (office review, handler & livestock witness inspections)
Assessment Identifier:	NP2171ADA
Assessment Activity: (select one)	<input type="checkbox"/> Documentation Adequacy Review <input type="checkbox"/> Pre-decisional Assessment <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Mid-Term Assessment <input type="checkbox"/> Renewal Assessment – 10 yr. <input type="checkbox"/> Corrective Action Review <input type="checkbox"/> Corrective Action Assessment <input type="checkbox"/> Other _____
Company Information	
Name of Company:	Washington State Department of Agriculture (WSDA)
Company Address:	1111 Washington Street, SE, 2 nd Floor
City, State, Zip:	Olympia, WA 98504
Contact Name:	Brenda Book
Title:	Certification Manager
Phone #:	360-902-2090
Email:	bbook@agr.wa.gov
Location(s) of Program Activities:	USA- WA, OR, AK,
Standards Applied:	7 CFR Part 205, NOP Final Rule
Scope of Program Activities:	Crops, wild crops, livestock & handlers
Countries of Operations:	USA
Assessment Team	
Team Leader:	Nikki Adams - GVD Supv Agric Marketing Specialist
Second Auditor:	Lars Crail- NOP Area Manager
Other (Identify Role):	Kathy Matejovsky (GVD Auditor- (observer, training on NOP audits) and Steve Ross – GVD Verification Branch Chief - (observer/evaluating of the auditors)

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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.
Yes - initial contact made in February 2012.
- Once assessment date is scheduled with the ACA, select satellite offices and witness audit sites to be visited during the assessment.
Yes- all 4 witness inspections scheduled prior to the onsite audit. 2 were conducted prior to the start of the office review.
- After assessment sites and on-site schedule has been finalized, complete the audit plan, cost estimate, and appropriate letter regarding the assessment.
Yes- sent to client and approved prior
- 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".*
Yes- sent via email

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.
Ok- current on file, FMMI # 3175939
- Obtain & review the most recent copy of program documentation from the company.

Title of documentation:	WSDA Guide to Organic Certification (AGR 420-237), Revision 12, dated Dec 2008 WSDA Organic Rules and Regulations (AGR PUB 420-209), dated May 2011 WSDA Organic Pprogram Quality Manual, Rev 8, dated July 2012
Date or revision number of documentation:	See above

- Review previous audit report.
NP9271ADA- 9/28- 10/1/09, 1 outstanding & 6 new NCs
- Review previous corrective actions report, as applicable.
NP9271ADA, 3/8-18/10
- Review previous notices of noncompliance issued to the ACA.
N/A
- Receive approval to conduct the assessment activity by obtaining a signed copy of the audit plan and cost estimate from the client.
Ok- received prior

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ON-SITE ASSESSMENT ACTIVITIES

OPENING MEETING- Via conference call on 6/18/12

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? **Yes, revised the latest NOP Final Rule date.**
- Review program documentation. Have there been any changes since the last assessment?
No Yes - What are the changes? **Changes to wording in forms, corrective actions implemented for the previous identified non compliances, changes in personnel.**
- Have findings from previous assessments been addressed? (if applicable)
Yes No **1 previous outstanding (2007) & 6 other previous (2009) NCs cleared**

NP7030MMC.NC4 – Adequately Addressed – Cleared - NOP §205.642 states, "...The certifying agent shall provide each applicant with an estimate of the total cost of certification and an estimate of the annual cost of updating the certification." *Livestock and crop operations are not being provided with a fee estimate. Handlers and out of state operations are provided with the estimate. Livestock and crop operations are provided a form to calculate their own estimates.* **Corrective Action:** WSDA POL-OFP 037 Cost Estimate Policy was revised March 28, 2008 to include providing all new and continuing certification applicants with a cost estimate for certification. An example of the cost estimate was provided for review. **Verification of Corrective Action:** WSDA had implemented the corrective actions in 2007, 2008, and the start of 2009 of providing the cost estimates to all clients showing the total cost of the accreditation or renewal. Due to the resignation of the responsible person performing the cost estimate and assisting in sending the cost estimate to clients and a subsequent hiring freeze, the cost estimates were being performed by two associates and the work load fell behind. WSDA decided in September 2009 to stop sending the cost estimates to clients because the clients were receiving the cost estimate for inspections that had already occurred and the client had already paid WSDA. **Corrective Action:** WSDA revised POL-OFP 037 *Cost Estimate Policy*, a Cost Estimate Letter template '*Organic Certification Cost Estimate- Producers*', 2010 Application Flow Chart, and AGR 2259 '*Organic Certification Fee Form- Producers*'. The revisions were

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submitted and the policy and forms more accurately reflect the requirements of NOP §205.642. WSDA is currently providing cost estimates for both initial and annual renewal certification.

Audit Findings: A review of various files verified that WSDA is providing a fee estimate to operations.

NP9271ADA.NC1 - Adequately Addressed – Cleared - Issuance of Export Certificates under an Export Arrangement between the USDA and a Foreign Governments requires that ACA's who issue TM-11 Export Certificates follow the export arrangements between the USDA and a foreign government. *WSDA did not follow the requirement of incorporating the compliance documents into their quality manual under the heading "Requirements for Export of U.S. Organic Raw and Processed Products to Japan or Taiwan". Additionally, WSDA has been using the acronym letters WDAJP since 2001 instead of the required WAAJP as assigned by the USDA as the unique codes for the export certificates. WSDA is using the correct acronym for the Taiwan TM 11 Export Certificates.* **Corrective Action:** WSDA renamed the electronic folder of the compliance documents to 'Requirements for Export of US Organic Raw and Processed Products to Japan or Taiwan'. Also, the WSDA tracking sheet for assigning the unique identifier was corrected. As of October 1, 2009, all TM-11 Japan Export documents issued under the USDA Export Agreement utilized the required WAAJP as assigned by USDA.

Audit Findings: A review of various TM-11 export certificates to Japan verified that WSDA is using the correct identifier (WAAJP). Additionally, the electronic folder is named and in place as stated.

NP9271ADA.NC2 – Adequately Addressed – Cleared - NOP § 205.406(a) (1-4) requires that to continue certification, a certified operation... submit the following information (1-4). *The updated OSP's submitted by the clients are not including additions or deletions to their existing OSP and other information deemed necessary by the certifying agent to determine compliance with the Act. Updated OSP's reviewed and observed during the on-site audit found that 8 of 10 OSP's simply stated "No Changes" to almost every question. Observations and file reviews found that there were indeed changes to the operations that should have been submitted.*

Corrective Action: Since the fall of 2009, WSDA has been working to revise the Organic System Plan (OSP) Updates. Revision of all WSDA Organic Certification Renewal Packets, including but not limited to the OSP Updates (AGR 2600, 2601, 2285, 2502, 2701, 2702) was completed on January 15, 2010. Additionally, a revision of the New Organic System Plans for Crop and Livestock Producers (AGR 2121, 2255, 2254) was completed on January 31, 2010. A cursory review of a random selection of the OSPs on the WSDA website verified that they have been revised as stated. WSDA states there is a three year plan to prioritize the revision of all other forms which will be presented to the WSDA Advisory Board in March 2010. Certification Specialists are attending bi-weekly meetings to ensure consistency in evaluating incoming information and ensuring follow-up questions are asked of clients if the OSP updates do not meet the requirements of § 205.406. WSDA conducted a training session with the Certification Specialists and WSDA Organic Inspectors for handler certification requirements on October 27-30, 2010, and additional training will be conducted for producer certification requirements on March 22-26, 2010. **Audit Findings:** A review of various files as well as witness audits observed, verified that WSDA has implemented the revised OSP which requires clients to send in updated OSPs with information on their current practices and state any changes.

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NP9271ADA.NC3 - Adequately Addressed - Cleared - NOP § 205.501(a)(11)(vi) requires that to prevent conflict of interest the ACA must ensure that the decision to certify an operation is made by a person different than those who conducted the review of documents and on-site inspection. *It was witnessed during the two onsite inspections that the inspectors for WSDA appear to be making decisions as to the acceptability of inputs used or the changes to the OSP that were not submitted to the ACA. The inspectors are not gathering additional information/documents/records and submitting such information to the ACA in order for the ACA to make certification decisions. The inspectors are informing the clients that the products or inputs comply or not with the Act.* **Corrective Action:** WSDA has revised the PRO-OFP 802 *Organic Inspection Procedures* and provide training to the staff to ensure the understanding of the distinction between the review and inspection duties as well as reviewing procedures to adequately report any changes discovered during the on-site inspection.

Audit Findings: A review of the inspection reports, reviews and observation at the witness inspections verified that the inspector is verifying the input information to the OSP, gathering the information and providing it to the reviewer to ake the final determination on acceptability.

NP9271ADA.NC4 - Adequately Addressed – Cleared - NOP § 205.403(d) requires that the inspector conduct an exit interview... The inspector must also address the need for any additional information as well as any issues of concern. *During the exit interview with the dairy operation, the inspector notified the client that the feed audit trail would be completed at the inspector's home. This does not allow for the client to provide additional information as needed or be informed of any issues of concern.* **Corrective Action:** WSDA Organic Inspectors are expected to complete an exit interview at the time of the inspection and that all control points of the inspection are completed and reviewed with the applicant or certified operation. Failure to complete the feed audit trail onsite will be a part of the employee's annual performance review. WSDA revised the PRO-OFP 802 *Organic Inspection Procedures* to expand on the expectations of the inspector(s) in conducting the audit and exit interview. WSDA conducted training on February 1-4, 2010, with all WSDA Field Inspectors on the inspection process and the requirements of § 205.403. **Audit Findings:** Observation at the witness inspections, interviews with staff, including inspectors, and review of personnel performance evaluations verified that exit interviews are being conducted at the conclusion of inspections as required.

NP9271ADA.NC5 – Adequately Addressed – Cleared - NOP § 205.403 (c) (1) (2) states, the on-site inspection of an operation must verify: (1) The operation's compliance or capability to comply with the Act and the regulations in this part; (2) that the information, including the organic production or handling system plan...." *During the processor witness inspection, the inspector did not verify the labels actually being used on-site. The inspector did review the labels in the client file, but no labels in the plant or on finished bottles were reviewed. Also, during the livestock witness inspection, the inspector did not perform a trace-back of dairy animal identification to verify the organic source or status.* **Corrective Action:** WSDA Organic Inspectors are expected to verify the organic system plans during the witness onsite inspections. Failure to complete a trace back audit verifying animal identification and origin and a review of labels on-site will be a part of the employee's annual performance evaluation. Also, PRO-OFP 802 *Organic Inspection Procedures* was expanded (Audits and Exit Interview

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sections) to state the requirements of the inspector in conducting the onsite inspection. WSDA conducted training on February 1-4, 2010, with all WSDA Field Inspectors on the inspection process. **Audit Findings:** Witness inspections observed as well as various files reviewed, verified that the inspectors are verifying the information accurately to what is stated in the OSPs and the compliance to the Act.

