

From: [Global Culture - Linda Van Hook](#)
To: [AMS - NOPAppeals](#)
Cc: [Lopez, JasonJ - AMS](#)
Subject: FW: Global Culture request to Appeal the Dec. 21, 2017 Notice of Proposed Suspension
Date: Thursday, March 8, 2018 2:38:09 AM
Attachments: [AIA17191JL GLO NoNC 072117.pdf](#)
[AIA17191JL GLO NoPS 112917.pdf](#)
[Global Culture request to Appeal 2017 Proposed Suspension.pdf](#)
[4-14-17 Annual Report- GLO.doc](#)

Dear Administrator, USDA, AMS, c/o Appeals Staff,

Global Culture is now sending our 4-14-17 Annual Report. I have attached the NOP NonCompliance Notice, the NOP Proposed Suspension Notice, GLO request for an Appeal, and GLO Annual Report Checklist - 4-14-17 here for you. The GLO Annual Report has many Exhibits (A-I), which will be sent in following emails (I just want to make sure that they send correctly because of the size).

Please let me know if you have any questions, as I'd be happy to clarify.

Kind Regards,

Linda Van Hook
Global Culture
315 Meigs Road, Ste. A-404
Santa Barbara, CA 93109
Tel (707) 464-6913, Fax (888) 493-7818
Linda@globalculture.us

From: Global Culture - Linda Van Hook [<mailto:Linda@globalculture.us>]
Sent: Monday, January 22, 2018 12:12 AM
To: 'NOPAppeals@ams.usda.gov'
Subject: Global Culture request to Appeal the Dec. 21, 2017 Notice of Proposed Suspension

Dear Administrator, USDA, AMS, c/o Appeals Staff,

Global Culture is requesting an appeal at this time. I have attached the original NonCompliance, the Proposed Suspension of Accreditation, and Global Culture's request for an Appeal here for you.

Kind Regards,

Linda Van Hook
Global Culture
315 Meigs Road, Ste. A-404
Santa Barbara, CA 93109
Tel (707) 464-6913, Fax (888) 493-7818
Linda@globalculture.us



1400 Independence Avenue, SW.
Room 2648-S, STOP 0268
Washington, DC 20250-0268

JUL 21 2017

NOTICE OF NONCOMPLIANCE

Linda Van Hook
Global Culture
P.O. Box 1640315 Meigs Rd, Ste A 404
Santa Barbara, CA 93109

Dear Ms. Van Hook:

On April 14, 2017, the United States Department of Agriculture (USDA), Agricultural Marketing Service (AMS), National Organic Program (NOP) notified Global Culture its 2017 annual report was due. The NOP granted Global Culture an extension on April 18, 2017 and accepted an extended submission date chosen by Global Culture on May 9, 2017. As of the date of this letter the NOP has not received a 2017 annual report from Global Culture. We have determined that Global Culture is noncompliant with the USDA organic regulations, 7 CFR Part 205, as follows:

AIA17191JL.NC1 – 7 CFR §205.510(a) states, “(a) Annual report and fees. An accredited certifying agent must submit annually to the Administrator, on or before the anniversary date of the issuance of the notification of accreditation, the following reports and fees: (1) A complete and accurate update of information submitted pursuant to §§205.503 and 205.504; (2) Information supporting any changes being requested in the areas of accreditation described in §205.500; (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; (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 (5) The fees required in §205.640(a).”

Comments: *Global Culture has not submitted to the NOP the annual report due April 14, 2017. The NOP granted an extension of one week on April 18, 2017. On May 9, 2017, Global Culture informed the NOP it would submit its annual report on May 15, 2017. The NOP has not received the Global Culture annual report due April 14, 2017.*

Global Culture must submit corrective actions to AIAInbox@ams.usda.gov within 30 days from the date of this Notice. The corrective actions should indicate how each noncompliance will be corrected and how the Global Culture management system will be modified to prevent a recurrence of the noncompliance. If you wish to rebut the noncompliance, please submit objective evidence that supports your argument to the AIAInbox@ams.usda.gov within 30 days from the date of this Notice.



1400 Independence Avenue, SW.
Room 2648-S, STOP 0268
Washington, DC 20250-0268

NOTICE OF PROPOSED SUSPENSION OF ACCREDITATION

December 21, 2017

Linda Van Hook
Global Culture
PO Box 1640
Santa Barbara, CA 93109

Dear Linda Van Hook:

On July 21, 2017, the National Organic Program (NOP) issued Global Culture a Notice of Noncompliance for not submitting the 2017 annual report due on April 14, 2017. A copy of the notice of noncompliance is enclosed for your reference. The notice required corrective actions to be submitted to the NOP on or before August 21, 2017. To date, the NOP has not received corrective actions to the noncompliance.

Global Culture has not submitted corrective actions to the noncompliance, and the NOP proposes to suspend Global Culture's accreditation as an NOP certifying agent effective 30 days from receipt of this letter. If the NOP suspends Global Culture's accreditation, you will be directed to cease all certification activities and make all client files available to the NOP pursuant to § 205.665(f) of the USDA organic regulations.

Pursuant to § 205.681 of the USDA organic regulations, Global Culture has the right to file an appeal of this proposed action within 30 days of receipt of this letter. Appeals must be submitted in writing to:

NOPAppeals@ams.usda.gov

or

Administrator, USDA, AMS
c/o NOP Appeals Staff
1400 Independence Avenue, SW
Room 2648-S, STOP 0268
Washington, DC 20250

If you have questions regarding this proposed action, please contact your Accreditation Manager, Jason Lopez, at JasonJ.Lopez@ams.usda.gov or (202) 260-9445.

Sincerely,

A handwritten signature in blue ink that reads "Cheri Courtney". The signature is written in a cursive, flowing style.

Cheri Courtney
Director Accreditation and International Activities Division
National Organic Program



1400 Independence Avenue, SW.
Room 2648-S, STOP 0268
Washington, DC 20250-0268

Enclosure: AIA17191JL Notice of Noncompliance

cc: NOP Appeals



GLOBAL CULTURE
315 Meigs Road, Ste A404
Santa Barbara, CA 93109
(707) 464-6913 ♦ Fax (888) 493-7818
Linda@globalculture.us

January 21, 2018

RE: Notice of Proposed Suspension of Accreditation
RE: Global Culture - Request of an Appeal

Dear AMS Administrator c/o the NOP Appeals Team,

We are requesting an appeal of the Notice of Proposed Suspension of Accreditation at this time. We ask that the decision be reexamined by the AMS Administrator's Office. The reason for this requests is so that all of the noncompliances can be resolved by Global Culture. We understand that we are late in getting our annual report to you. We ask that you take into account the many hardships that we encountered in 2017 and 2018. I won't go into these here at this time however I would like to explain if you will allow me to.

I have attached the Notice of Proposed Suspension of Accreditation as is required.

Kind Regards,

Linda Van Hook, Executive Director

Global Culture
315 Meigs Road, Ste A404
Santa Barbara, CA 93109

Linda@globalculture.us
(707) 464-6913



United States Department of Agriculture
Agricultural Marketing Service
National Organic Program

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

NOP 2024-1
Effective Date: January 13, 2012
Page 1 of 12

National Organic Program Annual Report Checklist

Instructions:

Accredited Certifying Agents (ACA) are encouraged to use this checklist to submit annual report information to the National Organic Program (NOP).

The intent of this checklist is to identify any changes that have occurred in the ACA's organization since the previous assessment or annual report, as applicable. Indicate if any changes have occurred by marking the "yes" or "no" column, as appropriate. If changes have occurred, the updated information must be submitted to the NOP with this completed checklist; information may be inserted directly into this checklist or attached separately and referenced in the checklist.

The annual report is due on the anniversary date of the ACA's accreditation; mailed information must be posted marked by the anniversary date of the ACA's accreditation. Annual reports must be submitted electronically via email or on electronic media (e.g. compact disk (CD, flash memory card, etc.); paper documents will not be accepted.

Where to Send Annual Reports Electronically or Electronic Media

USDA, AMS, National Organic Program
Accreditation and International Activities Division
100 Riverside Parkway, Suite 101
Fredericksburg, VA 22406
Phone: (540) 361-2712
Email: AIAInBox@ams.usda.gov



NOP ANNUAL REPORT CHECKLIST		
Changes? Yes/No	Requirement	Insert Responses or References Here
Yes	Name of Company: Name of Contact Person: Phone number of contact person: Email address of contact person: Additional Contact Person:	Global Culture LLC Linda Van Hook, Executive Director (707) 464-6913 Linda@globalculture.us Global Culture LLC Cindy Douglas, Reviewer, Inspector (b) (6) Cindy@globalculture.us
Yes	§205.510 – Annual report, recordkeeping, and renewal of accreditation (a) Annual report and fees. Certifying agents must annually submit to the NOP, on or before the anniversary date of the issuance of the notification of accreditation.	
	(1) Requires that the report contain a complete and accurate update of information submitted pursuant to §§205.503 and 205.504 below.	
	(2) Information supporting any changes being requested in the areas of accreditation described in §205.500;	
	(3) Requires submission of 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.	



NOP ANNUAL REPORT CHECKLIST		
Changes? Yes/No	Requirement	Insert Responses or References Here
Y	<p>(4) Requires submission of 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 included in the report? The proposed changes must satisfy the NOP requirements.</p>	<p>§ 205.510(a)(2). Global Culture's (GLO) accreditation in the scopes of Production of Crops, Handler-Processor, Livestock and Wild Harvest.</p> <p>§ 205.510(a)(3). See Exhibit A</p> <p>GLO's accreditation became effective April 14, 2003. GLO's effective date Certificate of Accreditation was signed and dated April 14, 2013 by James Link, Administrator, Ag Marketing of USDA, AMS, ARC Branch. No noncompliances were identified during the Renewal Accreditation Audit. GLO received the Notice of Accreditation Renewal dated 1/2/14 signed by Miles McEvoy. GLO's Mid-Term assessment was performed and completed on February 23, 2016. Two noncompliances were identified: NP5209 ADA.NC1 - §205.662 (a), and NP5209ADA.NC2- §205.662. (c)(1)-4. GLO responded to these noncompliances with proposed corrective actions on 3/23/16. GLO received from the Deputy Administrator the Corrective Action Review Report with resolved NonCompliances noted. Another noncompliance was issued to GLO on 1/12/2016 for not submitting the Organic Integrity Database by January 2, 2016. GLO sent in Corrective Actions and it was approved and stated as resolved.</p> <p>§ 205.510(a)(4). See Exhibit B 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.</p>
	<p>(5) Requires that the fees described in §205.640(a) be paid.</p>	



§205.500 – Areas and duration of accreditation	
§205.503 - Applicant information	
<i>A private or governmental entity seeking accreditation as a certifying agent must submit the following information:</i>	
<p>(a) Any updates to 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.</p>	<p>§ 205.503(a) Global Culture <u>Physical street address of office:</u> 120 Barranca Ave., Apt. A, Santa Barbara, CA, 93109 (not for mailing). <u>Current Main Mailing address: (for USPS, Fed Ex or UPS.</u> Global Culture 315 Meigs Road, Ste A-404 Santa Barbara, CA 93109 <u>Contact Numbers:</u> Telephone (707) 464-6913 Fax (888) 493-7818 Email Address: info@globalculture.us, Linda@globalculture.us <u>Name of the person(s) responsible for the certifying agent's day-to-day operations</u> Linda Van Hook (707) 464-6913 Tel., (888) 493-7818 Fax Linda@globalculture.us Global Culture LLC Linda Van Hook- SSS# (b) (6) Federal Employment Identification # 56-2594205. Secretary of State # 200610710176</p>
Yes	



<p>Yes</p>	<p>(b) Any updates to 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.</p>	<p>§ 205.503(b) <u>Name:</u> Global Culture Linda Van Hook Linda@globalculture.us (707) 464-6913 <u>Physical Office Location:</u> 120 Barranca Ave., Apt A, Santa Barbara, CA 93109 <u>Mailing Address:</u> Linda Van Hook Global Culture 315 Meigs Road, Ste A 404 Santa Barbara, CA 93109 <u>Name of Alternative Contact Person:</u> Cindy Douglas Cindy@globalculture.us (805) 315-5303 <u>Storage of Files older than 10 Years:</u> Chris Van Hook 117 Downing Street, Crescent City, CA 95531 (b) (6) (b) (6)</p>	
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<p>Y</p>	<p>(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.</p>	<p>§ 205.503 (c) Global Culture certifies 111 operations as of 4/1/17 in the following scopes: <u>Number of certified crop operations:</u> Current: 78 Projected: 80 <u>Number of certified livestock operations:</u> Current: 20 Projected: 20 <u>Number of certified wild crop operations:</u> Current: 0 Projected: 0 <u>Number of certified handling operations:</u> Current: 35 Projected: 40</p> <p>§ 205.503 (c) See Exhibit C GLO Fee Schedule</p> <p>Global Culture's Fee Schedule for all services provided for organic certifications.</p>	
<p>N</p>	<p>(d) Any updates to the type of entity the applicant is (e.g., government agricultural office, for-profit business, not-for-profit membership association).</p>	<p>§ 205.503 (d) Global Culture LLC is a for profit business</p>	
<p>NA</p>	<p>(1) For a governmental entity, any changes to the official's authority to conduct certification activities under the Act and the regulations in this part. (2) For a private entity, any changes to 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.</p>	<p>§ 205.503 (d)(1) NA</p>	
<p>Yes</p>	<p>(2) For a private entity, any changes to 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.</p>	<p>§ 205.503 (d)(2) Global Culture is owned by Linda Van Hook. Global Culture LLC is a limited liability for profit company. Chris Van Hook no longer is part owner as he sold his portion of GLO to Linda Van Hook. Global Culture is no longer a partnership as it is solely owned by Linda Van Hook.</p>	



N	<p>(e) Any updates to the list of State or foreign countries in which the certifying agent certifies production and handling operations and a list of each State or foreign country in which the certifying agent intends to certify production or handling operations.</p>	<p>§ 205.503 (e) Global Culture certifies only in the United States of America.</p>	
	<p>§205.504 Evidence of expertise and ability. To become an accredited certifying agent, a private or governmental entity submitted documents and information to demonstrate its expertise in organic production or handling techniques; its ability to fully comply with and implement the organic certification program established in subparts §§205.100 and 205.101, §§205.201 through 205.203, §§205.300 through 205.303, §§205.400 through 205.406, and §§205.661 and 205.662; and its ability to comply with the requirements for accreditation set forth in §205.501.</p>		
Yes	<p>(a) Personnel. (1) Any updates to the policies and procedures for training, evaluating, and supervising personnel;</p>	<p>Kathy Horgan, Linda Van Hook and Cindy Douglas are now trainers and supervisors for Inspectors and Reviewers used by Global Culture.</p>	



<p style="text-align: center;">Y</p>	<p>(2) Any updates to the name and position description of personnel used in the certification operation, including administrative staff, certification inspectors, members of any certification review and evaluation committees, contractors, and all parties responsibly connected to the certifying agent;</p>	<p>§ 205.504 (a)(2)</p> <p><u>Linda Van Hook</u> – GLO Owner, Executive Director, Administrator, Reviewer, Material Reviewer.</p> <p><u>Kathy Horgan</u> – Document Reviewer, Material Reviewer, Administration Staff, Inspector for (Crops, Livestock, Handling), Dairy Specialist, Inspector Supervisor and Trainer.</p> <p><u>Cindy Douglas</u>- Document Reviewer, Material Reviewer. Inspector for (Crops, Livestock, Handling), Administration Staff, Inspector Supervisor and Trainer.</p> <p><u>Chaponica Trimmell</u> - Inspector for (Crops, Livestock and Handling). Document Reviewer, Material Reviewer.</p> <p><u>Sarah Coppini</u> - Inspector for (Crops and Livestock). Document Reviewer, Material Reviewer.</p> <p><u>Matthew Molyneaux</u> – Inspector (Crops, Handling).</p> <p><u>Fruman Beren</u> – Inspector (Crops), no longer works with Global Culture.</p> <p><u>Chris Van Hook</u> – Chief Inspector, Part Owner, no longer owns nor works with Global Culture.</p>	
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N	(3) Any updates to the description of the qualifications, including experience, training, and education in agriculture, organic production, and organic handling, for:	<p>§ 205.504 (a)(3) Qualifications for inspectors and reviewers. Ideally they should have a Bachelor's degree in agriculture and/or food sciences, and/or equivalent practical experience in agriculture, organic production and organic handling, and an understanding of state and federal certification standards and procedures as applicable. On going training in the areas of production of crops, livestock, and handling is required.</p> <p>§ 205.504 (a)(3)(i)</p> <ul style="list-style-type: none"> • Kathy Horgan • Matthew Molyneux • Cindy Douglas • Chaponica Trimmell • Sarah Coppini <p>See attached Exhibit D</p> <p>GLO-Inspector Resumes</p> <p>§ 205.504 (a)(3)(ii)</p> <ul style="list-style-type: none"> • Linda Van Hook • Kathy Horgan • Cindy Douglas • Sarah Coppini • Chaponica Trimmell <p>See attached Exhibit E</p> <p>GLO-Reviewer Resumes</p>	
Y	(i) Each inspector used.		
Y	(ii) Each person designated to review or evaluate applications for certification; and		



N	(4) Any <u>updates</u> to the description of any training that has been provided or is intended to be provided to personnel to ensure that they comply with and implement the requirements of the Act and the regulations in this part.	<ul style="list-style-type: none"> • NOP/ACA Training • NOP Organic Insider • NOP Guidance Statements • NOP USDA Organic Literacy Initiative • NOP Trainings, Power Points • NOP Handbook • ATTRA Publications • E-Organic Webinars • Global Culture Annual Training and Meetings • OMRI Reports 	
(b) Administrative policies and procedures.			
N	(1) Any <u>updates</u> to the procedures used to evaluate certification applicants, make certification decisions, and issue certification certificates;		
N	(2) Any <u>updates</u> to the procedures 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;		
N	(3) Any <u>updates</u> to the procedures used for complying with the recordkeeping requirements set forth in §205.501(a)(9);		
N	(4) Any <u>updates</u> to the procedures used for maintaining the confidentiality of any business-related information as set forth in § 205.501(a)(10);	See Exhibit F for the current Confidentiality Agreements signed by all those that work with Global Culture.	
Y	(5) Any <u>updates</u> to the procedures used, including any fees to be assessed, for making the following information available to any member of the public upon request:	§ 205.504 (b)(5)(i)(ii)(iii)(iv)	
N	(i) Certification certificates issued;	See Exhibit C for GLO Fee Schedule	



Y	(ii) A list of producers and handlers whose operations it has certified, including for each the name of the operation, type(s) of operation, products produced, and the effective date of the certification.	See Exhibit G for the GLO List of Producers as of 4-1-17.	
Y	(iii) The results of laboratory analyses for residues of pesticides and other prohibited substances conducted ; and	See Exhibit H for the Results of Laboratory Analysis for Residues of Pesticides.	
N	(iv) Other business information as permitted in writing by the producer or handler; and		
N	(6) Any updates to the procedures used for sampling and residue testing pursuant to § 205.670.		
	(c) Conflicts of interest.		
N	(1) Any updates to the procedures implemented to prevent the occurrence of conflicts of interest, as described in § 205.501(a)(11).	Global Culture has all personnel sign Conflicts of Interest forms each year, and communicate with Admin if there are any potential conflicts of interests.	
Y	(2) Any updates to the conflict of interest disclosure report for all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and all parties responsibly connected to the certifying agent. The report must identify any food- or agriculture-related business interests, including business interests of immediate family members, that cause a conflict of interest	See Exhibit I for Conflict of Interest forms signed in 2017 by all Personnel that work with GLO.	
	(d) Current certification activities. An applicant who currently certifies production or handling operations must submit:	N/A – Only applicable to initial applicants.	



<p>(e) Other information. Any updates to any other information that may assist in the Administrator's evaluation of the agent's expertise and ability.</p>	<p>§ 205.504 (e)</p> <p>Linda Van Hook, Kathy Horgan, Cindy Douglas, and Matthew Molyneux attended the 2017 USDA National Organic Program certifier's training, and the Accredited Certifiers Association Professional Development Training in Portland, Oregon.</p> <p>See Exhibit A, Renewal of Accreditation Audit Findings with no noncompliances and Mid-Term Audit Assessment.</p> <p>See Exhibit J, Global Culture Organic System Manual 3-22-16, GLO-OMRI Contract, PCO Material Program Contract, GLO-ACA Membership, NOP-ACA Training 2017</p>	
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Y

For Internal Use Only		
Section I – General Information		
Date Review Initiated	Course of Action Taken	<input type="checkbox"/> Accepted <input type="checkbox"/> Additional Information Requested <input type="checkbox"/> Clarification of Submitted Information <input type="checkbox"/> Forwarded to Accreditation Committee <input type="checkbox"/> NoNC Issued <input type="checkbox"/> Other
Date Review Completion		
Assigned NOP Staff		
Section II – Comments		

From: [Global Culture - Linda Van Hook](#)
To: [AMS - NOPAppeals](#)
Cc: [Lopez, JasonJ - AMS](#)
Subject: [Caution: Suspicious Attachment]GLO Annual Report 4-14-17
Date: Thursday, March 8, 2018 2:45:09 AM
Attachments: [Exh. A-GLO Accreditation Renewal 1-2-2014.pdf](#)
[Exh. A-GLO Proposed Corrective Action NP5209ADA.NC1-2.pdf](#)
[Exh. A-GLO-AIA16010JZ GLO NoNC Res 031516.pdf](#)
[Exh. A-NP5209ADA GLO NCRpt 021816.pdf](#)
[Exh. A-NP5209ADA GLO NoNC 022316.pdf](#)
[NP5209ADA GLO CA Report 08 23 16.pdf](#)
[NP5209ADA GLO NoCont Accred 08 23 16.pdf](#)
[Registered Corrective Action Report.msg](#)
[Registered Notice of Continued Accreditation.htm](#)

RE: Global Culture (GLO) Annual Report 4-4-17

Exhibit A is attached here.