NP9271ADA.NC6 – Adequately Addressed – Cleared - NOP §205.239 (a) (1) Livestock living conditions states, “Access to the outdoors, shade, shelter, exercise areas, fresh air, and direct sunlight suitable to the species, its stage of production, the climate, and the environment.” *A review of 5 livestock client files for swine, poultry (layers, meat birds, & turkeys) and rabbits was conducted and found that all had limited access to the outdoors. However, 1 of the 5 (a large laying operation) clients OSP section A. Flow Chart states, (b) (4)*

[Redacted]

*The OSP Section E., 6a Livestock Living Conditions states, ‘If yes, please indicate why livestock are subject to confinement.’ The boxes are checked for ‘Inclement weather, stage of production and health, safety or well-being of animal’ and there is no further explanation in the OSP. A review of the past 3 years OSP updates did not indicate any changes to the access to the outdoors nor do the inspection reports for the last 4 years give any further clarification other than cold weather in 2 reports. There is not sufficient information given on the limited access to make a certification decision. **Corrective Action:** WSDA revised the AGR 2255 Organic System Plan- Non-Ruminant Livestock Producers for new applicants and the AGR 2600 Organic System Plan Renewal for Non-Ruminant Livestock Producers to add the wording ‘For each group of organic animals (chicks, pullets, weaners, etc.) describe how you provide access to the outdoors &/or pasture. Please include typical dates of confinement for each group, typical dates animals are provided access to outdoors &/or pasture for each group and details of the conditions of the outdoors &/or pasture that are provided.’ These updates were sent to all existing certified operations on December 15, 2009, and are due back by February 1, 2010. WSDA provided training for livestock reviewers on January 25, 2010. Additionally, WSDA sent staff to the National Organic Program certifier training conducted on February 25, 2010, and all reviewers and inspectors participated in the National Organic Program ‘Access to Pasture’ webinar conducted on March 17, 2010. WSDA plans on conducting additional training with all livestock reviewers and inspectors by May 1, 2010. WSDA stated that the client file in question was given the revised renewal OSP, but it is still in the review stage and is not yet completed. WSDA is in the process of updating the Livestock Inspection Reports to correlate with the new provisions of the Access to Pasture Rule and plans to have these reports revised by May 1, 2010.*

Audit Findings: A review of various files and observation at the witness inspection (Dairy) verified that livestock have adequate access to the outdoors. Information provided in the revised OSP is adequate to make a determination and verify at the inspection for compliance.

- Methods and procedures to be used to conduct the assessment.
- Confirmation of formal communication channels.

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- 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.
- Explain the conditions under which the audit would be terminated.
- Explain that audit findings and associated information is releasable under FOIA.
- Explain the audit appeal process.

Complete the following Attendance List:

Name	Title or Position	Opening	Closing
Nikki Adams	GVD Supv Agric Marketing Spec.	X	X
Lars Crail	NOP Area Manager	X	X
Kathy Matejovsky	GVD Supv Agric Marketing Spec.	X	X
Brenda Book	WSDA Program Manager	X	X
Scott Rice	WSDA Accreditation & Quality Manager	X	X
Steve Ross	GVD Verification Branch Chief		
(b) (6)	Organic Inspector	X	
(b) (6)	Asst Director Food Safety & Consumer Services	X	X
(b) (6)	Organic Processor & Livestock Coordinator	X	
(b) (6)	WSDA Reviewer		X
(b) (6)	WSDA Reviewer		X



(b) (6)	WSDA Admin/ records		X
(b) (6)	WSDA Material Registration reviewer		X

**** Nikki's comments/ review in blue & Lars' comments/ review in green. NCs cited in red. Notable comments in orange**

CHECKLIST SECTION I – General Information on Certification Process		
1	List locations of offices where key activities occur including key activities performed.	1 office at Capitol Building in Olympia, WA
2	Note the number of operations certified to the NOP at the time of the assessment.	Total: <u>1,119</u> NOP certified operations Crop: <u>654</u> Wild-crop: <u>2</u> Livestock: <u>91</u> Handlers: <u>339</u> Grower Groups: <u>0</u> Approximate Handler Types: Processors: <u>192</u> Distributors: <u>16</u> Traders: <u>17</u> Retailers: <u>33</u>



CHECKLIST SECTION I – General Information on Certification Process		
3	What does the ACA submit to applicants on initial application?	<p><u>General Application:</u> Application for Organic Certification (AGR 2289), Organic Operator Agreement (AGR 2281), Organic Certification Fees (AGR 2259), Production Estimate Form (AGR 2290), WSDA Brand Name Material List, WSDA Organic Rules & Regulations Book, WSDA Guide to Organic Certification, Organic Labeling Guidance (AGR 2508).</p> <p><u>Livestock:</u> Site Application Packets (AGR 2264), Site Application (AGR 2264), Organic Ruminant Livestock System Plan (AGR 2254), Organic Non-Ruminant System Plan (AGR 2255), Organic Yields & sales Estimates-Producer (AGR 2509), Previous Land Use Declaration (AGR 2262),</p> <p><u>Crops:</u> Production Yield & Sales Estimates (AGR 2509), Crop Producers Organic System Plan (AGR 2121), Site Application (AGR 2264), Previous Land Use Declaration (AGR 2262), WSDA Seed and Planting Stock Fact Sheet (AGR 3000), Organic Seed Availability Record (AGR 2261), Organic Material Application Records (AGR 2161), Organic Labeling Guidance (AGR 2508).</p> <p><u>Handler:</u> Organic Product Summary (AGR 2249), Organic Handling & Processing System Plan (AGR 2180), Organic System Plan Brokerage- Marketing Company (AGR 2248), Application for Organic Certification and Organic Operator Agreement (AGR 2265), Processor Fee Form (AGR 2258), Handler Fee Form (2260)</p> <p><u>Wild Crops:</u> crop packet and also a narrative asked to be submitted to verify the wild crop standards. Utilize POL-OFP 165 Wild Harvested Organic Crops Application and Inspection Procedures.</p>
4	How is the information, documents and or forms provided to those inquiring about certification (hard copy/electronic)?	Forms are available on line, but may also be sent in hard copy format.
5	Who (job title/position description) conducts the initial review for completeness and ability to comply?	An Organic Certification Coordinator assigns to an (OPS) Organic Program Specialist.
6	Who (job title/position description) reviews labels and material inputs?	Reviewer on file for that particular client or as assigned at random. If a reviewer leaves, then it is re-assigned to another reviewer.
7	How are inspectors selected / assigned for inspections?	Based on the region where they live and also on the areas trained, qualified too.



CHECKLIST SECTION I – General Information on Certification Process		
8	Are they staff inspectors or subcontracted?	Staff inspectors (7- full time & 3 part time inspectors and 1 in training) based on a region. None are subcontracted. When have inspections outside of WA, they send one of their own staff inspectors to conduct the review.
9	Who (job title/position description) makes the certification decision?	The final review is conducted and sent with a recommendation to a QA staff (3). Brenda Book- Program Manager's signature is on the certificate.
10	Provide a brief description of the annual update process.	Producers- due Feb 1 st and handlers- March 1 st. Packets are sent out 6 weeks prior to the due date. The pre-review is conducted based on the target inspection date and the projected first crop. The admin staff targets the early crops. The reviewer conducts the review, send information to the inspector to schedule. The inspection happens, and report sent back to the same reviewer. The review is conducted and a certificate is issued after the closing of any NCs, as applicable.
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?	Ideally, the same reviewer will review the inspection report.
12	Who (job title/position description) makes the determination on whether to issue a notice of non-compliance?	The reviewer sends a recommendation to the QA staff for review and final decision. Anything beyond a NC, only Brenda can make the decision to issue a notice of revocation, suspension, etc.
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?	The reviewer would then review and make a recommendation on acceptability to the QA Staff to review and make the final decision.
14	Are there any operations certified or undergoing the certification process which were re-instated after having been suspended or revoked?	None since the previous audit.



CHECKLIST SECTION I – General Information on Certification Process		
15	Does the ACA have a material evaluation program for liquid nitrogen fertilizers (LNF) with nitrogen content greater than 3%?	No
16	Does the ACA certify grower groups?	No

PROGRAM REQUIREMENTS

- ⁽¹⁾ Complies: For each requirement, identify whether the certifying agent complies, does not comply, or that a requirement is not applicable with an “X”.
- ⁽²⁾ 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.

Exclusions: Sections not included or addressed in checklist
<p>§205.502 Applying for Accreditation – procedural requirements not addressed by auditors. §205.505 Statement of Agreement – Reference only. If requirements are not met, cite to the appropriate section(s) of §205.501. §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 ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
References: NOP 2605 Reinstating Suspended Organic Operations NOP Policy Memo 11-4 Verification of Materials				
<p>§§205.400(c) and 205.670(a) Is there any evidence that a certified operation denied access to a representative of the Administrator, State, or ACA?</p>	X			Here have been no clients who have denied access.
<p>§205.401 Are all applications complete and do the OSPs meet the requirements for an OSP?</p>	X			Livestock: Organic Ruminant Livestock System Plan (AGR 2254), Organic Non-Ruminant System Plan (AGR 2255), Organic Livestock Feed Record (AGR2162), Organic Livestock Pest Control & Disease Record (AGR 2163), Organic Livestock Animal Inventory (AGR 2164), Previous Land Use Declaration



§§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 ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
				(AGR 2262), Organic Material Application Records (AGR 2161) <u>Crops:</u> Crop Producers Organic System Plan (AGR 2121), Previous Land Use Declaration (AGR 2262), WSDA Seed and Planting Stock Fact Sheet (AGR 3000), Organic Seed Availability Record (AGR 2261), Organic Material Application Records (AGR 2161) <u>Handler:</u> Organic Handling & Processing System Plan (AGR 2180), Organic System Plan Brokerage- Marketing Company (AGR 2248) <u>Wild Crops:</u> crop packet and also a narrative asked to be submitted to verify the wild crop standards. Utilize POL-OF 165 Wild Harvested Organic Crops Application and Inspection Procedures.
§205.402(a)(1) Upon accepting applications does the ACA review the application for completeness?	X			Per the Organic Certification Specialists. The application and various forms for application are reviewed and if needed more information is gathered prior to making a determination and assigning to an inspector.
§205.402(a)(2) Does the review include making a determination if the applicant is in compliance or can comply with the requirements?	X			Per interviews conducted, witness inspections observed, and various files reviewed, the reviews are adequate in determining compliance to the ACT. Reviewers are trained and knowledgeable.
§205.402(a)(3) 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	X			WSDA has not had any clients previously certified apply. However, WSDA has policies and procedures in place to request documentation and determine

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§§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 ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
notification of noncompliance or denial of certification?				compliance as needed
§205.402(b)(1) Is the time from receiving the application materials and the review reasonable?	X			Various files reviewed verified that the time of receipt to review is adequate to determine compliance.
§205.402(b)(1) Is the time between receiving an application and communicating the results of the review to an applicant reasonable?	X			Various files reviewed verified that the time of receipt to review and communication is reasonable.
§§205.402(b)(2) and 205.403(e)(2) Is a copy of the inspection report as approved by the ACA provided to that operation by the ACA?	X			Verified at the witness inspections as well as copies in the files reviewed.
§205.402(c) Do any clients withdraw their application and if so, was the process in accordance with the requirements?	X			A review of 2 files where clients surrendered their certification found that they where charges only fees as applicable. None were issued notices of non compliance.

§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 ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
§205.403(a)(1) 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?	X			PRO-OFP-082 Organic Inspection Procedures. Yes, all operation has an initial on site inspection conducted.
§205.403(b)(1)	X			Inspections are conducted



§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 ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
Are all inspections conducted within a reasonable time after the determination that the applicant appears to comply or can comply with the requirements?				within a reasonable time when production is taking place, crops are being produced, harvested, ect.
§205.403(b)(2) 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?	X			Per the witness inspections observed and various files reviewed, a knowledgeable representative of the operation is present during the inspections.
§205.403(c)(1) Do all inspections verify the operation's compliance or capability to comply with the Act and the regulations?	X			Per the witness inspections observed and various files reviewed.
§205.403(c)(2) 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?	X			Per the witness inspections observed and various files reviewed.
§205.403(c)(3) Do all inspections verify that prohibited substances had not been and were not being applied to the operation?	X			Per the witness inspections observed and various files reviewed. None observed and no evidence of any at the witness inspections.
§205.403(d) 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?	X			Per the witness inspections observed and various files reviewed. Exit interviews were thorough and accurate.



§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 ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
Does the exit interview(s) address the need for any <u>additional information</u> as well as any <u>issues of concern</u> ?				
§205.403(e)(1) Do inspectors provide the operation's authorized representative with a receipt for any samples taken during the inspections?	X			Have a carbon copy and the goldenrod copy is given to the client. Per the sampling procedure.

§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 ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
References: <i>NOP 2603 Organic Certificates</i> <i>NOP 2605 Reinstating Suspended Organic Operations</i> <i>NOP Policy Memo 11-4 Verification of Materials</i>				
§205.404(a) Does the ACA meet the requirements of 205.404(a) by: reviewing the inspection report, sample results, and any additional information within a <u>reasonable time</u> after the inspection; 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 (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?	X			Per various files reviewed, WSDA reviews the inspection and sample reports in a timely manner, grants certification as applicable and any notices of non-compliance are issued with a deadline for response.
evi§205.404(b) Does the ACA issue a certificate of organic operation	X			Yes, all certificates issued as required,

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§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 ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
in all cases where certification was granted?				
<p>§205.404(b)(1) – (4) 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>				
		X		<p>The certificates issued for the witness inspections in AK, both had incorrect scopes listed (Producer instead of wild crop, crop or livestock). The NOP 2603 is a guidance only and is not part of the Final Rule, therefore the following items missing from the certificate are NOT a non-compliance: There is no internet address for the ACA, anniversary date for the next renewal or the statement - "Once certified, a production or handling operation's organic certification continues in effect until surrendered, suspended or revoked".</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 ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
<p>References: NOP 2607 Disclosure of Information concerning USDA Accredited Certifying Agents and Certified Operations to the NOP NOP 4002 Enforcement Policy NOP Policy Memo 11-4 Verification of Materials</p>				
<p>§205.405(a) Does the ACA provide a written notification of noncompliance 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?</p>				
	X			<p>Per PRO-OFP-040 Compliance and Appeals Procedures section 1,c and the Letter of Non-compliance notice. There have been 9 denials since the previous onsite audit.</p>
§205.405(a)	X			Per the Notice of Non-



§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 ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
<p>If the ACA issued any <u>combined notice</u> of noncompliance and denial of certification, does it meet the requirements for both notifications?</p>				Compliance and Notice of Denial Letter.
<p>§205.405(a)(1) – (3) Do all notices of noncompliance that were issued contain the required information in accordance with §205.405(a) (1) – (3)?</p>	X			Yes, included in the form letter.
<p>§205.405(c)(1) In cases when the applicant provided corrective actions or a rebuttal, does the ACA:</p> <p>evaluate the rebuttal or corrective actions taken and supporting documentation;</p> <p>issue the applicant an approval of certification if the corrective action or rebuttal is sufficient for the applicant to qualify for certification; or</p> <p>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?</p>	X			Rebuttals received and the evaluation was adequate. WSDA issued a letter informing the client of acceptability and resolve. None of the 9 denied clients replied with any corrective actions or rebuttals in response to non compliances. However, WSDA does have procedures and policies in place to review and make a determination on acceptability.
<p>§205.405(c)(2) Does the ACA issue a written notice of denial of certification to all applicants that failed to respond to the notification of noncompliance?</p>	X			Yes, provided a denial letter to those who did not respond. In some cases, the proposed client did not respond to information requested after application, and therefore were denied.
<p>§205.405(c)(3) Does the ACA provide all notices of approval or denials to the Administrator?</p>	X			Yes, copies of the notices were cc'd to the NOP Appeals Team via email and show this on the form letters.
<p>§§205.405(d) and 205.405(d)(1) – (3) Do all issued denials of certification contain the required information in accordance with 205.405(d),</p>	X			Yes, all areas are included in the template letter as well as those chosen for review.



§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 ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
and 205.405(d)(1) – (3)?				
§205.405(f) 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?	X			There have not been any who have re-applied at this point. However, WSDA dos have procedures and policies in place to review the application as a new one.

§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 ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
References: <i>NOP 2607 Disclosure of Information concerning USDA Accredited Certifying Agents and Certified Operations to the NOP</i> <i>NOP 4002 Enforcement Policy</i> <i>NOP Policy Memo 11-4 Verification of Materials</i>				
§205.406(a)(1) – (4) Do all certified operations submit an updated OSP and pay the annual certification fees as required by §205.406(a) (1) – (4)?	X			Yes, various files reviewed verified that clients are submitted revise OSPs and annual certification fees as required.
§205.406(b) Following the receipt of an updated OSP does the ACA review it to see if the requirements of §205.406(a) have been met?	X			Yes, the revised OSPs are sent to a reviewer who determines adequacy. Interviews verified.
§§205.406(b) and 205.403(a)(1) Following the receipt of an updated OSP does the ACA within a reasonable time arrange and conduct an on-site inspection?	X			Generally within 1-2 months or at the time of production.
§205.406(c) Does the ACA provide a written notification of noncompliance to all operations in accordance with	X			PRO-OFP-040 Compliance & Appeals Procedure and Notice of Non-Compliance



§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 ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
§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?				letter
§205.406(d) 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?	X			Yes- per certificates for witness inspections observed, various files reviewed and interviews conducted verified that updates certificates are being issued.

§205.501 General Requirements for Accreditation

CHECKLIST SECTION VII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
References: NOP 2000 General Accreditation Policies and Procedures NOP 2026 Submitting Annual Lists of Certified Operations NOP 2606 Processing Requests for Temporary Variances NOP Appeals Procedure: Adverse Action Appeal Process – Certified Operation or Applicant for Certification Policy Memo 11-8 California State Organic Program, Additional Requirements Granted				
§205.501(a)(1) 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?	X			No issues noted.
§205.501(a)(2) Does the ACA <u>demonstrate the ability</u> to fully comply with the requirements for accreditation?	X			WSDA has a supportive system within the WA State Govt to comply and make continuous improvements to their program. WSDA has adequate resources, staff, knowledge, ect to carry out the provisions of the ACT.



§205.501 General Requirements for Accreditation				
CHECKLIST SECTION VII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
<p>§205.501(a)(3) 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?</p>	X			WSDA has adequate staff, resources, qualifications, ect. A review of files, interviews conducted, witness inspections observed verified that WSDA is able to accry out the provisions.
<p>§205.501(a)(4) 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?</p>	X			No issues noted.
<p>§205.501(a)(5) Does the ACA ensure certification personnel <u>have sufficient expertise</u> in organic production or handling techniques to successfully perform the duties assigned?</p>	X			No issues noted.
<p>§205.501(a)(6) Does the ACA conduct annual <u>performance evaluations</u> of all certification personnel in accordance with §205.501(a) (6)?</p>		X		Not all staff have had annual performance evaluations.
<p>§205.501(a)(7) Does the ACA have <u>an annual program review</u> of its certification activities conducted by someone who has expertise to conduct the reviews? Does the ACA <u>implement measures to correct</u> any noncompliances that are identified in the evaluation?</p>	X			The annual program review is being conducted and reported to the Advisory Committee as required. The reviews are being conducted and corrective actions implemented as needed. The 2011 review was completed and the 2012 review has been performed but is still in the process of being submitted/ reporting to the Advisory Committee.
<p>§205.501(a)(8) Does the ACA <u>provide sufficient information</u> to persons seeking certification to enable them to comply with the Act and the regulations?</p>	X			The list of forms, application, OSP, guide, Final Rule etc. are adequate.
<p>§205.501(a)(9) Does the ACA <u>maintain all records</u> pursuant to</p>	X			All files, records and docuemnts were available



§205.501 General Requirements for Accreditation				
CHECKLIST SECTION VII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
§205.510(b) and make all such records available for inspection and copying during normal business hours?				during the audit. All records are kept either on site or in records depository near the State Capitol building.
§205.501(a)(10) 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)?	X			No issues noted.
Does the ACA prevent conflicts of interest by:	---	---	---	---
§205.501(a)(11)(i) 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?	X			Yes, stated COIs listed by the staff, reviewed and verify that they are not assigned inspections, reviews ect of those clients.
§205.501(a)(11)(ii) <u>Excluding any person, including contractors</u> , with 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.	X			Yes, stated COIs listed by the staff, reviewed and verify that they are not assigned inspections, reviews ect of those clients.
§205.501(a)(11)(iii) 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.	X			Do not accept any gifts, payments, ect.
§205.501(a)(11)(iv) <u>Not giving advice or providing consultancy services</u> , to certification applicants or certified operations, for overcoming identified barriers to certification.	X			No issues noted or observed during the witness inspections.
§205.501(a)(11)(v) Requiring all certification personnel and responsibly connected parties to complete an <u>annual conflict of interest disclosure report</u> .	X			No issues noted.



§205.501 General Requirements for Accreditation				
CHECKLIST SECTION VII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
<p>§205.501(a)(11)(vi) 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.</p>	X			<p>Decision to certify applicants, allow on-going certification, issuance of noncompliances and adverse actions (Program Manager only) are all do done by approved Quality Assurance personnel. Currently this is the Program Manager, Crop, Livestock, Processing Coordinators. As a backup, the Accreditation Manager is also part of this team. See POL 043 for a complete list of Authorized QAC Personnel.</p>
<p><i>A private or governmental entity accredited as a certifying agent (ACA) under this subpart must:</i></p>	---	---	---	---
<p>§205.501(a)(12)(i) <u>Reconsider a certified operation's application</u> for 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.</p>			X	<p>Have not had any COI issues that would cause this situation so far. However, WSDA has proceures and policies in place to prevent COIs.</p>
<p>§205.501(a)(12)(ii) <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.</p>			X	<p>Have not had any COI issues that would cause this situation so far. However, WSDA has proceures and policies in place to prevent COIs.</p>
<p>§205.501(a)(13) <u>Accept the certification decisions</u> made by another ACA accredited or accepted by USDA.</p>	X			<p>Yes, WSDA accepts the decisions made by other ACAs in regards to certificates, products certified, ect.</p>
<p>§205.501(a)(14)</p>	X			<p>WSDA refrains from making</p>



§205.501 General Requirements for Accreditation				
CHECKLIST SECTION VII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
Refrain from making false or misleading claims about its accreditation status, the USDA accreditation program for ACAs, or the nature or qualities of products labeled as organically produced.				such claims. There is no evidence that WSDA has made any.
§205.501(a)(15)(i) Submit to the Administrator a copy of: 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.	X			Based on various files reviewed and correspondence, WSDA is copying all notices to the NOP team as required. Copies of notices and certified mail receipts, ect were available for review in the files.
§205.501(a)(15)(ii) Submit to the Administrator a list, on January 2 of each year, including the name, address, and telephone number of each operation granted certification during the preceding year.	X			The list was submitted late after WSDA got a notification from the NOP on 1/9/12. The notification was missed due to the notification that it was due being sent to the wrong email address for the WSDA contact. Additionally, there had been a major snowstorm in the area during this time, which shut down the govt for several days. WSDA immediately contacted the NOP when it was realized that it was overdue and submitted.
§205.501(a)(16) Charge applicants for certification and certified production and handling operations only those fees and charges for certification activities that it has filed with the Administrator.	X			A review of several files indicates that fee charges correspondence to the fee schedule and are calculated properly.
§205.501(a)(17) Pay and submit fees to AMS in accordance with §205.640.	X			Yes, fees are paid and copies of payments given to the auditor prior to the start of the audit.
§205.501(a)(18) Provide the inspector, prior to each on-site inspection, with previous on-site inspection reports and notify the inspector of its decision regarding certification of the	X			Verified during the witness inspections and various files reviewed.