Linda Van Hook
Global Culture
315 Meigs Road, Ste. A-404
Santa Barbara, CA 93109
Tel (707) 464-6913, Fax (888) 493-7818
Linda@globalculture.us

~~~~~  
**THINK Before You Open!**

This message has an HTML attachment that may display **possibly spoofed** web content. Pages like these are used in phishing attacks.

Prior to opening this attachment, please weigh this **warning** by considering whether you are expecting the message above, along with the inspection of sending addresses for unexpected names or domains.

Questions: Contact Client Technology Services (CTS) via email at (Spam.Abuse@wdc.usda.gov)



1400 Independence Avenue, SW  
Room 2648-S, STOP 0268  
Washington, DC 20250-0268

**NOTICE OF ACCREDITATION RENEWAL**

JAN 2 2014

Linda Van Hook  
Global Culture  
P.O. Box 1280  
Pacifica, California 94044

Dear Ms. Van Hook:

The United States Department of Agriculture (USDA) has reviewed the Global Culture's accreditation renewal application as a certifying agent to perform certification activities on behalf of USDA under the National Organic Program (NOP). Your application has been approved, subject to the conditions listed on the enclosed Terms of Accreditation document.

Please carefully review and then sign, date, and return the enclosed Terms of Accreditation document signifying your acceptance of the terms of your accreditation. Upon receipt of your signed acknowledgement of the Terms of Accreditation, the USDA will issue a formal Certificate of Accreditation. In the interim, this letter and the enclosed Terms of Accreditation will serve as your notice of accreditation.

The USDA grants this accreditation to Global Culture to certify crops, wild crops, livestock, and handling operations pursuant to the provisions of the Organic Foods Production Act of 1990 as amended (7 U.S.C. 6501 *et seq.*), and the USDA organic regulations (7 CFR Part 205). This accreditation is effective April 14, 2013, and will expire on April 14, 2018. The corrective actions for the noncompliance identified during the 2010 Mid-Term Assessment were verified and found to be implemented and effective. Therefore, that noncompliance has been cleared. There were no noncompliances identified during the most recent Renewal Audit. A copy of this audit report, NP3207LCA, is enclosed for your reference. No further action is required at this time.

Thank you for your willingness to represent the USDA as an accredited certifying agent. If you have any questions about this notice or the USDA organic regulations, please contact your Accreditation Manager, Julie Hartley at [Julie.Hartley@ams.usda.gov](mailto:Julie.Hartley@ams.usda.gov) or (202) 692-0047.

Sincerely,

A handwritten signature in blue ink, appearing to read "Miles V. McEvoy", written over a circular stamp or seal.

Miles V. McEvoy  
Deputy Administrator  
National Organic Program

Enclosures

cc: USDA Grading and Verification Division



GLOBAL CULTURE  
315 Meigs Road, Ste A 404  
(707) 464-6913 ♦ Fax (888) 493-7818  
Linda@globalculture.us  
info@globalculture.us

USDA, National Organic Program  
1400 Independence Ave., SW  
Room 2648-S, STOP 0268  
Washington, DC 20250-0268

Attention: AIAInbox@ams.usda.gov

3/23/16

Re: GLO - Notice of Noncompliance: dated 2/23/16  
NP5209ADA.NC1  
NP5209ADA.NC2

#### **Proposed Corrective Action**

Global Culture received the Notice of Noncompliance for not issuing a written Notice of Noncompliance to an operation that was producing a noncompliant organic label without the "Certified Organic by Global Culture" required under NOP §205.303 on one of their organic burrito products. This was discovered by a NOP complaint investigation.

NP5209ADA.NC1:

Global Culture received the NOP complaint investigation notification. That day, upon reviewing the complaint, we contacted the noncompliant certified operation's new Quality Assurance Manager by phone and email. We asked him if they had a label out in the marketplace not showing the COB requirement for a 205.303 label. We asked them to submit the label in question to us and it was reviewed and determined that it had never been sent to GLO for a review as GLO always requires of all of our certified operation. The new manager explained that they had a high turnover of managers within a six month period. The very next day, they submitted a revised label and a product profile for the noncompliant product. We then reviewed both and determined that the product was now compliant. They sent new practices and procedure to prevent the use of labels and organic products produced to ensure that all new products and labels would be sent to GLO for a review and approval prior to producing and selling organic products in the marketplace. They also pulled all of the noncompliant labels and started using the compliant labels that week. They responded so quickly, that GLO didn't issue a formal Notice of Noncompliance. The certified operation has since voluntarily surrendered their certification as of 12/31/15 as their organic portion of their operation was sold.

Upon receiving this GLO noncompliance, we understand that we should have issued a formal written Notice on Noncompliance to the certified operation. How will we prevent this from

happening again? We will follow our procedures written in our Global Culture Organic System Manual Certification Procedures found on page 34 as follows:

**C). Notice of Noncompliance:**

If Global Culture has reason to believe, based on the on-site inspection and a review of the information submitted by the certified operation that the operation is not complying with the requirements of the Act, and the NOP regulations, Global Culture will provide written notification of noncompliance to the operation.

NP5209ADA.NC2:

7 CFR §205.662 Noncompliance procedure for certified operations. (c) Proposed suspension or revocation. When rebuttal is unsuccessful or correction of the noncompliance is not completed within the prescribed time period, the certifying agent or State organic program's governing State official shall send the certified operation a written notification of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the noncompliance. When correction of a noncompliance is not possible, the notification of noncompliance and the proposed suspension or revocation of certification may be combined in one notification. The notification of proposed suspension or revocation of certification shall state:

- (1) The reasons for the proposed suspension or revocation;
- (2) The proposed effective date of such suspension or revocation;
- (3) The impact of a suspension or revocation on future eligibility for certification; and
- (4) The right to request mediation pursuant to §205.663 or to file an appeal pursuant to §205.681.

Global Culture received this noncompliance. If Global Culture issues a combined Notice of Noncompliance and Notice of Proposed Suspension we include all of the above including (4) The right to request mediation pursuant to §205.663 or to file an appeal pursuant to §205.681.

Following is Global Culture's procedures found in the Global Culture Organic System Manual Certification Procedures on page 30-32 as follows:

**E). Notification of Noncompliance, Notification of Suspension or Revocation and Notification of Denial of Certification.**

**1). Notification of Noncompliance**

a). When Global Culture has reason to believe based on the initial review of the application materials submitted by applicant, the on-site inspection reports filed by the inspector, results of any testing completed, or any other materials submitted, (NOP regulations §205.402, and §205.404), that an applicant is not able to comply or is not in compliance with the requirements of this manual and/or the NOP regulations, Global Culture will

provide a written notification of noncompliance to the applicant. When correction of a noncompliance is not possible, a notification of noncompliance and proposed suspension or revocation, or a notification of denial of certification may be combined in one notification. The notification will be mailed without delay to the applicant operation, State Organic Program official, and the USDA/AMS/NOP Administrator, and shall provide:

- 1). A description of each noncompliance.
- 2). The facts upon which the Notification of Noncompliance is based.
- 3). The date by which the applicant must rebut or correct each noncompliance and submit supporting documentation of each such correction when correction is possible.

b). Upon receipt of such Notification of Noncompliance, the applicant may:

- 1). Correct noncompliances and submit a description of the corrective actions taken with supporting documentation to Global Culture, or

- 2). Correct noncompliances and submit a new application to another certifying agent, provided that, the applicant must include a complete application, the notification of noncompliance received from Global Culture, and a description of the corrective actions taken with supporting documents, or

- 3). Submit written information to Global Culture to rebut the noncompliance described in the notice of noncompliance.

c). Upon receipt of the submitted rebuttal or response from applicant, Global Culture will without delay:

- 1). Evaluate the applicant's corrective actions taken and supporting documentation submitted or the written rebuttal, conduct an on-site inspection if necessary, and

- a). When the corrective action or rebuttal is sufficient for the applicant to qualify for certification, issue the applicant an approval, or

- b). When the corrective action or rebuttal is not sufficient for the applicant to qualify for certification, issue the applicant a written notice of denial of certification.

- d). Global Culture will issue a written notice of denial of certification to an applicant who fails to respond to the notification of noncompliance,

- e). Global Culture will provide notice of approval or denial to the USDA/AMS/NOP Administrator and /or the State Organic Program.

**2). The Notice of Denial will include the following:**

- a). A description of each noncompliance for which correction is not possible;

- b). The facts upon which the notification of denial is based;

c). Notice of applicant's failure to respond to a prior written Notice of Noncompliance/ Notice of Denial within specifically stated days, typically 30 days.

### **3). Proposed Suspension or Revocation**

When rebuttal is unsuccessful or correction of the noncompliance is not completed within the prescribed time period, Global Culture or the State Organic Program's governing State official shall send the certified operation a written notification of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the noncompliance. When correction of a noncompliance is not possible, the notification of noncompliance and the proposed suspension or revocation of certification may be combined in one notification. The notification of proposed suspension or revocation of certification shall state:

- a). The reason(s) for the proposed suspension or revocation.
- b). The proposed effective date of such suspension or revocation.
- c). The impact of a suspension or revocation on future eligibility for certification.
- d). The right to request mediation pursuant to NOP regulation §205.663 or to file an appeal pursuant to NOP regulation §205.681.

### **4). Suspension or Revocation**

a). If the certified operation fails 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, Global Culture or the State organic program's governing State official shall send the certified operation a written notification of suspension or revocation.

b). Global Culture or State organic program's governing State official must not send a notification of suspension or revocation to a certified operation that has requested mediation pursuant to NOP §205.663 or filed an appeal pursuant to NOP §205.681, while final resolution of either is pending.

We have attached our template for Notice of Noncompliance and Notice of Proposed Suspension.

We hope that our corrective actions submitted here will adequately address the two noncompliances and our practices will ensure them from occurring again. Please let us know if you have an questions, suggestions or concerns.

Kind Regards,



Linda Van Hook

Linda@globalculture.us

**NOTICE OF NONCOMPLIANCE RESOLUTION**

**MAR 14 2016**

Linda Van Hook  
Global Culture  
315 Meigs Road, Ste A 404  
Santa Barbara, CA 93109

Dear Ms. Van Hook:

On January 12, 2016, the United States Department of Agriculture (USDA), National Organic Program (NOP) issued a Notice of Noncompliance to Global Culture (GLO). GLO missed the January 8, 2016, deadline to publish its list of certified operations to the Organic INTEGRITY Database. This action was a noncompliance to the USDA organic regulations at §205.501(a)(15)(ii), as described below.

**AIA16010JZ.NC1** – 7 C.F.R §205.501(a)(15)(ii) which states, “(a) A private or governmental entity accredited as a certifying agent under this subpart must: (15) Submit to the Administrator a copy of:...(ii) A list, on January 2 of each year, including the name, address, and telephone number of each operation granted certification during the preceding year.”

**2016 Comments:** *The certifier did not publish its list of certified operations to the Organic INTEGRITY Database before the January 8, 2016 deadline.*

**2016 Corrective Actions:** GLO successfully published its list of certified operations to the Organic INTEGRITY Database on January 15, 2016. GLO will apply the knowledge of the publication process to future years to comply with USDA regulation and GLO policy.

In response to the noncompliance, you submitted the corrective action plan described above to the NOP on February 13, 2016. This plan demonstrated how you corrected the noncompliance which occurred, and it also showed how you will modify your policies and procedures to prevent this issue from recurring in the future. The NOP reviewed your submission and found that you adequately addressed the concerns we identified. During your next onsite assessment, we will verify that you have successfully implemented these changes and that the problem has not recurred.

Page 2

If you have questions regarding this notice, please contact your Accreditation Manager, Jason Lopez, at (202) 260-9445 or [JasonJ.Lopez@ams.usda.gov](mailto:JasonJ.Lopez@ams.usda.gov).

Sincerely,

A handwritten signature in blue ink that reads "R M for CC". The letters are cursive and somewhat stylized.

Cheri Courtney  
Director, Accreditation and International Activities Division  
National Organic Program

cc: AIA Inbox

## NATIONAL ORGANIC PROGRAM: NONCOMPLIANCE REPORT

### AUDIT AND REVIEW PROCESS

The National Organic Program (NOP) conducted a mid-term assessment of Global Culture. An onsite audit was conducted, and the audit report reviewed to determine Global Culture's capability to continue operating as a USDA accredited certifier.

### GENERAL INFORMATION

|                                           |                                                                                                                              |
|-------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|
| <b>Applicant Name</b>                     | Global Culture (GLO)                                                                                                         |
| <b>Physical Address</b>                   | 315 Miegs Rd, Suite A- 404                                                                                                   |
| <b>Mailing Address</b>                    | 315 Miegs Rd, Suite A- 404                                                                                                   |
| <b>Contact &amp; Title</b>                | Linda Van Hook, Executive Director                                                                                           |
| <b>E-mail Address</b>                     | <a href="mailto:linda@globalculture.us">linda@globalculture.us</a>                                                           |
| <b>Phone Number</b>                       | (707) 464-6913                                                                                                               |
| <b>Reviewer &amp; Auditor</b>             | Robert Yang, NOP Reviewer;<br>Nikki Adams, On-site Auditor.                                                                  |
| <b>Program</b>                            | USDA National Organic Program (NOP)                                                                                          |
| <b>Review &amp; Audit Date(s)</b>         | NOP assessment review: February 8, 2016<br>Onsite audit: November 2 – 4, 2015                                                |
| <b>Audit Identifier</b>                   | NP5209ADA                                                                                                                    |
| <b>Action Required</b>                    | Yes                                                                                                                          |
| <b>Audit &amp; Review Type</b>            | Mid-Term Assessment                                                                                                          |
| <b>Audit Objective</b>                    | To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of GLO's certification |
| <b>Audit &amp; Determination Criteria</b> | <i>7 CFR Part 205, National Organic Program as amended</i>                                                                   |
| <b>Audit &amp; Review Scope</b>           | GLO's certification services in carrying out the audit criteria during the period: October 28, 2013 through November 4, 2015 |

#### Organizational Structure:

Global Culture (GLO) is a private, for-profit company that has been accredited by the USDA National Organic Program (NOP) since April 14, 2003, to certify crops, wild crops, livestock, and handling operations. GLO certifies 132 operations to the USDS organic regulations – 85 crops, 12 livestock, and 27 handling operations. GLO does not certify wild crops operations, and does not provide grower group certification. The majority of GLO-certified operations are located in California.

GLO staff consists of the Executive Director, Chief Inspector, two contracted certification reviewers who also conduct inspections, and two contracted inspectors. A majority of the inspections are conducted by the Chief Inspector; the other inspectors primarily conduct crop

inspections. Two inspectors have been trained on conducting livestock and handler inspections. Certification decisions are made by the Executive Director.

#### Certification Process:

Requests for new certification may be received via telephone and email. The initial request for certification and correspondence is handled by the certification reviewers. New applicants are provided an application form, Global Certification Handbook (which includes the fee schedule and general requirements for certification and continuation of certification), applicable Organic System Plan(s) and a link to the USDA organic regulations. The application and Organic System Plan(s) are reviewed by a certification reviewer to determine whether the application is complete and whether the applicant appears to comply. After the initial review, the inspection is assigned to an inspector based on qualification and availability. Inspection assignments are rotated between the Chief Inspector and the four contracted inspectors. Upon completion of the inspection, the inspection report is reviewed, and the certification decision is made by the Executive Director. Organic certificates are issued at initial certification and updated annually, or when any of the information on the certificate changes.

For continuation of certification, GLO's certified clients are required to submit their annual update by their certification anniversary date. GLO sends its certified clients a letter two months prior to the anniversary date, and if the client doesn't respond GLO follows up with the client via email or phone call. If the client does not submit an annual update by the anniversary date and no response is received, a notice of noncompliance is issued. Upon completion of the annual inspection, a review of the inspection report and annual update information is conducted. If GLO determines that the operation complies, the operation is issued an updated certificate.

Labels are submitted by clients to GLO with an initial application, or whenever approval for use is needed. GLO reviews and approves all labels prior to use by the client. GLO has their own seal, but does not require its use on GLO-certified products.

Material reviews are conducted by GLO reviewers prior to use by operations and verified during the onsite inspections. GLO refers to the approved materials lists of the Organic Materials Review Institute and the Washington State Department of Agriculture when reviewing and approving inputs.

GLO conducts residue testing of at least 5% of its certified operations. GLO sends all samples to an ISO-accredited laboratory. The GLO Executive Director and Chief Inspector oversee and conduct annual training on pesticide residue sampling for GLO staff.

#### Administrative Records and Processes:

A review of personnel qualifications indicated that staff were provided with training on NOP requirements and other agricultural-related topics. Some of the training was conducted by external parties; others were internal trainings. Performance evaluations are completed annually.

The basis of certification for the GLO certification program is outlined in the GLO Organic Certification Manual. These documents, along with the forms required for applying or

continuing certification, are sent to the applicant/client upon request in either paper or electronic format.

#### Summary of Witness and Review Audits Conducted:

A witness audit of an annual inspection at a crops operation was conducted, and a review audit of a certified handling operation was conducted. The certified crop operation located in Lockeford, CA produced 100% organic butternut squash. The certified handling operation located in Chatsworth, CA produced ready-to-eat organic burritos.

### **NOP DETERMINATION**

The NOP reviewed the onsite audit results to determine whether GLO's corrective actions adequately addressed previous noncompliances. The NOP also reviewed the findings identified during the onsite audit to determine whether noncompliances should be issued to GLO.

#### Noncompliances from Prior Assessments

Any noncompliance labeled as "**Cleared**," indicates that the corrective actions for the noncompliance are determined to be implemented and working effectively. Any noncompliance labeled as "**Outstanding**" indicates that either the auditor could not verify implementation of the corrective actions or that records reviewed and audit observations did not demonstrate compliance.

**None.**

#### Noncompliances Identified during the Current Assessment

**NP5209ADA.NC1** - 7 CFR § 205.662 (a) states, "When an ... investigation of a certified operation by a certifying agent or a State organic program's governing State official reveals any noncompliance with the Act or regulations in this part, a written notification of noncompliance shall be sent to the certified operation."

**2015 Comments:** *An NOP complaint investigation regarding a noncompliant organic burrito label revealed that the product was produced by a GLO-certified operation. The label had the USDA organic seal without identifying the certifying agent that certified the product. Although GLO required the operation to submit corrective actions, GLO did not issue the operation a notification of noncompliance.*

**NP5209ADA.NC2** - 7 CFR § 205.662 (c)(1) – (4) states, "When correction of a noncompliance is not possible, the notification of noncompliance and the proposed suspension or revocation of certification may be combined in one notification. The notification of proposed suspension or revocation of certification shall state: The reasons for the proposed suspension or revocation;

The proposed effective date of such suspension or revocation; The impact of a suspension or revocation on future eligibility for certification; and The right to request mediation pursuant to § 205.663 or to file an appeal pursuant to § 205.681.”

**2015 Comments:** *The review of GLO’s issuance of a combined Notice of Noncompliance and Notice of Proposed Suspension revealed that GLO provided the operation with an opportunity to correct the noncompliance and subsequently issued the operation a Correction of Noncompliance notice upon accepting its corrective actions.*



1400 Independence Avenue, SW.  
Room 2648-S, STOP 0268  
Washington, DC 20250-0268

**FEB 23 2016**

**NOTICE OF NONCOMPLIANCE**

Linda Van Hook  
Global Culture  
315 Miags Rd, Suite A- 404  
Santa Barbara, CA 93109

Dear Ms. Van Hook:

On November 2 – 4, 2015, a representative of the United States Department of Agriculture (USDA), National Organic Program (NOP), completed an onsite audit of the Global Culture (GLO) organic certification program as part of its USDA Mid-term Accreditation Assessment. On February 8, 2016, the NOP reviewed the results of the onsite audit to determine GLO's compliance to the USDA organic regulations. A copy of the assessment report, NP5209ADA, is enclosed for your reference.

As the report indicates, there were no prior noncompliances from your previous audit. Two new noncompliances, NP5209ADA.NC1 and 2, were identified during the onsite audit as findings and determined to be noncompliances. Please submit proposed corrective actions for all noncompliances to the [AIAInbox@ams.usda.gov](mailto:AIAInbox@ams.usda.gov) within 30 days from the date of this Notice. All proposed corrective actions must indicate how the noncompliances will be corrected and how the GLO management system will be modified to prevent future noncompliances. If you wish to rebut any noncompliances, please submit objective evidence that supports your argument to the [AIAInbox@ams.usda.gov](mailto:AIAInbox@ams.usda.gov) within 30 days from the date of this Notice.

Please refer to [NOP 2608, Responding to Noncompliances](#) for further instructions on how to respond to noncompliances. Failure to promptly resolve noncompliances may result in proposed suspension or revocation of your USDA organic accreditation.

If you have questions regarding this notice, please contact your Accreditation Manager, Jason Lopez, at (202) 260-9445 or [JasonJ.Lopez@ams.usda.gov](mailto:JasonJ.Lopez@ams.usda.gov).

Sincerely,

A handwritten signature in blue ink that reads "Cheri Courtney".

Cheri Courtney  
Director, Accreditation and International Activities Division  
National Organic Program

Enclosure: Noncompliance Report

cc: AIA Inbox

## NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

### AUDIT AND REVIEW PROCESS

The National Organic Program (NOP) conducted a mid-term assessment of Global Culture (GLO). An onsite audit was conducted, and the audit report reviewed to determine GLO's capability to continue operating as a USDA accredited certifier. This report provides the results of the mid-term assessment and review of GLO's corrective actions.

### GENERAL INFORMATION

|                                           |                                                                                                                                       |
|-------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|
| <b>Applicant Name</b>                     | Global Culture (GLO)                                                                                                                  |
| <b>Physical Address</b>                   | 315 Miegs Rd, Suite A-404, Santa Barbara, CA 93109                                                                                    |
| <b>Mailing Address</b>                    | 315 Miegs Rd, Suite A-404, Santa Barbara, CA 93109                                                                                    |
| <b>Contact &amp; Title</b>                | Linda Van Hook, Executive Director                                                                                                    |
| <b>E-mail Address</b>                     | <a href="mailto:linda@globalculture.us">linda@globalculture.us</a>                                                                    |
| <b>Phone Number</b>                       | 707-464-6913                                                                                                                          |
| <b>Reviewers &amp; Auditor</b>            | Corrective Action Review: Penny Zuck<br>Audit Report Review: Robert Yang<br>Onsite Auditor: Nikki Adams                               |
| <b>Program</b>                            | USDA National Organic Program (NOP)                                                                                                   |
| <b>Review &amp; Audit Date(s)</b>         | Corrective Action Review: May 31 – August 11, 2016<br>NOP assessment review: February 8, 2016<br>Onsite audit: November 2 – 4, 2015   |
| <b>Audit Identifier</b>                   | NP5209ADA                                                                                                                             |
| <b>Action Required</b>                    | None                                                                                                                                  |
| <b>Audit &amp; Review Type</b>            | Mid-Term Assessment                                                                                                                   |
| <b>Audit Objective</b>                    | To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of GLO's certification program. |
| <b>Audit &amp; Determination Criteria</b> | <i>7 CFR Part 205, National Organic Program as amended</i>                                                                            |
| <b>Audit &amp; Review Scope</b>           | GLO's certification services in carrying out the audit criteria during the period: October 28, 2013 through November 4, 2015          |

Global Culture (GLO) is a private, for-profit company that has been accredited by the USDA National Organic Program (NOP) since April 14, 2003, to certify crops, wild crops, livestock, and handling operations. GLO certifies 132 operations to the USDS organic regulations – 85 crops, 12 livestock, and 27 handling operations. GLO does not certify wild crops operations, and does not provide grower group certification. The majority of GLO-certified operations are located in California.

## **NOP DETERMINATION:**

NOP reviewed the onsite audit results to determine whether GLO's corrective actions adequately addressed previous noncompliances. NOP also reviewed any corrective actions submitted as a result of noncompliances issued from Findings identified during the onsite audit.

### **Non-compliances from Prior Assessments**

Any noncompliance labeled as "**Cleared**," indicates that the corrective actions for the noncompliance are determined to be implemented and working effectively. Any noncompliance labeled as "**Outstanding**" indicates that either the auditor could not verify implementation of the corrective actions or that records reviewed and audit observations did not demonstrate compliance.

**None.**

### **Non-compliances Identified during the Current Assessment**

Any noncompliance labeled as "**Accepted**," indicates that the corrective actions for the noncompliance are accepted by the NOP and will be verified for implementation and effectiveness during the next onsite audit.

**NP5209ADA.NC1 – Accepted.** 7 CFR § 205.662 (a) states, "When an ... investigation of a certified operation by a certifying agent or a State organic program's governing State official reveals any noncompliance with the Act or regulations in this part, a written notification of noncompliance shall be sent to the certified operation."

**Comments:** *An NOP complaint investigation regarding a noncompliant organic burrito label revealed that the product was produced by a GLO-certified operation. The label had the USDA organic seal without identifying the certifying agent that certified the product. Although GLO required the operation to submit corrective actions, GLO did not issue the operation a notification of noncompliance.*

**2016 Corrective Action:** GLO informed the NOP that the operation has since surrendered certification. GLO will issue such operations a notification of noncompliance according to the Notice of Noncompliance procedures in its Global Culture Organic System Manual Certification Procedures.

**NP5209ADA.NC2 - 7 CFR § 205.662 (c)(1) – (4)** states, "When correction of a noncompliance is not possible, the notification of noncompliance and the proposed suspension or revocation of certification may be combined in one notification. The notification of proposed suspension or revocation of certification shall state: The reasons for the proposed suspension or revocation; The proposed effective date of such suspension or revocation; The impact of a suspension or revocation on future eligibility for certification; and The right to request mediation pursuant to § 205.663 or to file an appeal pursuant to § 205.681."

**Comments:** *The review of GLO's issuance of a combined Notice of Noncompliance and Notice of Proposed Suspension revealed that GLO provided the operation with an opportunity to*

*correct the noncompliance and subsequently issued the operation a Correction of Noncompliance notice upon accepting its corrective actions.*

**2016 Corrective Action:** GLO revised its procedures for issuing Notices of Noncompliance, Proposed Suspension or Revocation, Suspension or Revocation, and Denial of Certification. GLO also revised its combined Notice of Noncompliance and Proposed Revocation; and Notice of Noncompliance and Proposed Suspension templates. The revised templates notify the operation of the right to request mediation or file an appeal. GLO additionally created a training/guidance document that will be used to train staff on how to write and issue adverse action notices.



1400 Independence Avenue, SW.  
Room 2648-S, STOP 0268  
Washington, DC 20250-0268

**NOTICE OF CONTINUED ACCREDITATION**

Linda Van Hook  
Global Culture  
315 Miegs Road, Suite A-104  
Santa Barbara, CA 93109

**AUG 23 2016**

Dear Ms. Van Hook:

The United States Department of Agriculture (USDA), Agricultural Marketing Service (AMS), National Organic Program (NOP), has completed a Mid-Term Assessment of the Global Culture (GLO) organic certification program. The objective of the assessment is to confirm GLO's compliance to the USDA organic regulations as an accredited certifying agent.

Enclosed for your review is the NOP Assessment Report (NP5209ADA), which indicates that two noncompliances were identified. Corrective actions submitted in response to these noncompliances (NP5209ADA.NC1-NC2) are accepted. These corrective actions will be verified during your next on-site assessment. No further action is required at this time.

Thank you for your willingness to represent the USDA as an accredited certifying agent. If you have any questions about the NOP or the USDA organic regulations, please contact your Accreditation Manager, Jason Lopez, at [JasonJ.Lopez@ams.usda.gov](mailto:JasonJ.Lopez@ams.usda.gov) or (202) 260-9445.

Sincerely,

A handwritten signature in blue ink that reads "Miles V. McEvoy" with the word "FORMER" written in blue capital letters to the right of the signature.

Miles V. McEvoy  
Deputy Administrator  
National Organic Program

Enclosure: Corrective Action Report

cc: AIAInbox

**NOTICE OF NONCOMPLIANCE RESOLUTION**

**MAR 14 2016**

Linda Van Hook  
Global Culture  
315 Meigs Road, Ste A 404  
Santa Barbara, CA 93109

Dear Ms. Van Hook:

On January 12, 2016, the United States Department of Agriculture (USDA), National Organic Program (NOP) issued a Notice of Noncompliance to Global Culture (GLO). GLO missed the January 8, 2016, deadline to publish its list of certified operations to the Organic INTEGRITY Database. This action was a noncompliance to the USDA organic regulations at §205.501(a)(15)(ii), as described below.

**AIA16010JZ.NC1** – 7 C.F.R §205.501(a)(15)(ii) which states, “(a) A private or governmental entity accredited as a certifying agent under this subpart must: (15) Submit to the Administrator a copy of:...(ii) A list, on January 2 of each year, including the name, address, and telephone number of each operation granted certification during the preceding year.”

**2016 Comments:** *The certifier did not publish its list of certified operations to the Organic INTEGRITY Database before the January 8, 2016 deadline.*

**2016 Corrective Actions:** GLO successfully published its list of certified operations to the Organic INTEGRITY Database on January 15, 2016. GLO will apply the knowledge of the publication process to future years to comply with USDA regulation and GLO policy.

In response to the noncompliance, you submitted the corrective action plan described above to the NOP on February 13, 2016. This plan demonstrated how you corrected the noncompliance which occurred, and it also showed how you will modify your policies and procedures to prevent this issue from recurring in the future. The NOP reviewed your submission and found that you adequately addressed the concerns we identified. During your next onsite assessment, we will verify that you have successfully implemented these changes and that the problem has not recurred.

Page 2

If you have questions regarding this notice, please contact your Accreditation Manager, Jason Lopez, at (202) 260-9445 or [JasonJ.Lopez@ams.usda.gov](mailto:JasonJ.Lopez@ams.usda.gov).

Sincerely,

A handwritten signature in blue ink that reads "R M for CC". The letters are cursive and somewhat stylized.

Cheri Courtney  
Director, Accreditation and International Activities Division  
National Organic Program

cc: AIA Inbox

**From:** [Global Culture - Linda Van Hook](#)  
**To:** [AMS - NOPAppeals](#)  
**Cc:** [Lopez, JasonJ - AMS](#)  
**Subject:** GLO Annual Report 4-14-17, Exhibit B,C,D  
**Date:** Thursday, March 8, 2018 2:49:27 AM  
**Attachments:** [Exh. B-2017 GLO Internal Program Review & Performance Eval. Summary.doc](#)  
[Exh. C-GLO-Fee Schedule 2-27-17.doc](#)

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GLO Annual Report 4-14-17, Exhibits B and C are attached here.

Linda Van Hook  
Global Culture  
315 Meigs Road, Ste. A-404  
Santa Barbara, CA 93109  
Tel (707) 464-6913, Fax (888) 493-7818  
Linda@globalculture.us



GLOBAL CULTURE  
315 Meigs Road, Ste A404  
Santa Barbara, CA 93109  
(707) 464-6913  
[info@globalculture.us](mailto:info@globalculture.us)

### **4/1/17 Global Culture Internal Program Review & Performance Evaluation Summary Results**

This 2017 Global Culture Internal Program Review was conducted by Cindy Douglas, MS. with staff assistance from Linda Van Hook. Cindy Douglas is a reviewer and inspector for other certification agencies and has performed the Internal Program Review for another certification company and GLO as well. The 2017 staff Performance Evaluations were conducted by Linda Van Hook, Executive Director of Global Culture and Chris Van Hook, was the Chief Inspector up until April 1, 2017. This review was conducted in a planned and systematic manner and the results are documented in this internal review report.

The findings of this Global Culture 2017 Annual Internal Review and Performances Evaluations were that the procedures utilized by Global Culture appear to meet the NOP program requirements and The Terms of Accreditation. There is adequate staff members, inspectors, and reviewers to keep up with the 101 operations that GLO certifies. With the organic industry growing at such a rapid pace, it is not uncommon for GLO to suggest to new potential applicants seeking certification, to seek out another certifier in order to maintain GLO's administrative capacity to work with existing customers. GLO certifies less number of operations in 2017 than the prior year. For 2017 it is estimated that GLO will keep about the same amount of certified operations. If GLO decides to expand, it will add more personnel at that time.

**2017 Global Culture Performance Evaluations findings:** The personnel that works with GLO, (inspectors, reviewers, material reviewers, administration, certification committee members) all have adequate education, training and experience to conduct the required activities of the certification process. Overall their work is adequate in order to adhere to the NOP rules and regulations with the exemption of a few issues. We did stop using Truman Boren (Inspector) due to inadequate inspections, a few certified operation's complaints about his talking too much, and due to the fact that he lost his driver license. We also stopped using Chris Van Hook due to inadequate communication issues, late inspections, not fulfilling confirmed inspections in a timely manner.

**Areas that need improvement:** Better communication with the administrator, better adherence to timelines and due dates, more timely write ups of inspections to administration, more timely reviews of issuance of renewed organic certifications. These are issues GLO is currently working on to better serve certified operations. If the number of applicants grow, the need for qualified personnel may be considered, however GLO does not plan on expanding at this time. GLO is looking for more qualified personnel to help with timelines. They will be required to have the education, training and experience and computer system knowledge to be considered. This is such a specialized field and it may take time to find and train the right people for GLO. We have hired a few people for the administrative duties, however it did not work out for various reasons.

**2017 Global Culture Annual Internal Program Review:** Observations made, interviews conducted, and procedures and records reviewed, verified that Global Culture is currently operating in compliance to the

requirements of the review criteria. Global Culture is a small enough company with enough staff interaction to be able to address issues. Problems that do arise are addressed with staff and spoken about as necessary.

GLO Main office is located at: 120 Barranca Apt. A, Santa Barbara, CA 93109, and the mailing address is 315 Meigs Rd., Ste A 404, Santa Barbara, CA 93109. GLO does have some records of past certified operations at 117 Downing Street, Crescent City, CA 95531, for surrendered, withdrawn and revoked files from more than 10 years ago.

As of 4/14/2017, Global Culture, LLC certifies (101) operations in total. randomly selected operations were chosen for review:

(2) Crop Producers, (2) Livestock Producers and (2) Handler/Processors to review files for compliance. During GLO's Internal Audit Review, 2 certification files from each scope were randomly selected and reviewed. The NOP form 2005 File Review Worksheets were utilized to review the files (pages 85-102). Livestock, Crop, Handling scopes were chosen for review (GLO does not certify wild harvest operations, Brokers Traders, Retailers, nor any Grower Groups). Four of the 6 files had no issues to report. One Crop scope file needed a current copy of a wholesale label on file. One Handling scope file needed to make a correction on a minor error on their label (they included "Inc" after GLO's company name). This was a minor label revision request to the certified operation that was made. A follow up will be had with the certified operation to make sure they have revised the labels. GLO did allow them to use up the labels.

Global Culture's Certificate of Accreditation was signed by James E. Link dated April 14, 2013. The Terms of Accreditation dated 12/18/13 was signed and dated when received, by Linda Van Hook representative of Global Culture on 1/2/14. GLO completed the Mid-Term Assessment resulting in two Noncompliances. Corrective Actions were put into place to improve in the areas that were identified by NOP. NOP sent GLO a letter stating that the issues of the noncompliances were adequately addressed and adequate procedures are now in place to prevent the noncompliances from occurring again.

GLO uses the Penalty Matrix as a guide for issuing Noncompliances or Noncompliances in combination with Proposed Suspensions issued their certified operations. GLO has also been working with a Sound and Sensible approach prior to issuing noncompliances, or Noncompliances in combination with Proposed Suspensions. The Sound and Sensible approach being first; to communicate with the certified operation either by phone, email or letter to point out potential noncompliant issues. If it is a simple issue that can be corrected and does not put the organic integrity at risk, a formal Notice of Noncompliance may not be sent if it is acted upon quickly. These determinations are made with GLO's internal discussions with reviewers and inspectors prior to issuing the Notice of Noncompliance. If it is determined that the operation is not complying, a Notice is sent out.

Witness audits were performed on all inspectors last year. Unannounced inspections were conducted on 5% of certified applicants, and 5% of GLO's certified applicants had pesticide residue samples taken from their operations with no pesticide residue found (ND). All inspectors has a witness audit conducted by GLO in the field except for one inspector which another certification agency conducted. It was determined that each inspector performed inspections in compliance with the NOP requirements. All Global Culture staff Resume's, Annual Performance Evaluations, Conflict of Interest and Confidentiality documents are submitted annually and were determined to be in compliance. Global Culture requires continued education and/or training for all personnel that works with Global Culture. The Global Culture Program Internal Annual Program Review Audit and Performance Evaluations found that Global Culture complies with the USDA National Organic Program regulations.

As the National Organic Program continues to evolve, GLO requires all personnel to frequently visit the NOP website and all that it has to offer such as the National List, NOP Program Handbook and Guidance Documents, the Organic Insider Updates, E-Organic Webinars, NOP Training Modules, Interactive Videos, ATTRA Publications, NOP Blogs, the NOP Organic INTEGRITY Database and more.

*Linda Van Hook*

4/1/17

Signed electronically



GLOBAL CULTURE  
315 Meigs Road, Ste A404  
Santa Barbara, CA 93109  
(707) 464-6913  
[info@globalculture.us](mailto:info@globalculture.us)

### **4/1/17 Global Culture Internal Program Review & Performance Evaluation Summary Results**

This 2017 Global Culture Internal Program Review was conducted by Cindy Douglas, MS. with staff assistance from Linda Van Hook. Cindy Douglas is a reviewer and inspector for other certification agencies and has performed the Internal Program Review for another certification company and GLO as well. The 2017 staff Performance Evaluations were conducted by Linda Van Hook, Executive Director of Global Culture and Chris Van Hook, was the Chief Inspector up until April 1, 2017. This review was conducted in a planned and systematic manner and the results are documented in this internal review report.

The findings of this Global Culture 2017 Annual Internal Review and Performances Evaluations were that the procedures utilized by Global Culture appear to meet the NOP program requirements and The Terms of Accreditation. There is adequate staff members, inspectors, and reviewers to keep up with the 101 operations that GLO certifies. With the organic industry growing at such a rapid pace, it is not uncommon for GLO to suggest to new potential applicants seeking certification, to seek out another certifier in order to maintain GLO's administrative capacity to work with existing customers. GLO certifies less number of operations in 2017 than the prior year. For 2017 it is estimated that GLO will keep about the same amount of certified operations. If GLO decides to expand, it will add more personnel at that time.

**2017 Global Culture Performance Evaluations findings:** The personnel that works with GLO, (inspectors, reviewers, material reviewers, administration, certification committee members) all have adequate education, training and experience to conduct the required activities of the certification process. Overall their work is adequate in order to adhere to the NOP rules and regulations with the exemption of a few issues. We did stop using Truman Boren (Inspector) due to inadequate inspections, a few certified operation's complaints about his talking too much, and due to the fact that he lost his driver license. We also stopped using Chris Van Hook due to inadequate communication issues, late inspections, not fulfilling confirmed inspections in a timely manner.

**Areas that need improvement:** Better communication with the administrator, better adherence to timelines and due dates, more timely write ups of inspections to administration, more timely reviews of issuance of renewed organic certifications. These are issues GLO is currently working on to better serve certified operations. If the number of applicants grow, the need for qualified personnel may be considered, however GLO does not plan on expanding at this time. GLO is looking for more qualified personnel to help with timelines. They will be required to have the education, training and experience and computer system knowledge to be considered. This is such a specialized field and it may take time to find and train the right people for GLO. We have hired a few people for the administrative duties, however it did not work out for various reasons.

**2017 Global Culture Annual Internal Program Review:** Observations made, interviews conducted, and procedures and records reviewed, verified that Global Culture is currently operating in compliance to the

**5). Annual Certification Fees for Specific Scopes of Certification:**

An Annual Certification Fee will be charged for issuance of certification depending on the scope(s) of certification. This fee will be charged each year according to the Fee Schedule.

**A). Production - Crops:**

- 1). A base fee for parcels from anywhere between 1 - 20 acres .....\$ 625.00
- 2). For parcels greater than 20 acres, add to the above base fee of \$625.00 plus the following
  - a). next 80 acres at ..... \$ 15.00 / acre
  - b). next 100 acres at ..... \$ 10.00 / acre
  - c). above 200 acres at ..... \$ 5.00 / acre

Fee structures assume single parcels, or parcels in close proximity, and operated as a single farming operation. These certification fees may be discounted up to 50% if groups of 3 or more applicants in close proximity are inspected on the same trip to the area.

**B). Production of Orchards:**

- 1). A base fee for parcels from anywhere between 1 – 20 acres .....\$ 625.00
- 2). For parcels greater than 20 acres, add to the above base fee of \$625.00 plus the following
  - a). next 80 acres at .....\$ 7.50 / acre
  - b). next 100 acres at ..... \$ 4.50 / acre
  - c). next 200 acres at ..... \$ 3.00 / acre
  - d). above 400 acres at .....\$ 2.00 / acre

**C). Production – Livestock, Pastures and/or Crops for Applicant’s On-Farm Livestock:**

- 1). A base fee for parcels from 1 to 20 acres ..... \$550.00
- 2). For parcels greater than 20 acres, add to the base fee of..... \$550.00 plus the following:
  - a). next 80 acres at .....\$ 7.50 / acre
  - b). next 100 acres at .....\$ 4.50 / acre
  - c). next 200 acres at ..... \$ 3.00 / acre
  - d). above 400 acres at .....\$ 2.00 / acre
  - e). rangeland above 400 acres.....\$ .50/ acre

- 3. For adding new land there will be an additional administration fee...\$ 150.00

Fee structures assume single parcels, or parcels in close proximity, and operated as a single farming operation. These certification fees may be discounted up to 50% if groups of 3 or more applicants in close proximity are inspected on the same trip to the area.

### **C). Processors, Handlers, Nurseries, and Wild Harvest Crops**

Fees are based on projected Annual Gross Sales of Organic Products. Processor Fees assume up to (5) Products submitted for certification with application. Additional Products throughout the year may be charged an additional fee of up to \$50.00 per product.

Annual Certification Fees in these categories would be:

|                                           |             |
|-------------------------------------------|-------------|
| a). \$ 0.00 to \$299,999.00 .....         | \$ 625.00   |
| b). \$ 300,000.00 to \$ 499,999.00 .....  | \$ 950.00   |
| c). \$ 500,000.00 to \$ 749,999.00 .....  | \$ 1,250.00 |
| d). \$ 750,000.00 to \$1,000,000.00 ..... | \$ 1,900.00 |

- e). Annual Gross Sales in excess of \$ 1,000,000.00:  
Add the above fee of \$1,900.00 plus \$100.00 per \$100,000.00.

These certification fees may be discounted up to 50% if groups of 3 or more applicants in close proximity are inspected on the same trip to the area.

### **D). Animal Unit Fees**

In addition to the acreage involved in an organic livestock production operation there will be an additional fee based on the type and number of animals under organic production. As fluctuations in numbers may vary through out the year, a rough average should be used.

#### 1). Four Legged Animals –

Based upon the number of animals under organic management, expected during the next 12 months.....\$2.25 per organic animal.

#### 2). Feathered Animals –

|                                            |           |
|--------------------------------------------|-----------|
| a). 1 - 500 organic animals.....           | \$ 75.00  |
| b). 501 – 1,000 organic animals .....      | \$ 150.00 |
| c). 1,001 – 50,000 organic animals .....   | \$ 225.00 |
| d). 50,001 and above organic animals ..... | \$ 375.00 |

### **6). Miscellaneous Fees**

\$100.00 Late Fees If an operation's updated Organic System Plan information is received after the Annual Renewal Date, there may be a late fee of \$100.00 added to the total certification fees. These fees can be avoided by timely filing of the required paperwork. Global Culture makes attempts to contact all certified operations before the Operation's Annual Certification Renewal Date. However, the responsibility remains with the certified Operation to submit their Organic System Plan Updates before their annual renewal date.

Requests made by the public for the following, may be charged the following fees:

A copy of the organic certificate.....\$10.00  
A copy of the List of Certified Operations.....\$25.00  
A copy of the test results of laboratory analyses for residues of pesticides and other prohibited substances conducted.....\$ 25.00  
Each page copied for other business related information as permitted in writing by the producer or handler.....\$ 2.50 per page.

**7). Export Certificates**

Issuance of Export Certificates, NAQS Import Certificates,  
TM-11Forms.....\$ 50.00

**From:** [Global Culture - Linda Van Hook](#)  
**To:** [AMS - NOPAppeals](#)  
**Cc:** [Lopez, JasonJ - AMS](#)  
**Subject:** GLO Annual Report 4-14-17, Exhibit D  
**Date:** Thursday, March 8, 2018 2:51:41 AM  
**Attachments:** [Chris Van Hook-Resume-Training 2017.doc](#)  
[Cindy Douglas Training 2016.doc](#)  
[Kathy Horgan 2017 Resume.doc](#)  
[Mathew Molyneaux-Training 2016.docx](#)  
[Matthew Molyneaux 2017 Resume.doc](#)  
[Sarah Coppini 2017 Resume.doc](#)  
[Truman Boren-Resume-Training 2016.doc](#)

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GLO Annual Report 4-14-17, Exhibit D is attached here.

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Linda@globalculture.us

**Chris Van Hook**

P.O. Box 1394  
Crescent City, California

2017

Tel.: (b) (6)  
(b) (6)

**Summary:**

Perform research, development and implementation regarding issues of public perception, and legislative policy/law/regulations in Sacramento for 23 years. Lobby throughout the Capitol meeting Senate and Assembly Members from both parties for particular items of interest to the aquaculture, agriculture and environmental industries.

Co-Founder of USDA Organic Certification Company "Global Culture", certifying over 100 operations consisting of a very wide variety of farms, and processors throughout California and Oregon.

Spent 27 years in the field of mariculture, on many types of fish and kelp farms. This gives me a unique advantage in assessing fishery or mariculture projects.

Attended and completed Law school mid life, and passed the CA State Bar Exam in February 2006.

**Job History:**

August 2004 – Present. Founder of Clean Green Certified Agricultural Program. Establishment of a parallel third party agricultural certification system incorporating aspects of the NOP, International Organic Programs, and Sustainable Farming practices to allow producers an alternative to the USDA NOP Program.

April 2003 – Present Global Culture LLC.

Accredited by the U.S.D.A National Organic Program to certify organic operations. Over 43 years of agriculture experience. Global Culture effective date of accreditation is April 14, 2003. Organic inspector, and Organic Legal Consultant for Global Culture.

August 2006 – Present Establishment of Private Legal Practice. Establishment of a State wide private legal practice with offices in both Crescent City and Pacifica California. Concentrating on business law, real property issues, compliance and administrative law.

1987 – 2003 Abalone International, Inc., Crescent City, CA

Director, General Manager of Operations and majority holder of this harbor-based abalone farming company. Design, plan, permitting, construction and operations of farm. Sales, marketing and business development implemented throughout the U.S., China, and Japan. Responsible for an annual operating budget of \$500,000. This operation has been discontinued due to governmental over regulation.

1981 - Present Global Culture located in Crescent City, California.

Owner & Proprietor of this agriculture and mariculture consulting firm, which advises on projects of abalone farming, kelp farming and harvesting, salmon culture, and agricultural farms throughout the western United States, Jamaica, Haiti, Mexico, Canada, Iceland, Chile, and numerous other locations and global environments.

1997 - 2001 Crescent City Harbor Commission

Elected to and served a four-year term as Harbor Commissioner. Oversaw an annual budget of \$1.5 million. Worked with numerous State and Federal regulatory agencies regarding environmental water issues, dredging, Coastal Commission, direct management of the CEO and Harbor Master. Involved the Community for Cooperative Harbor Development.

1978 - 1987 Independent Orchard Works, Santa Barbara County, California

Owner of this farm and ranch development company. Farm development on an average budget in excess of \$1M. Experienced with management of creek side development issues.

1978 - 1984      California Lifeguard Association, Santa Barbara County, California  
Hired and trained as a beach life guard, spending the last three years as Supervisor of all guarded Santa Barbara County Beaches, Santa Barbara, California.

**Education:**

Juris Doctor, Concord School of Law, 2005. Admitted to the California State Bar on June 19, 2006

BA in Environmental Studies, minor in Zoology, University of California, Santa Barbara, 1982

My areas of work and study were aquaculture, and agriculture. Later in life I pursued a Doctorate of Law Degree.

**Related Activities/ Community Involvement:**

Guest lecturer for Humboldt State University (10 yrs.). Commercial fisheries and aquaculture classes.

Written and/or interviewed for, numerous papers and articles regarding aquaculture. Published in papers in 160 countries throughout the world. (Available on request)

**Relevant Training and Experience:**

August – November, 2002 – Hired and trained as an Organic Inspector for Organic Certifiers a USDA accredited organic certification company based in Ventura, California. Received training in inspections for crop production, livestock and processor/handlers. I inspected for, and represented the company in Northern California during this three month period.

November, 2002 - April, 2003 - Development of Policies, and Procedures for USDA Organic Accreditation of Global Culture. Full accreditation granted April 13, 2003.

May 2003 – Present - Chief Inspector. Direct and Train Global Culture Inspectors. Approved for the scopes of Livestock, Crop, Wild Harvest and Handler/Processor.

April 19, 2004 - Organic Training Educational Seminar,. Presented by Mr. Ray Green, Supervisor of the California Organic Program (an approved SOP). Eureka, California

December 2, 2005 - NOP Organic Practices Training Seminar, Concentration on Organic Retail Practices, Crop Production Practices, and Organic Dairy Management. Presented by Mr. Ray Green, Supervisor California Organic Program (an approved SOP). Crescent City, California

November 25, 2005 On-site Review and Training Update. Required and presented by Global Culture Executive Director Linda Van Hook, and Chief Inspector Chris Van Hook. Additional training in the formalities of an applicant's OSP. Training in the education of clients in their need to be able to provide this information to NOP, or SOP authorized personnel in the event of an unannounced on-site audit. This training was provided in response to problems identified by Mr. Ray Green, Director of the California SOP

January 25, 2006 USDA AMS NOP TRAINING SESSION, Pacific Grove, California. Training presented by NOP personnel regarding NOP regulation implementation. Global Culture Executive Director provided me with a review of the training as well as copies of all printed material collected from the meeting.

January 23, 2007 USDA AMS NOP TRAINING SESSION, Pacific Grove, California. Training presented by NOP personnel regarding NOP regulation implementation, updates and revisions after the *Harvey* decision.

March 8, 2007 ORGANIC STRAWBERRY TRAINING DAY, Summerland, California. I attended a review for Global Culture staff at the March 16, 07 annual meeting. The review included discussion of all printed material, and discussion of topics addressed at the training day. Copies of all information material was delivered to Global Culture staff for their complete reading and is kept on file for future review.

January 15, 2008 ACA/NASOP TRAINING, Louisville, Kentucky. Review of cd with materials from the one day training and ACA meeting. Presentations included material review, NOP pesticide/input review, Processing materials, Packaging aides, Pasture and Livestock management and compliance.

April 2, 2008 CALIFORNIA DEPARTMENT OF AGRICULTURE SOP TRAINING DAY, Crescent City, California. A one day Organic training day with topics including: organic registration process, amending registrations, preparation for on-site inspections, and the organic appeals process. A Q&A portion allowed for areas in question to be addressed. Hosted by Dave Carleson.

October 6 – 8, 2008 USDA ON-SITE AUDIT OF GLOBAL CULTURE OPERATIONS. This three day audit was a detailed and valuable training opportunity. Review of all of our policies and procedures, as well as having a USDA auditor follow me on three operation on-site inspections.

June 15, 2009 USDA NOP On-Line Training notes and power point presentations from the NOP Chicago, IL Meeting.

October 8 2009 Reviewed material from, and received instruction from Exec. Director regarding the Pasture Workshop in Smith River, CA – Sponsored by Del Norte County Resource Conservation District, and University of CA and Oregon State University Cooperative ext. USDA – NRCS.

December, 2009 On-Line Training NOP Labels, Labeling and Marketing Information

February 25, 2010 Attended the Access to Pasture Training . Presented by USDA National Organic Program in Williams, CA near Davis.

March 16, 2010 Attended the Serv-Safe Class given by the National Restaurant Association in Crescent City CA.

May 16, 17, 18, 19, June 8, 21, 2010 2010 Mid term Audit of Global Culture by Martin Friesenhahn, Team Leader, Nikki Adams, Team Member and Lars Crail, NOP Observer. This multi days audit was a detailed and valuable training opportunity. Review of all of our policies, practices and procedures, as well as having a USDA auditor follow me on three on-site inspections (certified processor – handler, poultry livestock producer and a nursery plant operation).

February 7, 2011, National Organic Program Accredited Certifying Agents Training in Portland, Oregon given by NOP.

March 11, 2011, Global Culture 2011 Annual Meeting, Crescent City, CA. Review and Inspector Training Day held in Crescent City, CA. Topics included: a review of the past 12 months, the operations that were inspected and certified. A recap of the NOP and ACA trainings in Portland, Oregon on Feb 7-9, 2011. Further guidance given on residue testing, unannounced inspections, crop rotation, and material reviews were discussed.

April 14, 2011 - CA Organic Program Meeting in Sacramento, CA – Round table discussion.

March 5, 2012 Global Culture Annual Meeting at 245 Anchor Way, Crescent City. Topics included: a review of the past 12 months, the operations that were inspected and certified. A recap of the NOP and ACA Trainings in San Antonio, TX. Further guidance given on Unannounced Inspections, Residue Testing, OSP's, NOP website, NOP Handbook, etc.

April 12, 2012 - CA Organic Program Meeting in Sacramento, CA – Round table discussion.

February 23, 2012 US-EU Equivalency webinar by Miles McEvoy

March 5, 2012 Global Culture Annual Meeting. A recap of the 2012 NOP Training & the ACA Training in San Antonio Texas

July 16, 2012 Organic Dairy Herd Health Webinar (eOrganic)

May 15, 2012 Organic Weed Management on Livestock Pasture Webinar.

July 19, 2012 Grass-Based Dairy webinar.

September 27, 2012 Links Between Biodiversity Requirements of Organic Systems and NRCS

Organic Literacy Initiative Training connecting with USDA resources - Video and Training Modules

(2013 - 1/16/13 - 1/17/13) Professional Development Training For Accredited Certifying Agents (ACA), Orlando, Florida.

(2013 - 1/15/13) National Organic Program Accredited Certifying Agent Training in Orlando Florida.

September 6, 2013 CDFA - CA Organic Program Roundtable Meeting with CA ACA's. Training for CA Organic Program.

January 19, 2014 NOP / Certifier Training in San Diego for USDA NOP Accredited Organic Certification Companies.

These mandatory meetings include training from senior NOP staff regarding updates, further guidance, and areas of increased concerns.

April 30, 2014 - Attended a Webinar Entitled "Food Safety for Leafy Greens". This presentation included preharvest and post harvest contamination potentials for leafy row crops.

February 10, 2015 - National Organic Program Accredited Certifying Agent Training in Little Rock, Arkansas.

These mandatory trainings are important to receive annual updates on areas of concern, areas in need of improvement as well as it gives ACA's the opportunity to hear from senior NOP staff what are the concerns of the program at this time.

February 11 thru February 12, 2015 ACA Professional Development Training for Accredited Certification Agencies

This 2 day training follows the above NOP training in order to bring everyone up to date on current topics and concerns. Additional training this year was in inspector witness audits, inspector qualifications, and GMO's.

April 6, 2015 - Attended and Chaired the Global Culture 2015 Annual Staff Training and Meeting. This meeting was conducted via video conferencing and included summaries of the February 10, 11, & 12 NOP / ACA training in Little Rock Arkansas as well as a summary from Kathy Horgan regarding pasture and dairy range management. The meeting also included inspector training, witness audits and unannounced inspections. Also covered was the need for continual improvement for inspectors to be able to keep up with the various guidance statements and regulations.

January 13, 2016 - USDA National Organic Program Certifier Training at The Hilton Savannah DeSoto, Savannah GA  
Attendance Certificate issued upon completion.

January 14 -15, 2016 - Accredited Certifiers Association Certifier Training at The Hilton Savannah DeSoto, Savannah GA  
Attendance Certificate issued upon completion.

March 2, 2016 - CDFA SOP Stakeholder meeting at the Embassy Suites in Seaside, California.

Agenda: In an effort to continuously improve programs, California Department of Food and Agriculture is convening an Organic Stakeholder Working Group. The purpose of the working group is to review the program and provide

recommendations to the department for how to maximize the efficiency and responsiveness of the State Organic Program to industry needs.

At the first meeting, we will review program revenue/budget, survey responses from registered producers, identify opportunities for improvement and generally, discuss projects for the department to consider in the future.

March 18, 2016 CDFA SOP Stakeholder meeting 9:00 a.m. – 3:00 p.m. Sacramento, CA 95833

Organic Stakeholder Working Group, California Department of Food and Agriculture 2800 Gateway Oaks Drive, Sacramento, CA 95833 AGENDA Meeting Purpose: Create mutual understanding and analysis of the SOP registration process and data collection; discuss opportunities for actionable improvements and possible solutions to address stakeholder concerns with current data collection and registration process; receive program update from CDPH.

## Conferences – Seminars – Workshops – Trainings / Attended

*Policy fulfillment: This form shall be used both to record outside training and educational activities as well as internal training events provided by GLO to their employees or contractors. This form may be expanded as needed. Personnel may attach additional information as needed.*

**Contractor:**      **Cindy Douglas**

**Last Update: 2/28/17**

| DATE        | EVENT ATTENDED                                                      | TOPICS COVERED                                                                                                                                   |
|-------------|---------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|
| Feb 1, 2017 | NOP/ACA Training                                                    | NOP and ACA training updates to the USDA National Organic Program                                                                                |
| Feb 2016    | County Ag FSMA meeting                                              | Hank Glickmass presented FSMA facts                                                                                                              |
| Jan 2016    | Eco Farm Conference                                                 | NOP Updates, IPM strategies, nutrient management                                                                                                 |
| Dec 2015    | County DPR                                                          | Renewed PAC license (passed required exam)                                                                                                       |
| Oct 2015    | Water Regulatory issues meeting, Grower Shipper Santa Maria Library | Water Board and Central Coast Groundwater Coalition update                                                                                       |
| Sept 2015   | GAP Training                                                        | Lead by IFSI (International Food Safety Institute) contractors, on farm site                                                                     |
| June 2015   | Whole Foods Market (WFM) Meeting                                    | WFM meeting with buyers and compliance department regarding food safety standards and sustainability index (Jenn Hunt, compliance WFM organized) |
| May 2015    | Food Safety Training                                                | Lead by IFSI on farm site with harvest crew, led some of the training                                                                            |
| 4/20/15     | Annual Training                                                     | ASCO                                                                                                                                             |
| Oct 2014    | Grower Shipper sponsored talk on immigration visas                  | General information on how to keep records and obtain visas for foreign workers                                                                  |
| March 2014  | Grower Shipper sponsored talk on labor regulations                  | EDD information and general labor laws                                                                                                           |
| March, 2014 | OSHA training                                                       | General OSHA Compliance                                                                                                                          |
| Jan, 2014   | Annual Training                                                     | CCOF                                                                                                                                             |
| Jan 2014    | Ecological Farming Conference, Asilomar, CA                         | Organic livestock, processing and crop                                                                                                           |
| All of 2014 | ACA Member and read list serve regularly                            | NOP updates, ACA member issues and general compliance discussions                                                                                |
| 3/4/13      | ASCO                                                                | Pesticide Residue Sampling – NOP Directives                                                                                                      |
| Feb, 2013   | Annual Training                                                     | CCOF                                                                                                                                             |
| June, 2012  | LGMA                                                                | Testing & Sampling Procedures: Chlorine, ph & irrigation water                                                                                   |
| April, 2012 | Compost Course                                                      | Maine Compost School. Certificate of Technical Ability in Composting                                                                             |
| March, 2012 | HACCP Training, Earthbound Farms                                    | Basic & Advanced                                                                                                                                 |
| Jan, 2012   | GAP Training, Salinas                                               | GAP                                                                                                                                              |

|      |      |                                |
|------|------|--------------------------------|
| 2012 | CDFA | Materials Registration, Marina |
|------|------|--------------------------------|

(b) (6)

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**WORK EXPERIENCE:**

Global Culture, LLC, Crescent City, CA

**Agriculture Inspector and Reviewer, 2006 to Present**

Serve as organic agriculture certification committee member responsible to review and interpret USDA National Organic Program regulations as they apply to agriculture operations resulting in issuance of organic certification for program participants. Conduct inspections of client agriculture operations.

(b) (6)

**EDUCATION:**

(b) (6)

**ADDITIONAL EXPERIENCE:**

(b) (6)

Continuing Education Log – 2015

Matthew Molyneux – Independent Organic Crop Inspector

e-Organic webinars viewed in December 2015



Matthew M. Molyneaux

(b) (6)

(b) (6)

(b) (6) (b) (6) (cell)

Education

(b) (6)

Employment History

(b) (6)

(b) (6)

Activities and Achievements

(b) (6)

**Sarah Michael Coppini**

(b) (6)  
(b) (6)

(b) (6)  
(b) (6)

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**EDUCATION**

(b) (6)

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**WORK EXPERIENCE**

**Global Culture-Inspector, Reviewer, Humboldt County, CA. 2017 - Current**

(b) (6)

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**REFERENCES**

(b) (6)

(b) (6)

**Truman Boren**

(b) (6)

March 28, 2016

**Experience:**

2003 – Present – USDA National Organic Program Crop Inspector for Global Culture LLC.

This work has included a 100 hr training program initially with follow up additional training annually. Job includes review of applicant’s file prior to inspection, communication with main office, scheduling of crop inspection, conducting annual on-site inspections and unannounced on-site inspections. Work also has includes training in sample collections as well as conducting crop produce sample collection and shipping to the lab. Tasks also include the writing of crop inspection reports, collection of any follow up information required from applicant from the inspection.

(b) (6)

**Education:**

(b) (6)

**Organic Training:**

(b) (6)

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**From:** [Global Culture - Linda Van Hook](#)  
**To:** [AMS - NOPAppeals](#)  
**Cc:** [Lopez, JasonJ - AMS](#)  
**Subject:** GLO Annual Report 4-14-17, Exhibit E  
**Date:** Thursday, March 8, 2018 2:53:36 AM  
**Attachments:** [Exh. E-Chaponica Trimmell Resume 2017.pdf](#)  
[Exh. E-Cindy Douglas 2017 Resume.doc](#)  
[Exh. E-Kathy Horgan-Resume 2016.doc](#)  
[Exh. E-Linda Van Hook-Resume-Training 2017.doc](#)  
[Exh. E-Sarah Coppini 2017 Resume.doc](#)

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GLO Annual Report 4-14-17, Exhibit E is attached here.

Linda Van Hook  
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Linda@globalculture.us

# Chaponica Trimmell

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(b) (6)

Phone: (b) (6)

(b) (6)

## Objective

(b) (6)

## Education

(b) (6)

## Work Experience

(b) (6)

## Volunteer Work

(b) (6)

## References

(b) (6)

Professional Profile of Cindy Douglas, M.S.

(b) (6)

(b) (6)

Education and Training

(b) (6)

Continuing Education

(b) (6)

Experience

(b) (6)

(b) (6)

(b) (6)

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◆ (b) (6)

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**WORK EXPERIENCE:**

(b) (6)

Global Culture, LLC, Crescent City, CA

**Organic Inspector, Reviewer, Material Reviewer, Administration, 2006 to Present**

Serve as organic agriculture certification committee member responsible to review and interpret USDA National Organic Program regulations as they apply to agriculture operations resulting in issuance of organic certification for program participants, Inspector, Reviewer, Administrative Duties

(b) (6)

**EDUCATION:**

(b) (6)

**ADDITIONAL EXPERIENCE:**

(b) (6)

(b) (6)

LINDA VAN HOOK  
315 Meigs Road, Ste A-404  
Santa Barbara, CA 93109  
(707) 464-6913  
Linda@globalculture.us

2017

### **Education**

(1974-1979) University of California, Santa Barbara.

(1979) B.A. in Cultural Anthropology. Course work included food production systems around the world and the need for sustainable food production.

### **Employment**

**Executive Director, Owner of Global Culture LLC (4/14/03 - Present).** Global Culture was accredited to the USDA National Organic Program on 4/14/03 and re-accredited on 4/14/08. Duties include administrative duties, accreditation manager, materials review, and certification decision determinations for certified operations to the USDA National Organic Program Standards. Global Culture LLC certifies operations as organic in the production of crops, wild harvest, livestock, processing and handling compliant to the USDA NOP (7CFR Part 205).

**2013 Co-Founder of Global Culture, LLC** also known as GLO with partner Chris Van Hook. We now certify over 100 operations consisting of scopes of Production of Crops, Processor/Handlers and Livestock Producers throughout the state of California mainly.

**Assistant Manager & Part Owner of Abalone International Inc., Crescent City, CA (1988-2009)** Abalone International was an abalone mariculture farm located in the Crescent City Harbor. Following is a list of duties performed:

Marketing:

Office Manager:

Handling/Processing/Labeling:

- HACCP trained, and responsible for all HACCP regulations compliance for abalone production.

- Wild Collection: Assisted in the wild collection of kelps used as abalone feed. This activity required the ecological management of the wild resource to assure a continuous supply of feed from the same beds. We harvested using sustainable practices from the same kelp beds for over 15 years.

Production (Livestock):

Management of 800,000 abalone. Basic animal husbandry aiming at overall animal health; Origin of livestock - sourcing healthy disease free and resistant abalone nursery stock suited for our specific oceanic conditions and site, Livestock living conditions - appropriate stocking rations, Livestock feed- sourcing wild kelp for weekly feeding, Livestock health care practices - monitoring for disease, keeping cages cleaned from barnacle, limpet and starfish growth and infestations which inhibit water flow through cage systems.

## **Office Manager, Northridge Electric, Crescent City, CA (2001- 2003)**

**Assistant Manager & Co-Owner, Independent Orchard Works, Santa Barbara, CA (1984 -1987).** Independent Orchard Works was a ranch management and landscaping company.

### **Organic Education & Training**

- (2004 April 19) Organic Training Educational Seminar. Presented by Mr. Ray Green, Supervisor California Organic Program. Eureka, California.
- (2005 August 20) Investigation request by Mr. William Bent, NOP Compliance Officer, regarding an investigation of an operation we had inspected by not yet certified. This was an education on Investigation.
- (2005 September 9-11) Represented Global Culture during an on-site audit conducted by USDA AMS personnel at our main office in Crescent City, California. The audit was conducted by Mr. Martin Friesenhahn, and Ms. Vickie Robertson. The audit was an education.
- (2005 December 2) Facilitated and represented Global Culture during a spot on-site check by Mr. Ray Green, Director of the California SOP. Mr. Green reviewed our file system, and inquired about three of our certified operations
- (2006 January 25) USDA AMS NOP TRAINING SESSION, Pacific Grove, California. Training presented by NOP personnel Mr. Mark Bradley, Mr. Robert Pooler, Mr. William Bent.
- (2007 January 23) USDA AMS NOP TRAINING SESSION, Pacific Grove, California. Training presented by NOP Mr. Mark Bradly. NOP regulation implementation, updates and revisions after the *Harvey* decision.
- (2007 March 8) ORGANIC STRAWBERRY TRAINING DAY, Summerland, California. I attended a review for Global Culture staff at the March 16, 07 annual meeting.
- (2007 March 15-17) NATIONAL ORGANIC DAIRY CONFERENCE, Fortuna, California. I attended this three day conference Topics included crop and pasture management, livestock management, housing, organic certification procedures, farm tours and marketing of organic products.
- (2008 January 14) ACA supplied Training CD of NOP Training in Louisville, Kentucky.
- (2008 January 15) ACA/NASOP TRAINING, Louisville, Kentucky. Review of the Training CD with materials from meeting. Presentations included material review, NOP pesticide/input review, processing materials, packaging aides, pasture and livestock care and compliance.
- (2008 April 2) CA Department of Agriculture SOP Training Day in Crescent City, California. An Organic training day with topics including: organic registration process, amending registrations, preparation for on-site inspections.
- (2009 June 15) USDA NOP On-Line Training notes and power point presentations from the NOP Chicago, IL Meeting.
- (2009 October 8) Pasture Workshop in Smith River, CA – Sponsored by Del Norte County Resource Conservation District, and University of CA and Oregon State University Cooperative ext. USDA – NRCS – attended.

- (2009 December) On-Line Training NOP Labels, Labeling and Marketing Information
- (2010 January 26) USDA NOP Training in Savannah Georgia – attended.
- (2010 January 27-28) Professional Development Training for Accredited Certifiers and State Organic Programs in Savannah Georgia – attended.
- (2010 March 16) Serv-Safe Class in Crescent City CA attended.
- (2010 June 24) Pesticide Residue Testing Webinar Training by the NOP.
- (2010 July 2). OMRI Website Training for Certifiers. Webinar by OMRI.
- (2010 August 20) How To Calculate Pasture Dry Matter Intake on Your Organic Dairy Farm – Webinar by eOrganic.
- (2010 September 16) Maximizing Dry Matter Intake on your Organic Dairy Pastures Webinar by eOrganic.
- (2011 February 7, 2011) National Organic Program Accredited Certifying Agents Training in Portland OR, USA
- (2011 February 8,9) Professional Development Training for Organic Certification Agencies, hosted by ACA
- (2012 January 24) Annual Training For Accredited Certifying Agents, San Antonio, Texas
- (2012 January 25-26) Accredited Certifiers Association Training in San Antonio, Texas
- (2012 February 23) Webinar of US-EU Equivalency put on by Miles McEvoy
- (2012 April 12) CA CDFA Organic Program Meeting in Sacramento, CA – Round table discussion. Highlighting the On-Line Database and Accounting System in progress.
- (2012 August 21) Organic Seed Finder Webinar (eOrganic)
- (2012 July 16) Organic Dairy Herd Health Webinar (eOrganic)
- (2012 August 21) Sourcing Organic Seed Just Got Easier. Organic Seed Finder.
- 2013 Professional Development Training For Accredited Certifying Agents (ACA), Orlando, Florida.
- 2013 National Organic Program Accredited Certifying Agent Training in Orlando Florida.
- 9/6/13 CDFA - CA Organic Program Roundtable Meeting with CA ACA's. Training for CA Organic Program.
- 2/19/14 National Organic Program - Certifier Training in San Diego, California
- 2/20/14 - 2/21/14 Professional Development Training for Accredited Certification Agencies - ACA
- 2014 - 2015 Numerous E-Organic Webinars
- 2014 December- NOP Meeting through readytalk.com
- April 6, 2015 Attended Global Culture 2015 Annual Staff training and meeting. This meeting included additional inspector training, a summarization of the February 10 USDA NOP meeting in Little Rock Arkansas, a summarization of the February 11 and 12, 2015 ACA training in Little Rock, Arkansas. Additionally there was a presentation from Kathy Horgan on her (3) day range and dairy management training in Chico California, spring of 2015.
- 2015 USDA National Organic Program Accredited Certifier Training- Little Rock, Arkansas

- 2015 Accredited Certifiers Association - Professional Development Training- Little Rock Arkansas
- 2016 USDA National Organic Program Accredited Certifier Training- Savannah Georgia
- 2016 Accredited Certifiers Association - Professional Development Training- Savannah Georgia
- 2015-2016-2017 Numerous E-Organic Webinars
- Frequent the NOP website for updates, guidance and trainings.
- Review the USDA NOP Program Handbook
- Read all USDA NOP newsletters and Guidance Documents
- Take part in the Accredited Certifiers Association Discussion Group.
- Read the OrganicProcessing Magazine until it stopped publishing.
- Read ATTRA Organic Publications and Newsletters
- Read OMRI Newsletters
- Read USDA Organic Literacy Initiative
- 2017 NOP Training, and ACA Professional Development Training in Portland, OR.
- 5/31/17: Organic Integrity in the Supply Chain: Overseeing Organic Imports Webinar

Sarah Michael Coppini

(b) (6)

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EDUCATION

(b) (6)

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WORK EXPERIENCE

(b) (6)

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REFERENCES

(b) (6)

**From:** [Global Culture - Linda Van Hook](#)  
**To:** [AMS - NOPAppeals](#)  
**Cc:** [Lopez, JasonJ - AMS](#)  
**Subject:** GLO Annual Report 4-14-17, Exhibit F  
**Date:** Thursday, March 8, 2018 2:56:45 AM  
**Attachments:** [Chaponica Trimmell- Confidentiality Form 2017.pdf](#)  
[Chris Van Hook- Confidentiality Form 2017.pdf](#)  
[Cindy Douglas- Confidentiality Form 2017.doc](#)  
[Kathy Horgan- Confidentiality Form17.pdf](#)  
[Linda Van Hook- Confidentiality Form 2017.pdf](#)  
[Matthew Molyneaux- Confidentiality Form 2017.doc](#)  
[Sarah Coppini- Confidentiality Form 2017.pdf](#)  
[Truman Boren-Confidentiality 2016.pdf](#)

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GLO Annual Report 4-14-17, Exhibit F is attached.

Linda Van Hook  
Global Culture  
315 Meigs Road, Ste. A-404  
Santa Barbara, CA 93109  
Tel (707) 464-6913, Fax (888) 493-7818  
[Linda@globalculture.us](mailto:Linda@globalculture.us)

**GLOBAL CULTURE**  
315 Meigs Road, Ste A404  
Santa Barbara, CA 93109  
Tel (707) 464-6913 ♦ Fax (888) 493-7818

**GLOBAL CULTURE POLICY FORM FOR MAINTAINING  
BUSINESS RELATED CONFIDENTIALITY**

**ATTENTION:** This form is required to be signed by all employees, subcontractors, directors, personnel of Global Culture prior to employment or commencement of any aspect of Global Culture's organic services.

I Chaponica Trimmell agree to maintain strict  
Print Name Legibly  
confidentiality with respect to Global Culture clients (future, current, past, confirmed or anticipated) under their applicable organic certification program and I will not disclosed to third parties (with the exception of the Secretary or the State organic program's governing official or their authorized representatives) any business related information concerning any client obtained while implementing the regulations in this part, except as provided in the NOP regulation # 205.504(b)(5), a copy of which has been provided to me, and I have read and understand.

I further agree that I will be asked to sign this or a similar form on an annual basis as long as I am working with Global Culture in their organic certification program.

**(b) (6)**

1/29/2017  
Date:

**(b) (6)**  
Linda Van Hook, Executive Director

3.1.17  
Date:

from work, discussions, and decisions in all stages of the certification process and the monitoring of certified production or handling operations for all entities in which I currently or have held a commercial interest, including an immediate family interest or the provision of consulting services, within the 12 month period prior to the application for certification.

3). Under no circumstances will I accept payment, gifts, or favors of any kind, other than prescribed fees, from any business I inspect and or certify, or that I am otherwise involved with the certification process of.

4). I will not give advice, or provide consultancy services to certification applicants, or certified operations, for overcoming identified barriers to certification.

5). I fully realize that I will be asked to complete an annual conflict of interest disclosure report each year.

6). By signing this form, I am accepting the responsibility of, and liability of keeping myself free of conflict of interests while working in any capacity with Global Culture in it's Organic Certifying Operations, and I fully realize that Global Culture expects me to maintain the highest standards by doing so.

**(b) (6)**

Signature of Employee / Contractor  
Signed electronically

1/29/2017

Date

**(b) (6)**

Linda Van Hook, Executive Director

3.1.17

Date

**GLOBAL CULTURE**  
315 Meigs Road, Ste A404  
Santa Barbara, CA 93109  
Tel (707) 464-6913 ♦ Fax (888) 493-7818

**GLOBAL CULTURE POLICY FORM FOR MAINTAINING  
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**ATTENTION:** This form is required to be signed by all employees, subcontractors, directors, personnel of Global Culture prior to employment or commencement of any aspect of Global Culture's organic services.

I CHRIS VAN HOOK agree to maintain strict  
Print Name Legibly  
confidentiality with respect to Global Culture clients (future, current, past, confirmed or anticipated) under their applicable organic certification program and I will not disclosed to third parties (with the exception of the Secretary or the State organic program's governing official or their authorized representatives) any business related information concerning any client obtained while implementing the regulations in this part, except as provided in the NOP regulation # 205.504(b)(5), a copy of which has been provided to me, and I have read and understand.

I further agree that I will be asked to sign this or a similar form on an annual basis as long as I am working with Global Culture in their organic certification program.

**(b) (6)**

Name

3/1/17  
Date:

**(b) (6)**

Linda Van Hook , Executive Director

3.3.17  
Date:

**GLOBAL CULTURE**  
315 Meigs Road, Ste A404  
Santa Barbara, CA 93109  
Tel (707) 464-6913 ♦ Fax (888) 493-7818

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I \_\_\_\_\_ Cindy Douglas \_\_\_\_\_ agree to maintain strict

Print Name Legibly

confidentiality with respect to Global Culture clients (future, current, past, confirmed or anticipated) under their applicable organic certification program and I will not disclosed to third parties (with the exception of the Secretary or the State organic program's governing official or their authorized representatives) any business related information concerning any client obtained while implementing the regulations in this part, except as provided in the NOP regulation # 205.504(b)(5), a copy of which has been provided to me, and I have read and understand.

I further agree that I will be asked to sign this or a similar form on an annual basis as long as I am working with Global Culture in their organic certification program.

**(b) (6)**

3/1/2017

\_\_\_\_\_  
Name

\_\_\_\_\_  
Date:

*Linda Van Hook*

3/3/17

\_\_\_\_\_  
Linda Van Hook, Executive Director

\_\_\_\_\_  
Date:

**GLOBAL CULTURE**  
315 Meigs Road, Ste A404  
Santa Barbara, CA 93109  
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I Kathy Horgan agree to maintain strict  
Print Name Legibly  
confidentiality with respect to Global Culture clients (future, current, past, confirmed or anticipated) under their applicable organic certification program and I will not disclosed to third parties (with the exception of the Secretary or the State organic program's governing official or their authorized representatives) any business related information concerning any client obtained while implementing the regulations in this part, except as provided in the NOP regulation # 205.504(b)(5), a copy of which has been provided to me, and I have read and understand.

I further agree that I will be asked to sign this or a similar form on an annual basis as long as I am working with Global Culture in their organic certification program.

(b) (6) 3/16/17  
Date:

(b) (6) 3.17.17  
Date:  
Linda Van Hook, Executive Director

**GLOBAL CULTURE**  
315 Meigs Road, Ste A404  
Santa Barbara, CA 93109  
Tel (707) 464-6913 ♦ Fax (888) 493-7818

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**ATTENTION:** This form is required to be signed by all employees, subcontractors, directors, personnel of Global Culture prior to employment or commencement of any aspect of Global Culture's organic services.

I LINDA VAN HOOK agree to maintain strict  
Print Name Legibly  
confidentiality with respect to Global Culture clients (future, current, past, confirmed or anticipated) under their applicable organic certification program and I will not disclosed to third parties (with the exception of the Secretary or the State organic program's governing official or their authorized representatives) any business related information concerning any client obtained while implementing the regulations in this part, except as provided in the NOP regulation # 205.504(b)(5), a copy of which has been provided to me, and I have read and understand.

I further agree that I will be asked to sign this or a similar form on an annual basis as long as I am working with Global Culture in their organic certification program.

**(b) (6)**

Name

**(b) (6)**

3.1.7

Date:

3/1/17

Chris Van Hook, Legal Consultant

Date:

**GLOBAL CULTURE**  
315 Meigs Road, Ste A404  
Santa Barbara, CA 93109  
Tel (707) 464-6913 ♦ Fax (888) 493-7818

**GLOBAL CULTURE POLICY FORM FOR MAINTAINING  
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**ATTENTION:** This form is required to be signed by all employees, subcontractors, directors, personnel of Global Culture prior to employment or commencement of any aspect of Global Culture's organic services.

I Matthew Molyneux agree to maintain strict  
Print Name Legibly

confidentiality with respect to Global Culture clients (future, current, past, confirmed or anticipated) under their applicable organic certification program and I will not disclosed to third parties (with the exception of the Secretary or the State organic program's governing official or their authorized representatives) any business related information concerning any client obtained while implementing the regulations in this part, except as provided in the NOP regulation # 205.504(b)(5), a copy of which has been provided to me, and I have read and understand.

I further agree that I will be asked to sign this or a similar form on an annual basis as long as I am working with Global Culture in their organic certification program.

(b) (6) \_\_\_\_\_ 3-1-17 \_\_\_\_\_  
Name Date:

*Linda Van Hook*

3/8/17

\_\_\_\_\_  
Linda Van Hook, Executive Director

\_\_\_\_\_  
Date:

**GLOBAL CULTURE**  
315 Meigs Road, Ste A404  
Santa Barbara, CA 93109  
Tel (707) 464-6913 ♦ Fax (888) 493-7818

**GLOBAL CULTURE POLICY FORM FOR MAINTAINING  
BUSINESS RELATED CONFIDENTIALITY**

**ATTENTION:** This form is required to be signed by all employees, subcontractors, directors, personnel of Global Culture prior to employment or commencement of any aspect of Global Culture's organic services.

I Sarah Coppini agree to maintain strict  
Print Name Legibly  
confidentiality with respect to Global Culture clients (future, current, past, confirmed or anticipated) under their applicable organic certification program and I will not disclosed to third parties (with the exception of the Secretary or the State organic program's governing official or their authorized representatives) any business related information concerning any client obtained while implementing the regulations in this part, except as provided in the NOP regulation # 205.504(b)(5), a copy of which has been provided to me, and I have read and understand.

I further agree that I will be asked to sign this or a similar form on an annual basis as long as I am working with Global Culture in their organic certification program.

(b) (6)

4-3-17  
Date:

(b) (6)

Linda Van Hook, Executive Director

4-7-17  
Date:

**GLOBAL CULTURE**  
Crescent City, California 95531  
Tel (707) 464-6913 ♦ Fax (888) 493-7818  
Mailing Address: 315 Meigs Rd., Ste A 404, Santa Barbara, CA 93109

**GLOBAL CULTURE POLICY FORM FOR MAINTAINING  
BUSINESS RELATED CONFIDENTIALITY**

**ATTENTION:** This form is required to be signed by all employees, subcontractors, directors, personnel of Global Culture prior to employment or commencement of any aspect of Global Culture's organic services.

I Truman Boren agree to maintain strict  
Print Name

confidentiality with respect to Global Culture clients (future, current, past, confirmed or anticipated) under their applicable organic certification program and I will not disclosed to third parties (with the exception of the Secretary or the State organic program's governing official or their authorized representatives) any business related information concerning any client obtained while implementing the regulations in this part, except as provided in the NOP regulation # 205.504(b)(5), a copy of which has been provided to me, and I have read and understand.

I further agree that I will be asked to sign this or a similar form on an annual basis as long as I am working for Global Culture in their organic certification program.

Signature: *Truman Boren*

Date: 3/28/16

**(b) (6)**  
Linda Van Hook, Executive Director

3.29.16  
Date

**From:** [Global Culture - Linda Van Hook](#)  
**To:** [AMS - NOPAppeals](#)  
**Cc:** [Lopez, JasonJ - AMS](#)  
**Subject:** GLO Annual Report 4-14-17, Exhibit G, H  
**Date:** Thursday, March 8, 2018 3:54:04 AM  
**Attachments:** [GLO - Client DB Form \(4-1-17\).xlsx.xls](#)  
(b) (4) [-Pesticide Residue Test 7-25-16.pdf](#)  
(b) (4) [-Sample Receipt 7-25-16.pdf](#)  
(b) (4) [-Sample Receipt 7-26-16.pdf](#)  
(b) (4) [- Residue Test 7-26-16.pdf](#)  
(b) (4) [Pest Residue Test 4-6-16 ND.pdf](#)  
(b) (4) [sample receipt 4-6-16.ai](#)  
(b) (4) [- Pest Test Results 4-22-16 ND.pdf](#)  
(b) (4) [Receipt of Samples Taken 4-6-16.pdf](#)  
(b) (4) [lab sample doc 8-25-16.pdf](#)  
(b) (4) [pest test results 8-25-16.pdf](#)  
(b) (4) [sample receipt 8-25-16.pdf](#)  
(b) (4) [2017 Pesticide Residue Tests \(3\).docx](#)

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GLO Annual Report 4-14-17, Exhibits G and H are attached.

Linda Van Hook  
Global Culture  
315 Meigs Road, Ste. A-404  
Santa Barbara, CA 93109  
Tel (707) 464-6913, Fax (888) 493-7818  
[Linda@globalculture.us](mailto:Linda@globalculture.us)

2011 Database of Certified Operations - Located outside the U.S.

All information must be submitted in Excel format and in English. PDF submissions will not be accepted. Please provide the following information for all certified organic operations by close of business on January 2, 2011. Begin data entry on row 7 and use the format specified. Thank you.

| Scope |  | Certification Number | Crops | Livestock | Handling | W/M Crops | Grower Group | Grower Group Size | Last Name    | First Name | Operations Name                                             | Physical Address     | Post Office Address (PO Box) | City     | State/Province | Postal Code | Country | Telephone Number | Fax Number     | Email Address               | Products Produced   |
|-------|--|----------------------|-------|-----------|----------|-----------|--------------|-------------------|--------------|------------|-------------------------------------------------------------|----------------------|------------------------------|----------|----------------|-------------|---------|------------------|----------------|-----------------------------|---------------------|
|       |  | 882958               | Yes   | No        | Yes      | No        |              |                   | M. Le        | John       | SAKARE M. Le. O. par. M. Le. SAKARE PRODUCTIONS par. SAKARE | 879 G. case Road     | PO Box 88184                 | Montreal | Quebec         | H2L 4P2     | Canada  | (514) 555-5555   | (514) 555-5554 | h.m.l.l.@                   | in Feb 2012, in May |
|       |  | 1454545              | Yes   |           |          |           | Yes          | 25                | Doroth schuh | Jane       | Bourgeois-Bourgeois                                         | 106 av St. case 1921 |                              | Montreal | Quebec         | H3T 4R1     | Canada  | (514) 496-1111   | (514) 496-1111 | jan@bourgeois-bourgeois.com | in Feb 2012, in May |



| Effective Date | Crops       | Harvested | Handling | Wash | Inspected | Grade | 0 | Last Name  | First Name | Operator's Name                 | Physical Address                                    | Post Office Address (PO Box) | City          | State      | Zip Code       | Telephone Number | Ext Number     | Cell Number                      | Email Address                                                 | Products Produced/Handled | Acres |
|----------------|-------------|-----------|----------|------|-----------|-------|---|------------|------------|---------------------------------|-----------------------------------------------------|------------------------------|---------------|------------|----------------|------------------|----------------|----------------------------------|---------------------------------------------------------------|---------------------------|-------|
| 5/29/09        | No          | Yes       | No       | No   | No        | No    |   | Contamagna | Ernie      | Delta Package Co. Of Lodi, Inc. | 6071 East Kettleman Lane<br>5231 Tompkins Hill Road |                              | Lodi          | California | 95240          | (209) 334-1023   | (209) 334-7065 | lrodin@deltapackage.com          | Cherry Package, Cherries                                      | NA                        |       |
| 5/4/15         | Yes         | No        | No       | No   | No        | No    |   | (b) (4)    | Carrie     | Edgewood Jerseys                |                                                     | Lodi                         | California    | 95551      | (916) 414-1111 |                  |                |                                  | Pasture, Hay, Haylage, Silage                                 | 429.59                    |       |
| 5/1/04         | No          | No        | Yes      | No   | No        | No    |   | Frenstra   | Henrik     | Henrik Frenstra, Riverview Of   | 6162 County Road 100                                |                              | Orland        | California | 95963          | (530) 865-5254   | (530) 865-5254 | rdgren@riverview.com             | New Butters, Nuts, Produce                                    | NA                        |       |
| 6/3/06         | No          | No        | Yes      | No   | No        | No    |   | Nichols    | Chris      | Muddy Waters Coffee Company     | 4159 Central Ave.                                   |                              | McKinleyville | California | 95519          | (707) 268-1133   | (707) 268-1133 | chris@lloydland.com              | Roasted Coffee                                                | NA                        |       |
| 5/29/05        | Surrendered | Yes       | No       | No   | No        | No    |   | (b) (4)    | Zarer      | Flora Organics                  | 5015 Davis Prairie Road                             | P.O. Box 206                 | Arcata        | California | 95521          | (707) 830-3465   | (707) 840-9000 | (b) (6)                          | Nursery Stock, Vegetable, Fruit & Flowers                     | 8                         |       |
| 5/17/03        | Yes         | No        | No       | No   | No        | No    |   | Holinger   | Claudia    | Claudia's Organic Herbs         | 3195 15th Fruit Road                                | P.O. Box 233                 | Orleans       | California | 95556          | (530) 677-3711   |                | claudiaholinger@yahoo.com        | Astorian Fruit, Vegetables, Herbs, Flowers, wine &g           | NA                        |       |
| 6/15/14        | Surrendered | No        | Yes      | No   | No        | No    |   | (b) (6)    | Frank      | California Crown Nut Company    | 5614 E. Whitmore Ave.                               |                              | Englewood     | California | 95326          | (209) 854-4081   | (209) 854-4085 | (b) (6)                          | Almond Alzet                                                  | NA                        |       |
| 6/11/12        | Yes         | Yes       | No       | No   | No        | No    |   | Boldina    | Frank      | Boldina Dairy                   | 225 Sage Road                                       |                              | Ferndale      | California | 95536          | (707) 407-6900   | (707) 796-4597 |                                  | Pasture, Hay, Silage, Cattle (Dairy-Last 1/3) Cattle          | 406.39                    |       |
| 6/31/15        | Yes         | No        | No       | No   | No        | No    |   | Schick     | Steve      | Schick Dairy                    | 5399 Robinsonville Road                             |                              | Fortuna       | California | 95540          | (707) 495-5700   |                | max1614@gmail.com                | Pasture, Hay, Haylage, Silage                                 | 305.38                    |       |
| 6/27/11        | Surrendered | Yes       | No       | No   | No        | No    |   | (b) (4)    |            | Great Valley Poultry            | 19790 Jack Lane Road                                |                              | Manterca      | California | 95366          | (209) 598-4559   | (209) 598-4559 | (b) (6)                          | Chicken, Chicken Eggs                                         | NA                        |       |
| 6/4/05         | Surrendered | No        | Yes      | No   | No        | No    |   | (b) (6)    |            |                                 |                                                     |                              |               |            |                |                  |                |                                  |                                                               |                           |       |
| 6/15/04        | Surrendered | No        | Yes      | No   | No        | No    |   | (b) (4)    |            |                                 |                                                     |                              |               |            |                |                  |                |                                  |                                                               |                           |       |
| 6/9/14         | Yes         | No        | Yes      | No   | No        | No    |   | Starke     | Tim        | Starke Farms                    | 165 Matthews Road                                   | P.O. Box 1724                | Lalaperst     | California | 95453          | (707) 262-2929   |                | timfranch@hotmail.com            | Walnuts                                                       | 118                       |       |
| 6/10/13        | Surrendered | Yes       | No       | No   | No        | No    |   | (b) (4)    | Chen       | Pacific Cheese Company - Amar   | 21600 Cabot Blvd.                                   |                              | Hayward-TX    | California | 94545          | (916) 414-1111   | (916) 414-1111 |                                  | Cheese                                                        | NA                        |       |
| 6/27/14        | No          | No        | Yes      | No   | No        | No    |   | Karamoor   | Saeed      | Elba Beauty, LLC                | 1940 Union Street, Unit 26                          |                              | Oakland       | California | 94607          | (424) 872-8570   |                | saeed@elbabeauty.com             | Body Care Products                                            | NA                        |       |
| 7/12/11        | Surrendered | Yes       | No       | No   | No        | No    |   | (b) (4)    |            | Shira Orchards                  | 1543 Freedom Blvd.                                  |                              | Wickville     | California | 95776          | (916) 414-1111   | (916) 414-1111 |                                  | Amber, Peaches, Lemons                                        | 12.1                      |       |
| 5/27/05        | Surrendered | Yes       | No       | No   | No        | No    |   | (b) (4)    |            |                                 |                                                     |                              |               |            |                |                  |                |                                  |                                                               |                           |       |
| 5/23/07        | Yes         | No        | Yes      | No   | No        | No    |   | (b) (6)    | Larry      | Donk Poultry Farms, LLC         | 30636 East Carter Road                              |                              | Farmington    | California | 95230          | (209) 885-1000   | (209) 885-1001 | umar.ques@donkspoultry.ca        | Chicken Eggs                                                  | NA                        |       |
| 6/5/07         | Yes         | Yes       | No       | No   | No        | No    |   | Nicholson  | Larry      | Nicholson Dairy                 | 4771 Grizzly Bluff Road                             |                              | Ferndale      | California | 95536          | (707) 796-6559   | (707) 796-6537 | (b) (6)                          | Pasture, Hay, Haylage, Dairy Cattle, Dairy Milk               | 169                       |       |
| 6/27/09        | Yes         | No        | No       | No   | No        | No    |   | Kerrin     | Kerrin     | Kerrin Horst                    | 1341 Rose Avenue                                    |                              | Ferndale      | California | 95536          | (707) 796-9703   | (707) 845-1593 |                                  | Pasture, Hay, Haylage, Silage, Corn Silage                    | 248                       |       |
| 7/29/11        | Yes         | No        | No       | No   | No        | No    |   | Estes      | Patrick    | P & J Estes, Inc.               | 17400 N. Thuleberry                                 |                              | Lodi          | California | 95237          | (209) 471-5488   | (209) 370-4439 | patrickestes@jbbball.net         | Butterfat Spagh                                               | 11.5                      |       |
| 7/13/08        | Yes         | No        | No       | No   | No        | No    |   | (b) (4)    | Eric       | Marshall Ranch                  | 8039 Kennedy Road                                   |                              | Sebastopol    | California | 95472          | (707) 829-6635   | (707) 829-4477 | EMarshall664@aol.com             | Apples                                                        | 212                       |       |
| 7/19/13        | Yes         | No        | Yes      | No   | No        | No    |   | Degan      | Sean       | Sean Degan                      | 6281 Bryoles Road                                   |                              | Clare         | CA         | 95973          | (530) 624-7663   |                | degansean@pacnet.com             | Almonds                                                       | 19.5                      |       |
| 7/19/14        | Yes         | No        | Yes      | No   | No        | No    |   | (b) (4)    | Chris      | Valley View Orchards            | 338 Chibacco Road                                   | P.O. Box 218                 | Wickville     | CA         | 95777          | (831) 759-3970   |                | valleyview677@yahoo.com          | Apples                                                        | 34                        |       |
| 7/9/13         | Surrendered | Yes       | No       | No   | No        | No    |   | (b) (4)    | Victor     | Marino Farms                    | 3019 S. Quinary Road                                |                              | Denair        | CA         | 95316          | (209) 883-4146   | (209) 883-0215 | vmarino@bellaviva.com            | Nectarine, Peaches, Apricot, Cherry, Almonds                  | 17                        |       |
| 6/20/06        | Yes         | No        | No       | No   | No        | No    |   | Meyers     | Mike       | Meyers Farming                  | 100 Wilson Road                                     |                              | Sebastopol    | CA         | 95472          | (707) 829-1106   |                | sebgrowm@aol.net                 | Apples                                                        | 99                        |       |
| 7/15/08        | Yes         | No        | No       | No   | No        | No    |   | Nolan      | Nathan     | Nolan Feed & Grain Company      | 502 Broadway                                        |                              | Emuda         | CA         | 95501          | (707) 442-3741   | (707) 442-2764 | Nathan@nolanfeed.com             | Custom Dairy Feed                                             | NA                        |       |
| 6/28/06        | No          | Yes       | No       | No   | No        | No    |   | (b) (6)    |            | Val-Pra, Inc., Valley Fruit & P | 1601 E. Olympic Blvd., Ste. #P.O. Box 960004        |                              | Los Angeles   | CA         | 90013          | (213) 699-6340   | (213) 699-6340 | (b) (6)                          | Fruit, Vegetables                                             | NA                        |       |
| 6/27/13        | Surrendered | No        | Yes      | No   | No        | No    |   | (b) (6)    |            | Acacia Farming & Shading        | 5613 E. Whitmore Ave.                               | P.O. Box 69                  | Englewood     | CA         | 95326          | (209) 854-4081   | (209) 854-4085 | shipping@californiagrow.com      | Almond Handling, & Shading                                    | NA                        |       |
| 7/19/14        | Surrendered | No        | Yes      | No   | No        | No    |   | (b) (6)    |            |                                 |                                                     |                              |               |            |                |                  |                |                                  |                                                               |                           |       |
| 7/22/11        | No          | Yes       | No       | No   | No        | No    |   | Giam       | Doug       | Giam Egg Ranch LP               | 3100 Yalacata Road                                  |                              | Aptos         | CA         | 95003          | (831) 688-3895   | (831) 688-3214 | office@giamranch.com             | Chicken, Chicken Eggs                                         | NA                        |       |
| 7/24/10        | Yes         | No        | No       | No   | No        | No    |   | Dervio     | Stan       | Dervio Gardens                  | 655 Gold Ridge Road                                 |                              | Sebastopol    | CA         | 95472          | (707) 823-6659   | (707) 823-6659 | devdervio@aol.com                | Apples                                                        | 24.5                      |       |