§205.501 General Requirements for Accreditation				
CHECKLIST SECTION VII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
operation site inspected by the inspector and of any requirements for the correction of minor noncompliances.				
§205.501(a)(19) <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;	X			All applicants are accepted based on their accreditation, scopes and staff. No issues noted.
§205.501(a)(20) Demonstrate its ability to <u>comply with a State's organic program</u> to certify organic production or handling operations within the State.	X			Own program for Washington State.
§205.501(a)(21) Comply with, implement, and <u>carry out any other terms and conditions</u> determined by the Administrator to be necessary.	X			WSDA has the staff, resources, procedures and policies in place to comply with any requests from the NOP Administrator. There have been no requests made. However, WSDA has helped the NOP in investigations as needed. TM-11 export certificates: per the Quality Manual, pg 79 and WAC 16-157-290 Export and transaction certificates and review of various certificates issued for Japan and Taiwan.
§205.501(b)(1) 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 production and handling operations certified by the certifying agent to indicate affiliation with the certifying agent. <i>Provided</i> , That, the certifying agent:	X			Per Quality Manual, pg 79 and WAC 16-157-260 procedure. WSDA has a seal for use for Handler, Processor and Producers. Verified that the use of such is not required.
<u>Does not require use of</u> its seal, logo, or other				



§205.501 General Requirements for Accreditation				
CHECKLIST SECTION VII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
identifying mark on any product sold, labeled, or represented as organically produced as a condition of certification.				
§205.501(b)(2) <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.	X			There was no evidence found that there are additional requirements beyond the Act for conditions of use.
<i>A private entity accredited as a certifying agent must:</i>	---	---	---	---
§205.501(c)(1) 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.			X	WSDA is a state governmental entity, not private.
§205.501(c)(2) 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.			X	WSDA is a state governmental entity, not private.
§205.501(c)(3) 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.			X	WSDA is a state governmental entity, not private.
§205.501(c)(d) 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, religion, age, disability, political beliefs, sexual orientation, or marital or family status.	X			Per the POL-HR-213, Discrimination and Harrassment Prevention policy. All areas stated. No evidence of discrimination evident.



§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 ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
References: NOP 2000 General Accreditation Policies and Procedures 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) 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;	X			The Application for Accreditation (Oct 28, 2011) has all the required information (the tax ID # is not required as this is a state government entity).
§205.503(b) 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;	X			OK- there is only one office location at the State Capitol building in Olympia, WA.
§205.503(c) 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;	X			The # of clients estimated per scope is included.
§205.503(d)(1) 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,	X			Government (State of WA), per state laws, regulations and codes.



§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 ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
§205.503(d)(2) 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;			X	Government (State of WA), not a private entity.
§205.503(e) 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.	X			WA, OR, AK, MN, MI, PA, NV, IL. No foreign countries.

§205.504 Evidence of Expertise and Ability				
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 IX	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
References: <i>NOP 2000 General Accreditation Policies and Procedures</i> <i>NOP Appeals Procedure: Adverse Action Appeal Process – Certified Operation or Applicant for Certification</i>				
Personnel	---	---	---	---
§205.504(a)(1) A copy of the applicant's policies and procedures for training, evaluating, and supervising personnel;	X			POL-OFP 042 indicates the on-going training for staff and training required for new staff members.
§205.504(a)(2) 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	X			Current WSDA Organic Program Organizational Chart was provided.



§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 ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
committees, contractors, and all parties responsibly connected to the certifying agent;				
§205.504(a)(3)(i) A description of the qualifications, including experience, training, and education in agriculture, organic production, and organic handling, for each inspector to be used by the applicant:	X			Brief resumes for each inspector. No issues noted.
§205.504(a)(3)(ii) and for Each person to be designated by the applicant to review or evaluate applications for certification:	X			Brief resumes for each inspector. No issues noted.
§205.504 (a) (4) 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.	X			Reviewed relevant training agendas/lesson plans for certification staff concluded for the past year: March 19 – 22, 2012 Inspector Mtg, April 11 -12, 2012. November 8-9, 2011. November 1-2, 2011. Training consists of program updates, investigative techniques, inspection improvements, available resources, etc... POL-OFP 042 indicates the on-going training and training required for new staff members. All staff attended IOIA basic inspector training during June 2012. Verified.



§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 ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
<i>Administrative Policies and Procedures</i>	---	---	---	---
§205.504(b)(1) A copy of the procedures to be used to evaluate certification applicants, make certification decisions, and issue certification certificates;	X			POL-OFP-041 Quality Assurance of Certification Reviews & Decisions; PRO-OFP-005 Processing Initial Applications, Renewal Applications, and Inspection reports for Organic Certification
§205.504(b)(2) 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 in this part to the Administrator;	X			POL-OFP-041 Quality Assurance of Certification Reviews & Decisions; PRO-OFP-005 Processing Initial Applications, Renewal Applications, and Inspection reports for Organic Certification; PRO OFP 040 Compliant and Appeals Procedures and PRO OFP 802 Organic Inspection Procedures
§205.504(b)(3) A copy of the procedures to be used for complying with the recordkeeping requirements set forth in §205.501(a)(9);	X			POL-OFP-023 Public Access to Information and Confidentiality Policy for Records Maintained under the USDA NOP; POL, 2159 WSDA Organic Food Program Document Release Authorization; 560-1—6 Request for Public Records Disclosure; POL-OFP-034 Records Management; POL-)FP-035 Document Control Policy; PRO-OFP-036 Document Control Procedure
§205.504(b)(4) A copy of the procedures to be used for maintaining	X			POL-OFP-023 Public Access to Information and



§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 ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
the confidentiality of any business-related information as set forth in §205.501(a)(10);				Confidentiality Policy for Records Maintained under the USDA NOP; POL, 2159 WSDA Organic Food Program Document Release Authorization
§205.504(b)(5) 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;	X			POL-OFP-023 Public Access to Information and Confidentiality Policy for Records Maintained under the USDA NOP
§205.504(b)(6) A copy of the procedures to be used for sampling and residue testing pursuant to §205.670.	X			PRO-OFP 2500 R/9/11
Conflicts of Interest	---	---	---	---
§205.504(c)(1) A copy of procedures intended to be implemented to prevent the occurrence of conflicts of interest, as described in §205.501(a)(11)	X			PRO-OFP 002 and the actual Conflict of Interest form (AGR 2215 – R 11/08). No issues noted.
§205.504(c)(2) 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).	X			No issues noted.
An applicant who currently certifies production or handling operations must submit:	---	---	---	---
§205.504(d)(1) A list of all production and handling operations currently certified by the applicant	X			Provided prior to the audit. Also, submitted to the Administrator with the renewal packet as well as in January 2012.
§205.504(d)(2) Copies of at least 3 different inspection reports and certification evaluation documents for production or handling operations certified by the applicant during	X			Various client files requested for the re-accreditation audit. Witness inspection files sent prior for review. Also, sent

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§205.504 Evidence of Expertise and Ability				
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 IX	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
the previous year for each area of operation for which accreditation is requested.				with the renewal packet to the NOP in October 2011, as required.
§205.504(d)(3) 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.	X			ISO Guide 65 accredited and EU Equivalency Assessment through IOAS. However, they withdrew from the certification side (but kept for their Material Review Program) in June 2012 due to the EU equivalency agreement. There were no issues identified in the previous review by IOAS.
§205.504(e) Any other information the applicant believes may assist in the Administrator's evaluation of the applicant's expertise and ability.			X	None stated.

§205.510 Annual Report, Recordkeeping, and Renewal of Accreditation				
CHECKLIST SECTION X	Complies ⁽¹⁾			Remarks ⁽²⁾
	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>	---	---	---	---
§205.510(a)(1) A complete and accurate update of information submitted pursuant to §§205.503 and 205.504;	X			Submitted October 28, 2011. All information requested as submitted as required.
§205.510(a)(2) Information supporting any changes being requested in the areas of accreditation described in §205.500;			X	No changes requested, still accredited to all 4 scopes.



§205.510 Annual Report, Recordkeeping, and Renewal of Accreditation				
CHECKLIST SECTION X	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
<p>§205.510(a)(3) 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;</p>	X			Summary of revisions, changes, ect implemented in the past year and upcoming were included. The previous audit corrective actions were submitted and deemed adequate by AMS.
<p>§205.510(a)(4) 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</p>	X			Examples of the most recent performance evaluations were submitted for review.
<p>§205.510(a)(5) The fees required in §205.640(a).</p>	X			Submitted. Copies of audit fees were forwarded to the auditor.
<p><i>Certifying agents must maintain records according to the following schedule:</i></p>	---	---	---	---
<p>§205.510(b)(1) 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;</p>	X			Records from applicants are kept a minimum of 5 yrs. Records are kept upstairs in the WSDA Organic Program area for a minimum of 2-3 years, then stored in records downstairs for another 2 years, then stored at an off site records storage near the State Capitol Building for another 5-6 years before being destroyed. WSDA has a tracking system for all files, files stored in boxes in the database and all records are easily identifiable and retrievable as needed.
<p>§205.510(b)(2) Records created by the ACA regarding applicants for</p>	X			Records created by WSDA regarding applicants are stored



§205.510 Annual Report, Recordkeeping, and Renewal of Accreditation				
CHECKLIST SECTION X	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
certification and certified operations must be maintained for <u>not less than 10 years beyond</u> their creation; and				for a minimum of 10 years.
§205.510(b)(3) 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.	X			Records pursuant to accreditation are maintained for a minimum of 5 yaers and up to 10 years.
Amending Accreditation	---	---	---	---
§205.510(f) Amendment to scope of an accreditation may be 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.			X	There has been no amendment to scopes of accreditation requested.

§205.642 Fee Schedule				
Document on Certification File Review Checklist and Certification File Review Worksheets.				
CHECKLIST SECTION XI	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
§205.642 Are the fees charged reasonable?	X			Appear to be.
§205.642 Is the fee schedule that was submitted to applicants the same as the one provided to the Administrator?	X			Fee schedule has not been changed since 5/2011 in AGR PUB 420-209.
§§205.501(a)(16) and 205.642 Are the fees charged to operations for certification consistent with the fee schedule filed with the Administrator?	X			Yes, accurate.
§205.642 Are all applicants provided with an estimate of the total cost of certification and an estimate of the annual cost of updating the certification?		X		POL-OFP-037 Cost Estimate Policy. Auditor inspected a renewal applicant and a new applicant. No issues noted.



§205.642 Fee Schedule				
Document on Certification File Review Checklist and Certification File Review Worksheets.				
CHECKLIST SECTION XI	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
				(b) (5)
§205.642 Are the nonrefundable portions of certification fees and the stages at which they become nonrefundable explained in the fee schedule submitted to the Administrator?		X		
§205.642 Does the ACA provide a copy of the fee schedule to anyone inquiring about the application process?	X		Inquiring individuals are directed to the online version and explained the fees. New application packet has a fee schedule and policy for nonrefundable fees.	

§205.661 Investigation of Certified Operations				
§205.662 Noncompliance Procedure for Certified Operations				
Document on Certification File Review Worksheet, "Table 5a - Notice of Noncompliance/Adverse Action Worksheet".				
CHECKLIST SECTION XII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
References: <i>NOP 2607 Disclosure of Information concerning USDA Accredited Certifying Agents and Certified Operations to the NOP</i> <i>NOP 4001 Complaint Handling Procedure</i> <i>NOP 4002 Enforcement Policy</i> <i>NOP Appeals Procedure: Adverse Action Appeal Process – Certified Operation or Applicant for Certification</i>				



§205.661 Investigation of Certified Operations				
§205.662 Noncompliance Procedure for Certified Operations				
Document on Certification File Review Worksheet, "Table 5a - Notice of Noncompliance/Adverse Action Worksheet".				
CHECKLIST SECTION XII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
<p>§205.661(a) 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?</p>	X			<p>PRO-OFP-802 Organic Inspection Procedures; PRO-OFP-031 Complaint Procedure; PRO-OFP-040 Compliance & Appeals Procedure; Organic Food Production Complaint Investigation; AGR Complaint Investigation Form. There have been several investigations performed due to complaints. One the NOP came out and performed a follow up as the lead investigator. All findings were reported to the WSDA Program Manager.</p>
<p>§205.662(a) 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?</p>	X			<p>PRO-OFP-040 Compliance & Appeals Procedure and Notice of Non-Compliance. Yes, notices of non-compliance are issued as required and a copy is sent to the NOP Appeals Team.</p>
<p>§205.662(a)(1) – (3) Does all Notifications of Noncompliance include: A description of each noncompliance; The facts upon which the notification of noncompliance is based; and The date by which the certified operation must rebut or correct each noncompliance and submit supporting documentation?</p>	X			<p>Notice of Non-Compliance letter; Yes, all areas required are included in the template letter as well as those letters sent to the clients which were reviewed.</p>
<p>§205.662(b) Does the ACA send the certified operation a written notification of noncompliance resolution after the certified operation demonstrates that each noncompliance is resolved?</p>	X			<p>Per PRO-OFP-040 Compliance and Appeals Procedures section 2, A; Notice of Resolution letter is sent to the client.</p>
<p>§205.662(c)</p>	X			<p>PRO-OFP-040 Compliance &</p>



§205.661 Investigation of Certified Operations				
§205.662 Noncompliance Procedure for Certified Operations				
Document on Certification File Review Worksheet, "Table 5a - Notice of Noncompliance/Adverse Action Worksheet".				
CHECKLIST SECTION XII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
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?				Appeals Procedure, section II, A and PRO-OFP-008 Non-renewal of organic certification.
§205.662(c)(1) – (4) Does all Notifications of Proposed Suspension / Proposed Revocations include: 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?	X			Per the Notification of Proposed Suspension/ Proposed Revocation letter. All elements are addressed.
§205.662(d) 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.			X	WSDA has not had to issue the letter to the one former client who had willfully violated, as the day after the inspection the operation called and surrendered their certification. However, the form, procedures, policy etc. are in place.
§205.662(e)(1) 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?	X			Yes, the notices of suspension or revocation have all had a written notification, which is also cc'd to the NOP team.
§205.662(e)(2) Has the ACA or State program sent a notice of			X	Have not had any while in the appeal or mediation process.



§205.661 Investigation of Certified Operations				
§205.662 Noncompliance Procedure for Certified Operations				
Document on Certification File Review Worksheet, "Table 5a - Notice of Noncompliance/Adverse Action Worksheet".				
CHECKLIST SECTION XII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
Suspension / Revocation during the time a final resolution of either mediation or appeal is pending for a certified operation which requested either one?				However, WSDA does have procedures, policies etc. in place. There has been one client who had further NCs identified while they were in the appeal process with NOP and the NOP ultimately denied and suspended the client.
§205.662(g) Violations of Act Has the ACA fined operations as a result of any noncompliance issues?			X	WSDA has not issued any fines, but have forwarded on results of one investigation where there was apparent willful violation after surrendering their certification. Therefore, the NOP will levy fines as applicable.
§205.660(d) 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?	X			Sent via certified mail, First class mail emails with return receipt. Copies of notification from postal service etc. were attached to the letters on file for review.

§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 <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 ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
§205.663 In all instances where mediation is requested, is the request from the applicant or certified operation in writing?	X			Yes, via mail or email
§205.663	X			Yes, they have a form letter



§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 ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
If the ACA rejects the request, is the notification to reject the request of mediation sent to the operation in writing?				and 1 which was rejected was reviewed and acceptable.
§205.663 Does the notification to reject the request of mediation advise the operation of their right to request an appeal pursuant to 205.681?	X			Yes, the letter contains the right to appeal and the appropriate information.
§205.663 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?	X			Yes, in the form letter.
§205.660(d) 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?	X			Yes, attached to the letter in the file and stated on the form letter.
§205.663 If mediation was accepted by the ACA, is the mediation conducted by a qualified mediator mutually agreed upon by the parties to the mediation?	X			WSDA is a state govt agency and has qualified Attorney Generals, lawyers client can opt to choose from which are approved by the State Attorney General, etc. to assign to the case. Also, WSDA provides a form that has other qualified mediators, which the Attorney General approves.
§205.663 Is an agreement reached no more than 30 days following the mediation session?	X			Yes, per the settlement agreement and mediation terms.
§205.663 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?	X			Yes they have procedures in place to inform the client of the right to appeal. There has been 1 client who rejected the mediation and appealed to the



§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 <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 ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
				NOP.

§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 ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	

References:
 NOP 2610 Sampling Procedures for Residue Testing
 NOP 2611 Laboratory Selection Criteria For Pesticide Residue Testing
 NOP 2611-1 Prohibited Pesticides for NOP Residue Testing

§205.670(c) Are samples collected by an inspector representing the ACA, State, or Administrator as applicable?	X			Procedure OPF 2500 Sample Collection Procedures
§205.403(e)(1) Does the inspector provide the operation with a receipt for the samples taken at the time of the inspection?	X			Procedure OPF 2500 Sample Collection Procedures. WSDA has a carbon copy form and a receipt is provided to the operator.
§205.403(e)(1) Is there any objective evidence that inspectors were charged for the samples taken?	X			Brenda Book indicated that all sampling costs are paid for by WSDA. A review of the fee schedule does not indicate otherwise, nor does any other material the NOP auditor reviewed.
§205.670(c) Is chain of custody maintained?	X			Procedure OPF 2500 Sample Collection Procedures. No issues noted.
§205.670(c) Is the sample submitted to an accredited lab?	X			Procedure: PRO-OFP 2500 Sample Collection Procedures and Sample Collection report AGR 420-2016 Lab: Washington State Dept of Ag Laboratory located in Yakima Washington. A



§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 ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
				current certificate indicating that the lab is accredited to ISO Guide 17025:2005 was reviewed. Auditor reviewed a copy of the service contract that WSDA Organic Program has with the WSDA lab. The contract is valid through 12/31/2012.
§205.670(c) 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?	X			As stated on certificate number 2665.01 and valid until March 31, 2014 in accordance with the methods of analysis of the AOAC..
§§205.670(d)(2) and 205.504(b)(5)(iii) Are test results available for public access?	X			POL OFP 023.
§§205.402(b)(3) and 205.403(e)(2) Is a copy of the test results provided to the applicant or certified operation?	X			PRO-OPF 2500 Procedures instruct sampler to leave a copy (Goldenrod Sheet) with the applicant/operator. A copy of the Pesticide Analysis results is sent with the inspection report. This was verified by a review of the Pat and Polly Conley Farm (891) file where fire retardant chemicals were unintentionally applied.
§205.670(d)(1) Are test results promptly provided to the Administrator or governing State official if applicable?	X			Auditor checked with NOP AIA to verify that test results are submitted. WSDA may begin sending the NOP a summary report on an annual basis since the lab provides an annual summary sheet. This report will be sent in lieu of



§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 ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
				individual reports.
§205.670(b) Was the testing paid for by the requesting official (Administrator or State) or the ACA?	X			As stated on certificate number 2665.01 and valid until March 31, 2014 in accordance with the methods of analysis of the AOAC..
§205.403(c)(3) Are results compared against the National List and the Act?	X			POL OFP 023.
§205.670(e) Do the results exceed the FDA or EPA regulatory tolerance (if there is an applicable tolerance)?	X			PRO-OPF 2500 Procedures instruct sampler to leave a copy (Goldenrod Sheet) with the applicant/operator. A copy of the Pesticide Analysis results is sent with the inspection report. This was verified by a review of the Pat and Polly Conley Farm (891) file where fire retardant chemicals were unintentionally applied.
§205.670(e) If the regulatory tolerance was exceeded is it reported to the applicable agency?	X			In the case of the file reviewed (Client 891), the WS Food Safety Program was alerted.
§205.671 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?			X	There were no test results that indicated a 5% over the EPA tolerance.
§205.671 Are investigations conducted to determine the cause of the prohibited substance?	X			Have conducted further investigations with additional on site inspections and a report is generated.



Note: NOP Auditor reviewed the following client files for compliance to 205.670 and 205.671: 632, 1465, and 891. All files had incidents of positive sample results.

§205.672 Emergency Pest or Disease Treatment				
<p>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.</p>				
CHECKLIST SECTION XV	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
§205.672 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?			X	None
<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>	---	---	---	---
§205.672(a) 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.			X	
§205.672(b) Any livestock that are treated with a prohibited substance or product derived from treated livestock, cannot be sold, labeled, or represented as organically produced.			X	
<i>Except that:</i>	---	---	---	---
§205.672(b)(1) 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			X	
§205.672(b)(2) 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.			X	



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).
- Present positive aspects of the certification program.
- Present any items that are pending a determination by the NOP AIA Division.
- Present the assessment findings. For each finding, cite the specific requirement of the assessment criteria.
- Discuss the next steps in the process:
 - 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)).
- Encourage feedback. Clients can submit feedback to AIAInBox@ams.usda.gov.

POSITIVE ASPECTS OF ACA'S CERTIFICATION PROGRAM

- Positive Aspect (1) – [Qualified, trained, friendly staff](#)
- Positive Aspect (2) – [Well organized. All information readily available before and during the audit. Files in a good format, easy to follow.](#)
- Positive Aspect (3) – [Dedicated to the organic program, good resources and buy in from upper magmt/ state govt officials.](#)

ITEMS PENDING A DETERMINATION BY NOP - N/A

- Pending Item (1) –



- Pending Item (2) –

FINDINGS:

- NC1 – §205.404(b) States “The certifying agent must issue a certificate of organic operation which specifies the: (3) Categories of organic operation, including crops, wild crops, livestock, or processed products by the certified operation...” *A review of various certificates issued found that the certificates state ‘Food Producer’ instead of Crop, Wild Crop or Livestock.*
- NC2 – §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;” *Several of WSDA’s certification staff have not received annual performance evaluations for 2010 and 2011.*
- NC3 – §205.642 states, “... the certifying agent may set the nonrefundable portion of certification fees; however, the nonrefundable portion of certification fees must be explained in the fee schedule submitted to the Administrator. The fee schedule must explain what fee amounts are nonrefundable and at what stage during the certification process fees become nonrefundable. The certifying agent shall provide all persons inquiring about the application process with a copy of its fee schedule.” *WSDA maintains a refund policy for fees charged; however, the refund policy is not currently available unless requested by the public. The program manager indicated that the policy will be placed in its “Guide to Organic Certification” when the new edition is revised. Currently, if anyone asks about the WSDA refund policy, it is provided.*
Also, “The certifying agent shall provide each applicant with an estimate of the total cost of certification...” *A review of fee estimate form found that there is a fee for additional/expedited inspections and reviews at a rate of \$40/ hour. However, expedited inspections performed were not given an estimate. WSDA management states that they are not currently accepting expedited reviews due to lack of staffing to fulfill such requests.*
- NC4 –
- NC5 -
- NC6 -



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.