| 7/25/10        | Yes         | No        | No       | No   | No        | No    |   | (b) (4)    |            |                                 |                                                     |                              |               |            |                |                  |                |                                  |                                                               |                           |       |
| 6/20/05        | No          | Yes       | No       | No   | No        | No    |   | Jenkins    | Richard    | Jenkins Poultry Farms           | 30639 East Carter Road                              |                              | Farmington    | CA         | 95238          | (209) 885-1000   | (209) 885-1001 | (b) (6)                          | Chicken, Chicken Eggs                                         | NA                        |       |
| 8/8/08         | Yes         | No        | Yes      | No   | No        | No    |   | Kahn       | Bob        | Cypress Hill Farm               | 5180 Loral Valley Loop Road                         |                              | Sonoma        | CA         | 95476          | (707) 996-1985   | (615) 435-9903 | bob.kahn@comcast.net             | Lavender, Olives, Olive Oil, Wine Grapes                      | 17                        |       |
| 7/24/07        | Surrendered | Yes       | No       | No   | No        | No    |   | (b) (4)    |            |                                 |                                                     |                              |               |            |                |                  |                |                                  |                                                               |                           |       |
| 7/27/09        | Yes         | No        | No       | No   | No        | No    |   | Walker     | Lee        | Walker Apples                   | 6814 Nolan Road, 6095 Anale P.O. Box 220            |                              | Graton        | CA         | 95444          | (707) 823-6310   | (707) 823-6310 | daywalker@walkerranch.net        | Apples                                                        | 23                        |       |
| 7/1/04         | Yes         | No        | No       | No   | No        | No    |   | Gebhart    | Greg       | Greg Gebhart                    |                                                     |                              | Orland        | CA         | 95963          | (530) 865-6600   |                |                                  | Fruit                                                         | 8.26                      |       |
| 7/25/13        | Yes         | No        | No       | No   | No        | No    |   | (b) (4)    |            |                                 |                                                     |                              |               |            |                |                  |                |                                  |                                                               |                           |       |
| 7/27/09        | Yes         | No        | No       | No   | No        | No    |   | Lima       | Mirreia    | Leo Pelicanos                   | 4119 Boner Road                                     | P.O. Box 576                 | Sebastopol    | CA         | 95473          | (707) 703-8608   |                | pelicanos_farms@hotmail.com      | Vegetable, Fruit                                              | 17                        |       |
| 8/5/09         | Yes         | No        | No       | No   | No        | No    |   | Venturi    | Larry      | Venturi Vineyards               | 2151 Tin Oak Place                                  |                              | Utah          | CA         | 95483          | (707) 462-2451   | (707) 462-8319 | lventuri@aol.net                 | Wine Grapes                                                   | 19.6                      |       |
| 8/5/06         | Yes         | No        | No       | No   | No        | No    |   | (b) (4)    |            |                                 |                                                     |                              |               |            |                |                  |                |                                  |                                                               |                           |       |
| 8/22/08        | Yes         | No        | Yes      | No   | No        | No    |   | Borzano    | (b) (6)    | Quality Packing & Shipping, db  | 6889 Navarro Road                                   |                              | Stockton      | CA         | 95215          | (209) 467-5620   | (209) 467-5662 | (b) (6)                          | Cherries, Olives, Olive Oil                                   | 101.5                     |       |
| 8/13/12        | Yes         | No        | No       | No   | No        | No    |   | Marshall   | Lee        | Marshall Brothers               | 8895 Martinelli Road                                |                              | Forestville   | CA         | 95348          | (707) 525-1017   | (707) 525-4463 | leemarshall@marshallvineyard.com | Apples                                                        | 70                        |       |
| 8/12/13        | Surrendered | No        | Yes      | No   | No        | No    |   | (b) (6)    |            | Marathon Cheese Corporation     | 304 East Street                                     |                              | Marathon      | WI         | 95498          | (614) 414-1111   | (614) 414-1111 | (b) (6)                          | Cheese - Cut, Shred, Packaging                                | NA                        |       |
| 8/15/15        | Yes         | Yes       | No       | No   | No        | No    |   | Jocuin     | Rochi      | Rochi Dairy                     | 3444 Coble Lane                                     |                              | Ferndale      | CA         | 95536          | (707) 499-5709   |                | 2121Bocuy@gmail.com              | Dairy Milk, Cattle (Dairy-Last 1/3), Cattle (Dairy - 8) acres | NA                        |       |
| 8/21/13        | No          | No        | Yes      | No   | No        | No    |   | (b) (4)    |            | Pacific Cheese Company, Inc., R | 8959 Double Diamond Parkway                         |                              | Reno          | NV         | 89531          | (775) 857-7263   | (775) 857-7263 | (b) (6)                          | Cheese - Cut, Shred, Packaging                                | NA                        |       |
| 9/17/09        | Yes         | No        | Yes      | No   | No        | No    |   | Sivert     | Mark       | B Florida Olive Oil Company     | 2625 Manches Center Road                            |                              | Fairfield     | CA         | 94534          | (707) 964-1579   | (707) 334-0116 | mark@fairfieldolive.com          | Olives, Olive Oil                                             | NA                        |       |



|     |                          |                                      |                                                                                         |
|-----|--------------------------|--------------------------------------|-----------------------------------------------------------------------------------------|
| Yes |                          |                                      |                                                                                         |
| No  | Alabama                  | Afghanistan                          | ABCERT AG                                                                               |
|     | Alaska                   | Albania                              | A Bee Organic                                                                           |
|     | Arizona                  | Algeria                              | Agricultural Services Certified Organic (ASCO)                                          |
|     | Arkansas                 | Andorra                              | Argencert S.R.L.                                                                        |
|     | California               | Angola                               | AUS-QUAL Pty. Ltd.                                                                      |
|     | Colorado                 | Antigua and Barbuda                  | Australian Certified Organic (ACO)                                                      |
|     | Connecticut              | Argentina                            | Austria Bio Garantie                                                                    |
|     | Delaware                 | Armenia                              | Baystate Organic Certifiers                                                             |
|     | District of Columbia     | Australia                            | BCS -- Oeko Garantie GmbH                                                               |
|     | Florida                  | Austria                              | Bio Latina                                                                              |
|     | Georgia                  | Azerbaijan                           | bio.inspecta                                                                            |
|     | Hawaii                   | Bahamas                              | BioAgriCert                                                                             |
|     | Idaho                    | Bahrain                              | Bio-Hellas                                                                              |
|     | Illinois                 | Bangladesh                           | BIOKONTROLL                                                                             |
|     | Indiana                  | Barbados                             | Bios s.r.l.                                                                             |
|     | Iowa                     | Belarus                              | Bolcert                                                                                 |
|     | Kansas                   | Belgium                              | CAAEE Certification Service                                                             |
|     | Kentucky                 | Belize                               | Canadian Seed Institute doing business as Centre for Systems Integration                |
|     | Louisiana                | Benin                                | CCOF Certification Services                                                             |
|     | Maine                    | Bhutan                               | CCOF Certification of Environmental Standards - GmbH (Ltd.)                             |
|     | Marshall Islands         | Bolivia                              | Certificadora Mexicana de Productos y Procesos Ecologicos S.C. (Certimex)               |
|     | Maryland                 | Bosnia—Herzegovina                   | Certified Organic, Inc.                                                                 |
|     | Massachusetts            | Botswana                             | CERTISYS sprl/bvba/GmbH                                                                 |
|     | Michigan                 | Brazil                               | Colorado Department of Agriculture                                                      |
|     | Minnesota                | British Virgin Islands               | Consell catala de la Produccio Agraria Ecologica (CCPAE)                                |
|     | Mississippi              | Brunei                               | Consorzio Per Il Controllo Dei Prodotti Biologici                                       |
|     | Missouri                 | Bulgaria                             | Control Union Certifications                                                            |
|     | Montana                  | Burkina Faso                         | Department of Plant Industry, Clemson                                                   |
|     | Nebraska                 | Burundi                              | DIO                                                                                     |
|     | Nevada                   | Cambodia                             | ECYSA: Entidad de Promocion Certification Y Servicios Agroalimentarios SA               |
|     | New Hampshire            | Cameroon                             | ECOCERT S.A.                                                                            |
|     | New Jersey               | Canada                               | Ecoglobe, LLC                                                                           |
|     | New Mexico               | Cape Verde                           | Eco-LOGICA                                                                              |
|     | New York                 | Central African Republic             | ETKO - Ecological Farming Controlling Organization                                      |
|     | North Carolina           | Chad                                 | Food Safety S.A.                                                                        |
|     | North Dakota             | Chile                                | Georgia Crop Improvement Association, Inc.                                              |
|     | Northern Mariana Islands | China                                | Global Culture                                                                          |
|     | Ohio                     | Colombia                             | Global Organic Alliance, Inc.                                                           |
|     | Oklahoma                 | Comoros                              | Global Organic Certification Services (Formerly Maharishi Vedic Organic Agriculture Ins |
|     | Oregon                   | Congo, Democratic Republic of the    | ICEA - Istituto per la Certificazione                                                   |
|     | Pennsylvania             | Congo, Republic of the (Brazzaville) | Idaho State Department of Agriculture                                                   |
|     | Puerto Rico              | Costa Rica                           | IMO - Institute for Marketecology - Switzerland                                         |
|     | Rhode Island             | Côte d'Ivoire (Ivory Coast)          | Indiana Certified Organic                                                               |
|     | South Carolina           | Croatia                              | Instituto Biodinamico (IBD)                                                             |
|     | South Dakota             | Cuba                                 | Instituto Mediterraneo Di Certificazione                                                |
|     | Tennessee                | Cyprus                               | International Certification Services, Inc.                                              |
|     | Texas                    | Czech Republic                       | Iowa Department of Agriculture                                                          |
|     | Utah                     | Denmark                              | Kentucky Department of Agriculture                                                      |
|     | Vermont                  | Djibouti                             | LACON GmbH                                                                              |
|     | Virgin Islands           | Dominica                             | LETIS S.A.                                                                              |
|     | Virginia                 | Dominican Republic                   | Louisiana Department of Agriculture and Forestry                                        |
|     | Washington               | East Timor (Indonesia)               | Marin Organic Certified Agriculture                                                     |
|     | West Virginia            | Ecuador                              | Maryland Department of Agriculture                                                      |

Wisconsin  
Wyoming

Egypt  
El Salvador  
Equatorial Guinea  
Eritrea  
Estonia  
Ethiopia  
Fiji  
Finland  
France  
Gabon  
Gambia  
Georgia, Republic of  
Germany  
Ghana  
Greece  
Greenland  
Grenada  
Guadeloupe  
Guatemala  
Guinea  
Guinea—Bissau  
Guyana  
Haiti  
Honduras  
Hong Kong  
Hungary  
Iceland  
India  
Indonesia  
Iran  
Iraq  
Ireland  
Israel  
Italy  
Jamaica  
Japan  
Jordan  
Kazakhstan  
Kenya  
Kiribati  
Korea, Democratic People's Republic of (North Korea)  
Korea, Republic of (South Korea)  
Kuwait  
Kyrgyzstan  
Laos  
Latvia  
Lebanon  
Lesotho  
Liberia  
Libya  
Liechtenstein  
Lithuania  
Luxembourg

Mayacert S.A.  
Midwest Organic Services Association, Inc  
Minnesota Crop Improvement Association  
Mississippi Department of Agriculture and Commerce  
MOFGA Certification Services  
Montana Department of Agriculture  
Monterey County Certified Organic  
NASAA Certified Organic  
Natural Food Certifiers  
Natures International Certification Services  
Nevada Department of Agriculture  
New Hampshire Department of Agriculture, Division of Regulatory Services  
New Jersey Department of Agriculture  
New Mexico Department of Agriculture  
NOFA New York, LLC  
Ohio Ecological Food and Farm Association  
OIA North America  
Oklahoma Department of Agriculture  
OneCert  
Oregon Department of Agriculture  
Oregon Tilth  
Organic Certifiers, Inc.  
Organic Crop Improvement Association  
Organic National and International Certifiers  
Organizacion Internacional Agropecuaria  
Pennsylvania Certified Organic  
Primuslabs.com  
ProCert  
Quality Assurance International  
Quality Certification Services  
Rhode Island Department of Environmental Management  
Scientific Certification Systems d/b/a NutriClean  
Stellar Certification Services, Inc.  
Suolo E Salute S.R.L  
Texas Department of Agriculture  
The Organic Food Chain Pty Ltd  
Utah Department of Agriculture  
Vermont Organic Farmers, LLC  
Washington State Department of Agriculture  
Yolo County Department of Agriculture

Macao (Macao)  
Macedonia  
Madagascar  
Malawi  
Malaysia  
Maldives  
Mali  
Malta  
Marshall Islands, Republic of the  
Mauritania  
Mauritius  
Mexico  
Micronesia, Federated States of  
Moldova  
Monaco (France)  
Mongolia  
Montenegro  
Morocco  
Mozambique  
Myanmar (Burma)  
Namibia  
Nauru  
Nepal  
Netherlands  
New Zealand  
Nicaragua  
Niger  
Nigeria  
Norway  
Oman  
Pakistan  
Palau  
Panama  
Papua New Guinea  
Paraguay  
Peru  
Philippines  
Poland  
Portugal  
Puerto Rico  
Qatar  
Romania  
Russia  
Rwanda  
Saint Kitts (St. Christopher and Nevis)  
Saint Lucia  
San Marino  
Sao Tome and Principe  
Saudi Arabia  
Senegal  
Serbia  
Seychelles  
Sierra Leone

Singapore  
Slovakia  
Slovenia  
Solomon Islands  
Somalia  
South Africa  
South Sudan  
Spain  
Sri Lanka  
Sudan  
Suriname  
Swaziland  
Sweden  
Switzerland  
Syria  
Taiwan  
Tajikistan  
Tanzania  
Thailand  
Togo  
Tonga  
Trinidad and Tobago  
Tunisia  
Turkey  
Turkmenistan  
Tuvalu  
Uganda  
Ukraine  
United Arab Emirates  
United Kingdom (Great Britain)  
United States of America (USA)  
Uruguay  
Uzbekistan  
Vanuatu  
Venezuela  
Vietnam  
Yemen  
Zambia  
Zimbabwe

# Analytical Report

August 8, 2016

**Client:**

Global Culture  
 315 Meigs Rd. Ste. A-404  
 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID: (b) (4)  
 7/25/16

EMA Sample No: 16080409-02

Date Received: 8/4/2016

Sample Matrix: Wine Grape

Analytical Method: FDA Import GC/MS/MS A - Cx

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

Comments:

R = Reported on another Screen  
 ND = None Detected at the Reporting Limit (RL)  
 Tolerance data taken from 40 CFR § 180 and/or MRLdatabase.com. Environmental Micro Analysis, Inc. makes no claims as to the accuracy of tolerance numbers.  
 Excess sample and extracts are stored for a minimum of 30 days from the date of analytical report. Special storage arrangements possible.  
 Results relate only to items tested.  
 Samples are analyzed as received.  
 Reports should not be reproduced, except in full, without written consent by Environmental Micro Analysis, Inc.  
 To see the scope of our ISO 17025 accreditation go to <http://emalab.com/ISO17025.pdf>

| Analyte                                    | Amount | RL ppm | Tolerance ppm |
|--------------------------------------------|--------|--------|---------------|
| Acephate                                   | ND     | 0.030  |               |
| Acetamiprid                                | ND     | 0.030  |               |
| Acrinathrin                                | ND     | 0.010  |               |
| Adilopropyl naphthalene, 2,6- (DIPN, 2,6-) | ND     | 0.010  |               |
| Alachlor                                   | ND     | 0.010  |               |
| Aldrin                                     | ND     | 0.010  |               |
| Allethrin                                  | ND     | 0.010  |               |
| Ametryn                                    | ND     | 0.010  |               |
| Aminocarb                                  | ND     | 0.010  |               |
| Atrazine                                   | ND     | 0.010  |               |
| Azinphos-methyl                            | ND     | 0.010  |               |
| Azoxystrobin                               | ND     | 0.010  |               |
| Benalaxyl                                  | ND     | 0.010  |               |
| Azoxystrobin                               | ND     | 0.010  |               |
| Bendiocarb                                 | ND     | 0.010  |               |
| Benfluralin                                | ND     | 0.010  |               |
| Benoxacor                                  | ND     | 0.010  |               |
| BHC-alpha (Benzene)                        | ND     | 0.010  |               |
| BHC-beta                                   | ND     | 0.010  |               |
| BHC-delta                                  | ND     | 0.010  |               |
| BHC-gamma (Lindane, gamma HCH)             | ND     | 0.010  |               |
| Bifenox                                    | ND     | 0.010  |               |
| Bifenthrin                                 | ND     | 0.010  |               |
| Bioresmethrin (resmethrin-trans)           | ND     | 0.010  |               |
| Biertanol I                                | ND     | 0.010  |               |
| Biertanol II                               | ND     | 0.010  |               |
| Boscalid                                   | ND     | 0.010  |               |
| Bromacil                                   | ND     | 0.030  |               |
| Bromophos-ethyl                            | ND     | 0.010  |               |
| Bromophos-methyl                           | ND     | 0.010  |               |
| Bromopropylate                             | ND     | 0.010  |               |
| Bupirimate                                 | ND     | 0.010  |               |
| Buprofezin (z-isomer)                      | ND     | 0.010  |               |
| Butachlor                                  | ND     | 0.010  |               |
| Butralin                                   | ND     | 0.010  |               |
| Butylate                                   | ND     | 0.030  |               |
| Cadusafos                                  | ND     | 0.010  |               |
| Captafol                                   | ND     | 0.010  |               |
| Captan                                     | ND     | 0.030  |               |
| Carbaryl                                   | ND     | 0.010  |               |
| Carbofuran                                 | ND     | 0.010  |               |
| Carbophenothion-ethyl                      | ND     | 0.010  |               |
| Carbophenothion-methyl (methyl Trithion)   | ND     | 0.010  |               |
| Carbosulfan                                | ND     | 0.030  |               |
| Carboxin                                   | ND     | 0.010  |               |
| Chlorbenzilate                             | ND     | 0.010  |               |
| Chlordane-alpha                            | ND     | 0.010  |               |
| Chlordane-oxy                              | ND     | 0.010  |               |
| Chlordane-trans (gamma)                    | ND     | 0.010  |               |
| Chlordimeform                              | ND     | 0.010  |               |
| Chlorfenapyr                               | ND     | 0.010  |               |
| Chlorfenvinphos                            | ND     | 0.010  |               |
| Chlorobenzilate                            | ND     | 0.010  |               |
| Chloroneb                                  | ND     | 0.010  |               |
| Chlorothalonil                             | ND     | 0.030  |               |
| Chlorpropham                               | ND     | 0.010  |               |
| Chlorpyrifos-ethyl                         | ND     | 0.010  |               |
| Chlorpyrifos-methyl                        | ND     | 0.010  |               |
| Chlothiophos                               | ND     | 0.010  |               |
| Clomazone                                  | ND     | 0.010  |               |
| Coumaphos                                  | ND     | 0.010  |               |
| Crotoxyphos                                | ND     | 0.010  |               |



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Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID: (b) (4)  
 7/25/16

EMA Sample No: 16080409-02

Date Received: 8/4/2016

Sample Matrix: Wine Grape

Analytical Method: FDA Import GC/MS/MS Cy - D

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

| Analyte                                  | Amount | RL ppm | Tolerance ppm |
|------------------------------------------|--------|--------|---------------|
| Cyanazine                                | ND     | 0.010  |               |
| Cyanofenphos                             | ND     | 0.010  |               |
| Cyanophos                                | ND     | 0.010  |               |
| Cycloate                                 | ND     | 0.030  |               |
| Cycluron                                 | ND     | 0.010  |               |
| Cyfluthrin (Total)                       | ND     | 0.010  |               |
| Cyhalothrin (lambda)                     | ND     | 0.010  |               |
| Cymiazole                                | ND     | 0.010  |               |
| Cypermethrin (Total)                     | ND     | 0.010  |               |
| Cyproconazole                            | ND     | 0.010  |               |
| Cyprodinil                               | ND     | 0.010  |               |
| DCPA (dacthal, Chlorthal-dimethyl)       | ND     | 0.010  |               |
| DDD-o,p'                                 | ND     | 0.030  |               |
| DDD-p,p'                                 | ND     | 0.010  |               |
| DDE-o,p'                                 | ND     | 0.010  |               |
| DDE-p,p'                                 | ND     | 0.010  |               |
| DDT-o,p'                                 | ND     | 0.010  |               |
| DDT-p,p'                                 | ND     | 0.030  |               |
| DEF (Tribufos)                           | ND     | 0.010  |               |
| Deltamethrin                             | ND     | 0.010  |               |
| Demeton-s-methyl                         | ND     | 0.030  |               |
| Desmedipham                              | ND     | 0.010  |               |
| Desmetyrn                                | ND     | 0.010  |               |
| Diallate I                               | ND     | 0.030  |               |
| Diallate II                              | ND     | 0.010  |               |
| Diazinon                                 | ND     | 0.010  |               |
| Diazinon-oxon (diazoxon)                 | ND     | 0.010  |               |
| Dichlofenthion                           | ND     | 0.010  |               |
| Dichlofluanid                            | ND     | 0.030  |               |
| Dichlorobenzonitrile, 2,6- (Dichlobenil) | ND     | 0.030  |               |
| Dichlorvos                               | ND     | 0.030  |               |
| Dichloran (Dichloran)                    | ND     | 0.030  |               |
| Dicofol-o,p'                             | ND     | 0.010  |               |
| Dicofol-p,p' (Kelthane)                  | ND     | 0.010  |               |
| Dicrototos (Dicrotophos)                 | ND     | 0.010  |               |
| Dieldrin                                 | ND     | 0.010  |               |
| Diehofencarb                             | ND     | 0.010  |               |
| Difenoconazole I                         | ND     | 0.010  |               |
| Difenoconazole II                        | ND     | 0.010  |               |
| Dimethachlor                             | ND     | 0.010  |               |
| Dimethoate                               | ND     | 0.010  |               |
| Dimethomorph I                           | ND     | 0.010  |               |
| Dimethomorph II                          | ND     | 0.010  |               |
| Diniconazole                             | ND     | 0.010  |               |
| Dinltramine                              | ND     | 0.030  |               |
| Dioxacarb                                | ND     | 0.030  |               |
| Dioxathion                               | ND     | 0.010  |               |
| Diphenamid                               | ND     | 0.010  |               |
| Diphenylamine                            | ND     | 0.010  |               |
| Dissulfoton                              | ND     | 0.010  |               |
| Disulfoton Sulfone                       | ND     | 0.010  |               |

Comments:

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# Analytical Report

August 8, 2016

**Client:**

**Global Culture**  
 315 Meigs Rd. Ste. A-404  
 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID: (b) (4)  
 7/25/16

EMA Sample No: 16080409-02

Date Received: 8/4/2016

Sample Matrix: Wine Grape

Analytical Method: FDA Import GC/MS/MS E - H

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

Comments:

| Analyte                             | Amount | RL<br>ppm | Tolerance<br>ppm |
|-------------------------------------|--------|-----------|------------------|
| Edifenphos                          | ND     | 0.010     |                  |
| Endosulfan I (alpha Isomer)         | ND     | 0.010     |                  |
| Endosulfan II (beta Isomer)         | ND     | 0.010     |                  |
| Endosulfan Sulfate                  | ND     | 0.010     |                  |
| Endrin                              | ND     | 0.010     |                  |
| Endrin Aldehyde                     | ND     | 0.030     |                  |
| EPN                                 | ND     | 0.010     |                  |
| Epoxiconazole                       | ND     | 0.010     |                  |
| Estenvalerate (Fenvalerate A-alpha) | ND     | 0.010     |                  |
| Etaconazole I                       | ND     | 0.010     |                  |
| Ethalfuralin (Sonalan)              | ND     | 0.010     |                  |
| Ethiofencarb                        | ND     | 0.010     |                  |
| Ethiolate                           | ND     | 0.030     |                  |
| Ethion                              | ND     | 0.010     |                  |
| Ethotumesate                        | ND     | 0.010     |                  |
| Ethoprophos (Ethoprop)              | ND     | 0.030     |                  |
| Ethoxyquin                          | ND     | 0.030     |                  |
| Etoxazole                           | ND     | 0.010     |                  |
| Etrinfos                            | ND     | 0.010     |                  |
| Famoxadone                          | ND     | 0.010     |                  |
| Famphur                             | ND     | 0.010     |                  |
| Fenamidone                          | ND     | 0.030     |                  |
| Fenamiphos (Phenamiphos)            | ND     | 0.010     |                  |
| Fenamiphos Sulfone                  | ND     | 0.010     |                  |
| Fenarimol                           | ND     | 0.010     |                  |
| Fenazaquin                          | ND     | 0.010     |                  |
| Fenbuconazole                       | ND     | 0.010     |                  |
| Fenfuram                            | ND     | 0.010     |                  |
| Fenhexamid                          | ND     | 0.010     |                  |
| Fenitrothion                        | ND     | 0.010     |                  |
| Fenobucarb                          | ND     | 0.010     |                  |
| Fenoxycarb                          | ND     | 0.010     |                  |
| Fenpropathrin                       | ND     | 0.010     |                  |
| Fenpropimorph                       | ND     | 0.010     |                  |
| Fensulfothion                       | ND     | 0.010     |                  |
| Fenthion                            | ND     | 0.010     |                  |
| Fenvalerate II                      | ND     | 0.010     |                  |
| Fipronil                            | ND     | 0.010     |                  |
| Flonicamid                          | ND     | 0.010     |                  |
| Fluchloralin                        | ND     | 0.010     |                  |
| Flucythrinate I                     | ND     | 0.010     |                  |
| Flucythrinate II                    | ND     | 0.010     |                  |
| Fludioxonil                         | ND     | 0.030     |                  |
| Fluopicolide                        | ND     | 0.010     |                  |
| Fluquinconazole                     | ND     | 0.010     |                  |
| Flurenol-butyl                      | ND     | 0.010     |                  |
| Fluridone                           | ND     | 0.010     |                  |
| Flusilazole                         | ND     | 0.010     |                  |
| Flutolanil                          | ND     | 0.010     |                  |
| Flutriafol                          | ND     | 0.010     |                  |
| Fluvalinate I                       | ND     | 0.010     |                  |
| Folpet                              | ND     | 0.010     |                  |
| Fonofos                             | ND     | 0.010     |                  |
| Fuberidazole                        | ND     | 0.030     |                  |
| Furalaxyl                           | ND     | 0.010     |                  |
| Heptaclor                           | ND     | 0.010     |                  |
| Heptachlor exo-epoxide (Isomer B)   | ND     | 0.010     |                  |
| Heptenophos                         | ND     | 0.010     |                  |
| Hexachlorobenzene                   | ND     | 0.030     |                  |
| Hexaconazole                        | ND     | 0.010     |                  |
| Hexythiazox                         | ND     | 0.030     |                  |

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# Analytical Report

August 8, 2016

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 315 Meigs Rd. Ste. A-404  
 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID: (b) (4)  
 7/25/16

EMA Sample No: 16080409-02

Date Received: 8/4/2016

Sample Matrix: Wine Grape

Analytical Method: FDA Import GC/MS/MS I - Pd

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

Comments:

| Analyte                            | Amount | RL<br>ppm | Tolerance<br>ppm |
|------------------------------------|--------|-----------|------------------|
| Imazali                            | ND     | 0.030     |                  |
| Indoxacarb                         | ND     | 0.010     |                  |
| Iprobenfos                         | ND     | 0.030     |                  |
| Iprodione                          | ND     | 0.030     |                  |
| Isocarbamid (Isocarbamide)         | ND     | 0.010     |                  |
| Isocarbophos                       | ND     | 0.010     |                  |
| Isodrin                            | ND     | 0.010     |                  |
| Isotefphos                         | ND     | 0.010     |                  |
| Isoprocarb                         | ND     | 0.010     |                  |
| Isopropalin                        | ND     | 0.010     |                  |
| Isoprotiofane                      | ND     | 0.030     |                  |
| Isoproturon                        | ND     | 0.030     |                  |
| Kresoxim-methyl                    | ND     | 0.010     |                  |
| Lenacil                            | ND     | 0.010     |                  |
| Leptophos                          | ND     | 0.010     |                  |
| Linuron                            | ND     | 0.010     |                  |
| Malaoxon (metabolite of Malathion) | ND     | 0.010     |                  |
| Malathion                          | ND     | 0.010     |                  |
| Mecarbam                           | ND     | 0.010     |                  |
| Mepanipyrim                        | ND     | 0.010     |                  |
| Mepronil                           | ND     | 0.010     |                  |
| Metalaxyl                          | ND     | 0.010     |                  |
| Metaldehyde                        | ND     | 0.030     |                  |
| Methidathion                       | ND     | 0.010     |                  |
| Methiocarb                         | ND     | 0.010     |                  |
| Methoprene                         | ND     | 0.030     |                  |
| Methoprotryne                      | ND     | 0.010     |                  |
| Methoxychlor, o,p'-                | ND     | 0.010     |                  |
| Methoxychlor, p,p'-                | ND     | 0.010     |                  |
| Metolachlor                        | ND     | 0.010     |                  |
| Metolcarb                          | ND     | 0.030     |                  |
| Metrafenone                        | ND     | 0.010     |                  |
| Metribuzin                         | ND     | 0.010     |                  |
| Mevinphos                          | ND     | 0.030     |                  |
| Mexacarbate                        | ND     | 0.010     |                  |
| MGK-264                            | ND     | 0.010     |                  |
| Mirex                              | ND     | 0.010     |                  |
| Molinate                           | ND     | 0.030     |                  |
| Monocrotophos                      | ND     | 0.030     |                  |
| Monolinuron                        | ND     | 0.010     |                  |
| Myclobutanil                       | ND     | 0.010     |                  |
| Naled                              | ND     | 0.030     |                  |
| Naphthaleneacetamide, 1-           | ND     | 0.010     |                  |
| Napropamide                        | ND     | 0.010     |                  |
| Nicotine                           | ND     | 0.030     |                  |
| Nitrofen                           | ND     | 0.010     |                  |
| Nitrothal-isopropyl                | ND     | 0.010     |                  |
| Nonachlor, cis-                    | ND     | 0.010     |                  |
| Nonachlor, Trans-                  | ND     | 0.010     |                  |
| Nuarimol                           | ND     | 0.010     |                  |
| Omethoate                          | ND     | 0.010     |                  |
| Oxadiazon                          | ND     | 0.010     |                  |
| Oxadixyl                           | ND     | 0.010     |                  |
| Oxyfluoren                         | ND     | 0.030     |                  |
| Paclobutrazole                     | ND     | 0.030     |                  |
| Paraoxon-ethyl                     | ND     | 0.010     |                  |
| Paraoxon-methyl                    | ND     | 0.010     |                  |
| Parathion-ethyl                    | ND     | 0.010     |                  |
| Parathion-methyl                   | ND     | 0.010     |                  |

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# Analytical Report

August 8, 2016

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 315 Meigs Rd. Ste. A-404  
 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID: (b) (4)  
 7/25/16

EMA Sample No: 16080409-02

Date Received: 8/4/2016

Sample Matrix: Wine Grape

Analytical Method: FDA Import GC/MS/MS Pe - So

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

Comments:

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| Analyte                      | Amount | RL ppm | Tolerance ppm |
|------------------------------|--------|--------|---------------|
| Penconazole                  | ND     | 0.010  |               |
| Pendimethalin (Penoxaline)   | ND     | 0.010  |               |
| Pentachloroaniline           | ND     | 0.010  |               |
| Pentachloroanisole           | ND     | 0.010  |               |
| Pentachlorobenzonitrile      | ND     | 0.010  |               |
| Pentachlorothioanisole       | ND     | 0.010  |               |
| Peopiconazole                | ND     | 0.010  |               |
| Permethrin I                 | ND     | 0.010  |               |
| Permethrin II (trans)        | ND     | 0.010  |               |
| Phenothrin I                 | ND     | 0.010  |               |
| Phenothrin II                | ND     | 0.010  |               |
| Phenthoate                   | ND     | 0.010  |               |
| Phenylphenol, 2-             | ND     | 0.010  |               |
| Phorate                      | ND     | 0.010  |               |
| Phorate sulfone              | ND     | 0.010  |               |
| Phorate sulfoxide            | ND     | 0.010  |               |
| Phosalone                    | ND     | 0.010  |               |
| Phosmet                      | ND     | 0.010  |               |
| Phosmet oxon                 | ND     | 0.030  |               |
| Phosphamidon I               | ND     | 0.010  |               |
| Phosphamidon II              | ND     | 0.010  |               |
| Piperonyl Butoxide           | ND     | 0.010  |               |
| Pirimicarb                   | ND     | 0.010  |               |
| Pirimiphos-ethyl             | ND     | 0.010  |               |
| Pirimiphos-methyl            | ND     | 0.010  |               |
| Prochloraz                   | ND     | 0.010  |               |
| Procymidone                  | ND     | 0.010  |               |
| Proflumetoxin                | ND     | 0.030  |               |
| Profenofos                   | ND     | 0.010  |               |
| Profluralin                  | ND     | 0.010  |               |
| Promecarb                    | ND     | 0.010  |               |
| Prometon                     | ND     | 0.010  |               |
| Prometryn                    | ND     | 0.010  |               |
| Pronamide (Propyzamide)      | ND     | 0.010  |               |
| Propachlor                   | ND     | 0.010  |               |
| Propanil                     | ND     | 0.010  |               |
| Propargite                   | ND     | 0.010  |               |
| Propetamphos                 | ND     | 0.010  |               |
| Propham                      | ND     | 0.030  |               |
| Propiconazole I              | ND     | 0.010  |               |
| Propiconazole II             | ND     | 0.010  |               |
| Propoxur                     | ND     | 0.010  |               |
| Pyracarbolid                 | ND     | 0.010  |               |
| Pyradostrobin                | ND     | 0.030  |               |
| Pyrazophos                   | ND     | 0.010  |               |
| Pyridaben                    | ND     | 0.010  |               |
| Pyridaphenthion              | ND     | 0.010  |               |
| Pyrifenox I                  | ND     | 0.010  |               |
| Pyrifenox II                 | ND     | 0.010  |               |
| Pyrimethanil                 | ND     | 0.010  |               |
| Pyriproxyfen                 | ND     | 0.010  |               |
| Quinalphos                   | ND     | 0.010  |               |
| Quinoxifen                   | ND     | 0.010  |               |
| Quintozene                   | ND     | 0.010  |               |
| Resmethrin -cis (cismethrin) | ND     | 0.010  |               |
| Ronnal (Fenchlorphos)        | ND     | 0.010  |               |
| Secbumeton                   | ND     | 0.010  |               |
| Simazine                     | ND     | 0.010  |               |
| Simetryn                     | ND     | 0.010  |               |

# Analytical Report

August 8, 2016

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Project No:

PO No:

Client Sample ID: (b) (4)  
 7/25/16

EMA Sample No: 16080409-02

Date Received: 8/4/2016

Sample Matrix: Wine Grape

Analytical Method: FDA Import GC/MS/MS Sp - Z

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

| Analyte                             | Amount | RL ppm | Tolerance ppm |
|-------------------------------------|--------|--------|---------------|
| Spirodiclofen                       | ND     | 0.030  |               |
| Spiromesifen                        | ND     | 0.030  |               |
| Spiroxamine I                       | ND     | 0.010  |               |
| Spiroxamine II                      | ND     | 0.010  |               |
| Sulfotep                            | ND     | 0.010  |               |
| Sulprofos                           | ND     | 0.030  |               |
| Tebuconazole                        | ND     | 0.010  |               |
| Tebufenpyrad                        | ND     | 0.010  |               |
| Tebupirimfos                        | ND     | 0.010  |               |
| Tebutam                             | ND     | 0.010  |               |
| Tebuthiuron                         | ND     | 0.010  |               |
| Tecnazene (TCNB)                    | ND     | 0.010  |               |
| Telluthrin, cis-                    | ND     | 0.010  |               |
| Terbacil                            | ND     | 0.010  |               |
| Terbufos                            | ND     | 0.010  |               |
| Terbumeton                          | ND     | 0.030  |               |
| Terbutylazine                       | ND     | 0.030  |               |
| Tetrachloraniline, 2,3,5,6-         | ND     | 0.010  |               |
| Tetrachlorvinphos, e-isomer         | ND     | 0.010  |               |
| Tetraconazole                       | ND     | 0.010  |               |
| Tetradifon                          | ND     | 0.010  |               |
| Tetrahydrophthalimide, cis-1,2,3,6- | ND     | 0.010  |               |
| Tetrahydrophthalimide, cis-Delta 4- | ND     | 0.030  |               |
| Tetramethrin I                      | ND     | 0.010  |               |
| Tetramethrin II                     | ND     | 0.010  |               |
| Thiabendazole                       | ND     | 0.030  |               |
| Thiamethoxam                        | ND     | 0.010  |               |
| Thionazin                           | ND     | 0.030  |               |
| Tolclofos-methyl                    | ND     | 0.010  |               |
| Tolyfluanid                         | ND     | 0.010  |               |
| Triadimefon                         | ND     | 0.010  |               |
| Triadimenol                         | ND     | 0.010  |               |
| Triazophos                          | ND     | 0.010  |               |
| Tricyclazole                        | ND     | 0.030  |               |
| Trifloxystrobin                     | ND     | 0.010  |               |
| Triflunizole                        | ND     | 0.010  |               |
| Trifluralin                         | ND     | 0.010  |               |
| Trimethacarb, 2,3,5-                | ND     | 0.010  |               |
| Trimethacarb, 3,4,5-                | ND     | 0.010  |               |
| Trimidal (Nuarimol)                 | ND     | 0.010  |               |
| Triflconazole                       | ND     | 0.010  |               |
| Vernolate                           | ND     | 0.030  |               |
| Vinclozolin                         | ND     | 0.010  |               |

Comments:

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August 8, 2016

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Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID: (b) (4)  
 7/25/16

EMA Sample No: 16080409-02

Date Received: 8/4/2016

Sample Matrix: Wine Grape

Analytical Method: FDA Import LC/MS/MS A-C

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

Comments:

R = Reported on another Screen  
 ND = None Detected at the Reporting Limit (RL)  
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| Analyte                 | Amount | RL ppm | Tolerance ppm |
|-------------------------|--------|--------|---------------|
| 3-Hydroxycarbofuran     | ND     | 0.010  |               |
| Acephate                | ND     | 0.010  |               |
| Acetamiprid             | ND     | 0.010  |               |
| Acetochlor              | ND     | 0.010  |               |
| Acibenzolar-S-methyl    | ND     | 0.010  |               |
| Alanycarb               | ND     | 0.010  |               |
| Aldicarb-sulfone        | ND     | 0.010  |               |
| Aldicarb-sulfoxide      | ND     | 0.010  |               |
| Ametryn                 | ND     | 0.010  |               |
| Amicarbazone            | ND     | 0.010  |               |
| Aminocarb               | ND     | 0.010  |               |
| Aspon                   | ND     | 0.010  |               |
| Atrazine                | ND     | 0.010  |               |
| Avermectin Ba           | ND     | 0.010  |               |
| Azinphos-methyl         | ND     | 0.010  |               |
| Azoxystrobin            | ND     | 0.010  |               |
| Benalaxyl               | ND     | 0.010  |               |
| Bendiocarb              | ND     | 0.010  |               |
| Benturacarb             | ND     | 0.010  |               |
| Bensulfide              | ND     | 0.010  |               |
| Benzoximate             | ND     | 0.010  |               |
| Bifenazate              | ND     | 0.010  |               |
| Bitertanol              | ND     | 0.010  |               |
| Boscalid                | ND     | 0.010  |               |
| Bromuconazole (isomer ) | ND     | 0.010  |               |
| Bupirimate              | ND     | 0.010  |               |
| Buprofezin              | ND     | 0.010  |               |
| Butafenacil             | ND     | 0.010  |               |
| Bulocarbaxim            | ND     | 0.010  |               |
| Carbaryl                | ND     | 0.010  |               |
| Carbendazim             | ND     | 0.010  |               |
| Carbetamide             | ND     | 0.010  |               |
| Carbofuran              | ND     | 0.010  |               |
| Carbosulfan             | ND     | 0.010  |               |
| Carboxine               | ND     | 0.010  |               |
| Carfentrazone-ethyl     | ND     | 0.010  |               |
| Chlorantraniliprole     | ND     | 0.010  |               |
| Chlordimeton            | ND     | 0.010  |               |
| Chlorfenvinphos         | ND     | 0.010  |               |
| Chlorfluazuron          | ND     | 0.010  |               |
| Chloroxuron             | ND     | 0.010  |               |
| Chlorpyrifos            | ND     | 0.010  |               |
| Chlorpyrifos-methyl     | ND     | 0.010  |               |
| Chlortoluron            | ND     | 0.010  |               |
| Clethodim               | ND     | 0.010  |               |
| Clofentazine            | ND     | 0.010  |               |
| Clothianidin            | ND     | 0.010  |               |
| Coumaphos               | ND     | 0.010  |               |
| Cumyluron               | ND     | 0.010  |               |
| Cyanazine               | ND     | 0.010  |               |
| Cyazofamid              | ND     | 0.010  |               |
| Cydluron                | ND     | 0.010  |               |
| Cyflufenamid            | ND     | 0.010  |               |
| Cyhexatin               | ND     | 0.010  |               |
| Cymoxanil               | ND     | 0.010  |               |
| Cyproconazole (isomer ) | ND     | 0.010  |               |
| Cyprodinil              | ND     | 0.010  |               |
| Cyromazine              | ND     | 0.010  |               |

# Analytical Report

August 8, 2016

**Client:**

Global Culture  
 315 Meigs Rd. Ste. A-404  
 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID: (b) (4)  
 7/25/16

EMA Sample No: 16080409-02

Date Received: 8/4/2016

Sample Matrix: Wine Grape

Analytical Method: FDA Import LC/MS/MS D-F

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

Comments:

R = Reported on another Screen  
 ND = None Detected at the Reporting Limit (RL)  
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| Analyte                | Amount | RL ppm | Tolerance ppm |
|------------------------|--------|--------|---------------|
| Daimuron               | ND     | 0.010  |               |
| Diafenthiuron          | ND     | 0.010  |               |
| Diazinon               | ND     | 0.010  |               |
| Dichlorvos             | ND     | 0.010  |               |
| Didobutrazol           | ND     | 0.010  |               |
| Diccrophos             | ND     | 0.010  |               |
| Diethofencarb          | ND     | 0.010  |               |
| Difenoconazole         | ND     | 0.010  |               |
| Diffubenzuron          | ND     | 0.010  |               |
| Dimethanamide          | ND     | 0.010  |               |
| Dimethoate             | ND     | 0.010  |               |
| Dimethomorph           | ND     | 0.010  |               |
| Dimoxystrobin          | ND     | 0.010  |               |
| Diniconazole           | ND     | 0.010  |               |
| Dioxacarb              | ND     | 0.010  |               |
| Diuron                 | ND     | 0.010  |               |
| DMST                   | ND     | 0.010  |               |
| DNOC                   | ND     | 0.010  |               |
| Dodine                 | ND     | 0.010  |               |
| Doramectin             | ND     | 0.010  |               |
| Emamectin Ba           | ND     | 0.010  |               |
| Epoxiconazole          | ND     | 0.010  |               |
| Eprinomectin           | ND     | 0.010  |               |
| Esprocarb              | ND     | 0.010  |               |
| Ethidimuron            | ND     | 0.010  |               |
| Ethiofencarb           | ND     | 0.010  |               |
| Ethiofencarb-sulfoxide | ND     | 0.010  |               |
| Ethion                 | ND     | 0.010  |               |
| Ethiprole              | ND     | 0.010  |               |
| Ethirimol              | ND     | 0.010  |               |
| Ethofumesate           | ND     | 0.010  |               |
| Ethoprop               | ND     | 0.010  |               |
| Etobenzanid            | ND     | 0.010  |               |
| Etoazole               | ND     | 0.010  |               |
| Famoxadone             | ND     | 0.010  |               |
| Fenamidone             | ND     | 0.010  |               |
| Fenarimol              | ND     | 0.010  |               |
| Fenazaquin             | ND     | 0.010  |               |
| Fenbuconazole          | ND     | 0.010  |               |
| Fenbutatin Oxide       | ND     | 0.010  |               |
| Fenhexamid             | ND     | 0.010  |               |
| Fenobucarb             | ND     | 0.010  |               |
| Fenoxycarb             | ND     | 0.010  |               |
| Fenpropimorph          | ND     | 0.010  |               |
| Fenpyroximate          | ND     | 0.010  |               |
| Fenuron                | ND     | 0.010  |               |
| Fonicamid              | ND     | 0.010  |               |
| Fluazifop-butyl        | ND     | 0.010  |               |
| Flubendiamide          | ND     | 0.010  |               |
| Fludioxinil            | ND     | 0.010  |               |
| Flufenacet             | ND     | 0.010  |               |
| Flufenoxuron           | ND     | 0.010  |               |
| Fluometuron            | ND     | 0.010  |               |
| Flupicolide            | ND     | 0.010  |               |
| Fluoxastrobin          | ND     | 0.010  |               |
| Fluquinconazole        | ND     | 0.010  |               |
| Flusilazole            | ND     | 0.010  |               |
| Flutolanil             | ND     | 0.010  |               |
| Flutriafol             | ND     | 0.010  |               |
| Fomesafen              | ND     | 0.010  |               |
| Forchlorfenuron        | ND     | 0.010  |               |
| Formetanate            | ND     | 0.010  |               |
| Fuberidazole           | ND     | 0.010  |               |
| Furalaxyl              | ND     | 0.010  |               |

# Analytical Report

August 8, 2016

**Client:**

Global Culture  
 315 Meigs Rd. Ste. A-404  
 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID: (b) (4)  
 7/25/16

EMA Sample No: 16080409-02

Date Received: 8/4/2016

Sample Matrix: Wine Grape

Analytical Method: FDA Import LC/MS/MS H-O

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

Comments:

| Analyte            | Amount | RL<br>ppm | Tolerance<br>ppm |
|--------------------|--------|-----------|------------------|
| Halofenozide       | ND     | 0.010     |                  |
| Hexaflumuron       | ND     | 0.010     |                  |
| Hexazinone         | ND     | 0.010     |                  |
| Hexythiazox        | ND     | 0.010     |                  |
| Hydramethylnon     | ND     | 0.010     |                  |
| Imazaili           | ND     | 0.010     |                  |
| Imazapyr           | ND     | 0.010     |                  |
| Imazethapyr        | ND     | 0.010     |                  |
| Imibenconazole     | ND     | 0.010     |                  |
| Imidacloprid       | ND     | 0.010     |                  |
| Indoxacarb         | ND     | 0.010     |                  |
| Iproconazole       | ND     | 0.010     |                  |
| Iprovalicarb       | ND     | 0.010     |                  |
| Isocarbamid        | ND     | 0.010     |                  |
| Isotefphos         | ND     | 0.010     |                  |
| Isoprocarb         | ND     | 0.010     |                  |
| Isoprothiolane     | ND     | 0.010     |                  |
| Isoproturon        | ND     | 0.010     |                  |
| Ivermectin         | ND     | 0.010     |                  |
| Kresoxim-methyl    | ND     | 0.010     |                  |