Certification File Review Worksheets
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 Date application received	B Date of review	C Review conducted by	D Inspection date	E Inspection conducted by	F Date of final review	G Final review conducted by	H Date certification decision made	I Certification decision made by	J Date findings sent to operation
1	Alaska Wild Harvest (dba Kahiltna Birchworks)	03/03/11 and 3/26/12 (UA)	04/22/11 and 04/18/12	(b) (6)	04/25-26/11 and 04/25-27/12 and 06/20/12 (NOP witness inspection)	(b) (6)	08/06/11 and 06/01/12 (harvest), but report for NOP witness inspection not yet reviewed	(b) (6)	08/06/11 and 06/01/12 (harvest), but not for the NP witness inspection	Brenda Book (2011) and (2012)	NA
2	Rempel Family Farm	01/03/11 (UA) and 01/04/12 (UA)	06/01/11 and 03/12/12	(b) (6)	08/11/11 and 06/21/12 (NOP witness inspection)	(b) (6)	9/29/11, but not yet reviewed for 2012 NOP witness inspection	(b) (6)	09/29/11, but NA for 2012	(b) (6)	NA
3	Sunrise Farm	02/03/11 (UA) and 02/03/12 (UA)	05/11/11 and 04/20/12	(b) (6)	09/07/11, but 2012 inspection has not yet taken place	(b) (6)	10/25/11	(b) (6)	05/11/11	(b) (6)	NA
4	Austin Family Farm	01/31/11 (UA)	04/22/11	(b) (6)	06/01/11	(b) (6)	07/18/11	(b) (6)		(b) (6)	NA
5	Josie Dairy	02/24/11 and 02/28/12 (UA)	03/03/11 and 03/01/12	(b) (6)	09/08/11 and 05/15/12	(b) (6)	09/14/11 and 06/14/12	(b) (6)	09/15/11 and 06/20/12	(b) (6)	NA
6	National Frozen Foods	02/28/11	06/09/11	(b) (6)	11/29/11	(b) (6)	02/3/12.	(b) (6)	06/11/11	(b) (6)	NA



Table 1 - General Certification File Review Information

File #	Name of applicant/certified operation sampled	A Date application received	B Date of review	C Review conducted by	D Inspection date	E Inspection conducted by	F Date of final review	G Final review conducted by	H Date certification decision made	I Certification decision made by	J Date findings sent to operation 205 402(b)(1)
		and 04/04/12 (UA)	and 07/10/12	(b) (6)	& 01/23/12 (2011) and 07/17/12 (NOP witness inspection	(b) (6)	but report for NOP witness inspection not yet reviewed	(b) (6) but NA for NOP witness inspection not yet reviewed	and 02/03/12, but witness insp report not yet reviewed	(b) (6) but NA for 2012 yet	
7											
8											
9											
10											
11											
12	Ranier Organic Natural Foods										
13	Aunt Thelma's Farm										
14	Raintree Farm										
15	Paul Madden Orchards										
16	Arete Vineyards										
17	Styger Family Farm										
18	Daryl German Farms										
19	Case Ranch										
20	Cargill Animal Nutrition										
21	Running Springs Ranch										
22	Fungi Perfecti										
23											
24											
25											

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



TABLE 2 - Summary of Certification File Review Information

File #	A Scope requested	B Scope granted (L, C, WC, H)	C IA/UA	D Sample (Y/N)	E Labels (Y/N)
1	WC	Producer	UA	N	Y
2	C	Producer	UA	N	N
3	C	Producer	UA	N	N
4	L	Producer	UA	N	N
5	L	Producer	UA	N	N
6	H	Handler	UA	N	Y
7					
8					
9					
10					
11					
12	H				
13	C				
14	C				
15	C				
16	C				
17	L				
18	L				
19	L				
20	H				
21	H				
22	H				
23					



TABLE 2 - Summary of Certification File Review Information

File #	A Scope requested	B Scope granted (L, C, WC, H)	C IA/UA	D Sample (Y/N)	E Labels (Y/N)
<p>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.</p> <p>A. Scope requested (L, C, WC, H)</p> <p>B. Scope granted (L, C, WC, H): <i>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.</i></p> <p>C. Initial application (IA) or updated application (UA)</p> <p>D. Was a sample pulled during the inspection? (Y/N) <i>If samples were pulled, include information in Table 7b. Sampling Worksheet - Sample and Reporting Information</i></p> <p>E. Are any labels used by the operation? (Y/N) <i>If there are labels, include information in Table 6a, 6b, or 6c Label Review Worksheet.</i></p>					

File #	Table 3 - Grower Group Information
1	N/A- no GG's
2	
3	
4	
5	
<p>Instructions: 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 Table 3. Make sure the information provided in Table 3 is entered into the corresponding File # in Table 1.</p>	



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

Name of Client	Scope	Notification of Noncompliance <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)		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)		
						Proposed Suspension (PS) Proposed Revocation (PR) NA – none sent Enter PS, PR, or NA as applicable					Suspension (Susp) Revocation (Rev) 205.662(e)(1) Enter Revocation or suspension if applicable	Did the certified operation request mediation or file an appeal? 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) <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>
Hollmeyer Farms	Crop	Y	Y	Y	NA	Proposed Suspension	Y	Y	Y	Y	Suspension	The client did not respond to any requests.
Heritage Meats	Handler	Y	Y	Y	NA	Proposed Suspension	Y	Y	Y	Y	None yet	The client requested mediation via email on 07/13/12.
Pacific Popcorn, LLC	Handler	Y	Y	Y	NA	Proposed Suspension	Y	Y	Y	Y	Suspension	The client did not respond to any requests.
Paradise Farms	Livestock	Y	Y	Y	NA	Proposed Suspension	Y	Y	Y	Y	Suspension	The client appealed the decision to the NOP who upheld the suspension, but offered a 1 yr suspension as a settlement in stead of the standard 3 yrs.



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

Name of Client	Scope	Notification of Noncompliance				Type of Proposed Adverse Action:	Notification of Proposed Adverse Action				Adverse Action Taken:	Request for Mediation or Appeal and Remarks
		Enter Yes, No, or NA as applicable										
		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) Proposed Revocation (PR) NA – none sent 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) Revocation (Rev) 205.662(e)(1) Enter Revocation or suspension if applicable	Did the certified operation request mediation or file an appeal? 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) <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 4th 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
Persephone Farm, LLC	Crop	Yes	No response provided	No response by applicant- issued Denial of Certification	Yes	Combined Notice of NC & Denial. Appropriate
Silver Cup Coffee, Inc.	Handler	Yes	No response provided	No response by applicant- issued Denial of Certification	Yes	Combined Notice of NC & Denial. 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
Alaska Wild Harvest	Organic Pure Birch Syrup	Y	N	Y	N	N/A	N/A	Y	Y	N	N/A	Y	Y	X	
Alaska Wild Harvest	Organic Breakfast Birch Syrup	Y	N	Y	Y	Y	N/A	Y	Y	N	N/A	Y	Y	X	
Camano Island Egg Company	Grade AA Large Eggs	N	NA	NA	N	Y	NA	Y	Y	Y	N	Y	Y	X	
The Meat Shop	Organic Beef	N	NA	NA	N	Y	NA	Y	Y	N	NA	Y	Y	X	
Cargill Animal Nutrition	Organic Cracked Corn (feed)	N	NA	NA	N	N	NA	Y	Y	N	NA	Y	Y	X	
Cargill Animal Nutrition	Organic Layer Complete 16 Crumbles (feed)	N	NA	NA	Y	Y	NA	Y	Y	N	NA	Y	Y	X	
Cargill Animal Nutrition	Organic Scratch (feed)	N	NA	NA	Y	Y	NA	Y	Y	N	NA	Y	Y	X	
Life Line Pet Nutrition	100 % Organic Icelandic Ocean Kelp	Y	N	Y	N	Y	NA	Y	Y	N	NA	Y	Y	X	

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)?

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

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)



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

Certification File Review Worksheets
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 Date application received	B Date of review	C Review conducted by	D Inspection date	E Inspection conducted by	F Date of final review	G Final review conducted by	H Date certification decision made	I Certification decision made by	J Date findings sent to operation 205 402(b)(1)
1	Alaska Wild Harvest (dba Kahiltna Birchworks)										
2	Rempel Family Farm										
3	Sunrise Farm										
4	The Growing Garden										
5	Austin Family Farm										
6	Josie Dairy										
7	Rootagaga Country Farm										
8	Van Tol Dairy										
9	National Frozen Foods										
10	Life Line Pet Nutrition										
11	The Meat Shop										
12	Ranier Organic Natural Foods	4/21/11	8/4/11	(b) (6)	11/8/11	(b) (6)	1/9/12	(b) (6)	No decision has been made to date.	NA	NA
13	Aunt Thelma's Farm	7/8/11	Unknown	(b) (6)	9/19/11	(b) (6)	9/23/11	(b) (6)	9/23/11	QAC	QAC
14	Raintree Farm										
15	Paul Madden Orchards										
16	Arete Vineyards										
17	Styger Family Farm	2/2/11	5/18/11	(b) (6)	8/9/11	(b) (6)	8/24/11	(b) (6)	8/26/11	(b) (6)	8/26/11
18	Daryl German Farms										
19	Case Ranch										
20	Cargill Animal Nutrition										
21	Running Springs Ranch										



Table 1 - General Certification File Review Information

File #	Name of applicant/certified operation sampled	A Date application received	B Date of review	C Review conducted by	D Inspection date	E Inspection conducted by	F Date of final review	G Final review conducted by	H Date certification decision made	I Certification decision made by	J Date findings sent to operation 205 402(b)(1)
22	Fungi Perfecti	4/27/11	6/15/11	(b) (6)	12/14/11	(b) (6)	1/31/12	(b) (6)	1/31/12	Unknown	1/31/12
23											
24											
25											

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

Notes:

1. **Styger Family Dairy:** Records indicate that only two staff members were involved in the certification process, i.e. review, inspection, and decision. (b) (6), WSDA Livestock and Processor Coordinator clarified that she is not the decision maker, but she did issue the notification with the decision. The certification decision maker is recorded electronically; not identified in the paper file. The electronic record indicated that (b) (6) was the decision maker. (b) (6) explanation was satisfactory and no issues identified by the NOP auditor.

2. **Rainier Organic Natural Foods Baking Co., Inc.** was issued a NoNC on 1/13/12 after a review of the IR. The operation had until 2/10/12 to submit corrective actions. The operation submitted corrective actions on 2/9/12; however, a determination and response by WSDA was not issued until July 9. The response stated that the 2/9/12 submission was not complete and the operation was reissued a NoNC with a new deadline of 8/3/12. No issues noted by the NOP auditor.

Although several boxes in Table 1 indicate “Unknown,” the NOP auditor interviewed the staff and reviewed WSDA policy to verify that at least three staff are involved in the certification process. Additionally, some of the information is stored in an electronic database that was not readily available to the auditors. Therefore, the NOP auditor selected a few of the client files missing the required information and WSDA staff located the information on the electronic database. No issues were identified by the auditors.