| Lactofen           | ND     | 0.010     |                  |
| Linuron            | ND     | 0.010     |                  |
| Malathion          | ND     | 0.010     |                  |
| Mandipropamid      | ND     | 0.010     |                  |
| Metenacet          | ND     | 0.010     |                  |
| Mepanipyrim        | ND     | 0.010     |                  |
| Mepronil           | ND     | 0.010     |                  |
| Metaflumizone      | ND     | 0.010     |                  |
| Metaxyl            | ND     | 0.010     |                  |
| Metconazole        | ND     | 0.010     |                  |
| Methamidophos      | ND     | 0.010     |                  |
| Methfuroxam        | ND     | 0.010     |                  |
| Methidathion       | ND     | 0.010     |                  |
| Methiocarb         | ND     | 0.010     |                  |
| Methomyl           | ND     | 0.010     |                  |
| Methoprotryne      | ND     | 0.010     |                  |
| Methoxyfenozide    | ND     | 0.010     |                  |
| Metobromuron       | ND     | 0.010     |                  |
| Metolachlor        | ND     | 0.010     |                  |
| Metoxuron          | ND     | 0.010     |                  |
| Metrafenone        | ND     | 0.010     |                  |
| Metribuzin         | ND     | 0.010     |                  |
| Metsulfuron-methyl | ND     | 0.010     |                  |
| Mevinphos          | ND     | 0.010     |                  |
| Mexacarbate        | ND     | 0.010     |                  |
| Molinate           | ND     | 0.010     |                  |
| Monocrotophos      | ND     | 0.010     |                  |
| Monolinuron        | ND     | 0.010     |                  |
| Moxidectin         | ND     | 0.010     |                  |
| Myclobutanil       | ND     | 0.010     |                  |
| Napropamide        | ND     | 0.010     |                  |
| Neburon            | ND     | 0.010     |                  |
| Nitenpyram         | ND     | 0.010     |                  |
| Novaluron          | ND     | 0.010     |                  |
| Ormethoate         | ND     | 0.010     |                  |
| Oxaryl             | ND     | 0.010     |                  |
| Oxadixyl           | ND     | 0.010     |                  |

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# Analytical Report

August 8, 2016

**Client:**

**Global Culture**  
 315 Meigs Rd. Ste. A-404  
 Santa Barbara, CA 93109

Phone: (805) 464-6913  
 Fax: (888) 493-7818  
 Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID: (b) (4)  
 7/25/16

EMA Sample No: 16080409-02

Date Received: 8/4/2016

Sample Matrix: Wine Grape

Analytical Method: FDA Import LC/MS/MS P-Trid

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

Comments:

R = Reported on another Screen  
 ND = None Detected at the Reporting Limit (RL)  
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| Analyte                          | Amount | RL ppm | Tolerance ppm |
|----------------------------------|--------|--------|---------------|
| Pencycuron                       | ND     | 0.010  |               |
| Pendimethalin                    | ND     | 0.010  |               |
| Phorate                          | ND     | 0.010  |               |
| Phosmet                          | ND     | 0.010  |               |
| Phoxim                           | ND     | 0.010  |               |
| Picoxystrobin                    | ND     | 0.010  |               |
| Piperonyl butoxide               | ND     | 0.010  |               |
| Pirimicarb                       | ND     | 0.010  |               |
| Pirimiphos-methyl                | ND     | 0.010  |               |
| Prochloraz                       | ND     | 0.010  |               |
| Promecarb                        | ND     | 0.010  |               |
| Prometon                         | ND     | 0.010  |               |
| Prometryn                        | ND     | 0.010  |               |
| Propachlor                       | ND     | 0.010  |               |
| Propamocarb                      | ND     | 0.010  |               |
| Propargite                       | ND     | 0.010  |               |
| Propazine                        | ND     | 0.010  |               |
| Propham                          | ND     | 0.010  |               |
| Propiconazole                    | ND     | 0.010  |               |
| Propoxur                         | ND     | 0.010  |               |
| Propyzamide                      | ND     | 0.010  |               |
| Pymetrozin                       | ND     | 0.010  |               |
| Pyracarbolid                     | ND     | 0.010  |               |
| Pyraclostrobin                   | ND     | 0.010  |               |
| Pyridaben                        | ND     | 0.010  |               |
| Pyridaphenthion                  | ND     | 0.010  |               |
| Pyrimethanil                     | ND     | 0.010  |               |
| Pyriproxyfen                     | ND     | 0.010  |               |
| Quinoxifen                       | ND     | 0.010  |               |
| Sebuthylazine                    | ND     | 0.010  |               |
| Secbumeton                       | ND     | 0.010  |               |
| Sehoxydin                        | ND     | 0.010  |               |
| Siduron                          | ND     | 0.010  |               |
| Simazine                         | ND     | 0.010  |               |
| Simetryn                         | ND     | 0.010  |               |
| Spinetoram-J +L                  | ND     | 0.010  |               |
| Spinosad                         | ND     | 0.010  |               |
| Spirodiclofen                    | ND     | 0.010  |               |
| Spiromecifen                     | ND     | 0.010  |               |
| Spirotetramat                    | ND     | 0.010  |               |
| Spiroxamine                      | ND     | 0.010  |               |
| Sulfentrazone                    | ND     | 0.010  |               |
| Tebuconazole                     | ND     | 0.010  |               |
| Tebufenozide                     | ND     | 0.010  |               |
| Tebufenpyrad                     | ND     | 0.010  |               |
| Tebuthiuron                      | ND     | 0.010  |               |
| Temephos                         | ND     | 0.010  |               |
| Tepraloxymid                     | ND     | 0.010  |               |
| Terbumeton                       | ND     | 0.010  |               |
| Terbutryn                        | ND     | 0.010  |               |
| Tetraconazole                    | ND     | 0.010  |               |
| Thiabendazole                    | ND     | 0.010  |               |
| Thiacloprid                      | ND     | 0.010  |               |
| Thiamethoxam                     | ND     | 0.010  |               |
| Thidiazuron                      | ND     | 0.010  |               |
| Thiobencarb                      | ND     | 0.010  |               |
| Thiofanox                        | ND     | 0.010  |               |
| Thiophanate-methyl (Carbendazim) | ND     | 0.010  |               |
| Triadimefon                      | ND     | 0.010  |               |
| Triadimenol                      | ND     | 0.010  |               |
| Triazophos                       | ND     | 0.010  |               |
| Tricyclazole                     | ND     | 0.010  |               |
| Tridemorph                       | ND     | 0.010  |               |

## Analytical Report

August 8, 2016

**Client:**

Global Culture  
315 Meigs Rd. Ste. A-404  
Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

**Analyte**

Trifloxystrobin  
Triflumizole  
Triflumuron  
Triflusulfuron-methyl  
Triphenyl Phosphate  
Triticonazole  
Uniconazole  
Vamidothion  
Zoxamide

| <u>Amount</u> | <u>RL</u><br><u>ppm</u> | <u>Tolerance</u><br><u>ppm</u> |
|---------------|-------------------------|--------------------------------|
| ND            | 0.010                   |                                |

Project No:

PO No:

Client Sample ID: (b) (4)  
7/25/16

EMA Sample No: 16080409-02

Date Received: 8/4/2016

Sample Matrix: Wine Grape

Analytical Method: FDA Import LC/MS/MS Trif-Z

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

Comments:

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ND = None Detected at the Reporting Limit (RL)  
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GLOBAL CULTURE  
Crescent City, CA 95531  
(707) 464-6913 ♦ Fax (888) 493-7818  
info@globalculture.us

Mailing Address: 315 Meigs Road, Ste A 404, Santa Barbara, CA 93109

**Receipt of Samples Taken at the On-Site Inspection**

§ 205.403 (e) Documents to the inspected operation.

1). At the time of the inspection, the inspector shall provide the operation's authorized representative with a receipt for any samples taken by the inspector. There shall be no charge to the inspector for the samples taken.

2). A copy of the on-site inspection report and any test results will be sent to the inspected operation by the certifying agent.

|                                                                                           |                   |
|-------------------------------------------------------------------------------------------|-------------------|
| Name of Operation:                                                                        | (b) (4) (b) (4)   |
| Sample Date and time taken:                                                               | 7-25-16 12:30pm   |
| Location taken:                                                                           | (b) (4)           |
| Sample of what was taken:                                                                 | Petite Sirah      |
| Number of Samples Taken:                                                                  | 1                 |
| Sample Identifier:                                                                        | (b) (4)           |
| Container used for sample:                                                                | zip lock bag      |
| Environmental conditions where sample was taken<br>(indoors, outdoors, temperature, etc): | In vineyard - Hot |
| Any other Information:                                                                    |                   |

*[Handwritten Signature]*  
Inspector's Signature

7-25-16  
Date

(b) (4)  
Certified Operation's Representative

7-25-16  
Date



GLOBAL CULTURE  
Crescent City, CA 95531  
(707) 464-6913 ♦ Fax (888) 493-7818  
info@globalculture.us

Mailing Address: 315 Meigs Road, Ste A 404, Santa Barbara, CA 93109

**Receipt of Samples Taken at the On-Site Inspection**

§ 205.403 (e) Documents to the inspected operation.

- 1). At the time of the inspection, the inspector shall provide the operation's authorized representative with a receipt for any samples taken by the inspector. There shall be no charge to the inspector for the samples taken.
- 2). A copy of the on-site inspection report and any test results will be sent to the inspected operation by the certifying agent.

|                                                                                                         |
|---------------------------------------------------------------------------------------------------------|
| Name of Operation:<br><b>(b) (4)</b>                                                                    |
| Sample Date and time taken:<br>7-26-16 10 am                                                            |
| Location taken:<br><b>(b) (4)</b> <b>(b) (4)</b>                                                        |
| Sample of what was taken:<br>Lacinato Kale                                                              |
| Number of Samples Taken:<br>1                                                                           |
| Sample Identifier:<br><b>(b) (4)</b>                                                                    |
| Container used for sample:<br>zip lock bag                                                              |
| Environmental conditions were sample was taken<br>(indoors, outdoors, temperature, etc):<br>cool cloudy |
| Any other Information:                                                                                  |

*[Handwritten Signature]*  
Inspector's Signature

**(b) (4)**

7-26-16

Date

7-26-16

Date

# Analytical Report

August 8, 2016

**Client:**

Global Culture  
 315 Meigs Rd. Ste. A-404  
 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID: (b) (4)  
 772672016

EMA Sample No: 16080409-01

Date Received: 8/4/2016

Sample Matrix: Kale

Analytical Method: FDA Import GC/MS/MS A - Cx

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

| Analyte                                    | Amount | RL ppm | Tolerance ppm |
|--------------------------------------------|--------|--------|---------------|
| Acephate                                   | ND     | 0.030  |               |
| Acetamiprid                                | ND     | 0.030  |               |
| Acrinathrin                                | ND     | 0.010  |               |
| Adisopropyl naphthalene, 2,6- (DIPN, 2,6-) | ND     | 0.010  |               |
| Alachlor                                   | ND     | 0.010  |               |
| Aldrin                                     | ND     | 0.010  |               |
| Allethrin                                  | ND     | 0.010  |               |
| Ametryn                                    | ND     | 0.010  |               |
| Aminocarb                                  | ND     | 0.010  |               |
| Atrazine                                   | ND     | 0.010  |               |
| Azinphos-methyl                            | ND     | 0.010  |               |
| Azoxystrobin                               | ND     | 0.010  |               |
| Benalaxyl                                  | ND     | 0.010  |               |
| Azoxystrobin                               | ND     | 0.010  |               |
| Bendiocarb                                 | ND     | 0.010  |               |
| Benfluralin                                | ND     | 0.010  |               |
| Benoxacor                                  | ND     | 0.010  |               |
| BHC-alpha (Benzene)                        | ND     | 0.010  |               |
| BHC-beta                                   | ND     | 0.010  |               |
| BHC-delta                                  | ND     | 0.010  |               |
| BHC-gamma (Lindane, gamma HCH)             | ND     | 0.010  |               |
| BifenoX                                    | ND     | 0.010  |               |
| Bifenthrin                                 | ND     | 0.010  |               |
| Bioresmethrin (resmethrin-trans)           | ND     | 0.010  |               |
| Biertanol I                                | ND     | 0.010  |               |
| Biertanol II                               | ND     | 0.010  |               |
| Boscalid                                   | ND     | 0.010  |               |
| Bromacil                                   | ND     | 0.030  |               |
| Bromophos-ethyl                            | ND     | 0.010  |               |
| Bromophos-methyl                           | ND     | 0.010  |               |
| Bromopropylate                             | ND     | 0.010  |               |
| Bupirimate                                 | ND     | 0.010  |               |
| Buprofezin (z-isomer)                      | ND     | 0.010  |               |
| Butachlor                                  | ND     | 0.010  |               |
| Butralin                                   | ND     | 0.010  |               |
| Butylate                                   | ND     | 0.030  |               |
| Cadusafos                                  | ND     | 0.010  |               |
| Captafol                                   | ND     | 0.010  |               |
| Captan                                     | ND     | 0.030  |               |
| Carbaryl                                   | ND     | 0.010  |               |
| Carbofuran                                 | ND     | 0.010  |               |
| Carbophenothion-ethyl                      | ND     | 0.010  |               |
| Carbophenothion-methyl (methyl Trithion)   | ND     | 0.010  |               |
| Carbosulfan                                | ND     | 0.030  |               |
| Carboxin                                   | ND     | 0.010  |               |
| Chlorbenzilate                             | ND     | 0.010  |               |
| Chlordane-alpha                            | ND     | 0.010  |               |
| Chlordane-oxy                              | ND     | 0.010  |               |
| Chlordane-trans (gamma)                    | ND     | 0.010  |               |
| Chlordimeform                              | ND     | 0.010  |               |
| Chlorfenapyr                               | ND     | 0.010  |               |
| Chlorfenvinphos                            | ND     | 0.010  |               |
| Chlorobenzilate                            | ND     | 0.010  |               |
| Chloroneb                                  | ND     | 0.010  |               |
| Chlorothalonil                             | ND     | 0.030  |               |
| Chlorpropham                               | ND     | 0.010  |               |
| Chlorpyrifos-ethyl                         | ND     | 0.010  |               |
| Chlorpyrifos-methyl                        | ND     | 0.010  |               |
| Chlorthiophos                              | ND     | 0.010  |               |
| Clomazone                                  | ND     | 0.010  |               |
| Coumaphos                                  | ND     | 0.010  |               |
| Crotoxyphos                                | ND     | 0.010  |               |

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# Analytical Report

August 8, 2016

**Client:**

Global Culture  
 315 Meigs Rd. Ste. A-404  
 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID: (b) (4)  
 7/26/2016

EMA Sample No: 16080409-01

Date Received: 8/4/2016

Sample Matrix: Kale

Analytical Method: FDA Import GC/MS/MS Cy - D

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

| Analyte                                  | Amount | RL ppm | Tolerance ppm |
|------------------------------------------|--------|--------|---------------|
| Cyanazine                                | ND     | 0.010  |               |
| Cyanofenphos                             | ND     | 0.010  |               |
| Cyanophos                                | ND     | 0.010  |               |
| Cycloate                                 | ND     | 0.030  |               |
| Cycluron                                 | ND     | 0.010  |               |
| Cyfluthrin (Total)                       | ND     | 0.010  |               |
| Cyhalothrin (lambda)                     | ND     | 0.010  |               |
| Cymiazole                                | ND     | 0.010  |               |
| Cypermethrin (Total)                     | ND     | 0.010  |               |
| Cyproconazole                            | ND     | 0.010  |               |
| Cyprodinil                               | ND     | 0.010  |               |
| DCPA (dacthal, Chlorthal-dimethyl)       | ND     | 0.010  |               |
| DDD-o,p'                                 | ND     | 0.030  |               |
| DDD-p,p'                                 | ND     | 0.010  |               |
| DDE-o p'                                 | ND     | 0.010  |               |
| DDE-p p'                                 | ND     | 0.010  |               |
| DDT-o,p'                                 | ND     | 0.010  |               |
| DDT-p,p'                                 | ND     | 0.030  |               |
| DEF (Tribufos)                           | ND     | 0.010  |               |
| Detlamehrin                              | ND     | 0.010  |               |
| Demeton-s-methyl                         | ND     | 0.030  |               |
| Desmedipham                              | ND     | 0.010  |               |
| Desmetryn                                | ND     | 0.010  |               |
| Diallate I                               | ND     | 0.030  |               |
| Diallate II                              | ND     | 0.010  |               |
| Diazinon                                 | ND     | 0.010  |               |
| Diazinon-oxon (diazoxon)                 | ND     | 0.010  |               |
| Dichlofenthion                           | ND     | 0.010  |               |
| Dichlofluaniid                           | ND     | 0.030  |               |
| Dichlorobenzonitrile, 2,6- (Dichlobenil) | ND     | 0.030  |               |
| Dichlorvos                               | ND     | 0.030  |               |
| Dichloran (Dichloran)                    | ND     | 0.030  |               |
| Dicofol-o,p'                             | ND     | 0.010  |               |
| Dicofol-p,p' (Kelthane)                  | ND     | 0.010  |               |
| Dicrototos (Dicrotophos)                 | ND     | 0.010  |               |
| Dieldrin                                 | ND     | 0.010  |               |
| Diethofencarb                            | ND     | 0.010  |               |
| Difenoconazole I                         | ND     | 0.010  |               |
| Difenoconazole II                        | ND     | 0.010  |               |
| Dimethachlor                             | ND     | 0.010  |               |
| Dimethoate                               | ND     | 0.010  |               |
| Dimethomorph I                           | ND     | 0.010  |               |
| Dimethomorph II                          | ND     | 0.010  |               |
| Diniconazole                             | ND     | 0.010  |               |
| Dinitramine                              | ND     | 0.030  |               |
| Dioxacarb                                | ND     | 0.030  |               |
| Dioxathion                               | ND     | 0.010  |               |
| Diphenamid                               | ND     | 0.010  |               |
| Diphenylamine                            | ND     | 0.010  |               |
| Disulfoton                               | ND     | 0.010  |               |
| Disulfoton Sulfone                       | ND     | 0.010  |               |

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# Analytical Report

August 8, 2016

**Client:**

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 315 Meigs Rd. Ste. A-404  
 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID: (b) (4)  
 7/26/2016

EMA Sample No: 16080409-01

Date Received: 8/4/2016

Sample Matrix: Kale

Analytical Method: FDA Import GC/MS/MS E - H

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

**Comments:**

| Analyte                             | Amount | RL ppm | Tolerance ppm |
|-------------------------------------|--------|--------|---------------|
| Edifenphos                          | ND     | 0.010  |               |
| Endosulfan I (alpha Isomer)         | ND     | 0.010  |               |
| Endosulfan II (beta Isomer)         | ND     | 0.010  |               |
| Endosulfan Sulfate                  | ND     | 0.010  |               |
| Endrin                              | ND     | 0.010  |               |
| Endrin Aldehyde                     | ND     | 0.030  |               |
| EPN                                 | ND     | 0.010  |               |
| Epoxiconazole                       | ND     | 0.010  |               |
| Esfenvalerate (Fenvalerate A-alpha) | ND     | 0.010  |               |
| Etaconazole I                       | ND     | 0.010  |               |
| Ethalfuralin (Sonalan)              | ND     | 0.010  |               |
| Ethiofencarb                        | ND     | 0.010  |               |
| Ethiolate                           | ND     | 0.030  |               |
| Ethion                              | ND     | 0.010  |               |
| Ethofumesate                        | ND     | 0.010  |               |
| Ethoprophos (Ethoprop)              | ND     | 0.030  |               |
| Ethoxyquin                          | ND     | 0.030  |               |
| Ettoxazole                          | ND     | 0.010  |               |
| Etrimfos                            | ND     | 0.010  |               |
| Famoxadone                          | ND     | 0.010  |               |
| Famphur                             | ND     | 0.010  |               |
| Fenamidone                          | ND     | 0.030  |               |
| Fenamiphos (Phenamiphos)            | ND     | 0.010  |               |
| Fenamiphos Sulfone                  | ND     | 0.010  |               |
| Fenarimol                           | ND     | 0.010  |               |
| Fenazaquin                          | ND     | 0.010  |               |
| Fenbuconazole                       | ND     | 0.010  |               |
| Fenfuram                            | ND     | 0.010  |               |
| Fenhexamid                          | ND     | 0.010  |               |
| Fenitrothion                        | ND     | 0.010  |               |
| Fenobucarb                          | ND     | 0.010  |               |
| Fenoxycarb                          | ND     | 0.010  |               |
| Fenpropathrin                       | ND     | 0.010  |               |
| Fenpropimorph                       | ND     | 0.010  |               |
| Fensulfothion                       | ND     | 0.010  |               |
| Fenthion                            | ND     | 0.010  |               |
| Fenvalerate II                      | ND     | 0.010  |               |
| Fipronil                            | ND     | 0.010  |               |
| Flonicamid                          | ND     | 0.010  |               |
| Fluchloralin                        | ND     | 0.010  |               |
| Flucythrinate I                     | ND     | 0.010  |               |
| Flucythrinate II                    | ND     | 0.010  |               |
| Fludioxonil                         | ND     | 0.030  |               |
| Fluopicolide                        | ND     | 0.010  |               |
| Fluquiniconazole                    | ND     | 0.010  |               |
| Flurenol-butyl                      | ND     | 0.010  |               |
| Fluridone                           | ND     | 0.010  |               |
| Flusilazole                         | ND     | 0.010  |               |
| Flutolanil                          | ND     | 0.010  |               |
| Flutriafol                          | ND     | 0.010  |               |
| Fluvalinate I                       | ND     | 0.010  |               |
| Folpet                              | ND     | 0.010  |               |
| Fonofos                             | ND     | 0.010  |               |
| Fuberidazole                        | ND     | 0.030  |               |
| Furalaxyl                           | ND     | 0.010  |               |
| Heptaclor                           | ND     | 0.010  |               |
| Heptaclor exo-epoxide (Isomer B)    | ND     | 0.010  |               |
| Heptenophos                         | ND     | 0.010  |               |
| Hexachlorobenzene                   | ND     | 0.030  |               |
| Hexaconazole                        | ND     | 0.010  |               |
| Hexythiazox                         | ND     | 0.030  |               |

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August 8, 2016

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 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

**Project No:**

**PO No:**

Client Sample ID: (b) (4)  
 7/26/2016

EMA Sample No: 16080409-01

Date Received: 8/4/2016

Sample Matrix: Kale

Analytical Method: FDA Import GC/MS/MS I - Pd

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

**Comments:**

| Analyte                            | Amount | RL ppm | Tolerance ppm |
|------------------------------------|--------|--------|---------------|
| Imazalil                           | ND     | 0.030  |               |
| Indoxacarb                         | ND     | 0.010  |               |
| Iprobenfos                         | ND     | 0.030  |               |
| Iprodione                          | ND     | 0.030  |               |
| Isocarbamid (Isocarbamide)         | ND     | 0.010  |               |
| Isocarbophos                       | ND     | 0.010  |               |
| Isodrin                            | ND     | 0.010  |               |
| Isofenphos                         | ND     | 0.010  |               |
| Isoprocab                          | ND     | 0.010  |               |
| Isopropalin                        | ND     | 0.010  |               |
| Isoprothiolane                     | ND     | 0.030  |               |
| Isoproturon                        | ND     | 0.030  |               |
| Kresoxim-methyl                    | ND     | 0.010  |               |
| Lenacil                            | ND     | 0.010  |               |
| Leptophos                          | ND     | 0.010  |               |
| Linuron                            | ND     | 0.010  |               |
| Malaoxon (metabolite of Malathion) | ND     | 0.010  |               |
| Malathion                          | ND     | 0.010  |               |
| Mecarbam                           | ND     | 0.010  |               |
| Mepanipyrim                        | ND     | 0.010  |               |
| Mepronil                           | ND     | 0.010  |               |
| Metalaxyl                          | ND     | 0.010  |               |
| Metalddehyde                       | ND     | 0.030  |               |
| Methidathion                       | ND     | 0.010  |               |
| Methiocarb                         | ND     | 0.010  |               |
| Methoprene                         | ND     | 0.030  |               |
| Methoprotryne                      | ND     | 0.010  |               |
| Methoxychlor, o,p'-                | ND     | 0.010  |               |
| Methoxychlor, p,p'-                | ND     | 0.010  |               |
| Metolachlor                        | ND     | 0.010  |               |
| Metolcarb                          | ND     | 0.030  |               |
| Metrafenone                        | ND     | 0.010  |               |
| Metribuzin                         | ND     | 0.010  |               |
| Mevinphos                          | ND     | 0.030  |               |
| Mexacarbate                        | ND     | 0.010  |               |
| MGK-264                            | ND     | 0.010  |               |
| Mirex                              | ND     | 0.010  |               |
| Molinate                           | ND     | 0.030  |               |
| Monocrotophos                      | ND     | 0.030  |               |
| Monolinuron                        | ND     | 0.010  |               |
| Myclobutanil                       | ND     | 0.010  |               |
| Naled                              | ND     | 0.030  |               |
| Naphthaleneacetamide, 1-           | ND     | 0.010  |               |
| Napropamide                        | ND     | 0.010  |               |
| Nicotine                           | ND     | 0.030  |               |
| Nitrofen                           | ND     | 0.010  |               |
| Nitrothal-isopropyl                | ND     | 0.010  |               |
| Nonachlor, cis-                    | ND     | 0.010  |               |
| Nonachlor, Trans-                  | ND     | 0.010  |               |
| Nuarimol                           | ND     | 0.010  |               |
| Omethoate                          | ND     | 0.010  |               |
| Oxadiazon                          | ND     | 0.010  |               |
| Oxadixyl                           | ND     | 0.010  |               |
| Oxyflurofen                        | ND     | 0.030  |               |
| Paclobutrazole                     | ND     | 0.030  |               |
| Paraoxon-ethyl                     | ND     | 0.010  |               |
| Paraoxon-methyl                    | ND     | 0.010  |               |
| Parathion-ethyl                    | ND     | 0.010  |               |
| Parathion-methyl                   | ND     | 0.010  |               |

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# Analytical Report

August 8, 2016

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Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

**Project No:**

**PO No:**

**Client Sample ID:** (b) (4)  
 7/26/2016

**EMA Sample No:** 16080409-01

**Date Received:** 8/4/2016

**Sample Matrix:** Kale

**Analytical Method:** FDA Import GC/MS/MS Pe - So

**Extraction Method:** FDA 302

**Date Extracted:** 8/5/2016

**Date Completed:** 8/5/2016

**Comments:**

| Analyte                      | Amount | RL ppm | Tolerance ppm |
|------------------------------|--------|--------|---------------|
| Penconazole                  | ND     | 0.010  |               |
| Pendimethalin (Penoxaline)   | ND     | 0.010  |               |
| Pentachloroaniline           | ND     | 0.010  |               |
| Pentachloroanisole           | ND     | 0.010  |               |
| Pentachlorobenzonitrile      | ND     | 0.010  |               |
| Pentachlorothioanisole       | ND     | 0.010  |               |
| Peopiconazole                | ND     | 0.010  |               |
| Permethrin I                 | ND     | 0.010  |               |
| Permethrin II (trans)        | ND     | 0.010  |               |
| Phenothrin I                 | ND     | 0.010  |               |
| Phenothrin II                | ND     | 0.010  |               |
| Phenthoate                   | ND     | 0.010  |               |
| Phenylphenol, 2-             | ND     | 0.010  |               |
| Phorate                      | ND     | 0.010  |               |
| Phorate sulfone              | ND     | 0.010  |               |
| Phorate sulfoxide            | ND     | 0.010  |               |
| Phosalone                    | ND     | 0.010  |               |
| Phosmet                      | ND     | 0.010  |               |
| Phosmet oxon                 | ND     | 0.030  |               |
| Phosphamidon I               | ND     | 0.010  |               |
| Phosphamidon II              | ND     | 0.010  |               |
| Piperonyl Butoxide           | ND     | 0.010  |               |
| Pirimicarb                   | ND     | 0.010  |               |
| Pirimiphos-ethyl             | ND     | 0.010  |               |
| Pirimiphos-methyl            | ND     | 0.010  |               |
| Prochloraz                   | ND     | 0.010  |               |
| Procymidone                  | ND     | 0.010  |               |
| Prodiamine                   | ND     | 0.030  |               |
| Profenofos                   | ND     | 0.010  |               |
| Profluralin                  | ND     | 0.010  |               |
| Promecarb                    | ND     | 0.010  |               |
| Prometon                     | ND     | 0.010  |               |
| Prometryn                    | ND     | 0.010  |               |
| Pronamide (Propyzamide)      | ND     | 0.010  |               |
| Propachlor                   | ND     | 0.010  |               |
| Propanil                     | ND     | 0.010  |               |
| Propargite                   | ND     | 0.010  |               |
| Propetamphos                 | ND     | 0.010  |               |
| Propham                      | ND     | 0.030  |               |
| Propiconazole I              | ND     | 0.010  |               |
| Propiconazole II             | ND     | 0.010  |               |
| Propoxur                     | ND     | 0.010  |               |
| Pyracarbolid                 | ND     | 0.010  |               |
| Pyraclostrobin               | ND     | 0.030  |               |
| Pyrazophos                   | ND     | 0.010  |               |
| Pyridaben                    | ND     | 0.010  |               |
| Pyridaphenthion              | ND     | 0.010  |               |
| Pyrifenox I                  | ND     | 0.010  |               |
| Pyrifenox II                 | ND     | 0.010  |               |
| Pyrimethanil                 | ND     | 0.010  |               |
| Pyriproxyfen                 | ND     | 0.010  |               |
| Quinalphos                   | ND     | 0.010  |               |
| Quinoxifen                   | ND     | 0.010  |               |
| Quintozene                   | ND     | 0.010  |               |
| Resmethrin -cis (cismethrin) | ND     | 0.010  |               |
| Ronnel (Fenchlorphos)        | ND     | 0.010  |               |
| Secbumeton                   | ND     | 0.010  |               |
| Simazine                     | ND     | 0.010  |               |
| Simetryn                     | ND     | 0.010  |               |

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## Analytical Report

August 8, 2016

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Project No:

PO No:

Client Sample ID: (b) (4)  
 7/26/2016

EMA Sample No: 16080409-01

Date Received: 8/4/2016

Sample Matrix: Kale

Analytical Method: FDA Import GC/MS/MS Sp - Z

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

| Analyte                             | Amount | RL ppm | Tolerance ppm |
|-------------------------------------|--------|--------|---------------|
| Spirodiclofen                       | ND     | 0.030  |               |
| Spiromesifen                        | ND     | 0.030  |               |
| Spiroxamine I                       | ND     | 0.010  |               |
| Spiroxamine II                      | ND     | 0.010  |               |
| Sulfotep                            | ND     | 0.010  |               |
| Sulprofos                           | ND     | 0.030  |               |
| Tebuconazole                        | ND     | 0.010  |               |
| Tebufenpyrad                        | ND     | 0.010  |               |
| Tebupirimfos                        | ND     | 0.010  |               |
| Tebutam                             | ND     | 0.010  |               |
| Tebuthiuron                         | ND     | 0.010  |               |
| Tecnazene (TCNB)                    | ND     | 0.010  |               |
| Tefluthrin, cis-                    | ND     | 0.010  |               |
| Terbacil                            | ND     | 0.010  |               |
| Terbufos                            | ND     | 0.010  |               |
| Terbumeton                          | ND     | 0.030  |               |
| Terbutylazine                       | ND     | 0.030  |               |
| Tetrachloraniline, 2,3,5,6-         | ND     | 0.010  |               |
| Tetrachlorvinphos, e-isomer         | ND     | 0.010  |               |
| Tetraconazole                       | ND     | 0.010  |               |
| Tetradifon                          | ND     | 0.010  |               |
| Tetrahydrophthalimide, cis-1,2,3,6- | ND     | 0.010  |               |
| Tetrahydrophthalimide, cis-Delta 4- | ND     | 0.030  |               |
| Tetramethrin I                      | ND     | 0.010  |               |
| Tetramethrin II                     | ND     | 0.010  |               |
| Thiabendazole                       | ND     | 0.030  |               |
| Thiamethoxam                        | ND     | 0.010  |               |
| Thionazin                           | ND     | 0.030  |               |
| Tolclofos-methyl                    | ND     | 0.010  |               |
| Tolyfluanid                         | ND     | 0.010  |               |
| Triadimefon                         | ND     | 0.010  |               |
| Triadimenol                         | ND     | 0.010  |               |
| Triazophos                          | ND     | 0.010  |               |
| Tricyclazole                        | ND     | 0.030  |               |
| Trifloxystrobin                     | ND     | 0.010  |               |
| Triflunizole                        | ND     | 0.010  |               |
| Trifluralin                         | ND     | 0.010  |               |
| Trimethacarb, 2,3,5-                | ND     | 0.010  |               |
| Trimethacarb, 3,4,5-                | ND     | 0.010  |               |
| Trimidal (Nuarimol)                 | ND     | 0.010  |               |
| Triticonazole                       | ND     | 0.010  |               |
| Vernolate                           | ND     | 0.030  |               |
| Vinclozolin                         | ND     | 0.010  |               |

Comments:

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Project No:

PO No:

Client Sample ID: (b) (4)  
 7/26/2016

EMA Sample No: 16080409-01

Date Received: 8/4/2016

Sample Matrix: Kale

Analytical Method: FDA Import LC/MS/MS A-C

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

**Comments:**

| Analyte                 | Amount | RL ppm | Tolerance ppm |
|-------------------------|--------|--------|---------------|
| 3-Hydroxycarbofuran     | ND     | 0.010  |               |
| Acephate                | ND     | 0.010  |               |
| Acetamidiprid           | ND     | 0.010  |               |
| Acetochlor              | ND     | 0.010  |               |
| Acibenzolar-S-methyl    | ND     | 0.010  |               |
| Alanycarb               | ND     | 0.010  |               |
| Aldicarb-sulfone        | ND     | 0.010  |               |
| Aldicarb-sulfoxide      | ND     | 0.010  |               |
| Ametryn                 | ND     | 0.010  |               |
| Amicarbazone            | ND     | 0.010  |               |
| Aminocarb               | ND     | 0.010  |               |
| Aspon                   | ND     | 0.010  |               |
| Atrazine                | ND     | 0.010  |               |
| Avermectin Ba           | ND     | 0.010  |               |
| Azinphos-methyl         | ND     | 0.010  |               |
| Azoxystrobin            | ND     | 0.010  |               |
| Benalaxyl               | ND     | 0.010  |               |
| Bendiocarb              | ND     | 0.010  |               |
| Benfuracarb             | ND     | 0.010  |               |
| Bensulide               | ND     | 0.010  |               |
| Benzoximate             | ND     | 0.010  |               |
| Bifenazate              | ND     | 0.010  |               |
| Bitertanol              | ND     | 0.010  |               |
| Boscalid                | ND     | 0.010  |               |
| Bromuconazole (isomer ) | ND     | 0.010  |               |
| Bupirimate              | ND     | 0.010  |               |
| Buprofezin              | ND     | 0.010  |               |
| Butafenacil             | ND     | 0.010  |               |
| Butocarboxim            | ND     | 0.010  |               |
| Carbaryl                | ND     | 0.010  |               |
| Carbendazim             | ND     | 0.010  |               |
| Carbetamide             | ND     | 0.010  |               |
| Carbofuran              | ND     | 0.010  |               |
| Carbosulfan             | ND     | 0.010  |               |
| Carboxine               | ND     | 0.010  |               |
| Carfentrazone-ethyl     | ND     | 0.010  |               |
| Chlorantraniliprole     | ND     | 0.010  |               |
| Chlordimeform           | ND     | 0.010  |               |
| Chlorfenvinphos         | ND     | 0.010  |               |
| Chlorfluazuron          | ND     | 0.010  |               |
| Chloroxuron             | ND     | 0.010  |               |
| Chlorpyrifos            | ND     | 0.010  |               |
| Chlorpyrifos-methyl     | ND     | 0.010  |               |
| Chlortoluron            | ND     | 0.010  |               |
| Clethodim               | ND     | 0.010  |               |
| Clofentezine            | ND     | 0.010  |               |
| Clothianidin            | ND     | 0.010  |               |
| Coumaphos               | ND     | 0.010  |               |
| Cumyluron               | ND     | 0.010  |               |
| Cyanazine               | ND     | 0.010  |               |
| Cyazofamid              | ND     | 0.010  |               |
| Cycluron                | ND     | 0.010  |               |
| Cyflufenamid            | ND     | 0.010  |               |
| Cyhexatin               | ND     | 0.010  |               |
| Cymoxanil               | ND     | 0.010  |               |
| Cyproconazole (isomer ) | ND     | 0.010  |               |
| Cyprodinil              | ND     | 0.010  |               |
| Cyromazine              | ND     | 0.010  |               |

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# Analytical Report

August 8, 2016

**Client:**

Global Culture  
 315 Meigs Rd. Ste. A-404  
 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID: (b) (4)  
 7/26/2016

EMA Sample No: 16080409-01

Date Received: 8/4/2016

Sample Matrix: Kale

Analytical Method: FDA Import LC/MS/MS D-F

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

**Comments:**

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| Analyte                | Amount | RL ppm | Tolerance ppm |
|------------------------|--------|--------|---------------|
| Daimuron               | ND     | 0.010  |               |
| Diafenthiuron          | ND     | 0.010  |               |
| Diazinon               | ND     | 0.010  |               |
| Dichlorvos             | ND     | 0.010  |               |
| Diclobutrazol          | ND     | 0.010  |               |
| Dicrotophos            | ND     | 0.010  |               |
| Diethofencarb          | ND     | 0.010  |               |
| Difenoconazole         | ND     | 0.010  |               |
| Diflubenzuron          | ND     | 0.010  |               |
| Dimethenamide          | ND     | 0.010  |               |
| Dimethoate             | ND     | 0.010  |               |
| Dimethomorph           | ND     | 0.010  |               |
| Dimoxystrobin          | ND     | 0.010  |               |
| Diniconazole           | ND     | 0.010  |               |
| Dioxacarb              | ND     | 0.010  |               |
| Diuron                 | ND     | 0.010  |               |
| DMST                   | ND     | 0.010  |               |
| DNOC                   | ND     | 0.010  |               |
| Dodine                 | ND     | 0.010  |               |
| Doramectin             | ND     | 0.010  |               |
| Emamectin Ba           | ND     | 0.010  |               |
| Epoxiconazole          | ND     | 0.010  |               |
| Eprinomectin           | ND     | 0.010  |               |
| Esprocarb              | ND     | 0.010  |               |
| Ethidimuron            | ND     | 0.010  |               |
| Ethiofencarb           | ND     | 0.010  |               |
| Ethiofencarb-sulfoxide | ND     | 0.010  |               |
| Ethion                 | ND     | 0.010  |               |
| Ethiprole              | ND     | 0.010  |               |
| Ethirimol              | ND     | 0.010  |               |
| Ethofumesate           | ND     | 0.010  |               |
| Ethoprop               | ND     | 0.010  |               |
| Etobenzanid            | ND     | 0.010  |               |
| Ettoxazole             | ND     | 0.010  |               |
| Famoxadone             | ND     | 0.010  |               |
| Fenamidone             | ND     | 0.010  |               |
| Fenarimol              | ND     | 0.010  |               |
| Fenazaquin             | ND     | 0.010  |               |
| Fenbuconazole          | ND     | 0.010  |               |
| Fenbutatin Oxide       | ND     | 0.010  |               |
| Fenhexamid             | ND     | 0.010  |               |
| Fenobucarb             | ND     | 0.010  |               |
| Fenoxycarb             | ND     | 0.010  |               |
| Fenpropimorph          | ND     | 0.010  |               |
| Fenpyroximate          | ND     | 0.010  |               |
| Fenuron                | ND     | 0.010  |               |
| Flonicamid             | ND     | 0.010  |               |
| Fluazifop-butyl        | ND     | 0.010  |               |
| Flubendiamide          | ND     | 0.010  |               |
| Fludioxinil            | ND     | 0.010  |               |
| Flufenacet             | ND     | 0.010  |               |
| Flufenoxuron           | ND     | 0.010  |               |
| Fluometuron            | ND     | 0.010  |               |
| Fluopicolide           | ND     | 0.010  |               |
| Fluoxastrobin          | ND     | 0.010  |               |
| Fluquinconazole        | ND     | 0.010  |               |
| Flusilazole            | ND     | 0.010  |               |
| Flutolanil             | ND     | 0.010  |               |
| Flutriafol             | ND     | 0.010  |               |
| Fomesafen              | ND     | 0.010  |               |
| Forchlorfenuron        | ND     | 0.010  |               |
| Formetanate            | ND     | 0.010  |               |
| Fuberidazole           | ND     | 0.010  |               |
| Furalaxyl              | ND     | 0.010  |               |

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August 8, 2016

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Phone: (805) 464-6913

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Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID: (b) (4)  
 7/26/2016

EMA Sample No: 16080409-01

Date Received: 8/4/2016

Sample Matrix: Kale

Analytical Method: FDA Import LC/MS/MS H-O

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

| Analyte            | Amount | RL ppm | Tolerance ppm |
|--------------------|--------|--------|---------------|
| Halofenozide       | ND     | 0.010  |               |
| Hexaflumuron       | ND     | 0.010  |               |
| Hexazinone         | ND     | 0.010  |               |
| Hexythiazox        | ND     | 0.010  |               |
| Hydramethylnon     | ND     | 0.010  |               |
| Imazalil           | ND     | 0.010  |               |
| Imazapyr           | ND     | 0.010  |               |
| Imazethapyr        | ND     | 0.010  |               |
| Imibenconazole     | ND     | 0.010  |               |
| Imidacloprid       | ND     | 0.010  |               |
| Indoxacarb         | ND     | 0.010  |               |
| Ipconazole         | ND     | 0.010  |               |
| Iprovalicarb       | ND     | 0.010  |               |
| Isocarbamid        | ND     | 0.010  |               |
| Isofenphos         | ND     | 0.010  |               |
| Isoprocarb         | ND     | 0.010  |               |
| Isoprothiolane     | ND     | 0.010  |               |
| Isoproturon        | ND     | 0.010  |               |
| Ivermectin         | ND     | 0.010  |               |
| Kresoxim-methyl    | ND     | 0.010  |               |
| Lactofen           | ND     | 0.010  |               |
| Linuron            | ND     | 0.010  |               |
| Malathion          | ND     | 0.010  |               |
| Mandipropamid      | ND     | 0.010  |               |
| Mefenacet          | ND     | 0.010  |               |
| Mepanipyrim        | ND     | 0.010  |               |
| Mepronil           | ND     | 0.010  |               |
| Metaflumizone      | ND     | 0.010  |               |
| Metalaxyl          | ND     | 0.010  |               |
| Metconazole        | ND     | 0.010  |               |
| Methamidophos      | ND     | 0.010  |               |
| Methfuroxam        | ND     | 0.010  |               |
| Methidathion       | ND     | 0.010  |               |
| Methiocarb         | ND     | 0.010  |               |
| Methomyl           | ND     | 0.010  |               |
| Methoprotryne      | ND     | 0.010  |               |
| Methoxyfenozide    | ND     | 0.010  |               |
| Metobromuron       | ND     | 0.010  |               |
| Metolachlor        | ND     | 0.010  |               |
| Metoxuron          | ND     | 0.010  |               |
| Metrafenone        | ND     | 0.010  |               |
| Metribuzin         | ND     | 0.010  |               |
| Metsulfuron-methyl | ND     | 0.010  |               |
| Mevinphos          | ND     | 0.010  |               |
| Mexacarbate        | ND     | 0.010  |               |
| Molinate           | ND     | 0.010  |               |
| Monocrotophos      | ND     | 0.010  |               |
| Monolinuron        | ND     | 0.010  |               |
| Moxidectin         | ND     | 0.010  |               |
| Myclobutanil       | ND     | 0.010  |               |
| Napropamide        | ND     | 0.010  |               |
| Neburon            | ND     | 0.010  |               |
| Nitenpyram         | ND     | 0.010  |               |
| Novaluron          | ND     | 0.010  |               |
| Omethoate          | ND     | 0.010  |               |
| Oxamyl             | ND     | 0.010  |               |
| Oxadixyl           | ND     | 0.010  |               |

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August 8, 2016

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 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID: (b) (4)  
 7/26/2016

EMA Sample No: 16080409-01

Date Received: 8/4/2016

Sample Matrix: Kale

Analytical Method: FDA Import LC/MS/MS P-Trid

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

| Analyte                          | Amount | RL ppm | Tolerance ppm |
|----------------------------------|--------|--------|---------------|
| Pencycuron                       | ND     | 0.010  |               |
| Pendimethalin                    | ND     | 0.010  |               |
| Phorate                          | ND     | 0.010  |               |
| Phosmet                          | ND     | 0.010  |               |
| Phoxim                           | ND     | 0.010  |               |
| Picoxystrobin                    | ND     | 0.010  |               |
| Piperonyl butoxide               | ND     | 0.010  |               |
| Pirimicarb                       | ND     | 0.010  |               |
| Pirimiphos-methyl                | ND     | 0.010  |               |
| Prochloraz                       | ND     | 0.010  |               |
| Promecarb                        | ND     | 0.010  |               |
| Prometon                         | ND     | 0.010  |               |
| Prometryn                        | ND     | 0.010  |               |
| Propachlor                       | ND     | 0.010  |               |
| Propamocarb                      | ND     | 0.010  |               |
| Propargite                       | ND     | 0.010  |               |
| Propazine                        | ND     | 0.010  |               |
| Propham                          | ND     | 0.010  |               |
| Propiconazole                    | ND     | 0.010  |               |
| Propoxur                         | ND     | 0.010  |               |
| Propyzamide                      | ND     | 0.010  |               |
| Pymetrozin                       | ND     | 0.010  |               |
| Pyracarbolid                     | ND     | 0.010  |               |
| Pyraclostrobin                   | ND     | 0.010  |               |
| Pyridaben                        | ND     | 0.010  |               |
| Pyridaphenthion                  | ND     | 0.010  |               |
| Pyrimethanil                     | ND     | 0.010  |               |
| Pyriproxyfen                     | ND     | 0.010  |               |
| Quinoxifen                       | ND     | 0.010  |               |
| Sebuthylazine                    | ND     | 0.010  |               |
| Secbumeton                       | ND     | 0.010  |               |
| Sethoxydim                       | ND     | 0.010  |               |
| Siduron                          | ND     | 0.010  |               |
| Simazine                         | ND     | 0.010  |               |
| Simetryn                         | ND     | 0.010  |               |
| Spinetoram-J +L                  | ND     | 0.010  |               |
| Spinosad                         | ND     | 0.010  |               |
| Spirodiclofen                    | ND     | 0.010  |               |
| Spiromecifen                     | ND     | 0.010  |               |
| Spirotetramat                    | ND     | 0.010  |               |
| Spiroxamine                      | ND     | 0.010  |               |
| Sulfentrazone                    | ND     | 0.010  |               |
| Tebuconazole                     | ND     | 0.010  |               |
| Tebufenozide                     | ND     | 0.010  |               |
| Tebufenpyrad                     | ND     | 0.010  |               |
| Tebuthiuron                      | ND     | 0.010  |               |
| Temephos                         | ND     | 0.010  |               |
| Tepaloxymid                      | ND     | 0.010  |               |
| Terbumeton                       | ND     | 0.010  |               |
| Terbutryn                        | ND     | 0.010  |               |
| Tetraconazole                    | ND     | 0.010  |               |
| Thiabendazole                    | ND     | 0.010  |               |
| Thiacloprid                      | ND     | 0.010  |               |
| Thiamethoxam                     | ND     | 0.010  |               |
| Thidiazuron                      | ND     | 0.010  |               |
| Thiobencarb                      | ND     | 0.010  |               |
| Thiofanox                        | ND     | 0.010  |               |
| Thiophanate-methyl (Carbendazim) | ND     | 0.010  |               |
| Triadimefon                      | ND     | 0.010  |               |
| Triadimenol                      | ND     | 0.010  |               |
| Triazophos                       | ND     | 0.010  |               |
| Tricyclazole                     | ND     | 0.010  |               |
| Tridemorph                       | ND     | 0.010  |               |

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## Analytical Report

August 8, 2016

**Client:**

Global Culture  
315 Meigs Rd. Ste. A-404  
Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Analyte

Amount RL Tolerance  
ppm ppm

|                       |    |       |
|-----------------------|----|-------|
| Trifloxystrobin       | ND | 0.010 |
| Triflumizole          | ND | 0.010 |
| Triflumuron           | ND | 0.010 |
| Triflusulfuron-methyl | ND | 0.010 |
| Triphenyl Phosphate   | ND | 0.010 |
| Triticonazole         | ND | 0.010 |
| Vamidothion           | ND | 0.010 |
| Zoxamide              | ND | 0.010 |

Project No:

PO No:

Client Sample ID: (b) (4)  
7/26/2016

EMA Sample No: 16080409-01

Date Received: 8/4/2016

Sample Matrix: Kale

Analytical Method: FDA Import LC/MS/MS Trif-Z

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

Comments:

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# Analytical Report

August 8, 2016

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 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID: (b) (4)  
 7/25/16

EMA Sample No: 16080409-02

Date Received: 8/4/2016

Sample Matrix: Wine Grape

Analytical Method: FDA Import GC/MS/MS A - Cx

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

| Analyte                                    | Amount | RL ppm | Tolerance ppm |
|--------------------------------------------|--------|--------|---------------|
| Acephate                                   | ND     | 0.030  |               |
| Acetamiprid                                | ND     | 0.030  |               |
| Acrinathrin                                | ND     | 0.010  |               |
| Adisopropyl naphthalene, 2,6- (DIPN, 2,6-) | ND     | 0.010  |               |
| Alachlor                                   | ND     | 0.010  |               |
| Aldrin                                     | ND     | 0.010  |               |
| Allethrin                                  | ND     | 0.010  |               |
| Ametryn                                    | ND     | 0.010  |               |
| Aminocarb                                  | ND     | 0.010  |               |
| Atrazine                                   | ND     | 0.010  |               |
| Azinphos-methyl                            | ND     | 0.010  |               |
| Azoxystrobin                               | ND     | 0.010  |               |
| Benalaxyl                                  | ND     | 0.010  |               |
| Azoxystrobin                               | ND     | 0.010  |               |
| Bendiocarb                                 | ND     | 0.010  |               |
| Benfluralin                                | ND     | 0.010  |               |
| Benoxacor                                  | ND     | 0.010  |               |
| BHC-alpha (Benzene)                        | ND     | 0.010  |               |
| BHC-beta                                   | ND     | 0.010  |               |
| BHC-delta                                  | ND     | 0.010  |               |
| BHC-gamma (Lindane, gamma HCH)             | ND     | 0.010  |               |
| Bifenox                                    | ND     | 0.010  |               |
| Bifenthrin                                 | ND     | 0.010  |               |
| Bioresmethrin (resmethrin-trans)           | ND     | 0.010  |               |
| Biertanol I                                | ND     | 0.010  |               |
| Biertanol II                               | ND     | 0.010  |               |
| Boscalid                                   | ND     | 0.010  |               |
| Bromacil                                   | ND     | 0.030  |               |
| Bromophos-ethyl                            | ND     | 0.010  |               |
| Bromophos-methyl                           | ND     | 0.010  |               |
| Bromopropylate                             | ND     | 0.010  |               |
| Bupirimate                                 | ND     | 0.010  |               |
| Buprofezin (z-isomer)                      | ND     | 0.010  |               |
| Butachlor                                  | ND     | 0.010  |               |
| Butralin                                   | ND     | 0.010  |               |
| Butylate                                   | ND     | 0.030  |               |
| Cadusafos                                  | ND     | 0.010  |               |
| Captafol                                   | ND     | 0.010  |               |
| Captan                                     | ND     | 0.030  |               |
| Carbaryl                                   | ND     | 0.010  |               |
| Carbofuran                                 | ND     | 0.010  |               |
| Carbophenothion-ethyl                      | ND     | 0.010  |               |
| Carbophenothion-methyl (methyl Trithion)   | ND     | 0.010  |               |
| Carbosulfan                                | ND     | 0.030  |               |
| Carboxin                                   | ND     | 0.010  |               |
| Chlorbenzilate                             | ND     | 0.010  |               |
| Chlordane-alpha                            | ND     | 0.010  |               |
| Chlordane-oxy                              | ND     | 0.010  |               |
| Chlordane-trans (gamma)                    | ND     | 0.010  |               |
| Chlordimeform                              | ND     | 0.010  |               |
| Chlorfenapyr                               | ND     | 0.010  |               |
| Chlorfenvinphos                            | ND     | 0.010  |               |
| Chlorobenzilate                            | ND     | 0.010  |               |
| Chloroneb                                  | ND     | 0.010  |               |
| Chlorothalonil                             | ND     | 0.030  |               |
| Chlorpropham                               | ND     | 0.010  |               |
| Chlorpyrifos-ethyl                         | ND     | 0.010  |               |
| Chlorpyrifos-methyl                        | ND     | 0.010  |               |
| Chlorthiophos                              | ND     | 0.010  |               |
| Clomazone                                  | ND     | 0.010  |               |
| Coumaphos                                  | ND     | 0.010  |               |
| Crotoxyphos                                | ND     | 0.010  |               |

**Comments:**

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# Analytical Report

August 8, 2016

**Client:**

Global Culture  
 315 Meigs Rd. Ste. A-404  
 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID: (b) (4)  
 7/25/16

EMA Sample No: 16080409-02

Date Received: 8/4/2016

Sample Matrix: Wine Grape

Analytical Method: FDA Import GC/MS/MS Cy - D

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

| Analyte                                  | Amount | RL ppm | Tolerance ppm |
|------------------------------------------|--------|--------|---------------|
| Cyanazine                                | ND     | 0.010  |               |
| Cyanofenphos                             | ND     | 0.010  |               |
| Cyanophos                                | ND     | 0.010  |               |
| Cycloate                                 | ND     | 0.030  |               |
| Cycluron                                 | ND     | 0.010  |               |
| Cyfluthrin (Total)                       | ND     | 0.010  |               |
| Cyhalothrin (lambda)                     | ND     | 0.010  |               |
| Cymiazole                                | ND     | 0.010  |               |
| Cypermethrin (Total)                     | ND     | 0.010  |               |
| Cyproconazole                            | ND     | 0.010  |               |
| Cyprodinil                               | ND     | 0.010  |               |
| DCPA (dacthal, Chlorthal-dimethyl)       | ND     | 0.010  |               |
| DDD-o,p'                                 | ND     | 0.030  |               |
| DDD-p,p'                                 | ND     | 0.010  |               |
| DDE-o p'                                 | ND     | 0.010  |               |
| DDE-p p'                                 | ND     | 0.010  |               |
| DDT-o,p'                                 | ND     | 0.010  |               |
| DDT-p,p'                                 | ND     | 0.030  |               |
| DEF (Tribufos)                           | ND     | 0.010  |               |
| Detlathrin                               | ND     | 0.010  |               |
| Demeton-s-methyl                         | ND     | 0.030  |               |
| Desmedipham                              | ND     | 0.010  |               |
| Desmetryn                                | ND     | 0.010  |               |
| Diallate I                               | ND     | 0.030  |               |
| Diallate II                              | ND     | 0.010  |               |
| Diazinon                                 | ND     | 0.010  |               |
| Diazinon-oxon (diazoxon)                 | ND     | 0.010  |               |
| Dichlofenthion                           | ND     | 0.010  |               |
| Dichlofluaniid                           | ND     | 0.030  |               |
| Dichlorobenzonitrile, 2,6- (Dichlobenil) | ND     | 0.030  |               |
| Dichlorvos                               | ND     | 0.030  |               |
| Dichloran (Dichloran)                    | ND     | 0.030  |               |
| Dicofol-o,p'                             | ND     | 0.010  |               |
| Dicofol-p,p' (Kelthane)                  | ND     | 0.010  |               |
| Dicrototos (Dicrotophos)                 | ND     | 0.010  |               |
| Dieldrin                                 | ND     | 0.010  |               |
| Diethofencarb                            | ND     | 0.010  |               |
| Difenoconazole I                         | ND     | 0.010  |               |
| Difenoconazole II                        | ND     | 0.010  |               |
| Dimethachlor                             | ND     | 0.010  |               |
| Dimethoate                               | ND     | 0.010  |               |
| Dimethomorph I                           | ND     | 0.010  |               |
| Dimethomorph II                          | ND     | 0.010  |               |
| Diniconazole                             | ND     | 0.010  |               |
| Dinitramine                              | ND     | 0.030  |               |
| Dioxacarb                                | ND     | 0.030  |               |
| Dioxathion                               | ND     | 0.010  |               |
| Diphenamid                               | ND     | 0.010  |               |
| Diphenylamine                            | ND     | 0.010  |               |
| Disulfoton                               | ND     | 0.010  |               |
| Disulfoton Sulfone                       | ND     | 0.010  |               |

**Comments:**

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# Analytical Report

August 8, 2016

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 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID: (b) (4)  
 7/25/16

EMA Sample No: 16080409-02

Date Received: 8/4/2016

Sample Matrix: Wine Grape

Analytical Method: FDA Import GC/MS/MS E - H

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

**Comments:**

| Analyte                             | Amount | RL ppm | Tolerance ppm |
|-------------------------------------|--------|--------|---------------|
| Edifenphos                          | ND     | 0.010  |               |
| Endosulfan I (alpha Isomer)         | ND     | 0.010  |               |
| Endosulfan II (beta Isomer)         | ND     | 0.010  |               |
| Endosulfan Sulfate                  | ND     | 0.010  |               |
| Endrin                              | ND     | 0.010  |               |
| Endrin Aldehyde                     | ND     | 0.030  |               |
| EPN                                 | ND     | 0.010  |               |
| Epoxiconazole                       | ND     | 0.010  |               |
| Esfenvalerate (Fenvalerate A-alpha) | ND     | 0.010  |               |
| Etaconazole I                       | ND     | 0.010  |               |
| Ethalfuralin (Sonalan)              | ND     | 0.010  |               |
| Ethiofencarb                        | ND     | 0.010  |               |
| Ethiolate                           | ND     | 0.030  |               |
| Ethion                              | ND     | 0.010  |               |
| Ethofumesate                        | ND     | 0.010  |               |
| Ethoprophos (Ethoprop)              | ND     | 0.030  |               |
| Ethoxyquin                          | ND     | 0.030  |               |
| Etiozazole                          | ND     | 0.010  |               |
| Etrifos                             | ND     | 0.010  |               |
| Famoxadone                          | ND     | 0.010  |               |
| Famphur                             | ND     | 0.010  |               |
| Fenamidone                          | ND     | 0.030  |               |
| Fenamiphos (Phenamiphos)            | ND     | 0.010  |               |
| Fenamiphos Sulfone                  | ND     | 0.010  |               |
| Fenarimol                           | ND     | 0.010  |               |
| Fenazaquin                          | ND     | 0.010  |               |
| Fenbuconazole                       | ND     | 0.010  |               |
| Fenfuram                            | ND     | 0.010  |               |
| Fenhexamid                          | ND     | 0.010  |               |
| Fenitrothion                        | ND     | 0.010  |               |
| Fenobucarb                          | ND     | 0.010  |               |
| Fenoxycarb                          | ND     | 0.010  |               |
| Fenpropathrin                       | ND     | 0.010  |               |
| Fenpropimorph                       | ND     | 0.010  |               |
| Fensulfothion                       | ND     | 0.010  |               |
| Fenthion                            | ND     | 0.010  |               |
| Fenvalerate II                      | ND     | 0.010  |               |
| Fipronil                            | ND     | 0.010  |               |
| Flonicamid                          | ND     | 0.010  |               |
| Fluchloralin                        | ND     | 0.010  |               |
| Flucythrinate I                     | ND     | 0.010  |               |
| Flucythrinate II                    | ND     | 0.010  |               |
| Fludioxonil                         | ND     | 0.030  |               |
| Fluopicolide                        | ND     | 0.010  |               |
| Fluquiniconazole                    | ND     | 0.010  |               |
| Flurenol-butyl                      | ND     | 0.010  |               |
| Fluridone                           | ND     | 0.010  |               |
| Flusilazole                         | ND     | 0.010  |               |
| Flutolanil                          | ND     | 0.010  |               |
| Flutriafol                          | ND     | 0.010  |               |
| Fluvalinate I                       | ND     | 0.010  |               |
| Folpet                              | ND     | 0.010  |               |
| Fonofos                             | ND     | 0.010  |               |
| Fuberidazole                        | ND     | 0.030  |               |
| Furalaxyl                           | ND     | 0.010  |               |
| Heptaclor                           | ND     | 0.010  |               |
| Heptaclor exo-epoxide (Isomer B)    | ND     | 0.010  |               |
| Heptenophos                         | ND     | 0.010  |               |
| Hexachlorobenzene                   | ND     | 0.030  |               |
| Hexaconazole                        | ND     | 0.010  |               |
| Hexythiazox                         | ND     | 0.030  |               |

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August 8, 2016

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Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

**Project No:**

**PO No:**

Client Sample ID: (b) (4)  
 7/25/16

EMA Sample No: 16080409-02

Date Received: 8/4/2016

Sample Matrix: Wine Grape

Analytical Method: FDA Import GC/MS/MS I - Pd

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

**Comments:**

| Analyte                            | Amount | RL ppm | Tolerance ppm |
|------------------------------------|--------|--------|---------------|
| Imazalil                           | ND     | 0.030  |               |
| Indoxacarb                         | ND     | 0.010  |               |
| Iprobenfos                         | ND     | 0.030  |               |
| Iprodione                          | ND     | 0.030  |               |
| Isocarbamid (Isocarbamide)         | ND     | 0.010  |               |
| Isocarbophos                       | ND     | 0.010  |               |
| Isodrin                            | ND     | 0.010  |               |
| Isofenphos                         | ND     | 0.010  |               |
| Isoprocab                          | ND     | 0.010  |               |
| Isopropalin                        | ND     | 0.010  |               |
| Isoprothiolane                     | ND     | 0.030  |               |
| Isoproturon                        | ND     | 0.030  |               |
| Kresoxim-methyl                    | ND     | 0.010  |               |
| Lenacil                            | ND     | 0.010  |               |
| Leptophos                          | ND     | 0.010  |               |
| Linuron                            | ND     | 0.010  |               |
| Malaoxon (metabolite of Malathion) | ND     | 0.010  |               |
| Malathion                          | ND     | 0.010  |               |
| Mecarbam                           | ND     | 0.010  |               |
| Mepanipyrim                        | ND     | 0.010  |               |
| Mepronil                           | ND     | 0.010  |               |
| Metalaxyl                          | ND     | 0.010  |               |
| Metalddehyde                       | ND     | 0.030  |               |
| Methidathion                       | ND     | 0.010  |               |
| Methiocarb                         | ND     | 0.010  |               |
| Methoprene                         | ND     | 0.030  |               |
| Methoprotryne                      | ND     | 0.010  |               |
| Methoxychlor, o,p'-                | ND     | 0.010  |               |
| Methoxychlor, p,p'-                | ND     | 0.010  |               |
| Metolachlor                        | ND     | 0.010  |               |
| Metolcarb                          | ND     | 0.030  |               |
| Metrafenone                        | ND     | 0.010  |               |
| Metribuzin                         | ND     | 0.010  |               |
| Mevinphos                          | ND     | 0.030  |               |
| Mexacarbate                        | ND     | 0.010  |               |
| MGK-264                            | ND     | 0.010  |               |
| Mirex                              | ND     | 0.010  |               |
| Molinat                            | ND     | 0.030  |               |
| Monocrotophos                      | ND     | 0.030  |               |
| Monolinuron                        | ND     | 0.010  |               |
| Myclobutanil                       | ND     | 0.010  |               |
| Naled                              | ND     | 0.030  |               |
| Naphthaleneacetamide, 1-           | ND     | 0.010  |               |
| Napropamide                        | ND     | 0.010  |               |
| Nicotine                           | ND     | 0.030  |               |
| Nitrofen                           | ND     | 0.010  |               |
| Nitrothal-isopropyl                | ND     | 0.010  |               |
| Nonachlor, cis-                    | ND     | 0.010  |               |
| Nonachlor, Trans-                  | ND     | 0.010  |               |
| Nuarimol                           | ND     | 0.010  |               |
| Omethoate                          | ND     | 0.010  |               |
| Oxadiazon                          | ND     | 0.010  |               |
| Oxadixyl                           | ND     | 0.010  |               |
| Oxyflurofen                        | ND     | 0.030  |               |
| Paclobutrazole                     | ND     | 0.030  |               |
| Paraoxon-ethyl                     | ND     | 0.010  |               |
| Paraoxon-methyl                    | ND     | 0.010  |               |
| Parathion-ethyl                    | ND     | 0.010  |               |
| Parathion-methyl                   | ND     | 0.010  |               |

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August 8, 2016

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Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID: (b) (4)  
 7/25/16

EMA Sample No: 16080409-02

Date Received: 8/4/2016

Sample Matrix: Wine Grape

Analytical Method: FDA Import GC/MS/MS Pe - So

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

**Comments:**

| Analyte                      | Amount | RL ppm | Tolerance ppm |
|------------------------------|--------|--------|---------------|
| Penconazole                  | ND     | 0.010  |               |
| Pendimethalin (Penoxaline)   | ND     | 0.010  |               |
| Pentachloroaniline           | ND     | 0.010  |               |
| Pentachloroanisole           | ND     | 0.010  |               |
| Pentachlorobenzonitrile      | ND     | 0.010  |               |
| Pentachlorothioanisole       | ND     | 0.010  |               |
| Peopiconazole                | ND     | 0.010  |               |
| Permethrin I                 | ND     | 0.010  |               |
| Permethrin II (trans)        | ND     | 0.010  |               |
| Phenothrin I                 | ND     | 0.010  |               |
| Phenothrin II                | ND     | 0.010  |               |
| Phenthoate                   | ND     | 0.010  |               |
| Phenylphenol, 2-             | ND     | 0.010  |               |
| Phorate                      | ND     | 0.010  |               |
| Phorate sulfone              | ND     | 0.010  |               |
| Phorate sulfoxide            | ND     | 0.010  |               |
| Phosalone                    | ND     | 0.010  |               |
| Phosmet                      | ND     | 0.010  |               |
| Phosmet oxon                 | ND     | 0.030  |               |
| Phosphamidon I               | ND     | 0.010  |               |
| Phosphamidon II              | ND     | 0.010  |               |
| Piperonyl Butoxide           | ND     | 0.010  |               |
| Pirimicarb                   | ND     | 0.010  |               |
| Pirimiphos-ethyl             | ND     | 0.010  |               |
| Pirimiphos-methyl            | ND     | 0.010  |               |
| Prochloraz                   | ND     | 0.010  |               |
| Procymidone                  | ND     | 0.010  |               |
| Prodiamine                   | ND     | 0.030  |               |
| Profenofos                   | ND     | 0.010  |               |
| Profluralin                  | ND     | 0.010  |               |
| Promecarb                    | ND     | 0.010  |               |
| Prometon                     | ND     | 0.010  |               |
| Prometryn                    | ND     | 0.010  |               |
| Pronamide (Propyzamide)      | ND     | 0.010  |               |
| Propachlor                   | ND     | 0.010  |               |
| Propanil                     | ND     | 0.010  |               |
| Propargite                   | ND     | 0.010  |               |
| Propetamphos                 | ND     | 0.010  |               |
| Propham                      | ND     | 0.030  |               |
| Propiconazole I              | ND     | 0.010  |               |
| Propiconazole II             | ND     | 0.010  |               |
| Propoxur                     | ND     | 0.010  |               |
| Pyracarbolid                 | ND     | 0.010  |               |
| Pyraclostrobin               | ND     | 0.030  |               |
| Pyrazophos                   | ND     | 0.010  |               |
| Pyridaben                    | ND     | 0.010  |               |
| Pyridaphenthion              | ND     | 0.010  |               |
| Pyrifenox I                  | ND     | 0.010  |               |
| Pyrifenox II                 | ND     | 0.010  |               |
| Pyrimethanil                 | ND     | 0.010  |               |
| Pyriproxyfen                 | ND     | 0.010  |               |
| Quinalphos                   | ND     | 0.010  |               |
| Quinoxifen                   | ND     | 0.010  |               |
| Quintozene                   | ND     | 0.010  |               |
| Resmethrin -cis (cismethrin) | ND     | 0.010  |               |
| Ronnel (Fenchlorphos)        | ND     | 0.010  |               |
| Secbumeton                   | ND     | 0.010  |               |
| Simazine                     | ND     | 0.010  |               |
| Simetryn                     | ND     | 0.010  |               |

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August 8, 2016

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Project No:

PO No:

Client Sample ID: (b) (4)  
 7/25/16

EMA Sample No: 16080409-02

Date Received: 8/4/2016

Sample Matrix: Wine Grape

Analytical Method: FDA Import GC/MS/MS Sp - Z

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

| Analyte                             | Amount | RL ppm | Tolerance ppm |
|-------------------------------------|--------|--------|---------------|
| Spirodiclofen                       | ND     | 0.030  |               |
| Spiromesifen                        | ND     | 0.030  |               |
| Spiroxamine I                       | ND     | 0.010  |               |
| Spiroxamine II                      | ND     | 0.010  |               |
| Sulfotep                            | ND     | 0.010  |               |
| Sulprofos                           | ND     | 0.030  |               |
| Tebuconazole                        | ND     | 0.010  |               |
| Tebufenpyrad                        | ND     | 0.010  |               |
| Tebupirimfos                        | ND     | 0.010  |               |
| Tebutam                             | ND     | 0.010  |               |
| Tebuthiuron                         | ND     | 0.010  |               |
| Tecnazene (TCNB)                    | ND     | 0.010  |               |
| Tefluthrin, cis-                    | ND     | 0.010  |               |
| Terbacil                            | ND     | 0.010  |               |
| Terbufos                            | ND     | 0.010  |               |
| Terbumeton                          | ND     | 0.030  |               |
| Terbutylazine                       | ND     | 0.030  |               |
| Tetrachloraniline, 2,3,5,6-         | ND     | 0.010  |               |
| Tetrachlorvinphos, e-isomer         | ND     | 0.010  |               |
| Tetraconazole                       | ND     | 0.010  |               |
| Tetradifon                          | ND     | 0.010  |               |
| Tetrahydrophthalimide, cis-1,2,3,6- | ND     | 0.010  |               |
| Tetrahydrophthalimide, cis-Delta 4- | ND     | 0.030  |               |
| Tetramethrin I                      | ND     | 0.010  |               |
| Tetramethrin II                     | ND     | 0.010  |               |
| Thiabendazole                       | ND     | 0.030  |               |
| Thiamethoxam                        | ND     | 0.010  |               |
| Thionazin                           | ND     | 0.030  |               |
| Tolclofos-methyl                    | ND     | 0.010  |               |
| Tolyfluanid                         | ND     | 0.010  |               |
| Triadimefon                         | ND     | 0.010  |               |
| Triadimenol                         | ND     | 0.010  |               |
| Triazophos                          | ND     | 0.010  |               |
| Tricyclazole                        | ND     | 0.030  |               |
| Trifloxystrobin                     | ND     | 0.010  |               |
| Triflunizole                        | ND     | 0.010  |               |
| Trifluralin                         | ND     | 0.010  |               |
| Trimethacarb, 2,3,5-                | ND     | 0.010  |               |
| Trimethacarb, 3,4,5-                | ND     | 0.010  |               |
| Trimidal (Nuarimol)                 | ND     | 0.010  |               |
| Triticonazole                       | ND     | 0.010  |               |
| Vernolate                           | ND     | 0.030  |               |
| Vinclozolin                         | ND     | 0.010  |               |

Comments:

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Project No:

PO No:

Client Sample ID: (b) (4)  
 7/25/16

EMA Sample No: 16080409-02

Date Received: 8/4/2016

Sample Matrix: Wine Grape

Analytical Method: FDA Import LC/MS/MS A-C

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

**Comments:**

| Analyte                 | Amount | RL ppm | Tolerance ppm |
|-------------------------|--------|--------|---------------|
| 3-Hydroxycarbofuran     | ND     | 0.010  |               |
| Acephate                | ND     | 0.010  |               |
| Acetamidiprid           | ND     | 0.010  |               |
| Acetochlor              | ND     | 0.010  |               |
| Acibenzolar-S-methyl    | ND     | 0.010  |               |
| Alanycarb               | ND     | 0.010  |               |
| Aldicarb-sulfone        | ND     | 0.010  |               |
| Aldicarb-sulfoxide      | ND     | 0.010  |               |
| Ametryn                 | ND     | 0.010  |               |
| Amicarbazone            | ND     | 0.010  |               |
| Aminocarb               | ND     | 0.010  |               |
| Aspon                   | ND     | 0.010  |               |
| Atrazine                | ND     | 0.010  |               |
| Avermectin Ba           | ND     | 0.010  |               |
| Azinphos-methyl         | ND     | 0.010  |               |
| Azoxystrobin            | ND     | 0.010  |               |
| Benalaxyl               | ND     | 0.010  |               |
| Bendiocarb              | ND     | 0.010  |               |
| Benfuracarb             | ND     | 0.010  |               |
| Bensulide               | ND     | 0.010  |               |
| Benzoximate             | ND     | 0.010  |               |
| Bifenazate              | ND     | 0.010  |               |
| Bitertanol              | ND     | 0.010  |               |
| Boscalid                | ND     | 0.010  |               |
| Bromuconazole (isomer ) | ND     | 0.010  |               |
| Bupirimate              | ND     | 0.010  |               |
| Buprofezin              | ND     | 0.010  |               |
| Butafenacil             | ND     | 0.010  |               |
| Butocarboxim            | ND     | 0.010  |               |
| Carbaryl                | ND     | 0.010  |               |
| Carbendazim             | ND     | 0.010  |               |
| Carbetamide             | ND     | 0.010  |               |
| Carbofuran              | ND     | 0.010  |               |
| Carbosulfan             | ND     | 0.010  |               |
| Carboxine               | ND     | 0.010  |               |
| Carfentrazone-ethyl     | ND     | 0.010  |               |
| Chlorantraniliprole     | ND     | 0.010  |               |
| Chlordimeform           | ND     | 0.010  |               |
| Chlorfenvinphos         | ND     | 0.010  |               |
| Chlorfluzazuron         | ND     | 0.010  |               |
| Chloroxuron             | ND     | 0.010  |               |
| Chlorpyrifos            | ND     | 0.010  |               |
| Chlorpyrifos-methyl     | ND     | 0.010  |               |
| Chlortoluron            | ND     | 0.010  |               |
| Clethodim               | ND     | 0.010  |               |
| Clofentezine            | ND     | 0.010  |               |
| Clothianidin            | ND     | 0.010  |               |
| Coumaphos               | ND     | 0.010  |               |
| Cumyluron               | ND     | 0.010  |               |
| Cyanazine               | ND     | 0.010  |               |
| Cyazofamid              | ND     | 0.010  |               |
| Cycluron                | ND     | 0.010  |               |
| Cyflufenamid            | ND     | 0.010  |               |
| Cyhexatin               | ND     | 0.010  |               |
| Cymoxanil               | ND     | 0.010  |               |
| Cyproconazole (isomer ) | ND     | 0.010  |               |
| Cyprodinil              | ND     | 0.010  |               |
| Cyromazine              | ND     | 0.010  |               |

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# Analytical Report

August 8, 2016

**Client:**

Global Culture  
 315 Meigs Rd. Ste. A-404  
 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID: (b) (4)  
 7/25/16

EMA Sample No: 16080409-02

Date Received: 8/4/2016

Sample Matrix: Wine Grape

Analytical Method: FDA Import LC/MS/MS D-F

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

**Comments:**

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| Analyte                | Amount | RL ppm | Tolerance ppm |
|------------------------|--------|--------|---------------|
| Daimuron               | ND     | 0.010  |               |
| Diafenthiuron          | ND     | 0.010  |               |
| Diazinon               | ND     | 0.010  |               |
| Dichlorvos             | ND     | 0.010  |               |
| Diclobutrazol          | ND     | 0.010  |               |
| Dicrotophos            | ND     | 0.010  |               |
| Diethofencarb          | ND     | 0.010  |               |
| Difenoconazole         | ND     | 0.010  |               |
| Diflubenzuron          | ND     | 0.010  |               |
| Dimethenamide          | ND     | 0.010  |               |
| Dimethoate             | ND     | 0.010  |               |
| Dimethomorph           | ND     | 0.010  |               |
| Dimoxystrobin          | ND     | 0.010  |               |
| Diniconazole           | ND     | 0.010  |               |
| Dioxacarb              | ND     | 0.010  |               |
| Diuron                 | ND     | 0.010  |               |
| DMST                   | ND     | 0.010  |               |
| DNOC                   | ND     | 0.010  |               |
| Dodine                 | ND     | 0.010  |               |
| Doramectin             | ND     | 0.010  |               |
| Emamectin Ba           | ND     | 0.010  |               |
| Epoxiconazole          | ND     | 0.010  |               |
| Eprinomectin           | ND     | 0.010  |               |
| Esprocarb              | ND     | 0.010  |               |
| Ethidimuron            | ND     | 0.010  |               |
| Ethiofencarb           | ND     | 0.010  |               |
| Ethiofencarb-sulfoxide | ND     | 0.010  |               |
| Ethion                 | ND     | 0.010  |               |
| Ethiprole              | ND     | 0.010  |               |
| Ethirimol              | ND     | 0.010  |               |
| Ethofumesate           | ND     | 0.010  |               |
| Ethoprop               | ND     | 0.010  |               |
| Etobenzanid            | ND     | 0.010  |               |
| Ettoxazole             | ND     | 0.010  |               |
| Famoxadone             | ND     | 0.010  |               |
| Fenamidone             | ND     | 0.010  |               |
| Fenarimol              | ND     | 0.010  |               |
| Fenazaquin             | ND     | 0.010  |               |
| Fenbuconazole          | ND     | 0.010  |               |
| Fenbutatin Oxide       | ND     | 0.010  |               |
| Fenhexamid             | ND     | 0.010  |               |
| Fenobucarb             | ND     | 0.010  |               |
| Fenoxycarb             | ND     | 0.010  |               |
| Fenpropimorph          | ND     | 0.010  |               |
| Fenpyroximate          | ND     | 0.010  |               |
| Fenuron                | ND     | 0.010  |               |
| Flonicamid             | ND     | 0.010  |               |
| Fluazifop-butyl        | ND     | 0.010  |               |
| Flubendiamide          | ND     | 0.010  |               |
| Fludioxinil            | ND     | 0.010  |               |
| Flufenacet             | ND     | 0.010  |               |
| Flufenoxuron           | ND     | 0.010  |               |
| Fluometuron            | ND     | 0.010  |               |
| Fluopicolide           | ND     | 0.010  |               |
| Fluoxastrobin          | ND     | 0.010  |               |
| Fluquinconazole        | ND     | 0.010  |               |
| Flusilazole            | ND     | 0.010  |               |
| Flutolanil             | ND     | 0.010  |               |
| Flutriafol             | ND     | 0.010  |               |
| Fomesafen              | ND     | 0.010  |               |
| Forchlorfenuron        | ND     | 0.010  |               |
| Formetanate            | ND     | 0.010  |               |
| Fuberidazole           | ND     | 0.010  |               |
| Furalaxyl              | ND     | 0.010  |               |

# Analytical Report

August 8, 2016

**Client:**

Global Culture  
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 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID: (b) (4)  
 7/25/16

EMA Sample No: 16080409-02

Date Received: 8/4/2016

Sample Matrix: Wine Grape

Analytical Method: FDA Import LC/MS/MS H-O

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

**Comments:**

| Analyte            | Amount | RL ppm | Tolerance ppm |
|--------------------|--------|--------|---------------|
| Halofenozide       | ND     | 0.010  |               |
| Hexaflumuron       | ND     | 0.010  |               |
| Hexazinone         | ND     | 0.010  |               |
| Hexythiazox        | ND     | 0.010  |               |
| Hydramethylnon     | ND     | 0.010  |               |
| Imazalil           | ND     | 0.010  |               |
| Imazapyr           | ND     | 0.010  |               |
| Imazethapyr        | ND     | 0.010  |               |
| Imibenconazole     | ND     | 0.010  |               |
| Imidacloprid       | ND     | 0.010  |               |
| Indoxacarb         | ND     | 0.010  |               |
| Ipconazole         | ND     | 0.010  |               |
| Iprovalicarb       | ND     | 0.010  |               |
| Isocarbamid        | ND     | 0.010  |               |
| Isofenphos         | ND     | 0.010  |               |
| Isoprocarb         | ND     | 0.010  |               |
| Isoprothiolane     | ND     | 0.010  |               |
| Isoproturon        | ND     | 0.010  |               |
| Ivermectin         | ND     | 0.010  |               |
| Kresoxim-methyl    | ND     | 0.010  |               |
| Lactofen           | ND     | 0.010  |               |
| Linuron            | ND     | 0.010  |               |
| Malathion          | ND     | 0.010  |               |
| Mandipropamid      | ND     | 0.010  |               |
| Mefenacet          | ND     | 0.010  |               |
| Mepanipyrim        | ND     | 0.010  |               |
| Mepronil           | ND     | 0.010  |               |
| Metaflumizone      | ND     | 0.010  |               |
| Metalaxyl          | ND     | 0.010  |               |
| Metconazole        | ND     | 0.010  |               |
| Methamidophos      | ND     | 0.010  |               |
| Methfuroxam        | ND     | 0.010  |               |
| Methidathion       | ND     | 0.010  |               |
| Methiocarb         | ND     | 0.010  |               |
| Methomyl           | ND     | 0.010  |               |
| Methoprotryne      | ND     | 0.010  |               |
| Methoxyfenozide    | ND     | 0.010  |               |
| Metobromuron       | ND     | 0.010  |               |
| Metolachlor        | ND     | 0.010  |               |
| Metoxuron          | ND     | 0.010  |               |
| Metrafenone        | ND     | 0.010  |               |
| Metribuzin         | ND     | 0.010  |               |
| Metsulfuron-methyl | ND     | 0.010  |               |
| Mevinphos          | ND     | 0.010  |               |
| Mexacarbate        | ND     | 0.010  |               |
| Molinate           | ND     | 0.010  |               |
| Monocrotophos      | ND     | 0.010  |               |
| Monolinuron        | ND     | 0.010  |               |
| Moxidectin         | ND     | 0.010  |               |
| Myclobutanil       | ND     | 0.010  |               |
| Napropamide        | ND     | 0.010  |               |
| Neburon            | ND     | 0.010  |               |
| Nitenpyram         | ND     | 0.010  |               |
| Novaluron          | ND     | 0.010  |               |
| Omethoate          | ND     | 0.010  |               |
| Oxamyl             | ND     | 0.010  |               |
| Oxadixyl           | ND     | 0.010  |               |

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# Analytical Report

August 8, 2016

**Client:**

Global Culture  
 315 Meigs Rd. Ste. A-404  
 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

**Project No:**

**PO No:**

**Client Sample ID:** (b) (4)  
 7/25/16

**EMA Sample No:** 16080409-02

**Date Received:** 8/4/2016

**Sample Matrix:** Wine Grape

**Analytical Method:** FDA Import LC/MS/MS P-Trid

**Extraction Method:** FDA 302

**Date Extracted:** 8/5/2016

**Date Completed:** 8/5/2016

**Comments:**

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 ND = None Detected at the Reporting Limit (RL)  
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| Analyte                          | Amount | RL ppm | Tolerance ppm |
|----------------------------------|--------|--------|---------------|
| Pencycuron                       | ND     | 0.010  |               |
| Pendimethalin                    | ND     | 0.010  |               |
| Phorate                          | ND     | 0.010  |               |
| Phosmet                          | ND     | 0.010  |               |
| Phoxim                           | ND     | 0.010  |               |
| Picoxystrobin                    | ND     | 0.010  |               |
| Piperonyl butoxide               | ND     | 0.010  |               |
| Pirimicarb                       | ND     | 0.010  |               |
| Pirimiphos-methyl                | ND     | 0.010  |               |
| Prochloraz                       | ND     | 0.010  |               |
| Promecarb                        | ND     | 0.010  |               |
| Prometon                         | ND     | 0.010  |               |
| Prometryn                        | ND     | 0.010  |               |
| Propachlor                       | ND     | 0.010  |               |
| Propamocarb                      | ND     | 0.010  |               |
| Propargite                       | ND     | 0.010  |               |
| Propazine                        | ND     | 0.010  |               |
| Propham                          | ND     | 0.010  |               |
| Propiconazole                    | ND     | 0.010  |               |
| Propoxur                         | ND     | 0.010  |               |
| Propyzamide                      | ND     | 0.010  |               |
| Pymetrozin                       | ND     | 0.010  |               |
| Pyracarbolid                     | ND     | 0.010  |               |
| Pyraclostrobin                   | ND     | 0.010  |               |
| Pyridaben                        | ND     | 0.010  |               |
| Pyridaphenthion                  | ND     | 0.010  |               |
| Pyrimethanil                     | ND     | 0.010  |               |
| Pyriproxyfen                     | ND     | 0.010  |               |
| Quinoxifen                       | ND     | 0.010  |               |
| Sebuthylazine                    | ND     | 0.010  |               |
| Secbumeton                       | ND     | 0.010  |               |
| Sethoxydim                       | ND     | 0.010  |               |
| Siduron                          | ND     | 0.010  |               |
| Simazine                         | ND     | 0.010  |               |
| Simetryn                         | ND     | 0.010  |               |
| Spinetoram-J +L                  | ND     | 0.010  |               |
| Spinosad                         | ND     | 0.010  |               |
| Spirodiclofen                    | ND     | 0.010  |               |
| Spiromecifen                     | ND     | 0.010  |               |
| Spirotetramat                    | ND     | 0.010  |               |
| Spiroxamine                      | ND     | 0.010  |               |
| Sulfentrazone                    | ND     | 0.010  |               |
| Tebuconazole                     | ND     | 0.010  |               |
| Tebufenozide                     | ND     | 0.010  |               |
| Tebufenpyrad                     | ND     | 0.010  |               |
| Tebuthiuron                      | ND     | 0.010  |               |
| Temephos                         | ND     | 0.010  |               |
| Tepaloxymid                      | ND     | 0.010  |               |
| Terbumeton                       | ND     | 0.010  |               |
| Terbutryn                        | ND     | 0.010  |               |
| Tetraconazole                    | ND     | 0.010  |               |
| Thiabendazole                    | ND     | 0.010  |               |
| Thiacloprid                      | ND     | 0.010  |               |
| Thiamethoxam                     | ND     | 0.010  |               |
| Thidiazuron                      | ND     | 0.010  |               |
| Thiobencarb                      | ND     | 0.010  |               |
| Thiofanox                        | ND     | 0.010  |               |
| Thiophanate-methyl (Carbendazim) | ND     | 0.010  |               |
| Triadimefon                      | ND     | 0.010  |               |
| Triadimenol                      | ND     | 0.010  |               |
| Triazophos                       | ND     | 0.010  |               |
| Tricyclazole                     | ND     | 0.010  |               |
| Tridemorph                       | ND     | 0.010  |               |

## Analytical Report

August 8, 2016

**Client:**

Global Culture  
315 Meigs Rd. Ste. A-404  
Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Analyte

Amount      RL  
ppm            ppm

|                       |    |       |
|-----------------------|----|-------|
| Trifloxystrobin       | ND | 0.010 |
| Triflumizole          | ND | 0.010 |
| Triflumuron           | ND | 0.010 |
| Triflusulfuron-methyl | ND | 0.010 |
| Triphenyl Phosphate   | ND | 0.010 |
| Triticonazole         | ND | 0.010 |
| Vamidothion           | ND | 0.010 |
| Zoxamide              | ND | 0.010 |

Project No:

PO No:

Client Sample ID: (b) (4)  
7/25/16

EMA Sample No: 16080409-02

Date Received: 8/4/2016

Sample Matrix: Wine Grape

Analytical Method: FDA Import LC/MS/MS Trif-Z

Extraction Method: FDA 302

Date Extracted: 8/5/2016

Date Completed: 8/5/2016

Comments:

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# Analytical Report

April 21, 2016

**Client:**

Global Culture  
 315 Meigs Rd. Ste. A-404  
 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No: (b) (4)

PO No:

Client Sample ID: (b) (4)  
 4/6/2016

EMA Sample No: 16041232-01

Date Received: 4/12/2016

Sample Matrix: Alfalfa

Analytical Method: FDA IMP-OC1

Extraction Method: FDA 302

Date Extracted: 4/15/2016

Date Completed: 4/19/2016

**Comments:**

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| Analyte             | Amount | RL ppm | Tolerance ppm |
|---------------------|--------|--------|---------------|
| Acrinathrin         | ND     | 0.010  |               |
| Aldrin              | ND     | 0.010  |               |
| alpha-BHC           | ND     | 0.010  |               |
| Atrazine            | ND     | 0.010  |               |
| Benfluralin         | ND     | 0.010  |               |
| beta Chlordane      | ND     | 0.010  |               |
| Bifenthrin          | ND     | 0.010  |               |
| Boscalid            | ND     | 0.010  |               |
| Bromopropylate      | ND     | 0.010  |               |
| Captan              | ND     | 0.010  |               |
| Chlorodimeform      | ND     | 0.010  |               |
| Chlorobenzilate     | ND     | 0.010  |               |
| Chloroneb           | ND     | 0.010  |               |
| Chlorthal Dimethyl  | ND     | 0.010  |               |
| Chlorothalonil      | ND     | 0.010  |               |
| CIPC                | ND     | 0.010  |               |
| cis-Chlordane       | ND     | 0.010  |               |
| cis-Nonachlor       | ND     | 0.010  |               |
| cis-Permethrin      | ND     | 0.010  |               |
| Clomazone           | ND     | 0.010  |               |
| Cyanazine           | ND     | 0.010  |               |
| Cypermethrin        | ND     | 0.010  |               |
| Cyproconazole       | ND     | 0.010  |               |
| Deltamethrin        | ND     | 0.010  |               |
| delta-BHC           | ND     | 0.010  |               |
| Diallate-1          | ND     | 0.010  |               |
| Diallate-2          | ND     | 0.010  |               |
| 3,4-Dichloroaniline | ND     | 0.010  |               |
| Dichlobenil         | ND     | 0.010  |               |
| Dichlofuanid        | ND     | 0.010  |               |
| Dichloran           | ND     | 0.010  |               |
| Dieldrin            | ND     | 0.010  |               |
| Difenoconazole 1, 2 | ND     | 0.010  |               |
| Dimethachlor        | ND     | 0.010  |               |
| Dimethmorph 1, 2    | ND     | 0.010  |               |
| Dinitramine         | ND     | 0.010  |               |
| Dursban             | ND     | 0.010  |               |
| Endosulfan Sulfate  | ND     | 0.010  |               |
| Endosulfan-I        | ND     | 0.010  |               |
| Endosulfan-II       | ND     | 0.010  |               |
| Endrin              | ND     | 0.010  |               |
| Epoxiconazole       | ND     | 0.010  |               |
| Etaconazole-1       | ND     | 0.010  |               |
| Etaconazole-2       | ND     | 0.010  |               |
| Ethafuralin         | ND     | 0.010  |               |
| Etridiazole         | ND     | 0.010  |               |
| Fenarimol           | ND     | 0.010  |               |
| Fenbuconazole       | ND     | 0.010  |               |
| Fenhexamid          | ND     | 0.010  |               |
| Fenvalerate-1       | ND     | 0.010  |               |
| Fenvalerate-2       | ND     | 0.010  |               |
| Fipronil            | ND     | 0.010  |               |
| Fluchloralin        | ND     | 0.010  |               |
| Flucythrinate       | ND     | 0.010  |               |
| Fludioxanil         | ND     | 0.010  |               |
| Fluquinconazole     | ND     | 0.010  |               |
| Flutolanil          | ND     | 0.010  |               |
| Fluvalinate         | ND     | 0.010  |               |
| Folpet              | ND     | 0.010  |               |
| gamma-BHC/Lindane   | ND     | 0.010  |               |
| gamma-Chlordene     | ND     | 0.010  |               |
| Heptachlor          | ND     | 0.010  |               |
| Heptachlor Epoxide  | ND     | 0.010  |               |
| Hexachlorobenzene   | ND     | 0.010  |               |

# Analytical Report

April 21, 2016

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 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No: (b) (4)

PO No:

Client Sample ID: (b) (4)  
 4/6/2016

EMA Sample No: 16041232-01

Date Received: 4/12/2016

Sample Matrix: Alfalfa

Analytical Method: FDA IMP-OC2

Extraction Method: FDA 302

Date Extracted: 4/15/2016

Date Completed: 4/19/2016

**Comments:**

| Analyte                            | Amount | RL ppm | Tolerance ppm |
|------------------------------------|--------|--------|---------------|
| Hexaconazole                       | ND     | 0.010  |               |
| Imazalil                           | ND     | 0.010  |               |
| Iprodione                          | ND     | 0.010  |               |
| lambda-Cyhalothrin                 | ND     | 0.010  |               |
| Linuron                            | ND     | 0.010  |               |
| Metolachlor                        | ND     | 0.010  |               |
| Mirex                              | ND     | 0.010  |               |
| Monolinuron                        | ND     | 0.010  |               |
| Myclobutanil                       | ND     | 0.010  |               |
| Notrofen                           | ND     | 0.010  |               |
| Nuarimol                           | ND     | 0.010  |               |
| o,p'-DDT                           | ND     | 0.010  |               |
| 0,p'-Methoxychlor                  | ND     | 0.010  |               |
| p,p'-DDE                           | ND     | 0.010  |               |
| p,p'-DDT                           | ND     | 0.010  |               |
| p,p'-Methoxychlor                  | ND     | 0.010  |               |
| Penconazole                        | ND     | 0.010  |               |
| Pentachloroaniline                 | ND     | 0.010  |               |
| Pentachlorobenzene                 | ND     | 0.010  |               |
| Pentachlorobenzonitrile            | ND     | 0.010  |               |
| Pentachlorothioanisole             | ND     | 0.010  |               |
| Polychlorinatedbiphenyl - Cogeners | ND     | 0.010  |               |
| Prochloraz                         | ND     | 0.010  |               |
| Procymidone                        | ND     | 0.010  |               |
| Profluralin                        | ND     | 0.010  |               |
| Pronamide                          | ND     | 0.010  |               |
| Propachlor                         | ND     | 0.010  |               |
| Propanil                           | ND     | 0.010  |               |
| Propiconazole/Tilt-1               | ND     | 0.010  |               |
| Propiconazole/Tilt-2               | ND     | 0.010  |               |
| Pyraclostrobin                     | ND     | 0.010  |               |
| Pyridaben                          | ND     | 0.010  |               |
| Pyrifenox-1                        | ND     | 0.010  |               |
| Pyrifenox-2                        | ND     | 0.010  |               |
| Quinoxifen                         | ND     | 0.010  |               |
| Quintozene                         | ND     | 0.010  |               |
| Simazine                           | ND     | 0.010  |               |
| Tebuconazole                       | ND     | 0.010  |               |
| Tebufenpyrad                       | ND     | 0.010  |               |
| Tecnezene                          | ND     | 0.010  |               |
| Tefluthrin                         | ND     | 0.010  |               |
| Terbuthylazine                     | ND     | 0.010  |               |
| Tetradifon                         | ND     | 0.010  |               |
| Tolyfluanid                        | ND     | 0.010  |               |
| trans-Chlordane                    | ND     | 0.010  |               |
| trans-Nonachlor                    | ND     | 0.010  |               |
| trans-Permethrin                   | ND     | 0.010  |               |
| Triadimefon                        | ND     | 0.010  |               |
| Triadimenol                        | ND     | 0.010  |               |
| Triallate                          | ND     | 0.010  |               |
| Trifloxystrobin                    | ND     | 0.010  |               |
| Triflumizole                       | ND     | 0.010  |               |
| Trifluralin                        | ND     | 0.010  |               |
| Triticonazole                      | ND     | 0.010  |               |
| Vinclozolin                        | ND     | 0.010  |               |

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# Analytical Report

April 21, 2016

**Client:**

Global Culture  
 315 Meigs Rd. Ste. A-404  
 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No: (b) (4)

PO No:

Client Sample ID: (b) (4)  
 4/6/2016

EMA Sample No: 16041232-01

Date Received: 4/12/2016

Sample Matrix: Alfalfa

Analytical Method: FDA IMP-NSO-1

Extraction Method: FDA 302

Date Extracted: 4/15/2016

Date Completed: 4/18/2016

**Comments:**

| Analyte                  | Amount | RL ppm | Tolerance ppm |
|--------------------------|--------|--------|---------------|
| Allethrin                | ND     | 0.050  |               |
| Acetamidiprid            | ND     | 0.050  |               |
| alpha-Spiroxamine        | ND     | 0.050  |               |
| Ametryn                  | ND     | 0.050  |               |
| Aminocarb                | ND     | 0.050  |               |
| Amitraz                  | ND     | 0.050  |               |
| Aniten/Flurecol Butyl E. | ND     | 0.050  |               |
| Azoxystrobin             | ND     | 0.050  |               |
| Benalaxyl                | ND     | 0.050  |               |
| Bendiocarb               | ND     | 0.050  |               |
| beta-Spiroxamine         | ND     | 0.050  |               |
| Biphenyl                 | ND     | 0.050  |               |
| Biteranol-1              | ND     | 0.050  |               |
| Biteranol-2              | ND     | 0.050  |               |
| Bufenocarb-1             | ND     | 0.050  |               |
| Bufenocarb-2             | ND     | 0.050  |               |
| Bupirimate               | ND     | 0.050  |               |
| Buprofezin               | ND     | 0.050  |               |
| Butralin                 | ND     | 0.050  |               |
| Butylate                 | ND     | 0.050  |               |
| 3-OH Carbofuran          | ND     | 0.050  |               |
| Carbaryl                 | ND     | 0.050  |               |
| Carbofuran               | ND     | 0.050  |               |
| Carbosulfan              | ND     | 0.050  |               |
| Carboxin                 | ND     | 0.050  |               |
| Cycloate/Ro Neet         | ND     | 0.050  |               |
| Cycluron                 | ND     | 0.050  |               |
| Cymiazole                | ND     | 0.050  |               |
| Cyprodinil               | ND     | 0.050  |               |
| Desmedipham              | ND     | 0.050  |               |
| Desmethyl Diphenamid     | ND     | 0.050  |               |
| Desmetryn                | ND     | 0.050  |               |
| Diethofenocarb           | ND     | 0.050  |               |
| Difenoconazole           | ND     | 0.050  |               |
| Dioxacarb                | ND     | 0.050  |               |
| Diphenamid               | ND     | 0.050  |               |
| Diphenylamine            | ND     | 0.050  |               |
| d-Phenothrin #           | ND     | 0.050  |               |
| EPTC/Eptam               | ND     | 0.050  |               |
| Ethiofenocarb            | ND     | 0.050  |               |
| Ethiolate                | ND     | 0.050  |               |
| Ethofumesate             | ND     | 0.050  |               |
| Ethoxyquin               | ND     | 0.050  |               |
| Etofenprox               | ND     | 0.050  |               |
| Famoxadone               | ND     | 0.050  |               |
| Fenazaquin               | ND     | 0.050  |               |
| Fenfuram                 | ND     | 0.050  |               |
| Fenobucarb               | ND     | 0.050  |               |
| Fenoxycarb               | ND     | 0.050  |               |
| Fenpropathrin            | ND     | 0.050  |               |
| Fenpropimorph            | ND     | 0.050  |               |
| Flusilazole              | ND     | 0.050  |               |
| Fuberiazole              | ND     | 0.050  |               |
| Furalaxyl                | ND     | 0.050  |               |
| Hexazinone               | ND     | 0.050  |               |
| Isocarbamid              | ND     | 0.050  |               |

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# Analytical Report

April 21, 2016

**Client:**

Global Culture  
 315 Meigs Rd. Ste. A-404  
 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No: (b) (4)

PO No:

Client Sample ID: (b) (4)  
 4/6/2016

EMA Sample No: 16041232-01

Date Received: 4/12/2016

Sample Matrix: Alfalfa

Analytical Method: FDA IMP-NSO-2

Extraction Method: FDA 302

Date Extracted: 4/15/2016

Date Completed: 4/18/2016

| Analyte               | Amount | RL ppm | Tolerance ppm |
|-----------------------|--------|--------|---------------|
| Isoproc carb          | ND     | 0.050  |               |