TABLE 2 - Summary of Certification File Review Information

File #	A Scope requested	B Scope granted (L, C, WC, H)	C IA/UA	D Sample (Y/N)	E Labels (Y/N)
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12	H	H – A processor of wholesale and retail baked goods and tortillas. (b) (4)	UA	N	Y
13	C	C – Small all-organic tree fruit operation (b) (4)	UA	N	Y
14	C				
15	C				
16	C				
17	L	L – An all organic dairy located in west central Washington. The operation has (b) (4). The livestock witness inspection was conducted on this operation. The operation has excellent records and management practices. (b) (4)	UA	N	N
18	L				
19	L				
20	H				
21	H				
22	H	H – Processor and producer of various mushroom products. (b) (4)	UA	N	Y
23					



TABLE 2 - Summary of Certification File Review Information

File #	A Scope requested	B Scope granted (L, C, WC, H)	C IA/UA	D Sample (Y/N)	E Labels (Y/N)
<p>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.</p> <p>A. Scope requested (L, C, WC, H)</p> <p>B. Scope granted (L, C, WC, H): <i>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.</i></p> <p>C. Initial application (IA) or updated application (UA)</p> <p>D. Was a sample pulled during the inspection? (Y/N) <i>If samples were pulled, include information in Table 7b. Sampling Worksheet - Sample and Reporting Information</i></p> <p>E. Are any labels used by the operation? (Y/N) <i>If there are labels, include information in Table 6a, 6b, or 6c Label Review Worksheet.</i></p>					

File #	Table 3 - Grower Group Information
1	N/A- no GG's
2	
3	
4	
5	
<p>Instructions: 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 Table 3. Make sure the information provided in Table 3 is entered into the corresponding File # in Table 1.</p>	



Table 4 - Personnel Information Worksheet

Name	Status – Employee / Contractor	Title / Position	Scopes Approved	Education	Training	Experience	Job Description?	COI?	Confidentiality?	Perf Eval?
Book, Brenda	Employee	Organic Program Manager	All scopes	BA in Sustainable Ag Systems & Plant Studies	IOIA basic for all scopes.	Worked in the organic produce industry and as a manager of a farmers market. Worked as various capacities at WSDA since 2002.	Yes	10/14/11 4/11	10/14/11	9/14/09
(b) (6)	Employee	Organic Crop Production and Handling Certification Coordinator	All scopes	BA in environmental and social sciences.	IOIA basic course	Worked in the private industry with certified companies. Worked for WSDA in certification since 1994.	Yes	10/17/11 7/11	10/17/11	9/11/09



(b) (6)	Employee	Livestock/ Processor Certification Coordinator	All scopes	MS in Environmental Studies, BA in Sustainable Agriculture.	IOIA inspector training.	Organic operation (Dairy and produce) manager. Employee with WSDA organic program since 2002 as an inspector, reviewer and coordinator.	Yes	10/19/11	10/19/11	5/12/09
(b) (6)	Employee	Inspector	All scopes	NA	IOIA training	Organic orchard and packing house manager	Yes	10/17/11	10/17/11	9/23/11
(b) (6)	Employee	Certification Specialist/ Reviewer	All scopes	NA	IOIA training	Worked as various capacities with WSDA as inspector, reviewer, and coordinator	Yes	10/11/11	10/11/11	5/23/12. See note below.



(b) (6)	Employee	Inspector	All scopes	BS – soil science.	IOIA basic inspector training.	r. WSDA organic farm and processing inspector since 2005. Worked in the private industry as owner of an organic operation.	Yes	10/21/11	10/21/11	3/1/12 (for 2011)

Below please provide number of personnel, divided into categories and / or job titles.
EX: Administrative Staff (3), Technical Staff [including inspectors, reviewers] (7), etc.

XXX

Sampling process: NOP auditor selected 6 staff members and reviewed their files. The 2011 season was selected for completed COI, Confidentiality and performance evaluation.



Note: No contractors are used for certification functions. All inspectors are WSDA organic program staff.

NC1 - Per Brenda Book and the NOP Auditor's review of the personnel records/files, all staff under the supervision of Brenda Book have not received annual performance reviews; whereas, all other staff have received current performance evaluations.

(b) (6) [REDACTED] file indicates that a performance evaluation was conducted in 2010 and 2012, but not 2011.



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

Name of Client	Scope	Notification of Noncompliance				Type of Proposed Adverse Action:	Notification of Proposed Adverse Action				Adverse Action Taken:	Request for Mediation or Appeal and Remarks	
		Enter Yes, No, 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)			
		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)					Proposed Revocation (PR)	NA – none sent Enter PS, PR, or NA as applicable	
													<p>Did the certified operation request mediation or file an appeal?</p> <p>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)</p> <p>Enter Remarks as appropriate. <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.</p>
Rainier Organic Natural Foods Baking Co. (NoNC 15 Mar & 31 Mar 11)	Processor	Y	Y	Y	Y								



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

Name of Client	Scope	Notification of Noncompliance <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)		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)		
						Proposed Suspension (PS) Proposed Revocation (PR) NA – none sent Enter PS, PR, or NA as applicable					Suspension (Susp) Revocation (Rev) 205.662(e)(1) Enter Revocation or suspension if applicable	Did the certified operation request mediation or file an appeal? 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) <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 4th 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
Rainier Organic Bakery	Heavenly Soy & Flax Bread	N	NA	NA	N	Y	N	Y	Y	N	NA	N	NA	X	
Rainier Organic Bakery (Private Label - (b) (4))	(b) (4)	N	NA	NA	N	Y	N	Y	Y	N	NA	N	NA	X	
Fungi Perfecti - Processor	Host Defense - Chaga	N	NA	NA	N	Y	N	Y	Y	N	NA	N	NA	X	

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)?

Not a finding for WSDA: Rainier Natural Foods Bakery – processor for (b) (4) was identified with two findings: (b) (5)

(b) (4)



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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
Fungi Perfecti	Host Defense Chaga (Dietary Supplement)	N	N	N	NA	NA	NA	NA	Y	Y	Y	N	Y	
Pacific Rim Winemakers	Pacific Rim Vin de Glaciere Riesling 2011	N	N	N	NA	NA	NA	NA	Y	Y	Y	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)



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Table 7a - Sample Testing Worksheet – General Information

Provide information on sampling conducted by the ACA since the previous assessment. <i>(# of operations with samples pulled; number of samples pulled overall; types of samples (soil, tissue, product, water, etc...))</i>	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 Type of Sample Pulled	M What was sample tested for?	N Why was the sample pulled?	O Provide info on test results	P Provide info on ACA decision & outcome	Complies		
																		Yes	No	
1	Roger R. And Sally Ellis (632)	Y	Y	Y	Y	Y	Y	Y	N	N	N	N	cherries	Organo Phosphate s and Organochlorine	As part of WSDA risk analysis residue collection program.	Positive, but below 5% EPA tolerance.	WSDA issued a noncompliance to the operation and a resolution was issued after review of the corrective actions.	X		
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”



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 Type of Sample Pulled	M What was sample tested for?	N Why was the sample pulled?	O Provide info on test results	P Provide info on ACA decision & outcome	Complies	
																		Yes	No

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)

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

Nikki

<p>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 <u>full file review</u> was conducted.</p> <p>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.</p> <p>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.</p>			
Fees and other charges for certification §205.642			
	Yes	No	Certification File Number(s)
Is the operation provided with an estimate?	X		Files 1- 6
Are the fees charged consistent with the Fee Schedule submitted to the Administrator?	X		Files 1- 6
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)	X		Files 1- 6
"Effective date of certification"? §205.404(b)(2) <i>(Date operation was initially certified to NOP Regulations)</i>	X		Files 1- 6
Scope -- Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation? §205.404(b)(3)	X		Files 1- 6
Name, address, internet address , and telephone number of the certifying agent? §205.404(b)(4)		X	Files 1- 6
Issue date of the certificate?	X		Files 1- 6
Anniversary date? <i>(Date when certified operation is required to submit their next annual update)</i>		X	Files 1- 6
Label classification for processed organic products? <i>(100% Organic, Organic, or Made with Organic (specified ingredients or food groups))</i>	X		Files 1- 6
The statement "Certified Organic under the US National Organic Program 7 CFR Part 205"?	X		Files 1- 6
The statement "Once certified, a production or handling operation's organic certification continues in effect until surrendered, suspended or revoked"? §205.404(c)		X	Files 1- 6
Are certificates issued in English?	X		Files 1 - 6
Remarks:			
<p>The NOP 2603 is a guidance only and is not part of the Final Rule, therefore the following items missing from their certificate are NOT a non-compliance: There is no internet address for the ACA, anniversary date for the next renewal or the statement - "Once certified, a production or handling operation's organic certification continues in effect until surrendered, suspended or revoked".</p>			



Application §205.401			
Does the application include:	Yes	No	Certification File Number(s)
The name of person completing the application?	X		Files 1- 6
Applicant's business name?	X		Files 1 - 6
Applicant's address?	X		Files 1- 6
Applicant's telephone number?	X		Files 1- 6
If a corporation, the name, address, and telephone number of the person authorized to act on the applicant's behalf?	X		Files 1- 6
Information on previous certifications?	X		Files 1- 6
Other information deemed necessary by the ACA to determine compliance with the ACT?	X		Files 1- 6
Remarks:			
Per the Application for Organic Certification (AGR 2289) , Organic Operator Agreement (AGR 2281) , Site Application Packets (AGR 2264) , Site Application (AGR 2264) , Application for Organic Certification and Organic Operator Agreement (AGR 2265) .			
Organic System Plan (OSP) §205.401(a) and §205.406(a)			
Does the OSP include:	Yes	No	Certification File Number(s)
A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed? §§205.200; 205.202 - 205.207; 205.236 - 205.240; and 205.270 - 205.272	X		Files 1- 6
A list of each substance 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?	X		Files 1- 6
A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented?	X		Files 1- 6
A description of the recordkeeping system implemented to comply with the requirements established in §205.103?	X		Files 1- 6
Does the OSP include a description of the management practices and physical barriers 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	X		Files 1- 6
Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations?	X		Files 1- 6



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?	X		Files 1- 6
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?	X		Files 1- 6
Any additions to or deletions from the information required pursuant to §205.401(b)?	X		Files 1- 6
An update on the correction of minor noncompliance's previously identified by the certifying agent as requiring correction for continued certification?	X		Files 1- 6
Other information as deemed necessary by the certifying agent to determine compliance with the Act and the regulations	X		Files 1- 6
Remarks:			
<p><u>Livestock:</u> Organic Ruminant Livestock System Plan (AGR 2254), Organic Non-Ruminant System Plan (AGR 2255), Organic Yields & sales Estimates- Producer (AGR 2509), Previous Land Use Declaration (AGR 2262)</p> <p><u>Crops:</u> Production Yield & Sales Estimates (AGR 2509), Crop Producers Organic System Plan (AGR 2121), Previous Land Use Declaration (AGR 2262), WSDA Seed and Planting Stock Fact Sheet (AGR 3000), Organic Seed Availability Record (AGR 2261), Organic Material Application Records (AGR 2161), Organic Labeling Guidance (AGR 2508).</p> <p><u>Handler:</u> Organic Product Summary (AGR 2249), Organic Handling & Processing System Plan (AGR 2180), Organic System Plan Brokerage- Marketing Company (AGR 2248),</p> <p><u>Wild Crops:</u> crop OSP and also a narrative asked to be submitted to verify the wild crop standards. Utilize POL- OFP 165 Wild Harvested Organic Crops Application and Inspection Procedures.</p>			
General Assessments:	Yes	No	Certification File Number(s)
Are the materials and inputs used in compliance with the NL and annotations?	X		Files 1- 6
Is the application and OSP complete?	X		Files 1- 6
Is there evidence that an exit interview was conducted?	X		Files 1- 6
Information on issues of concern identified by inspector.	X		Files 1- 6
Were there any notices of non-compliance, or adverse actions by the ACA and was the correct process followed?	X		Files 1- 6
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)	X		Files 1- 6
Remarks:			
The OSP and associated forms/ records are compliant and adequate to capture needed information in order to access an operations compliance with the Rule.			