| Isopropalin           | ND     | 0.050  |               |
| Isoprothiolane        | ND     | 0.050  |               |
| Lenacil               | ND     | 0.050  |               |
| MBTZ                  | ND     | 0.050  |               |
| Mepronil              | ND     | 0.050  |               |
| Metalaxyl             | ND     | 0.050  |               |
| Metaldehyde           | ND     | 0.050  |               |
| Methfuroxan           | ND     | 0.050  |               |
| Methiocarb            | ND     | 0.050  |               |
| Methoprotryne         | ND     | 0.050  |               |
| Metolacarb            | ND     | 0.050  |               |
| Metribuzin            | ND     | 0.050  |               |
| Mexacarbate           | ND     | 0.050  |               |
| MGK-264               | ND     | 0.050  |               |
| Molinate              | ND     | 0.050  |               |
| Naphthalene Acetamide | ND     | 0.050  |               |
| Naproanilid           | ND     | 0.050  |               |
| Napropamide           | ND     | 0.050  |               |
| Nitralin              | ND     | 0.050  |               |
| Nitrothal Isopropyl   | ND     | 0.050  |               |
| Norea                 | ND     | 0.050  |               |
| Octhilinone           | ND     | 0.050  |               |
| o-Phenylphenol        | ND     | 0.050  |               |
| Pebulate              | ND     | 0.050  |               |
| Pendimethalin         | ND     | 0.050  |               |
| Phenmedipham          | ND     | 0.050  |               |
| Piperonyl Butoxide    | ND     | 0.050  |               |
| Pirimacarb            | ND     | 0.050  |               |
| Promecarb             | ND     | 0.050  |               |
| Prometon              | ND     | 0.050  |               |
| Prometryn             | ND     | 0.050  |               |
| Propargite            | ND     | 0.050  |               |
| Propham               | ND     | 0.050  |               |
| Propoxur              | ND     | 0.050  |               |
| Pyracarbolid          | ND     | 0.050  |               |
| Pyrethrin-1           | ND     | 0.050  |               |
| Pyrethrin-2           | ND     | 0.050  |               |
| Pyrimethanil          | ND     | 0.050  |               |
| Pyriproxifen          | ND     | 0.050  |               |
| Resmethrin            | ND     | 0.050  |               |
| Secbumeton            | ND     | 0.050  |               |
| Sethoxydim            | ND     | 0.050  |               |
| Simetryn              | ND     | 0.050  |               |
| Tebutam               | ND     | 0.050  |               |
| Tebuthiuron           | ND     | 0.050  |               |
| Terbumeton            | ND     | 0.050  |               |
| Terbutryn             | ND     | 0.050  |               |
| Tetraconazole         | ND     | 0.050  |               |
| Tetramethrin-1        | ND     | 0.050  |               |
| Tetramethrin-2        | ND     | 0.050  |               |
| Thiabendazole         | ND     | 0.050  |               |
| THPI                  | ND     | 0.050  |               |
| Tralkoxydim           | ND     | 0.050  |               |
| Tricyclazole          | ND     | 0.050  |               |
| 2,3,5-Trimethacarb    | ND     | 0.050  |               |
| 3,4,5-Trimethacarb    | ND     | 0.050  |               |
| Vernolate             | ND     | 0.050  |               |

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## Analytical Report

April 21, 2016

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Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No: (b) (4)

PO No:

Client Sample ID: (b) (4)  
4/6/2016

EMA Sample No: 16041232-01

Date Received: 4/12/2016

Sample Matrix: Alfalfa

Analytical Method: FDA IMP-PHOS-1

Extraction Method: FDA 302

Date Extracted: 4/15/2016

Date Completed: 4/18/2016

| Analyte                    | Amount | RL<br>ppm | Tolerance<br>ppm |
|----------------------------|--------|-----------|------------------|
| Acephate                   | ND     | 0         | 010              |
| Azinphos-methyl            | ND     | 0         | 010              |
| beta-Chlorfenvinphos       | ND     | 0         | 010              |
| Cadusafos                  | ND     | 0         | 010              |
| Carbpfenothion             | ND     | 0         | 010              |
| Chlorpyrifos               | ND     | 0         | 010              |
| Chlorpyrifos OA            | ND     | 0         | 010              |
| Chlorpyrifos-methyl        | ND     | 0         | 010              |
| Chlorthiophos              | ND     | 0         | 010              |
| Coumaphos                  | ND     | 0         | 010              |
| Cyanofenphos               | ND     | 0         | 010              |
| Cyanophos                  | ND     | 0         | 010              |
| DEF                        | ND     | 0         | 010              |
| Demeton S Sulfone          | ND     | 0         | 010              |
| Diazinon                   | ND     | 0         | 010              |
| Dichlorvos                 | ND     | 0         | 010              |
| Dicrotophos                | ND     | 0         | 010              |
| Dimethoate                 | ND     | 0         | 010              |
| Dioxathion                 | ND     | 0         | 010              |
| Disulfoton                 | ND     | 0         | 010              |
| Edifenphos                 | ND     | 0         | 010              |
| EPN                        | ND     | 0         | 010              |
| Ethion                     | ND     | 0         | 010              |
| Ethoprop                   | ND     | 0         | 010              |
| 2-Ethylhexyldiphenyl phos. | ND     | 0         | 010              |
| Fenamiphos                 | ND     | 0         | 010              |
| Fenamiphos Sulfone         | ND     | 0         | 010              |
| Fenitrothion               | ND     | 0         | 010              |
| Fenthion                   | ND     | 0         | 010              |
| Fonophos                   | ND     | 0         | 010              |
| Heptenophos                | ND     | 0         | 010              |
| Isofenphos                 | ND     | 0         | 010              |
| Leptophos                  | ND     | 0         | 010              |
| Malathion                  | ND     | 0         | 010              |
| Malathion OA               | ND     | 0         | 010              |

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## Analytical Report

April 21, 2016

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Phone: (805) 464-6913

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Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No: (b) (4)

PO No:

Client Sample ID: (b) (4)  
4/6/2016

EMA Sample No: 16041232-01

Date Received: 4/12/2016

Sample Matrix: Alfalfa

Analytical Method: FDA IMP-PHOS-2

Extraction Method: FDA 302

Date Extracted: 4/15/2016

Date Completed: 4/18/2016

| Analyte                         | Amount | RL<br>ppm | Tolerance<br>ppm |
|---------------------------------|--------|-----------|------------------|
| Mercarbam                       | ND     | 0.010     |                  |
| Methamidophos                   | ND     | 0.010     |                  |
| Methodathion                    | ND     | 0.010     |                  |
| Methyl Parathion                | ND     | 0.010     |                  |
| Methyl Parathion OA             | ND     | 0.010     |                  |
| Mevinphos                       | ND     | 0.010     |                  |
| Monocrotophos                   | ND     | 0.010     |                  |
| Omethaote                       | ND     | 0.010     |                  |
| Parathion                       | ND     | 0.010     |                  |
| Parathion OA                    | ND     | 0.010     |                  |
| Phorate                         | ND     | 0.010     |                  |
| Phorate Sulfone                 | ND     | 0.010     |                  |
| Phorate Sulfoxide               | ND     | 0.010     |                  |
| Phosalone                       | ND     | 0.010     |                  |
| Phosmet                         | ND     | 0.010     |                  |
| Pirimiphos-methyl               | ND     | 0.010     |                  |
| Profenophos                     | ND     | 0.010     |                  |
| Prothiophos                     | ND     | 0.010     |                  |
| Pyrazophos                      | ND     | 0.010     |                  |
| Pyridaphenthion                 | ND     | 0.010     |                  |
| Quinalphos                      | ND     | 0.010     |                  |
| Sulfotep                        | ND     | 0.010     |                  |
| Sulprofos                       | ND     | 0.010     |                  |
| Terbufos                        | ND     | 0.010     |                  |
| Tetrachlorvinphos               | ND     | 0.010     |                  |
| Tolclophos Methyl               | ND     | 0.010     |                  |
| Trizaphos                       | ND     | 0.010     |                  |
| Trichlorfon                     | ND     | 0.010     |                  |
| Tris (Chloropropyl) Phosphate-1 | ND     | 0.010     |                  |
| Tris (Chloropropyl) Phosphate-2 | ND     | 0.010     |                  |
| Tris 2-Butoxyethyl Phosphate    | ND     | 0.010     |                  |

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GLOBAL CULTURE  
Crescent City, CA 95531  
(707) 464-6913 ♦ Fax (888) 493-7818  
info@globalculture.us

Mailing Address: 315 Meigs Road, Ste A 404, Santa Barbara, CA 93109

**Receipt of Samples Taken at the On-Site Inspection**

§ 205.403 (e) Documents to the inspected operation.

1). At the time of the inspection, the inspector shall provide the operation's authorized representative with a receipt for any samples taken by the inspector. There shall be no charge to the inspector for the samples taken.

2). A copy of the on-site inspection report and any test results will be sent to the inspected operation by the certifying agent.

|                                                                                                                      |
|----------------------------------------------------------------------------------------------------------------------|
| Name of Operation:<br><b>(b) (4)</b>                                                                                 |
| Sample Date and time taken:<br>4/6/16 10:15 AM                                                                       |
| Location taken:<br><b>(b) (4)</b>                                                                                    |
| Sample or what was taken:<br>Alfalfa                                                                                 |
| Number of Samples Taken:<br>one 1 gal ziplock bag                                                                    |
| Sample Identifier:<br><b>(b) (4)</b>                                                                                 |
| Container used for sample:<br>New food grade ziplock bag                                                             |
| Environmental conditions were sample was taken<br>(indoors, outdoors, temperature, etc):<br>outdoor clear/sunny/warm |
| Any other Information:<br>—                                                                                          |

*Thomson*  
Inspector's Signature

4/6/16  
Date

**(b) (4)**

Certified Operation's Representative

4/6/16  
Date

# Analytical Report

April 21, 2016

**Client:**

Global Culture  
 315 Meigs Rd. Ste. A-404  
 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No: (b) (4)

PO No:

Client Sample ID: (b) (4)  
 4/6/2016

EMA Sample No: 16041233-01

Date Received: 4/12/2016

Sample Matrix: Clover Plant Tissue

Analytical Method: FDA IMP-OC1

Extraction Method: FDA 302

Date Extracted: 4/15/2016

Date Completed: 4/19/2016

**Comments:**

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| Analyte             | Amount | RL ppm | Tolerance ppm |
|---------------------|--------|--------|---------------|
| Acrinathrin         | ND     | 0.010  |               |
| Aldrin              | ND     | 0.010  |               |
| alpha-BHC           | ND     | 0.010  |               |
| Atrazine            | ND     | 0.010  |               |
| Benfluralin         | ND     | 0.010  |               |
| beta Chlordane      | ND     | 0.010  |               |
| Bifenthrin          | ND     | 0.010  |               |
| Boscalid            | ND     | 0.010  |               |
| Bromopropylate      | ND     | 0.010  |               |
| Captan              | ND     | 0.010  |               |
| Chlorodimeform      | ND     | 0.010  |               |
| Chlorobenzilate     | ND     | 0.010  |               |
| Chloroneb           | ND     | 0.010  |               |
| Chlorthal Dimethyl  | ND     | 0.010  |               |
| Chlorothalonil      | ND     | 0.010  |               |
| CIPC                | ND     | 0.010  |               |
| cis-Chlordane       | ND     | 0.010  |               |
| cis-Nonachlor       | ND     | 0.010  |               |
| cis-Permethrin      | ND     | 0.010  |               |
| Clomazone           | ND     | 0.010  |               |
| Cyanazine           | ND     | 0.010  |               |
| Cypermethrin        | ND     | 0.010  |               |
| Cyproconazole       | ND     | 0.010  |               |
| Deltamethrin        | ND     | 0.010  |               |
| delta-BHC           | ND     | 0.010  |               |
| Diallate-1          | ND     | 0.010  |               |
| Diallate-2          | ND     | 0.010  |               |
| 3,4-Dichloroaniline | ND     | 0.010  |               |
| Dichlobenil         | ND     | 0.010  |               |
| Dichlofuanid        | ND     | 0.010  |               |
| Dichloran           | ND     | 0.010  |               |
| Dieldrin            | ND     | 0.010  |               |
| Difenoconazole 1, 2 | ND     | 0.010  |               |
| Dimethachlor        | ND     | 0.010  |               |
| Dimethmorph 1, 2    | ND     | 0.010  |               |
| Dinitramine         | ND     | 0.010  |               |
| Dursban             | ND     | 0.010  |               |
| Endosulfan Sulfate  | ND     | 0.010  |               |
| Endosulfan-I        | ND     | 0.010  |               |
| Endosulfan-II       | ND     | 0.010  |               |
| Endrin              | ND     | 0.010  |               |
| Epoxiconazole       | ND     | 0.010  |               |
| Etaconazole-1       | ND     | 0.010  |               |
| Etaconazole-2       | ND     | 0.010  |               |
| Ethafuralin         | ND     | 0.010  |               |
| Etridiazole         | ND     | 0.010  |               |
| Fenarimol           | ND     | 0.010  |               |
| Fenbuconazole       | ND     | 0.010  |               |
| Fenhexamid          | ND     | 0.010  |               |
| Fenvalerate-1       | ND     | 0.010  |               |
| Fenvalerate-2       | ND     | 0.010  |               |
| Fipronil            | ND     | 0.010  |               |
| Fluchloralin        | ND     | 0.010  |               |
| Flucythrinate       | ND     | 0.010  |               |
| Fludioxanil         | ND     | 0.010  |               |
| Fluquinconazole     | ND     | 0.010  |               |
| Flutolanil          | ND     | 0.010  |               |
| Fluvalinate         | ND     | 0.010  |               |
| Folpet              | ND     | 0.010  |               |
| gamma-BHC/Lindane   | ND     | 0.010  |               |
| gamma-Chlordene     | ND     | 0.010  |               |
| Heptachlor          | ND     | 0.010  |               |
| Heptachlor Epoxide  | ND     | 0.010  |               |
| Hexachlorobenzene   | ND     | 0.010  |               |

# Analytical Report

April 21, 2016

**Client:**

Global Culture  
 315 Meigs Rd. Ste. A-404  
 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No: (b) (4)

PO No:

Client Sample ID: (b) (4)  
 4/6/2016

EMA Sample No: 16041233-01

Date Received: 4/12/2016

Sample Matrix: Clover Plant Tissue

Analytical Method: FDA IMP-OC2

Extraction Method: FDA 302

Date Extracted: 4/15/2016

Date Completed: 4/19/2016

**Comments:**

| Analyte                            | Amount | RL ppm | Tolerance ppm |
|------------------------------------|--------|--------|---------------|
| Hexaconazole                       | ND     | 0.010  |               |
| Imazalil                           | ND     | 0.010  |               |
| Iprodione                          | ND     | 0.010  |               |
| lambda-Cyhalothrin                 | ND     | 0.010  |               |
| Linuron                            | ND     | 0.010  |               |
| Metolachlor                        | ND     | 0.010  |               |
| Mirex                              | ND     | 0.010  |               |
| Monolinuron                        | ND     | 0.010  |               |
| Myclobutanil                       | ND     | 0.010  |               |
| Notrofen                           | ND     | 0.010  |               |
| Nuarimol                           | ND     | 0.010  |               |
| o,p'-DDT                           | ND     | 0.010  |               |
| 0,p'-Methoxychlor                  | ND     | 0.010  |               |
| p,p'-DDE                           | ND     | 0.010  |               |
| p,p'-DDT                           | ND     | 0.010  |               |
| p,p'-Methoxychlor                  | ND     | 0.010  |               |
| Penconazole                        | ND     | 0.010  |               |
| Pentachloroaniline                 | ND     | 0.010  |               |
| Pentachlorobenzene                 | ND     | 0.010  |               |
| Pentachlorobenzonitrile            | ND     | 0.010  |               |
| Pentachlorothioanisole             | ND     | 0.010  |               |
| Polychlorinatedbiphenyl - Cogeners | ND     | 0.010  |               |
| Prochloraz                         | ND     | 0.010  |               |
| Procymidone                        | ND     | 0.010  |               |
| Profluralin                        | ND     | 0.010  |               |
| Pronamide                          | ND     | 0.010  |               |
| Propachlor                         | ND     | 0.010  |               |
| Propanil                           | ND     | 0.010  |               |
| Propiconazole/Tilt-1               | ND     | 0.010  |               |
| Propiconazole/Tilt-2               | ND     | 0.010  |               |
| Pyraclostrobin                     | ND     | 0.010  |               |
| Pyridaben                          | ND     | 0.010  |               |
| Pyrifenox-1                        | ND     | 0.010  |               |
| Pyrifenox-2                        | ND     | 0.010  |               |
| Quinoxifen                         | ND     | 0.010  |               |
| Quintozene                         | ND     | 0.010  |               |
| Simazine                           | ND     | 0.010  |               |
| Tebuconazole                       | ND     | 0.010  |               |
| Tebufenpyrad                       | ND     | 0.010  |               |
| Tecnezene                          | ND     | 0.010  |               |
| Tefluthrin                         | ND     | 0.010  |               |
| Terbuthylazine                     | ND     | 0.010  |               |
| Tetradifon                         | ND     | 0.010  |               |
| Tolyfluanid                        | ND     | 0.010  |               |
| trans-Chlordane                    | ND     | 0.010  |               |
| trans-Nonachlor                    | ND     | 0.010  |               |
| trans-Permethrin                   | ND     | 0.010  |               |
| Triadimefon                        | ND     | 0.010  |               |
| Triadimenol                        | ND     | 0.010  |               |
| Triallate                          | ND     | 0.010  |               |
| Trifloxystrobin                    | ND     | 0.010  |               |
| Triflumizole                       | ND     | 0.010  |               |
| Trifluralin                        | ND     | 0.010  |               |
| Triticonazole                      | ND     | 0.010  |               |
| Vinclozolin                        | ND     | 0.010  |               |

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# Analytical Report

April 21, 2016

**Client:**

Global Culture  
 315 Meigs Rd. Ste. A-404  
 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No: (b) (4)

PO No:

Client Sample ID: (b) (4)  
 4/6/2016

EMA Sample No: 16041233-01

Date Received: 4/12/2016

Sample Matrix: Clover Plant Tissue

Analytical Method: FDA IMP-NSO-1

Extraction Method: FDA 302

Date Extracted: 4/15/2016

Date Completed: 4/18/2016

**Comments:**

| Analyte                  | Amount | RL ppm | Tolerance ppm |
|--------------------------|--------|--------|---------------|
| Allethrin                | ND     | 0.010  |               |
| Acetamidiprid            | ND     | 0.010  |               |
| alpha-Spiroxamine        | ND     | 0.010  |               |
| Ametryn                  | ND     | 0.010  |               |
| Aminocarb                | ND     | 0.010  |               |
| Amitraz                  | ND     | 0.010  |               |
| Aniten/Flurecol Butyl E. | ND     | 0.010  |               |
| Azoxystrobin             | ND     | 0.010  |               |
| Benalaxyl                | ND     | 0.010  |               |
| Bendiocarb               | ND     | 0.010  |               |
| beta-Spiroxamine         | ND     | 0.010  |               |
| Biphenyl                 | ND     | 0.010  |               |
| Biteranol-1              | ND     | 0.010  |               |
| Biteranol-2              | ND     | 0.010  |               |
| Bufenocarb-1             | ND     | 0.010  |               |
| Bufenocarb-2             | ND     | 0.010  |               |
| Bupirimate               | ND     | 0.010  |               |
| Buprofezin               | ND     | 0.010  |               |
| Butralin                 | ND     | 0.010  |               |
| Butylate                 | ND     | 0.010  |               |
| 3-OH Carbofuran          | ND     | 0.010  |               |
| Carbaryl                 | ND     | 0.010  |               |
| Carbofuran               | ND     | 0.010  |               |
| Carbosulfan              | ND     | 0.010  |               |
| Carboxin                 | ND     | 0.010  |               |
| Cycloate/Ro Neet         | ND     | 0.010  |               |
| Cycluron                 | ND     | 0.010  |               |
| Cymiazole                | ND     | 0.010  |               |
| Cyprodinil               | ND     | 0.010  |               |
| Desmedipham              | ND     | 0.010  |               |
| Desmethyl Diphenamid     | ND     | 0.010  |               |
| Desmetryn                | ND     | 0.010  |               |
| Diethofencarb            | ND     | 0.010  |               |
| Difenoconazole           | ND     | 0.010  |               |
| Dioxacarb                | ND     | 0.010  |               |
| Diphenamid               | ND     | 0.010  |               |
| Diphenylamine            | ND     | 0.010  |               |
| d-Phenothrin #           | ND     | 0.010  |               |
| EPTC/Eptam               | ND     | 0.010  |               |
| Ethiofencarb             | ND     | 0.010  |               |
| Ethiolate                | ND     | 0.010  |               |
| Ethofumesate             | ND     | 0.010  |               |
| Ethoxyquin               | ND     | 0.010  |               |
| Etofenprox               | ND     | 0.010  |               |
| Famoxadone               | ND     | 0.010  |               |
| Fenazaquin               | ND     | 0.010  |               |
| Fenfuram                 | ND     | 0.010  |               |
| Fenobucarb               | ND     | 0.010  |               |
| Fenoxycarb               | ND     | 0.010  |               |
| Fenpropathrin            | ND     | 0.010  |               |
| Fenpropimorph            | ND     | 0.010  |               |
| Flusilazole              | ND     | 0.010  |               |
| Fuberidazole             | ND     | 0.010  |               |
| Furalaxyl                | ND     | 0.010  |               |
| Hexazinone               | ND     | 0.010  |               |
| Isocarbamid              | ND     | 0.010  |               |

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## Analytical Report

April 21, 2016

**Client:**

Global Culture  
315 Meigs Rd. Ste. A-404  
Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No: (b) (4)

PO No:

Client Sample ID: (b) (4)  
4/6/2016

EMA Sample No: 16041233-01

Date Received: 4/12/2016

Sample Matrix: Clover Plant Tissue

Analytical Method: FDA IMP-NSO-2

Extraction Method: FDA 302

Date Extracted: 4/15/2016

Date Completed: 4/18/2016

| <u>Analyte</u>        | <u>Amount</u> | <u>RL</u><br><u>ppm</u> | <u>Tolerance</u><br><u>ppm</u> |
|-----------------------|---------------|-------------------------|--------------------------------|
| Isoproc carb          | ND            | 0                       | 010                            |
| Isopropalin           | ND            | 0                       | 010                            |
| Isoprothiolane        | ND            | 0                       | 010                            |
| Lenacil               | ND            | 0                       | 010                            |
| MBTZ                  | ND            | 0                       | 010                            |
| Mepronil              | ND            | 0                       | 010                            |
| Metalaxyl             | ND            | 0                       | 010                            |
| Metaldehyde           | ND            | 0                       | 010                            |
| Methfuroxan           | ND            | 0                       | 010                            |
| Methiocarb            | ND            | 0                       | 010                            |
| Methoprotryne         | ND            | 0                       | 010                            |
| Metolacarb            | ND            | 0                       | 010                            |
| Metribuzin            | ND            | 0                       | 010                            |
| Mexacarbate           | ND            | 0                       | 010                            |
| MGK-264               | ND            | 0                       | 010                            |
| Molinate              | ND            | 0                       | 010                            |
| Naphthalene Acetamide | ND            | 0                       | 010                            |
| Naproanilid           | ND            | 0                       | 010                            |
| Napropamide           | ND            | 0                       | 010                            |
| Nitralin              | ND            | 0                       | 010                            |
| Nitrothal Isopropyl   | ND            | 0                       | 010                            |
| Norea                 | ND            | 0                       | 010                            |
| Octhilinone           | ND            | 0                       | 010                            |
| o-Phenylphenol        | ND            | 0                       | 010                            |
| Pebulate              | ND            | 0                       | 010                            |
| Pendimethalin         | ND            | 0                       | 010                            |
| Phenmedipham          | ND            | 0                       | 010                            |
| Pipernonyl Butoxide   | ND            | 0                       | 010                            |
| Pirimacarb            | ND            | 0                       | 010                            |
| Promecarb             | ND            | 0                       | 010                            |
| Prometon              | ND            | 0                       | 010                            |
| Prometryn             | ND            | 0                       | 010                            |
| Propargite            | ND            | 0                       | 010                            |
| Propham               | ND            | 0                       | 010                            |
| Propoxur              | ND            | 0                       | 010                            |
| Pyracarbolid          | ND            | 0                       | 010                            |
| Pyrethrin-1           | ND            | 0                       | 010                            |
| Pyrethrin-2           | ND            | 0                       | 010                            |
| Pyrimethanil          | ND            | 0                       | 010                            |
| Pyriproxifen          | ND            | 0                       | 010                            |
| Resmethrin            | ND            | 0                       | 010                            |
| Secbumeton            | ND            | 0                       | 010                            |
| Sethoxydim            | ND            | 0                       | 010                            |
| Simetryn              | ND            | 0                       | 010                            |
| Tebutam               | ND            | 0                       | 010                            |
| Tebuthiuron           | ND            | 0                       | 010                            |
| Terbumeton            | ND            | 0                       | 010                            |
| Terbutryn             | ND            | 0                       | 010                            |
| Tetraconazole         | ND            | 0                       | 010                            |
| Tetramethrin-1        | ND            | 0                       | 010                            |
| Tetramethrin-2        | ND            | 0                       | 010                            |
| Thiabendazole         | ND            | 0                       | 010                            |
| THPI                  | ND            | 0                       | 010                            |
| Tralkoxydim           | ND            | 0                       | 010                            |
| Tricyclazole          | ND            | 0                       | 010                            |
| 2,3,5-Trimethacarb    | ND            | 0                       | 010                            |
| 3,4,5-Trimethacarb    | ND            | 0                       | 010                            |
| Vernolate             | ND            | 0                       | 010                            |

Comments:

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## Analytical Report

April 21, 2016

**Client:**

Global Culture  
315 Meigs Rd. Ste. A-404  
Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No: (b) (4)

PO No:

Client Sample ID: (b) (4)  
4/6/2016

EMA Sample No: 16041233-01

Date Received: 4/12/2016

Sample Matrix: Clover Plant Tissue

Analytical Method: FDA IMP-PHOS-1

Extraction Method: FDA 302

Date Extracted: 4/15/2016

Date Completed: 4/18/2016

| Analyte                    | Amount | RL<br>ppm | Tolerance<br>ppm |
|----------------------------|--------|-----------|------------------|
| Acephate                   | ND     | 0         | 010              |
| Azinphos-methyl            | ND     | 0         | 010              |
| beta-Chlorfenvinphos       | ND     | 0         | 010              |
| Cadusafos                  | ND     | 0         | 010              |
| Carbpfenothion             | ND     | 0         | 010              |
| Chlorpyrifos               | ND     | 0         | 010              |
| Chlorpyrifos OA            | ND     | 0         | 010              |
| Chlorpyrifos-methyl        | ND     | 0         | 010              |
| Chlorthiophos              | ND     | 0         | 010              |
| Coumaphos                  | ND     | 0         | 010              |
| Cyanofenphos               | ND     | 0         | 010              |
| Cyanophos                  | ND     | 0         | 010              |
| DEF                        | ND     | 0         | 010              |
| Demeton S Sulfone          | ND     | 0         | 010              |
| Diazinon                   | ND     | 0         | 010              |
| Dichlorvos                 | ND     | 0         | 010              |
| Dicrotophos                | ND     | 0         | 010              |
| Dimethoate                 | ND     | 0         | 010              |
| Dioxathion                 | ND     | 0         | 010              |
| Disulfoton                 | ND     | 0         | 010              |
| Edifenphos                 | ND     | 0         | 010              |
| EPN                        | ND     | 0         | 010              |
| Ethion                     | ND     | 0         | 010              |
| Ethoprop                   | ND     | 0         | 010              |
| 2-Ethylhexyldiphenyl phos. | ND     | 0         | 010              |
| Fenamiphos                 | ND     | 0         | 010              |
| Fenamiphos Sulfone         | ND     | 0         | 010              |
| Fenitrothion               | ND     | 0         | 010              |
| Fenthion                   | ND     | 0         | 010              |
| Fonophos                   | ND     | 0         | 010              |
| Heptenophos                | ND     | 0         | 010              |
| Isofenphos                 | ND     | 0         | 010              |
| Leptophos                  | ND     | 0         | 010              |
| Malathion                  | ND     | 0         | 010              |
| Malathion OA               | ND     | 0         | 010              |

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# Analytical Report

April 21, 2016

**Client:**

Global Culture  
 315 Meigs Rd. Ste. A-404  
 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No: (b) (4)

PO No:

Client Sample ID: (b) (4)  
 4/6/2016

EMA Sample No: 16041233-01

Date Received: 4/12/2016

Sample Matrix: Clover Plant Tissue

Analytical Method: FDA IMP-PHOS-2

Extraction Method: FDA 302

Date Extracted: 4/15/2016

Date Completed: 4/18/2016

| Analyte                         | Amount | RL ppm | Tolerance ppm |
|---------------------------------|--------|--------|---------------|
| Mercarbam                       | ND     | 0.010  |               |
| Methamidophos                   | ND     | 0.010  |               |
| Methodathion                    | ND     | 0.010  |               |
| Methyl Parathion                | ND     | 0.010  |               |
| Methyl Parathion OA             | ND     | 0.010  |               |
| Mevinphos                       | ND     | 0.010  |               |
| Monocrotophos                   | ND     | 0.010  |               |
| Omethaote                       | ND     | 0.010  |               |
| Parathion                       | ND     | 0.010  |               |
| Parathion OA                    | ND     | 0.010  |               |
| Phorate                         | ND     | 0.010  |               |
| Phorate Sulfone                 | ND     | 0.010  |               |
| Phorate Sulfoxide               | ND     | 0.010  |               |
| Phosalone                       | ND     | 0.010  |               |
| Phosmet                         | ND     | 0.010  |               |
| Pirimiphos-methyl               | ND     | 0.010  |               |
| Profenophos                     | ND     | 0.010  |               |
| Prothiophos                     | ND     | 0.010  |               |
| Pyrazophos                      | ND     | 0.010  |               |
| Pyridaphenthion                 | ND     | 0.010  |               |
| Quinalphos                      | ND     | 0.010  |               |
| Sulfotep                        | ND     | 0.010  |               |
| Sulprofos                       | ND     | 0.010  |               |
| Terbufos                        | ND     | 0.010  |               |
| Tetrachlorvinphos               | ND     | 0.010  |               |
| Tolclophos Methyl               | ND     | 0.010  |               |
| Trizaphos                       | ND     | 0.010  |               |
| Trichlorfon                     | ND     | 0.010  |               |
| Tris (Chloropropyl) Phosphate-1 | ND     | 0.010  |               |
| Tris (Chloropropyl) Phosphate-2 | ND     | 0.010  |               |
| Tris 2-Butoxyethyl Phosphate    | ND     | 0.010  |               |

Comments:

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Mailing Address: 315 Meigs Road, Ste A 404, Santa Barbara, CA 93109

**Receipt of Samples Taken at the On-Site Inspection**

§ 205.403 (e) Documents to the inspected operation.

1). At the time of the inspection, the inspector shall provide the operation's authorized representative with a receipt for any samples taken by the inspector. There shall be no charge to the inspector for the samples taken.

2). A copy of the on-site inspection report and any test results will be sent to the inspected operation by the certifying agent.

|                                                                                       |                            |
|---------------------------------------------------------------------------------------|----------------------------|
| Name of Operation:                                                                    | (b) (4)                    |
| Sample Date and time taken:                                                           | 4/6/16 11:15 AM            |
| Location taken:                                                                       | (b) (4)                    |
| Sample of what was taken:                                                             | Berseem Clover (silage)    |
| Number of Samples Taken:                                                              | one 1 gal ziplock bag      |
| Sample Identifier:                                                                    | (b) (4)                    |
| Container used for sample:                                                            | New food grade ziplock Bag |
| Environmental conditions were sample was taken (indoors, outdoors, temperature, etc): | outdoor sunny/warm         |
| Any other Information:                                                                |                            |

Tom B  
Inspector's Signature

4/6/16  
Date

(b) (4)  
Certified Operation's Representative

4-6-16  
Date

Ship samples to:  
**Environmental Micro Analysis, Inc.**  
460 N. East Street  
Woodland, CA 95776  
(530) 666-6890, Fax (530) 666-2987

Report to and Invoice:  
**Global Culture**  
315 Meigs Road, Ste A 404  
Santa Barbara, CA 93109  
(707) 464-6913, Fax (888) 493-7818  
Linda@globalculture.us

Special Instructions:  
FDA Import Screen

Project: (b) (4)

Purchase Order number:

Report via: ( X one) Fax (888) 493-7818  
**X E-Mail: Linda@globalculture.us**

| Sample ID | Product Name/<br>Matrix | Test Requested       | Other Identifier | Sample<br>Date |
|-----------|-------------------------|----------------------|------------------|----------------|
| PB1       | Berseem<br>Clover       | FDA Import<br>Screen |                  | 4/6/16         |
|           |                         |                      |                  |                |
|           |                         |                      |                  |                |
|           |                         |                      |                  |                |
|           |                         |                      |                  |                |

Ship samples to:  
**Environmental Micro Analysis, Inc.**  
460 N. East Street  
Woodland, CA 95776  
(530) 666-6890, Fax (530) 666-2987

Report to and Invoice:  
**Global Culture**  
315 Meigs Road, Ste A 404  
Santa Barbara, CA 93109  
(707) 464-6913, Fax (888) 493-7818  
Linda@globalculture.us

Special Instructions:

---

---

---

Project:

Purchase Order number:

Report via: ( X one) Fax (888) 493-7818  
X E-Mail: Linda@globalculture.us

| Sample ID | Product Name/<br>Matrix | Test Requested       | Other Identifier | Sample<br>Date |
|-----------|-------------------------|----------------------|------------------|----------------|
| (b) (4)   | Asian<br>Pears          | FDA Import<br>Screen | (b) (4)          | 8/25/16        |
|           |                         |                      |                  |                |
|           |                         |                      |                  |                |
|           |                         |                      |                  |                |
|           |                         |                      |                  |                |

# Analytical Report

September 2, 2016

**Client:**

Global Culture  
315 Meigs Rd. Ste. A-404  
Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID: (b) (4)  
8/25/2016

EMA Sample No: 16083114-01

Date Received: 8/31/2016

Sample Matrix: Asian Pear

Analytical Method: FDA Import GC/MS/MS A - Cx

Extraction Method: FDA 302

Date Extracted: 9/1/2016

Date Completed: 9/1/2016

**Comments:**

R = Reported on another Screen  
ND = None Detected at the Reporting Limit (RL)  
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| Analyte                                    | Amount | RL ppm | Tolerance ppm |
|--------------------------------------------|--------|--------|---------------|
| Acephate                                   | ND     | 0.030  |               |
| Acetamiprid                                | ND     | 0.030  |               |
| Acrinathrin                                | ND     | 0.010  |               |
| Adisopropyl naphthalene, 2,6- (DIPN, 2,6-) | ND     | 0.010  |               |
| Alachlor                                   | ND     | 0.010  |               |
| Aldrin                                     | ND     | 0.010  |               |
| Allethrin                                  | ND     | 0.010  |               |
| Ametryn                                    | ND     | 0.010  |               |
| Aminocarb                                  | ND     | 0.010  |               |
| Atrazine                                   | ND     | 0.010  |               |
| Azinphos-methyl                            | ND     | 0.010  |               |
| Azoxystrobin                               | ND     | 0.010  |               |
| Benalaxyl                                  | ND     | 0.010  |               |
| Azoxystrobin                               | ND     | 0.010  |               |
| Bendiocarb                                 | ND     | 0.010  |               |
| Benfluralin                                | ND     | 0.010  |               |
| Benoxacor                                  | ND     | 0.010  |               |
| BHC-alpha (Benzene)                        | ND     | 0.010  |               |
| BHC-beta                                   | ND     | 0.010  |               |
| BHC-delta                                  | ND     | 0.010  |               |
| BHC-gamma (Lindane, gamma HCH)             | ND     | 0.010  |               |
| BifenoX                                    | ND     | 0.010  |               |
| Bifenthrin                                 | ND     | 0.010  |               |
| Bioresmethrin (resmethrin-trans)           | ND     | 0.010  |               |
| Bitertanol I                               | ND     | 0.010  |               |
| Bitertanol II                              | ND     | 0.010  |               |
| Boscalid                                   | ND     | 0.010  |               |
| Bromacil                                   | ND     | 0.030  |               |
| Bromophos-ethyl                            | ND     | 0.010  |               |
| Bromophos-methyl                           | ND     | 0.010  |               |
| Bromopropylate                             | ND     | 0.010  |               |
| Bupirimate                                 | ND     | 0.010  |               |
| Buprofezin (z-isomer)                      | ND     | 0.010  |               |
| Butachlor                                  | ND     | 0.010  |               |
| Butralin                                   | ND     | 0.010  |               |
| Butylate                                   | ND     | 0.030  |               |
| Cadusafos                                  | ND     | 0.010  |               |
| Captafol                                   | ND     | 0.010  |               |
| Captan                                     | ND     | 0.030  |               |
| Carbaryl                                   | ND     | 0.010  |               |
| Carbofuran                                 | ND     | 0.010  |               |
| Carbophenothion-ethyl                      | ND     | 0.010  |               |
| Carbophenothion-methyl (methyl Trithion)   | ND     | 0.010  |               |
| Carbosulfan                                | ND     | 0.030  |               |
| Carboxin                                   | ND     | 0.010  |               |
| Chlorbenzilate                             | ND     | 0.010  |               |
| Chlordane-alpha                            | ND     | 0.010  |               |
| Chlordane-oxy                              | ND     | 0.010  |               |
| Chlordane-trans (gamma)                    | ND     | 0.010  |               |
| Chlordimeform                              | ND     | 0.010  |               |
| Chlorfenapyr                               | ND     | 0.010  |               |
| Chlorfenvinphos                            | ND     | 0.010  |               |
| Chlorobenzilate                            | ND     | 0.010  |               |
| Chloroneb                                  | ND     | 0.010  |               |
| Chlorothalonil                             | ND     | 0.030  |               |
| Chlorpropham                               | ND     | 0.010  |               |
| Chlorpyrifos-ethyl                         | ND     | 0.010  |               |
| Chlorpyrifos-methyl                        | ND     | 0.010  |               |
| Chlorthiophos                              | ND     | 0.010  |               |
| Clomazone                                  | ND     | 0.010  |               |
| Coumaphos                                  | ND     | 0.010  |               |
| Crotoxyphos                                | ND     | 0.010  |               |

# Analytical Report

September 2, 2016

**Client:**

Global Culture  
 315 Meigs Rd. Ste. A-404  
 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: linda@globalculture.us

Project No:

PO No:

Client Sample ID: (b) (4)  
 8/25/2016

EMA Sample No: 16083114-01

Date Received: 8/31/2016

Sample Matrix: Asian Pear

Analytical Method: FDA Import GC/MS/MS Cy - D

Extraction Method: FDA 302

Date Extracted: 9/1/2016

Date Completed: 9/1/2016

| Analyte                                  | Amount | RL ppm | Tolerance ppm |
|------------------------------------------|--------|--------|---------------|
| Cyanazine                                | ND     | 0.010  |               |
| Cyanofenphos                             | ND     | 0.010  |               |
| Cyanophos                                | ND     | 0.010  |               |
| Cycloate                                 | ND     | 0.030  |               |
| Cycluron                                 | ND     | 0.010  |               |
| Cyfluthrin (Total)                       | ND     | 0.010  |               |
| Cyhalothrin (lambda)                     | ND     | 0.010  |               |
| Cymiazole                                | ND     | 0.010  |               |
| Cypermethrin (Total)                     | ND     | 0.010  |               |
| Cyproconazole                            | ND     | 0.010  |               |
| Cyprodinil                               | ND     | 0.010  |               |
| DCPA (dacthal, Chlorthal-dimethyl)       | ND     | 0.010  |               |
| DDD-o,p'                                 | ND     | 0.030  |               |
| DDD-p,p'                                 | ND     | 0.010  |               |
| DDE-o p'                                 | ND     | 0.010  |               |
| DDE-p p'                                 | ND     | 0.010  |               |
| DDT-o,p'                                 | ND     | 0.010  |               |
| DDT-p,p'                                 | ND     | 0.030  |               |
| DEF (Tribufos)                           | ND     | 0.010  |               |
| Deltamethrin                             | ND     | 0.010  |               |
| Demeton-s-methyl                         | ND     | 0.030  |               |
| Desmedipham                              | ND     | 0.010  |               |
| Desmetryn                                | ND     | 0.010  |               |
| Diallate I                               | ND     | 0.030  |               |
| Diallate II                              | ND     | 0.010  |               |
| Diazinon                                 | ND     | 0.010  |               |
| Diazinon-oxon (diazoxon)                 | ND     | 0.010  |               |
| Dichlofenthion                           | ND     | 0.010  |               |
| Dichlofluaniid                           | ND     | 0.030  |               |
| Dichlorobenzonitrile, 2,6- (Dichlobenil) | ND     | 0.030  |               |
| Dichlorvos                               | ND     | 0.030  |               |
| Dichloran (Dichloran)                    | ND     | 0.030  |               |
| Dicofol-o,p'                             | ND     | 0.010  |               |
| Dicofol-p,p' (Kelthane)                  | ND     | 0.010  |               |
| Dicrotofos (Dicrotophos)                 | ND     | 0.010  |               |
| Dieldrin                                 | ND     | 0.010  |               |
| Diethofencarb                            | ND     | 0.010  |               |
| Difenoconazole I                         | ND     | 0.010  |               |
| Difenoconazole II                        | ND     | 0.010  |               |
| Dimethachlor                             | ND     | 0.010  |               |
| Dimethoate                               | ND     | 0.010  |               |
| Dimethomorph I                           | ND     | 0.010  |               |
| Dimethomorph II                          | ND     | 0.010  |               |
| Diniconazole                             | ND     | 0.010  |               |
| Dinitramine                              | ND     | 0.030  |               |
| Dioxacarb                                | ND     | 0.030  |               |
| Dioxathion                               | ND     | 0.010  |               |
| Diphenamid                               | ND     | 0.010  |               |
| Diphenylamine                            | ND     | 0.010  |               |
| Disulfoton                               | ND     | 0.010  |               |
| Disulfoton Sulfone                       | ND     | 0.010  |               |

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# Analytical Report

September 2, 2016

**Client:**

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Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID:

(b) (4)  
8/25/2016

EMA Sample No: 16083114-01

Date Received: 8/31/2016

Sample Matrix: Asian Pear

Analytical Method: FDA Import GC/MS/MS E - H

Extraction Method: FDA 302

Date Extracted: 9/1/2016

Date Completed: 9/1/2016

**Comments:**

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| Analyte                             | Amount | RL ppm | Tolerance ppm |
|-------------------------------------|--------|--------|---------------|
| Edifenphos                          | ND     | 0.010  |               |
| Endosulfan I (alpha Isomer)         | ND     | 0.010  |               |
| Endosulfan II (beta Isomer)         | ND     | 0.010  |               |
| Endosulfan Sulfate                  | ND     | 0.010  |               |
| Endrin                              | ND     | 0.010  |               |
| Endrin Aldehyde                     | ND     | 0.030  |               |
| EPN                                 | ND     | 0.010  |               |
| Epoxiconazole                       | ND     | 0.010  |               |
| Esfenvalerate (Fenvalerate A-alpha) | ND     | 0.010  |               |
| Etaconazole I                       | ND     | 0.010  |               |
| Ethalfuralin (Sonalan)              | ND     | 0.010  |               |
| Ethiofencarb                        | ND     | 0.010  |               |
| Ethiolate                           | ND     | 0.030  |               |
| Ethion                              | ND     | 0.010  |               |
| Ethofumesate                        | ND     | 0.010  |               |
| Ethoprophos (Ethoprop)              | ND     | 0.030  |               |
| Ethoxyquin                          | ND     | 0.030  |               |
| Etoxazole                           | ND     | 0.010  |               |
| Etrifos                             | ND     | 0.010  |               |
| Famoxadone                          | ND     | 0.010  |               |
| Famphur                             | ND     | 0.010  |               |
| Fenamidone                          | ND     | 0.030  |               |
| Fenamiphos (Phenamiphos)            | ND     | 0.010  |               |
| Fenamiphos Sulfone                  | ND     | 0.010  |               |
| Fenarimol                           | ND     | 0.010  |               |
| Fenazaquin                          | ND     | 0.010  |               |
| Fenbuconazole                       | ND     | 0.010  |               |
| Fenfuram                            | ND     | 0.010  |               |
| Fenhexamid                          | ND     | 0.010  |               |
| Fenitrothion                        | ND     | 0.010  |               |
| Fenobucarb                          | ND     | 0.010  |               |
| Fenoxycarb                          | ND     | 0.010  |               |
| Fenpropathrin                       | ND     | 0.010  |               |
| Fenpropimorph                       | ND     | 0.010  |               |
| Fensulfothion                       | ND     | 0.010  |               |
| Fenthion                            | ND     | 0.010  |               |
| Fenvalerate II                      | ND     | 0.010  |               |
| Fipronil                            | ND     | 0.010  |               |
| Flonicamid                          | ND     | 0.010  |               |
| Fluchloralin                        | ND     | 0.010  |               |
| Flucythrinate I                     | ND     | 0.010  |               |
| Flucythrinate II                    | ND     | 0.010  |               |
| Fludioxonil                         | ND     | 0.030  |               |
| Fluopicolide                        | ND     | 0.010  |               |
| Fluquiniconazole                    | ND     | 0.010  |               |
| Flurenol-butyl                      | ND     | 0.010  |               |
| Fluridone                           | ND     | 0.010  |               |
| Flusilazole                         | ND     | 0.010  |               |
| Flutolanil                          | ND     | 0.010  |               |
| Flutriafol                          | ND     | 0.010  |               |
| Fluvalinate I                       | ND     | 0.010  |               |
| Folpet                              | ND     | 0.010  |               |
| Fonofos                             | ND     | 0.010  |               |
| Fuberidazole                        | ND     | 0.030  |               |
| Furalaxyl                           | ND     | 0.010  |               |
| Heptaclor                           | ND     | 0.010  |               |
| Heptaclor exo-epoxide (Isomer B)    | ND     | 0.010  |               |
| Heptenophos                         | ND     | 0.010  |               |
| Hexachlorobenzene                   | ND     | 0.030  |               |
| Hexaconazole                        | ND     | 0.010  |               |
| Hexythiazox                         | ND     | 0.030  |               |

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**Project No:**

PO No:

Client Sample ID: (b) (4)

8/25/2016

EMA Sample No: 16083114-01

Date Received: 8/31/2016

Sample Matrix: Asian Pear

Analytical Method: FDA Import GC/MS/MS I - Pd

Extraction Method: FDA 302

Date Extracted: 9/1/2016

Date Completed: 9/1/2016

**Comments:**

| Analyte                            | Amount | RL ppm | Tolerance ppm |
|------------------------------------|--------|--------|---------------|
| Imazalil                           | ND     | 0.030  |               |
| Indoxacarb                         | ND     | 0.010  |               |
| Iprobenfos                         | ND     | 0.030  |               |
| Iprodione                          | ND     | 0.030  |               |
| Isocarbamid (Isocarbamide)         | ND     | 0.010  |               |
| Isocarbophos                       | ND     | 0.010  |               |
| Isodrin                            | ND     | 0.010  |               |
| Isofenphos                         | ND     | 0.010  |               |
| Isoprocab                          | ND     | 0.010  |               |
| Isopropalin                        | ND     | 0.010  |               |
| Isoprothiolane                     | ND     | 0.030  |               |
| Isoproturon                        | ND     | 0.030  |               |
| Kresoxim-methyl                    | ND     | 0.010  |               |
| Lenacil                            | ND     | 0.010  |               |
| Leptophos                          | ND     | 0.010  |               |
| Linuron                            | ND     | 0.010  |               |
| Malaaxon (metabolite of Malathion) | ND     | 0.010  |               |
| Malathion                          | ND     | 0.010  |               |
| Mecarbam                           | ND     | 0.010  |               |
| Mepanipirim                        | ND     | 0.010  |               |
| Mepronil                           | ND     | 0.010  |               |
| Metalaxyl                          | ND     | 0.010  |               |
| Metalddehyde                       | ND     | 0.030  |               |
| Methidathion                       | ND     | 0.010  |               |
| Methiocarb                         | ND     | 0.010  |               |
| Methoprene                         | ND     | 0.030  |               |
| Methoprotryne                      | ND     | 0.010  |               |
| Methoxychlor, o,p'-                | ND     | 0.010  |               |
| Methoxychlor, p,p'-                | ND     | 0.010  |               |
| Metolachlor                        | ND     | 0.010  |               |
| Metolcarb                          | ND     | 0.030  |               |
| Metrafenone                        | ND     | 0.010  |               |