Overall Determination Statement:

Include 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.

Include a statement on whether the initial review, inspection, and final decisions were in compliance with the requirements.

Partial Files reviewed: (Crop)The Growing Garden, Rootabaga Country Farm, (Livestock) Van Tol Dairy, (Handler) Life Line Pet Nutrition, The Meat Shop, Cargill Animal Nutrition, Life Line Pet Nutrition



National Organic Program Certification File Review Checklist

LARS' file review

<p>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 <u>full file review</u> was conducted.</p> <p>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.</p> <p>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.</p>			
Fees and other charges for certification §205.642			
	Yes	No	Certification File Number(s)
Is the operation provided with an estimate?		X	Files 12, 13, 17, 22. See NC3.
Are the fees charged consistent with the Fee Schedule submitted to the Administrator?	X		Files 12, 13, 17, 22.
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)	X		Files 12, 13, 17, 22.
"Effective date of certification"? §205.404(b)(2) <i>(Date operation was initially certified to NOP Regulations)</i>	X		Files 12, 13, 17, 22.
Scope -- Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation? §205.404(b)(3)		X	Files 12, 13, 17, 22. See NC1
Name, address, internet address, and telephone number of the certifying agent? §205.404(b)(4)	X		Files 12, 13, 17, 22.
Issue date of the certificate?	X		Files 12, 13, 17, 22.
Anniversary date? <i>(Date when certified operation is required to submit their next annual update)</i>		X	Files 12, 13, 17, 22. There is no internet address for the ACA, anniversary date for the next renewal or the statement - "Once certified, a production or handling operation's organic certification continues in effect until surrendered, suspended or revoked". Not listed as a NC since this is

NP2171ADA Certification File Rev Checklist WSDA Olympia WA 06 20 12



			NOP guidance (NOP 2603).
Label classification for processed organic products? <i>(100% Organic, Organic, or Made with Organic (specified ingredients or food groups))</i>	X		Files 12, 13, 17, 22.
The statement "Certified Organic under the US National Organic Program 7 CFR Part 205"?	X		Files 12, 13, 17, 22.
The statement "Once certified, a production or handling operation's organic certification continues in effect until surrendered, suspended or revoked"? §205.404(c)		X	Files 12, 13, 17, 22. There is no internet address for the ACA, anniversary date for the next renewal or the statement - "Once certified, a production or handling operation's organic certification continues in effect until surrendered, suspended or revoked". Not listed as a NC since this is NOP guidance (NOP 2603).
Are certificates issued in English?	X		Files 12, 13, 17, 22.
Remarks:			
XXX			



Application §205.401			
Does the application include:	Yes	No	Certification File Number(s)
The name of person completing the application?	X		Files 12, 13, 17, 22.
Applicant's business name?	X		Files 12, 13, 17, 22.
Applicant's address?	X		Files 12, 13, 17, 22.
Applicant's telephone number?	X		Files 12, 13, 17, 22.
If a corporation, the name, address, and telephone number of the person authorized to act on the applicant's behalf?	X		Files 12, 13, 17, 22.
Information on previous certifications?	X		Files 12, 13, 17, 22.
Other information deemed necessary by the ACA to determine compliance with the ACT?	X		Files 12, 13, 17, 22.
Remarks:			
XXX			
Organic System Plan (OSP) §205.401(a) and §205.406(a)			
Does the OSP include:	Yes	No	Certification File Number(s)
A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed? §§205.200; 205.202 - 205.207; 205.236 – 205.240; and 205.270 – 205.272	X		Files 12, 13, 17, 22.
A list of each substance 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?	X		Files 12, 13, 17, 22.
A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented?	X		Files 12, 13, 17, 22.
A description of the recordkeeping system implemented to comply with the requirements established in §205.103?	X		Files 12, 13, 17, 22.
Does the OSP include a description of the management practices and physical barriers 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	X		Files 12, 13, 17, 22.
Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations?	X		Files 12, 13, 17, 22.



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?	X		Files 12, 13, 17, 22.
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?	X		Files 12, 13, 17, 22.
Any additions to or deletions from the information required pursuant to §205.401(b)?	X		Files 12, 13, 17, 22.
An update on the correction of minor noncompliance's previously identified by the certifying agent as requiring correction for continued certification?	X		Files 12, 13, 17, 22.
Other information as deemed necessary by the certifying agent to determine compliance with the Act and the regulations	X		Files 12, 13, 17, 22.
Remarks:			
XXX			
General Assessments:	Yes	No	Certification File Number(s)
Are the materials and inputs used in compliance with the NL and annotations?	X		Files 12, 13, 17, 22.
Is the application and OSP complete?	X		Files 12, 13, 17, 22.
Is there evidence that an exit interview was conducted?	X		Files 12, 13, 17, 22.
Information on issues of concern identified by inspector.	X		Files 12, 13, 17, 22.
Were there any notices of non-compliance, or adverse actions by the ACA and was the correct process followed?	X		Files 12, 13, 17, 22.
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)	X		Files 12, 13, 17, 22.
Remarks:			
XXX			

<p>Overall Determination Statement:</p> <p>Include 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.</p> <p>Include a statement on whether the initial review, inspection, and final decisions were in compliance with the requirements.</p> <p>With the exception of the finding for expedited fee estimate and the certificate issues, WSDA has an excellent certification program.</p>




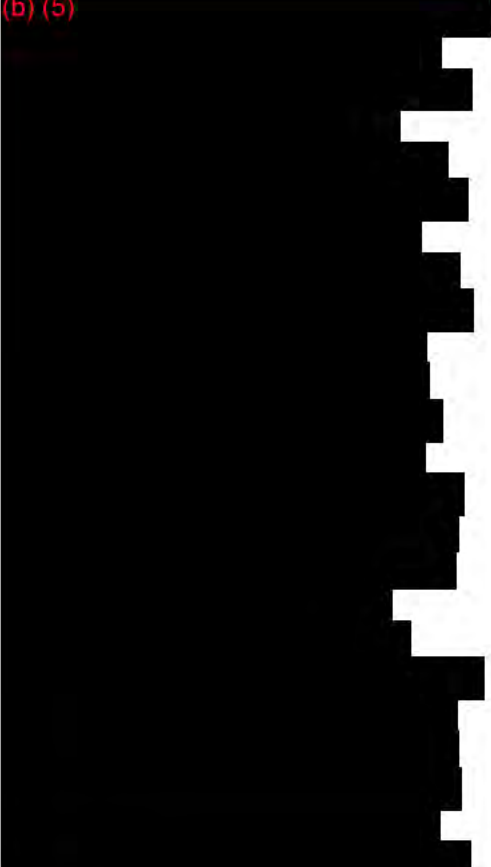
National Organic Program Witness Audit Checklist

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:	06/20/12
Name of operation:	Alaska Wild Harvest, LLC dba Kahiltna Birchworks
Location of operation:	Wasilla, AK
Scope of certification requested:	Wild Crop
Scope of certification granted:	Organic Food Producer, but says (Other: Wild Birch Trees) under each location information - this is not a scope under NOP per 205.404 (b)(3)
Actual or Demonstration inspection:	Demonstration
Inspector's Name:	(b) (6)
Subcontracted or staff inspector:	Staff Inspector
Verify conflict of interest and confidentiality status of inspector:	COI- on file. No COIs apparent
Name of knowledgeable representative of the operation:	Dulce Ben-East- owner
Names of anyone else present during the inspection:	No
Time Inspection started:	11:00 am
Time Inspection completed:	6:55 pm
Was there enough time allocated for the inspection?	Yes
Did the inspector verify the corrective actions on previous non-compliances as applicable?	No previous non-compliances
General information on operation to include: crops grown, acreage, fields, where fields are located (1 site or 2 or more); wild-crops collected, training of collectors; type of livestock operation, number of animals, identification methods; type of handling operation, products processed, etc...	(b) (4)

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	(b) (4) 
General information on materials and inputs used and are they in compliance with the National List (NL) and annotations.	N/A- no inputs used and no evidence of any observed.

As appropriate did the OSP adequately address the requirements for:	
Crops	
Land requirements §205.202	
Soil fertility and crop nutrient management practice standard §205.203	
Seeds and planting stock practice standard §205.204	
Crop rotation practice standard §205.205	
Crop pest, weed, and disease management practice standard §205.206	
Wild-Crops	
Wild crop harvesting practice standard §205.207	(b) (5) 



	(b) (5)
Livestock	
Origin of livestock §205.236	
Livestock feed §205.237	
Livestock health care practice standard §205.238	
Livestock living conditions §205.239	
Pasture Practice Standard §205.240	
Handler	
Organic handling requirements §205.270	
Facility pest management practice standard §205.271	
Commingleing and contact with prohibited substance prevention practice standard §205.272	

Sampling	
Was a sample pulled during the inspection? §205.670	No samples pulled during the inspection.
What was sampled and why?	N/A
Verify sampling procedures, chain of control, etc. §205.670(c)	N/A
Did the inspector provide the applicant with a receipt for any samples taken? §205.403(e)	N/A
Did the sampling process follow the ACA's sampling procedure?	N/A
Was the inspector charged for the samples? §205.403(e)	N/A
Did the ACA pay for the testing? §205.670(b)	N/A

Labels	
Were labels verified during the on-site inspection? §205.403(c)(2)	Yes
Were the labels being used the same as those approved by the ACA?	Yes- labels for pure birch syrup and birch breakfast syrup.
How was the inspector made aware of which labels are approved by the ACA?	Had copies from the file to compare.

Exit Interview §205.403(d)	
Document information addressed by the inspector during the exit interview	
Yes- at 6:55 pm at the Kahiltna Birchworks store with the owner.	

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Was the exit interview conducted with a knowledgeable representative?	Yes- the owner
Did the exit interview address the accuracy and completeness of the inspection observations?	Yes- no issues noted.
Did the exit interview address the need for additional information?	N/A
Did the exit interview address issues of concern identified during the inspection?	N/A

Questions for the inspector: 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?	The full client file, report, maps, correspondence, ect.
Does the Inspector have a copy of the NOP Standards?	Yes- current
If applicable was the inspector knowledgeable of recent updates to the standards or policy clarifications?	Yes, via conf calls, email, conversation and trainings by WSDA
How is the inspector informed of the ACA's policies and procedures and changes to them?	Via conf calls, email, conversation and trainings by WSDA
Does the inspector provide consulting services of any kind?	No, and none observed during the inspection.
If so, how is this information provided to the ACA?	
What is the inspector's background (experience, training, and education) in relation to the operation being inspected?	Many years of organic farming, inspection, trainings and education in Agriculture and organics. Previous work in entomolgy, crops and farm management. Has been an inspector with WSDA for 13 years.

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?	N/A

Kahiltma Birchworks WSDA Wild Crop Witness Inspection 06 20 12