| Metribuzin                         | ND     | 0.010  |               |
| Mevinphos                          | ND     | 0.030  |               |
| Mexacarbate                        | ND     | 0.010  |               |
| MGK-264                            | ND     | 0.010  |               |
| Mirex                              | ND     | 0.010  |               |
| Molinate                           | ND     | 0.030  |               |
| Monocrotophos                      | ND     | 0.030  |               |
| Monolinuron                        | ND     | 0.010  |               |
| Myclobutanil                       | ND     | 0.010  |               |
| Naled                              | ND     | 0.030  |               |
| Naphthaleneacetamide, 1-           | ND     | 0.010  |               |
| Napropamide                        | ND     | 0.010  |               |
| Nicotine                           | ND     | 0.030  |               |
| Nitrofen                           | ND     | 0.010  |               |
| Nitrothal-isopropyl                | ND     | 0.010  |               |
| Nonachlor, cis-                    | ND     | 0.010  |               |
| Nonachlor, Trans-                  | ND     | 0.010  |               |
| Nuarimol                           | ND     | 0.010  |               |
| Omethoate                          | ND     | 0.010  |               |
| Oxadiazon                          | ND     | 0.010  |               |
| Oxadixyl                           | ND     | 0.010  |               |
| Oxyflurofen                        | ND     | 0.030  |               |
| Paclobutrazole                     | ND     | 0.030  |               |
| Paraoxon-ethyl                     | ND     | 0.010  |               |
| Paraoxon-methyl                    | ND     | 0.010  |               |
| Parathion-ethyl                    | ND     | 0.010  |               |
| Parathion-methyl                   | ND     | 0.010  |               |

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# Analytical Report

September 2, 2016

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Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID:

(b) (4)  
 8/25/2016

EMA Sample No: 16083114-01

Date Received: 8/31/2016

Sample Matrix: Asian Pear

Analytical Method: FDA Import GC/MS/MS Pe - So

Extraction Method: FDA 302

Date Extracted: 9/1/2016

Date Completed: 9/1/2016

**Comments:**

| Analyte                      | Amount | RL ppm | Tolerance ppm |
|------------------------------|--------|--------|---------------|
| Penconazole                  | ND     | 0.010  |               |
| Pendimethalin (Penoxaline)   | ND     | 0.010  |               |
| Pentachloroaniline           | ND     | 0.010  |               |
| Pentachloroanisole           | ND     | 0.010  |               |
| Pentachlorobenzonitrile      | ND     | 0.010  |               |
| Pentachlorothioanisole       | ND     | 0.010  |               |
| Peopiconazole                | ND     | 0.010  |               |
| Permethrin I                 | ND     | 0.010  |               |
| Permethrin II (trans)        | ND     | 0.010  |               |
| Phenothrin I                 | ND     | 0.010  |               |
| Phenothrin II                | ND     | 0.010  |               |
| Phenthoate                   | ND     | 0.010  |               |
| Phenylphenol, 2-             | ND     | 0.010  |               |
| Phorate                      | ND     | 0.010  |               |
| Phorate sulfone              | ND     | 0.010  |               |
| Phorate sulfoxide            | ND     | 0.010  |               |
| Phosalone                    | ND     | 0.010  |               |
| Phosmet                      | ND     | 0.010  |               |
| Phosmet oxon                 | ND     | 0.030  |               |
| Phosphamidon I               | ND     | 0.010  |               |
| Phosphamidon II              | ND     | 0.010  |               |
| Piperonyl Butoxide           | ND     | 0.010  |               |
| Pirimicarb                   | ND     | 0.010  |               |
| Pirimiphos-ethyl             | ND     | 0.010  |               |
| Pirimiphos-methyl            | ND     | 0.010  |               |
| Prochloraz                   | ND     | 0.010  |               |
| Procymidone                  | ND     | 0.010  |               |
| Prodiamine                   | ND     | 0.030  |               |
| Profenofos                   | ND     | 0.010  |               |
| Profluralin                  | ND     | 0.010  |               |
| Promecarb                    | ND     | 0.010  |               |
| Prometon                     | ND     | 0.010  |               |
| Prometryn                    | ND     | 0.010  |               |
| Pronamide (Propyzamide)      | ND     | 0.010  |               |
| Propachlor                   | ND     | 0.010  |               |
| Propanil                     | ND     | 0.010  |               |
| Propargite                   | ND     | 0.010  |               |
| Propetamphos                 | ND     | 0.010  |               |
| Propham                      | ND     | 0.030  |               |
| Propiconazole I              | ND     | 0.010  |               |
| Propiconazole II             | ND     | 0.010  |               |
| Propoxur                     | ND     | 0.010  |               |
| Pyracarbolid                 | ND     | 0.010  |               |
| Pyraclostrobin               | ND     | 0.030  |               |
| Pyrazophos                   | ND     | 0.010  |               |
| Pyridaben                    | ND     | 0.010  |               |
| Pyridaphenthion              | ND     | 0.010  |               |
| Pyrifenox I                  | ND     | 0.010  |               |
| Pyrifenox II                 | ND     | 0.010  |               |
| Pyrimethanil                 | ND     | 0.010  |               |
| Pyriproxyfen                 | ND     | 0.010  |               |
| Quinalphos                   | ND     | 0.010  |               |
| Quinoxifen                   | ND     | 0.010  |               |
| Quintozene                   | ND     | 0.010  |               |
| Resmethrin -cis (cismethrin) | ND     | 0.010  |               |
| Ronnel (Fenchlorphos)        | ND     | 0.010  |               |
| Secbumeton                   | ND     | 0.010  |               |
| Simazine                     | ND     | 0.010  |               |
| Simetryn                     | ND     | 0.010  |               |

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September 2, 2016

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Santa Barbara, CA 93109

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Project No:

PO No:

Client Sample ID: (b) (4)  
8/25/2016

EMA Sample No: 16083114-01

Date Received: 8/31/2016

Sample Matrix: Asian Pear

Analytical Method: FDA Import GC/MS/MS Sp - Z

Extraction Method: FDA 302

Date Extracted: 9/1/2016

Date Completed: 9/1/2016

| Analyte                             | Amount | RL<br>ppm | Tolerance<br>ppm |
|-------------------------------------|--------|-----------|------------------|
| Spirodiclofen                       | ND     | 0.030     |                  |
| Spiromesifen                        | ND     | 0.030     |                  |
| Spiroxamine I                       | ND     | 0.010     |                  |
| Spiroxamine II                      | ND     | 0.010     |                  |
| Sulfotep                            | ND     | 0.010     |                  |
| Sulprofos                           | ND     | 0.030     |                  |
| Tebuconazole                        | ND     | 0.010     |                  |
| Tebufenpyrad                        | ND     | 0.010     |                  |
| Tebupirimfos                        | ND     | 0.010     |                  |
| Tebutam                             | ND     | 0.010     |                  |
| Tebuthiuron                         | ND     | 0.010     |                  |
| Tecnazene (TCNB)                    | ND     | 0.010     |                  |
| Tefluthrin, cis-                    | ND     | 0.010     |                  |
| Terbacil                            | ND     | 0.010     |                  |
| Terbufos                            | ND     | 0.010     |                  |
| Terbumeton                          | ND     | 0.030     |                  |
| Terbutylazine                       | ND     | 0.030     |                  |
| Tetrachloraniline, 2,3,5,6-         | ND     | 0.010     |                  |
| Tetrachlorvinphos, e-isomer         | ND     | 0.010     |                  |
| Tetraconazole                       | ND     | 0.010     |                  |
| Tetradifon                          | ND     | 0.010     |                  |
| Tetrahydrophthalimide, cis-1,2,3,6- | ND     | 0.010     |                  |
| Tetrahydrophthalimide, cis-Delta 4- | ND     | 0.030     |                  |
| Tetramethrin I                      | ND     | 0.010     |                  |
| Tetramethrin II                     | ND     | 0.010     |                  |
| Thiabendazole                       | ND     | 0.030     |                  |
| Thiamethoxam                        | ND     | 0.010     |                  |
| Thionazin                           | ND     | 0.030     |                  |
| Tolclofos-methyl                    | ND     | 0.010     |                  |
| Tolyfluanid                         | ND     | 0.010     |                  |
| Triadimefon                         | ND     | 0.010     |                  |
| Triadimenol                         | ND     | 0.010     |                  |
| Triazophos                          | ND     | 0.010     |                  |
| Tricyclazole                        | ND     | 0.030     |                  |
| Trifloxystrobin                     | ND     | 0.010     |                  |
| Triflunizole                        | ND     | 0.010     |                  |
| Trifluralin                         | ND     | 0.010     |                  |
| Trimethacarb, 2,3,5-                | ND     | 0.010     |                  |
| Trimethacarb, 3,4,5-                | ND     | 0.010     |                  |
| Trimidal (Nuarimol)                 | ND     | 0.010     |                  |
| Triticonazole                       | ND     | 0.010     |                  |
| Vernolate                           | ND     | 0.030     |                  |
| Vinclozolin                         | ND     | 0.010     |                  |

Comments:

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## Analytical Report

September 2, 2016

**Client:**

Global Culture  
315 Meigs Rd. Ste. A-404  
Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID: (b) (4)  
8/25/2016

EMA Sample No: 16083114-01

Date Received: 8/31/2016

Sample Matrix: Asian Pear

Analytical Method: FDA Import LC/MS/MS A-C

Extraction Method: FDA 302

Date Extracted: 9/1/2016

Date Completed: 9/1/2016

**Comments:**

| Analyte                | Amount | RL ppm | Tolerance ppm |
|------------------------|--------|--------|---------------|
| 3-Hydroxycarbofuran    | ND     | 0.010  |               |
| Acephate               | ND     | 0.010  |               |
| Acetamidiprid          | ND     | 0.010  |               |
| Acetochlor             | ND     | 0.010  |               |
| Acibenzolar-S-methyl   | ND     | 0.010  |               |
| Alanycarb              | ND     | 0.010  |               |
| Aldicarb-sulfone       | ND     | 0.010  |               |
| Aldicarb-sulfoxide     | ND     | 0.010  |               |
| Ametryn                | ND     | 0.010  |               |
| Amicarbazone           | ND     | 0.010  |               |
| Aminocarb              | ND     | 0.010  |               |
| Aspon                  | ND     | 0.010  |               |
| Atrazine               | ND     | 0.010  |               |
| Avermectin Ba          | ND     | 0.010  |               |
| Azinphos-methyl        | ND     | 0.010  |               |
| Azoxystrobin           | ND     | 0.010  |               |
| Benalaxyl              | ND     | 0.010  |               |
| Bendiocarb             | ND     | 0.010  |               |
| Benfuracarb            | ND     | 0.010  |               |
| Bensulide              | ND     | 0.010  |               |
| Benzoximate            | ND     | 0.010  |               |
| Bifenazate             | ND     | 0.010  |               |
| Bitertanol             | ND     | 0.010  |               |
| Boscalid               | ND     | 0.010  |               |
| Bromuconazole (isomer) | ND     | 0.010  |               |
| Bupirimate             | ND     | 0.010  |               |
| Buprofezin             | ND     | 0.010  |               |
| Butafenacil            | ND     | 0.010  |               |
| Butocarboxim           | ND     | 0.010  |               |
| Carbaryl               | ND     | 0.010  |               |
| Carbendazim            | ND     | 0.010  |               |
| Carbetamide            | ND     | 0.010  |               |
| Carbofuran             | ND     | 0.010  |               |
| Carbosulfan            | ND     | 0.010  |               |
| Carboxine              | ND     | 0.010  |               |
| Carfentrazone-ethyl    | ND     | 0.010  |               |
| Chlorantraniliprole    | ND     | 0.010  |               |
| Chlordimeform          | ND     | 0.010  |               |
| Chlorfenvinphos        | ND     | 0.010  |               |
| Chlorfluazuron         | ND     | 0.010  |               |
| Chloroxuron            | ND     | 0.010  |               |
| Chlorpyrifos           | ND     | 0.010  |               |
| Chlorpyrifos-methyl    | ND     | 0.010  |               |
| Chlortoluron           | ND     | 0.010  |               |
| Clethodim              | ND     | 0.010  |               |
| Clofentezine           | ND     | 0.010  |               |
| Clothianidin           | ND     | 0.010  |               |
| Coumaphos              | ND     | 0.010  |               |
| Cumyluron              | ND     | 0.010  |               |
| Cyanazine              | ND     | 0.010  |               |
| Cyazofamid             | ND     | 0.010  |               |
| Cycluron               | ND     | 0.010  |               |
| Cyflufenamid           | ND     | 0.010  |               |
| Cyhexatin              | ND     | 0.010  |               |
| Cymoxanil              | ND     | 0.010  |               |
| Cyproconazole (isomer) | ND     | 0.010  |               |
| Cyprodinil             | ND     | 0.010  |               |
| Cyromazine             | ND     | 0.010  |               |

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# Analytical Report

September 2, 2016

**Client:**

Global Culture  
 315 Meigs Rd. Ste. A-404  
 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID: (b) (4)

8/25/2016

EMA Sample No: 16083114-01

Date Received: 8/31/2016

Sample Matrix: Asian Pear

Analytical Method: FDA Import LC/MS/MS D-F

Extraction Method: FDA 302

Date Extracted: 9/1/2016

Date Completed: 9/1/2016

**Comments:**

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| Analyte                | Amount | RL ppm | Tolerance ppm |
|------------------------|--------|--------|---------------|
| Daimuron               | ND     | 0.010  |               |
| Diafenthiuron          | ND     | 0.010  |               |
| Diazinon               | ND     | 0.010  |               |
| Dichlorvos             | ND     | 0.010  |               |
| Diclobutrazol          | ND     | 0.010  |               |
| Dicrotophos            | ND     | 0.010  |               |
| Diethofencarb          | ND     | 0.010  |               |
| Difenoconazole         | ND     | 0.010  |               |
| Diflubenzuron          | ND     | 0.010  |               |
| Dimethenamide          | ND     | 0.010  |               |
| Dimethoate             | ND     | 0.010  |               |
| Dimethomorph           | ND     | 0.010  |               |
| Dimoxystrobin          | ND     | 0.010  |               |
| Diniconazole           | ND     | 0.010  |               |
| Dioxacarb              | ND     | 0.010  |               |
| Diuron                 | ND     | 0.010  |               |
| DMST                   | ND     | 0.010  |               |
| DNOC                   | ND     | 0.010  |               |
| Dodine                 | ND     | 0.010  |               |
| Doramectin             | ND     | 0.010  |               |
| Emamectin Ba           | ND     | 0.010  |               |
| Epoxiconazole          | ND     | 0.010  |               |
| Eprinomectin           | ND     | 0.010  |               |
| Esprocarb              | ND     | 0.010  |               |
| Ethidimuron            | ND     | 0.010  |               |
| Ethiofencarb           | ND     | 0.010  |               |
| Ethiofencarb-sulfoxide | ND     | 0.010  |               |
| Ethion                 | ND     | 0.010  |               |
| Ethiprole              | ND     | 0.010  |               |
| Ethirimol              | ND     | 0.010  |               |
| Ethofumesate           | ND     | 0.010  |               |
| Ethoprop               | ND     | 0.010  |               |
| Etobenzanid            | ND     | 0.010  |               |
| Ettoxazole             | ND     | 0.010  |               |
| Famoxadone             | ND     | 0.010  |               |
| Fenamidone             | ND     | 0.010  |               |
| Fenarimol              | ND     | 0.010  |               |
| Fenazaquin             | ND     | 0.010  |               |
| Fenbuconazole          | ND     | 0.010  |               |
| Fenbutatin Oxide       | ND     | 0.010  |               |
| Fenhexamid             | ND     | 0.010  |               |
| Fenobucarb             | ND     | 0.010  |               |
| Fenoxycarb             | ND     | 0.010  |               |
| Fenpropimorph          | ND     | 0.010  |               |
| Fenpyroximate          | ND     | 0.010  |               |
| Fenuron                | ND     | 0.010  |               |
| Flonicamid             | ND     | 0.010  |               |
| Fluazifop-butyl        | ND     | 0.010  |               |
| Flubendiamide          | ND     | 0.010  |               |
| Fludioxinil            | ND     | 0.010  |               |
| Flufenacet             | ND     | 0.010  |               |
| Flufenoxuron           | ND     | 0.010  |               |
| Fluometuron            | ND     | 0.010  |               |
| Fluopicolide           | ND     | 0.010  |               |
| Fluoxastrobin          | ND     | 0.010  |               |
| Fluquinconazole        | ND     | 0.010  |               |
| Flusilazole            | ND     | 0.010  |               |
| Flutolanil             | ND     | 0.010  |               |
| Flutriafol             | ND     | 0.010  |               |
| Fomesafen              | ND     | 0.010  |               |
| Forchlorfenuron        | ND     | 0.010  |               |
| Formetanate            | ND     | 0.010  |               |
| Fuberidazole           | ND     | 0.010  |               |
| Furalaxyl              | ND     | 0.010  |               |

# Analytical Report

September 2, 2016

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 Santa Barbara, CA 93109

Phone: (805) 464-6913

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Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Project No:

PO No:

Client Sample ID:

(b) (4)  
 8/25/2016

EMA Sample No: 16083114-01

Date Received: 8/31/2016

Sample Matrix: Asian Pear

Analytical Method: FDA Import LC/MS/MS H-O

Extraction Method: FDA 302

Date Extracted: 9/1/2016

Date Completed: 9/1/2016

**Comments:**

| Analyte            | Amount | RL ppm | Tolerance ppm |
|--------------------|--------|--------|---------------|
| Halofenozide       | ND     | 0.010  |               |
| Hexaflumuron       | ND     | 0.010  |               |
| Hexazinone         | ND     | 0.010  |               |
| Hexythiazox        | ND     | 0.010  |               |
| Hydramethylnon     | ND     | 0.010  |               |
| Imazalil           | ND     | 0.010  |               |
| Imazapyr           | ND     | 0.010  |               |
| Imazethapyr        | ND     | 0.010  |               |
| Imibenconazole     | ND     | 0.010  |               |
| Imidacloprid       | ND     | 0.010  |               |
| Indoxacarb         | ND     | 0.010  |               |
| Ipconazole         | ND     | 0.010  |               |
| Iprovalicarb       | ND     | 0.010  |               |
| Isocarbamid        | ND     | 0.010  |               |
| Isofenphos         | ND     | 0.010  |               |
| Isoprocarb         | ND     | 0.010  |               |
| Isoprothiolane     | ND     | 0.010  |               |
| Isoproturon        | ND     | 0.010  |               |
| Ivermectin         | ND     | 0.010  |               |
| Kresoxim-methyl    | ND     | 0.010  |               |
| Lactofen           | ND     | 0.010  |               |
| Linuron            | ND     | 0.010  |               |
| Malathion          | ND     | 0.010  |               |
| Mandipropamid      | ND     | 0.010  |               |
| Mefenacet          | ND     | 0.010  |               |
| Mepanipyrim        | ND     | 0.010  |               |
| Mepronil           | ND     | 0.010  |               |
| Metaflumizone      | ND     | 0.010  |               |
| Metalaxyl          | ND     | 0.010  |               |
| Metconazole        | ND     | 0.010  |               |
| Methamidophos      | ND     | 0.010  |               |
| Methfuroxam        | ND     | 0.010  |               |
| Methidathion       | ND     | 0.010  |               |
| Methiocarb         | ND     | 0.010  |               |
| Methomyl           | ND     | 0.010  |               |
| Methoprotryne      | ND     | 0.010  |               |
| Methoxyfenozide    | ND     | 0.010  |               |
| Metobromuron       | ND     | 0.010  |               |
| Metolachlor        | ND     | 0.010  |               |
| Metoxuron          | ND     | 0.010  |               |
| Metrafenone        | ND     | 0.010  |               |
| Metribuzin         | ND     | 0.010  |               |
| Metsulfuron-methyl | ND     | 0.010  |               |
| Mevinphos          | ND     | 0.010  |               |
| Mexacarbate        | ND     | 0.010  |               |
| Molinate           | ND     | 0.010  |               |
| Monocrotophos      | ND     | 0.010  |               |
| Monolinuron        | ND     | 0.010  |               |
| Moxidectin         | ND     | 0.010  |               |
| Myclobutanil       | ND     | 0.010  |               |
| Napropamide        | ND     | 0.010  |               |
| Neburon            | ND     | 0.010  |               |
| Nitenpyram         | ND     | 0.010  |               |
| Novaluron          | ND     | 0.010  |               |
| Omethoate          | ND     | 0.010  |               |
| Oxamyl             | ND     | 0.010  |               |
| Oxadixyl           | ND     | 0.010  |               |

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# Analytical Report

September 2, 2016

**Client:**

Global Culture  
 315 Meigs Rd. Ste. A-404  
 Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

**Project No:**

**PO No:**

**Client Sample ID:** (b) (4)

8/25/2016

**EMA Sample No:** 16083114-01

**Date Received:** 8/31/2016

**Sample Matrix:** Asian Pear

**Analytical Method:** FDA Import LC/MS/MS P-Trid

**Extraction Method:** FDA 302

**Date Extracted:** 9/1/2016

**Date Completed:** 9/1/2016

**Comments:**

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| Analyte                          | Amount | RL ppm | Tolerance ppm |
|----------------------------------|--------|--------|---------------|
| Pencycuron                       | ND     | 0.010  |               |
| Pendimethalin                    | ND     | 0.010  |               |
| Phorate                          | ND     | 0.010  |               |
| Phosmet                          | ND     | 0.010  |               |
| Phoxim                           | ND     | 0.010  |               |
| Picoxystrobin                    | ND     | 0.010  |               |
| Piperonyl butoxide               | ND     | 0.010  |               |
| Pirimicarb                       | ND     | 0.010  |               |
| Pirimiphos-methyl                | ND     | 0.010  |               |
| Prochloraz                       | ND     | 0.010  |               |
| Promecarb                        | ND     | 0.010  |               |
| Prometon                         | ND     | 0.010  |               |
| Prometryn                        | ND     | 0.010  |               |
| Propachlor                       | ND     | 0.010  |               |
| Propamocarb                      | ND     | 0.010  |               |
| Propargite                       | ND     | 0.010  |               |
| Propazine                        | ND     | 0.010  |               |
| Propham                          | ND     | 0.010  |               |
| Propiconazole                    | ND     | 0.010  |               |
| Propoxur                         | ND     | 0.010  |               |
| Propyzamide                      | ND     | 0.010  |               |
| Pymetrozin                       | ND     | 0.010  |               |
| Pyracarbolid                     | ND     | 0.010  |               |
| Pyraclostrobin                   | ND     | 0.010  |               |
| Pyridaben                        | ND     | 0.010  |               |
| Pyridaphenthion                  | ND     | 0.010  |               |
| Pyrimethanil                     | ND     | 0.010  |               |
| Pyriproxyfen                     | ND     | 0.010  |               |
| Quinoxifen                       | ND     | 0.010  |               |
| Sebuthylazine                    | ND     | 0.010  |               |
| Secbumeton                       | ND     | 0.010  |               |
| Sethoxydim                       | ND     | 0.010  |               |
| Siduron                          | ND     | 0.010  |               |
| Simazine                         | ND     | 0.010  |               |
| Simetryn                         | ND     | 0.010  |               |
| Spinetoram-J +L                  | ND     | 0.010  |               |
| Spinosad                         | ND     | 0.010  |               |
| Spirodiclofen                    | ND     | 0.010  |               |
| Spiromecifen                     | ND     | 0.010  |               |
| Spirotetramat                    | ND     | 0.010  |               |
| Spiroxamine                      | ND     | 0.010  |               |
| Sulfentrazone                    | ND     | 0.010  |               |
| Tebuconazole                     | ND     | 0.010  |               |
| Tebufenozide                     | ND     | 0.010  |               |
| Tebufenpyrad                     | ND     | 0.010  |               |
| Tebuthiuron                      | ND     | 0.010  |               |
| Temephos                         | ND     | 0.010  |               |
| Tepaloxymid                      | ND     | 0.010  |               |
| Terbumeton                       | ND     | 0.010  |               |
| Terbutryn                        | ND     | 0.010  |               |
| Tetraconazole                    | ND     | 0.010  |               |
| Thiabendazole                    | ND     | 0.010  |               |
| Thiacloprid                      | ND     | 0.010  |               |
| Thiamethoxam                     | ND     | 0.010  |               |
| Thidiazuron                      | ND     | 0.010  |               |
| Thiobencarb                      | ND     | 0.010  |               |
| Thiofanox                        | ND     | 0.010  |               |
| Thiophanate-methyl (Carbendazim) | ND     | 0.010  |               |
| Triadimefon                      | ND     | 0.010  |               |
| Triadimenol                      | ND     | 0.010  |               |
| Triazophos                       | ND     | 0.010  |               |
| Tricyclazole                     | ND     | 0.010  |               |
| Tridemorph                       | ND     | 0.010  |               |

## Analytical Report

September 2, 2016

**Client:**

Global Culture  
315 Meigs Rd. Ste. A-404  
Santa Barbara, CA 93109

Phone: (805) 464-6913

Fax: (888) 493-7818

Email: [linda@globalculture.us](mailto:linda@globalculture.us)

Analyte

Amount

RL  
ppm

Tolerance  
ppm

|                       |    |       |
|-----------------------|----|-------|
| Trifloxystrobin       | ND | 0.010 |
| Triflumizole          | ND | 0.010 |
| Triflumuron           | ND | 0.010 |
| Triflusulfuron-methyl | ND | 0.010 |
| Triphenyl Phosphate   | ND | 0.010 |
| Triticonazole         | ND | 0.010 |
| Uniconazole           | ND | 0.010 |
| Vamidothion           | ND | 0.010 |
| Zoxamide              | ND | 0.010 |

Project No:

PO No:

Client Sample ID: (b) (4)  
8/25/2016

EMA Sample No: 16083114-01

Date Received: 8/31/2016

Sample Matrix: Asian Pear

Analytical Method: FDA Import LC/MS/MS Trif-Z

Extraction Method: FDA 302

Date Extracted: 9/1/2016

Date Completed: 9/1/2016

Comments:

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GLOBAL CULTURE  
Crescent City, CA 95531  
(707) 464-6913 ♦ Fax (888) 493-7818  
info@globalculture.us

Mailing Address: 315 Meigs Road, Ste A 404, Santa Barbara, CA 93109

**Receipt of Samples Taken at the On-Site Inspection**

§ 205.403 (e) Documents to the inspected operation.

1). At the time of the inspection, the inspector shall provide the operation's authorized representative with a receipt for any samples taken by the inspector. There shall be no charge to the inspector for the samples taken.

2). A copy of the on-site inspection report and any test results will be sent to the inspected operation by the certifying agent.

|                                                                                                                   |
|-------------------------------------------------------------------------------------------------------------------|
| Name of Operation:<br><b>(b) (4)</b>                                                                              |
| Sample Date and time taken:<br>8/25/16                                                                            |
| Location taken:<br><b>(b) (4)</b> <b>(b) (4)</b>                                                                  |
| Sample of what was taken:<br>Asian Pears                                                                          |
| Number of Samples Taken:<br>1                                                                                     |
| Sample Identifier:<br><b>(b) (4)</b>                                                                              |
| Container used for sample:<br>New Food grade ziplock                                                              |
| Environmental conditions were sample was taken<br>(indoors, outdoors, temperature, etc):<br>outdoor overcast/cool |
| Any other Information:                                                                                            |

  
Inspector's Signature  
**(b) (4)**

8/25/16  
Date  
8-25-16  
Date

**CALIFORNIA DEPARTMENT OF AGRICULTURE**  
**OPERATION DETAILS - SAMPLING RESULTS**

Operation Organic ID: 10-000652

Operation Company Name: (b) (4)

VIEW SAMPLE RESULTS

07/20/2017

Lab ID:

**R17O00236**

Analysis:

**Pesticide Screen**

Pesticide Detected:

**None**

Amount:

EPA Tolerance:

NOP Tolerance:

Limit:

Ext.Code:

Det.Code:

**OPERATION DETAILS - SAMPLING RESULTS**

Operation Organic ID: 10-000652

Operation Company Name: (b) (4)

VIEW SAMPLE RESULTS

05/05/2017

Lab ID:

**R17O00096**

Analysis:

**Pesticide Screen**

Pesticide Detected:

**None**

Amount:

EPA Tolerance:

NOP Tolerance:

Limit:

Ext.Code:

Det.Code:

**OPERATION DETAILS - SAMPLING RESULTS**

Operation Organic ID: 10-000652

Operation Company Name: (b) (4)

VIEW SAMPLE RESULTS

03/29/2017

Lab ID:

**R17O00068**

Analysis:

**Pesticide Screen**

Pesticide Detected:

**None**

Amount:

EPA Tolerance:

NOP Tolerance:

Limit:

Ext.Code:

Det.Code:

**From:** [Global Culture - Linda Van Hook](#)  
**To:** [AMS - NOPAppeals](#)  
**Cc:** [Lopez, JasonJ - AMS](#)  
**Subject:** GLO Annual Report 4-14-17 Exhibit J  
**Date:** Thursday, March 8, 2018 4:05:16 AM  
**Attachments:** [ACA-GLO Membership 10-1-15 to 09-30-16.pdf](#)  
[ACA-GLO Membership 10-1-16 to 09-30-17.pdf](#)  
[GLO Organic System Manual 3-22-16.doc](#)  
[GLO-ACA Membership 2015-2016.pdf](#)  
[GLO-Mid Term Audit 2-18-16.pdf](#)  
[GLO-NOP-ACA Training- Portland, OR 2017.pdf](#)  
[GLO-NOP-ACA Training-Savannah, GA 2016.pdf](#)  
[OMRI-GLO 2017 Contract Agreement.pdf](#)  
[PCO-GLO Material List-Review Agreement 2017.pdf](#)

---

GLO Annual Report 4-14-17 Exhibit J is attached.

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# The Accredited Certifiers Association, Inc.

PO Box 472 • Port Crane, NY 13833

[www.accreditedcertifiers.org](http://www.accreditedcertifiers.org)

*extends its appreciation to*

## **Global Culture**

**a USDA Accredited Certifier**

315 Meigs Road, Suite A 404

Santa Barbara, CA 93109

for membership in the

***Accredited Certifiers Association, Inc.***

From October 1, 2015 to September 30, 2016

*Accredited certifying agents working together to ensure the integrity of  
organic certification in the United States*



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**GLOBAL CULTURE**  
Crescent City, California 95531  
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**Global Culture**  
**Organic System Manual**  
**Certification Procedures**

**Notice To User:**

**Please understand when using this manual that the USDA National Organic Program Regulatory Text is the Official Organic Standards, and that the information listed in this manual is for general guidance only.**

**Global Culture**  
**Organic System Manual Certification Procedures**  
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## Appendix

A). National List of Allowed and Prohibited Substances.

NOP Regulations Section 205.600, ET SEQ. The most current National List of Allowed and Prohibited Substances can be found at the following NOP website [www.ams.usda.gov/nop/](http://www.ams.usda.gov/nop/)

B). National Organic Program (NOP) Regulatory Text. The most current NOP Regulation can be found at the following NOP website [www.ams.usda.gov/nop/](http://www.ams.usda.gov/nop/)

## **1). STATEMENT OF PURPOSE:**

Global Culture organic certification procedures allow for the certifying of operations that meet the requirements of the Organic Foods Production Act of 1990 (the “Act”) as amended, the USDA National Organic Program (NOP) (7 CFR Part 205.) and applicable State Organic Programs (SOP) regulations.

## **II). GLOBAL CULTURE GENERAL POLICIES:**

In carrying out its certifying responsibilities, Global Culture adheres to the following policies:

- 1). Global Culture uses the most current NOP standards as the basis for its certification procedure. A copy of the NOP regulation is provided to the applicant for his review at the beginning of the certification process. Please note that the most current National Organic Program Regulatory Text can be found at [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop). Global Culture takes all steps necessary to evaluate applicant conformance with the applicable NOP and SOP regulations. Global Culture will comply with, implement, and carry out any other terms and conditions determined by the AMS administrator, or SOP representative to be necessary.
- 2). Global Culture will not make false or misleading claims about its accreditation status, the USDA accreditation program for certifying agents, or the nature or qualities of products labeled as organically produced.
- 3). Global Culture will provide sufficient information to persons seeking certification to enable them to comply with applicable requirements of the Act and NOP regulations. The most current USDA NOP Regulations can be found at the following link: [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)
- 4). All requirements, applications, on-site inspections and decisions regarding certification are confined to matters specifically related to the scope of the certification being sought.
- 5). Global Culture accepts certification decisions made by other certifying agents who have been accredited to the USDA National Organic Program pursuant to NOP regulation §205.500.
- 6). Global Culture does not exclude from participation in, or deny the benefits of, the NOP to any person due to discrimination on the basis of race, color, national origin, gender, religion, age, disability, political beliefs, sexual orientation, marital, or family status.
- 7). Global Culture will maintain strict confidentiality with respect to its clients and will not disclose to third parties (with the exception of the Secretary of Agriculture and/or the applicable SOP Official or their authorized representatives) any business-related information concerning any client obtained while implementing the regulations in this part, except as provided for in section §205.504(b)(5).
- 8). Global Culture will accept all applications for certification that fall within its scope

of accreditation and geographic inspection radius 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.

9). Global Culture will submit to the Administrator a copy of:

a). Any notice of denial of certification issued pursuant to NOP regulation §205.405, notification of noncompliance, notice of noncompliance correction, notification of proposed suspension or revocation, and notice of suspension or revocation sent pursuant to NOP regulation §205.662 simultaneously with it's issuance.

b). A list on or before January 2 of each year, including the name, address, telephone number and scope of certification of each operation granted certification by Global Culture during the preceding year.

10). Global Culture will 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.

11). Global Culture will pay and submit fees to AMS in accordance with NOP regulation §205.640.

12). Global Culture will provide the inspector, prior to each on-site inspection with the previous years on-site inspection reports and notify the inspector of it's decision regarding certification of the production or handling operation site inspected by the inspector and of any requirements for the correction of minor noncompliance.

### **III). APPLICABILITY**

#### **A). What has to be Certified**

1). Except for operations exempt or excluded as provided for below, each production or handling operation or specified portion of a production or handling operation that produces or handles crops, livestock, livestock products, or other agricultural products that are intended to be sold, labeled, or represented as "100 Percent Organic", "Organic", or "Made with Organic (Specific Ingredients or Food Group(s))" must be certified according to the NOP Regulations and the standards set forth therein.

2). Any production or handling operation or specified portion of a production or handling operation that has already been certified by a certifying agent on the date that the certifying agent receives it's accreditation under the NOP Regulations shall be deemed to be certified under the Act until the operation's next anniversary date of certification. Such recognition shall only be available to those operations certified by a certifying agent that receives its accreditation within 18 months from February 20, 2001.

#### **B). Exemptions from Certification**

1). A production or handling operation that sells agricultural products as "Organic" but whose gross agricultural income from organic sales totals \$5,000.00 or less annually is

exempt from certification and exempt from submitting an Organic System Plan for acceptance or approval but must comply with the applicable organic production, and handling requirements of NOP §205.101 (c) and the labeling requirements of NOP §205.310. The products from such operations shall not be used as ingredients identified as organic in processed products produced by another handling operation.

2). A handling operation that is a retail food establishment or portion of a retail food establishment that handles organically produced agricultural products but does not process them is exempt from the requirements of this part.

3). A handling operation or portion of a handling operation that only handles agricultural products that contain less than 70% organic ingredients by total weight of the finished product (excluding water and salt) is exempt from the requirements of this part except:

- a). The provisions for prevention of contact of organic products with prohibited substances set forth in NOP §205.272 with respect to any organically produced ingredients used in an agricultural product.
- b). The labeling provisions of section (IV) (G) (1-2) of this manual below, and NOP §205.305, and §205.310.
- c). The record keeping provisions in paragraph (c) of the NOP §205.101.

### **C). Exclusions from Certification**

1). A handling operation or portion of a handling operation is excluded from the requirements of this part, except for the requirements for the prevention of commingling and contact with prohibited substances as set forth in section (IV)(E)(3) of this manual, with respect to any organically produced products, if such operation or portion of the operation only sells organic agricultural products labeled as “100 Percent Organic”, “Organic”, or “Made with Organic (Specified Ingredients or Food Group(s))” that:

- a). Are packaged or otherwise enclosed in a container prior to being received or acquired by the operation.
- b). Remain in the same package or container and are not otherwise processed while in the control of the handling operation.

2). A handling operation that is a retail food establishment or portion of a retail food establishment that processes, on the premises of the retail food establishment, raw and ready-to-eat food from agricultural products that were previously labeled as “100 Percent Organic”, “Organic”, or “Made with Organic (Specified Food Group(s))” is excluded from the requirements of certification under the NOP Regulations, except:

- a). The requirements for the prevention of contact with prohibited substances as provided in the NOP section §205.272.
- b). The labeling provisions of NOP section §205.310.

#### **D). Records to be Maintained by Exempt Operations**

- 1). Any handling operation exempt from certification as set forth above must maintain records sufficient to:
  - a). Prove that ingredients identified as organic were organically produced and handled.
  - b). Verify quantities produced from such ingredients.
- 2). Records must be maintained for no less than 5 years beyond their creation and the operations must allow a representative of the Secretary of the NOP and the applicable State organic programs governing State official access to these records for inspection and copying during normal business hours to determine compliance with the applicable regulations.

#### **IV. ORGANIC PRODUCTION, HANDLING, AND LABELING REQUIREMENTS**

Any agricultural product that is sold, labeled, or represented as “100 Percent Organic”, “Organic”, or “Made with Organic (Specified Ingredients or Food Group(s))” must be produced and handled in accordance with the NOP Regulations and the standards set forth below.

Applicants of a production or handling operation intending to sell, label, or represent agricultural products as “100 Percent Organic”, “Organic”, or “Made with Organic (Specified Ingredients or Food Group(s))” must comply with the applicable provisions of the NOP regulations, section 205.200(c). Production practices implemented in accordance with this subpart must maintain or improve the natural resources of the operation, including soil and water quality.

#### **A). Organic Production and Handling System Plan (OSP)**

The applicant of a production or handling operation, except as exempt or excluded under NOP regulation 205.101 intending to sell, label, or represent agricultural products as “100 Percent Organic”, “Organic”, or “Made with Organic (Specified Ingredients or Food Group(s))” must develop an organic production or handling system plan agreed upon by the producer or handler and Global Culture. An Organic System Plan must include (NOP regulation §205.201):

- 1). A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed.
- 2). A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and the documentation of commercial availability as applicable.
- 3). A description of the monitoring practices and procedures to be performed, to verify that plan is effectively implemented.

4). A description of the record keeping system which must comply with NOP regulation §205.103.

- a). Be adapted to the particular business that the applicant is conducting.
- b). Fully disclose all activities and transactions of the applicant's operation in sufficient detail as to be readily understood and audited.
- c). Be maintained for not less than 5 years beyond their creation.
- d). Be sufficient to demonstrate compliance with the Act, and NOP regulations.

5). 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 handling operations and products with prohibited substances.

6). Any additional information deemed necessary by Global Culture to verify compliance with the NOP regulations.

7). A producer may substitute a plan prepared to meet the requirements of another Federal, State, or local government regulatory program for the Organic System Plan provided that, the submitted plan meets all of the requirements of this subpart.

### **C). Production (Crops)**

#### **1). Land Requirements:**

Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as "organic" must:

- a). Have been managed in accordance with the Farm Practices Standards set forth below.
- b). Have had no prohibited substances (listed in NOP §205.105, §205.600) applied to it for a period of three years immediately preceding harvest of the crop.
- c). Have distinct, defined boundaries and buffer zones, such as runoff diversions to prevent the unintended application of a prohibited substance to the crop, or contact with a prohibited substance applied to adjoining land that is not under organic management.

#### **2). Soil Fertility and Crop Nutrient Management Practice Standards.**

- a). The producer must select and implement tillage and cultivation practices that maintain or improve the physical, chemical, and biological condition of the soils, and minimize soil erosion.
- b). The producer must manage crop nutrients, and soil fertility through rotations, use of cover crops, and the application of plant and animal materials.

c). The producer must manage plant and animal materials to maintain or improve soil organic matter content in a manner that does not contribute to contamination of crops, soil or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances. Animal and plant materials include:

1). Raw Animal Manure, which must be composted unless:

a). Applied to land used for a crop not intended for human consumption.

b). Incorporated into the soil not less than 120 days prior to the harvest of a product whose edible portion has direct contact with the soil surface or soil particles.

c). Incorporated into the soil not less than 90 days prior to the harvest of a product whose edible portion does not have direct contact with the soil surface or soil particles.

2). Composted Plant and Animal Materials produced through a process that:

a) Established an initial C: N ratio of between 25:1 and 40:1 and

b). Maintained a temperature of between 131F and 170F for 3 days using a vessel or static aerated pile system or

c). Maintained a temperature of between 131F and 170F for 15 days using a windrow composting system during which period, the materials must be turned a minimum of five times.

3). Processed Manure Products must be treated so that all portions of the product, without causing combustion,

a). Reach a minimum temperature of either 150° F (66°C) for at least one hour or 165°F (74°C), and

b). Are dried to a maximum moisture level of 12%; or an equivalent heating and drying process could be used.

In determining the acceptability or an equivalent process, processed manure products should not contain more than 1X10 to the third, (1,000) MPN (Most Probable Number) fecal coliform per gram of processed manure sampled and not contain more than 3 MPN Salmonella per 4 gram sample of processed manure.

4). Uncomposted Plant Materials

A producer may manage crop nutrients and soil fertility to maintain or improve soil organic matter content in a manner that does not contribute to contamination of crops, soil or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances by applying:

1). A crop nutrient or soil amendment included on the National List of synthetic substances allowed for use in organic crop production.

- 2). A mined substance of low solubility.
- 3). A mined substance of high solubility, Provided, that the substance is used in compliance with the conditions established on the National List of nonsynthetic materials prohibited for crop production.
- 4). Ash obtained from the burning of a plant or animal material, except as prohibited in paragraph (e) of this section: Provided, that the material burned has not been treated or combined with a prohibited substance or the ash is not included on the National List of nonsynthetic substances prohibited for use in organic crop production, and
- 5). A plant or animal material that has been altered by a manufacturing process, Provided, that the material is included on the National List of synthetic substances allowed for use in organic crop production as established in NOP regulation 205.601.

The producer must not use:

- 1). Any fertilizer or composted plant and animal material that contains a synthetic substance not included on the National List of synthetic substances allowed for use in organic crop production.
- 2). Sewage sludge - (biosolids) as defined in 40 CFR Part 503
- 3). Burning as a means of disposal for crop residues produced on the operation, Except that, burning may be used to suppress the spread of disease or to stimulate seed germination.

**3). Seeds and Planting Stock Standards**

- a). A producer must use organically grown seeds, and annual seedlings, and planting stock, Except that,
  - 1). Nonorganically produced, untreated seeds and planting stock may be used to produce an organic crop when an equivalent organically produced variety is not commercially available, Except that, organically produced seed must be used for the production of edible sprouts.
  - 2). Nonorganically produced seeds and planting stock that have been treated with a substance included on the National List of synthetic substances allowed for use in organic crop production may be used to produce an organic crop when an equivalent organically produced or untreated variety is not commercially available.
  - 3). Nonorganically produced annual seedlings may be used to produce an organic crop when a temporary variance has been granted in accordance with NOP regulation §205.290(a)(2).
  - 4). Nonorganically produced planting stock to be used to produce a perennial crop may be sold, labeled or represented as organically produced only after the planting stock has been maintained under a system of organic management for a period of not less than (1)

year.

5). Seeds, annual seedlings, and planting stock treated with prohibited substances may be used to produce an organic crop when the application of the materials is a requirement of Federal or State phytosanitary regulations.

#### **4).Natural Resources**

Production practices must maintain or improve natural resources (soil and water quality, wetlands, woodlands and wildlife) of the operation. Your field map should include features such as hedgerows, woodlands, wetlands, riparian zones, special habitats, etc. Make note of native plants present and or wildlife seen moving through farm. Think about how you can provide for biodiversity and conservation such as understanding farm's location within watershed, know what native plants and animal existed on the land before it was a farm, learn about regional natural areas and conservation priorities, work with neighbors and others to enhance biodiversity through connectivity, restoration, etc.

Do you provide habitat for pollinators, insect predator, birds and bats by providing bird/bat/bee boxes, hedgerows/windbreaks, maintain/provide natural roosting/nesting/foraging sites, etc.? Are you restoring and/or protecting natural areas by allowing native plants/wildlife specific to the site, preserve/restore wildlife corridors, establish legal conservation areas, native habitats not converted to farmland since certification, etc.?

#### **5). Crop Rotation Practice Standard**

Definitions:

Crop rotation. The practice of alternating the annual crops grown on a specific field in a planned pattern or sequence in successive crop years so that crops of the same species or family are not grown repeatedly without interruption on the same field. Perennial cropping systems employ means such as alley cropping, intercropping, and hedgerows to introduce biological diversity in lieu of crop rotation.

Crop year. That normal growing season for a crop as determined by the Secretary.

#### **§ 205.205 Crop rotation practice standard.**

The producer must implement a crop rotation including but not limited to sod, cover crops, green manure crops, and catch crops that provide the following functions that are applicable to the operation:

- (a) Maintain or improve soil organic matter content;
- (b) Provide for pest management in annual and perennial crops;
- (c) Manage deficient or excess plant nutrients; and
- (d) Provide erosion control.

## **6). Crop Pest, Weed and Disease Management Practice Standard**

- a). The producer must use management practices to prevent crop pests, weeds, and diseases including but not limited to:
- 1). Crop rotation, soil and crop nutrient management practices as provided for in NOP regulation §205.203 and §205.205.
  - 2). Sanitation measures to remove disease vectors, weed seeds, and habitat for pest organisms and,
  - 3). Cultural practices that enhance crop health, including selection of plant species and varieties with regard to suitability to site-specific conditions and resistance to prevalent pests, weeds, and diseases.
- b). Pest problems may be controlled through mechanical or physical methods including but not limited to:
- 1). Augmentation or introduction of predators or parasites of the pest species.
  - 2). Development of habitat for natural enemies of the pests.
  - 3). Nonsynthetic controls such as lures, traps, and repellents.
- c). Weed problems may be controlled through:
- 1). Mulching with fully biodegradable materials.
  - 2). Livestock grazing
  - 3). Mowing
  - 4). Hand weeding or mechanical cultivation
  - 5). Flame, heat, or electrical means or:
  - 6). Plastic or other synthetic mulches: Provided that, they are removed from the field at the end of the growing or harvest season.
- d). Disease problems may be controlled through:
- 1). Management practices which suppress the spread of disease organisms or,
  - 2). Application of nonsynthetic biological, botanical, or mineral inputs.
- e). When the practices provided for in paragraphs (a) through (d) of this section are insufficient to prevent the control of crop pests, weeds, and diseases, a biological or botanical substance or a substance included on the National List of synthetic substances allowed for in organic crop production may be applied to prevent, suppress, or control

pests, weeds, or diseases: Provided that, the conditions for using the substance are documented in the Organic System Plan.

f). The producer may not use lumber treated with arsenate or other prohibited materials for new installations or replacement purposes in contact with soil or livestock.

#### **D). Production (Livestock)**

##### **1). Origin of Livestock.**

Livestock products that are to be sold, labeled, or represented as organic must be from livestock under continuous organic management from the last third of gestation or hatching: Except that,

a). Poultry. Poultry or edible poultry products must be from poultry that has been under continuous organic management beginning no later than the second day of life.

b). Dairy Animals. Milk or milk products must be from animals that have been under continuous organic management beginning no later than 1 year prior to the production of milk or milk products that are to be sold, labeled or represented as organic, Except

1. That, crops and forage from land, included in the organic system plan of a dairy farm, that is in the third year of organic management may be consumed by the dairy animals of the farm during the 12-month period immediately prior to the sale of organic milk and milk products; and

2. That when an entire distinct herd is converted to organic production the producer may, provided no milk produced under this subparagraph enters the stream of commerce labeled as organic after June 9, 2007:

3. For the first 9 months of the year, provide a minimum of 80 percent feed that is either organic or raised from land included in the Organic System Plan and managed in compliance with organic crop requirements; and

4. Provide feed in compliance with NOP regulation §205.237 for the final 3 months.

5. Once an entire distinct herd has been converted to organic production, all dairy animals shall be under organic management from the last third of gestation.

c). Breeder Stock. Livestock used as breeder stock may be brought from a nonorganic operation into an organic operation at any time: Provided that, if such livestock are gestating and the offspring are to be raised as organic livestock, the breeder stock must be brought onto the facility no later than the last third of gestation.

##### **2). The following are prohibited:**

a). Livestock or edible livestock products that are removed from an organic operation and subsequently managed on a nonorganic operation may not be sold, labeled or represented as organically produced.

b). Breeder or dairy stock that has not been under continuous organic management since the last third of gestation may not be sold, labeled, or represented as organic slaughter stock.

**3). Records to be maintained:**

The producer of an organic livestock operation must maintain records sufficient to preserve the identity of all organically managed animals and edible and non-edible animal products on the operation.

**4). §205.237 Livestock Feed.**

**§ 205.237 Livestock feed.**

(a) The producer of an organic livestock operation must provide livestock with a total feed ration composed of agricultural products, including pasture and forage, that are organically produced and handled by operations certified to the NOP, except as provided in §205.236(a)(2)(i), except, that, synthetic substances allowed under §205.603 and nonsynthetic substances not prohibited under §205.604 may be used as feed additives and feed supplements, *Provided*, That, all agricultural ingredients included in the ingredients list, for such additives and supplements, shall have been produced and handled organically.

b). The producer of an organic operation must not:

- 1). Use animal drugs, including hormones to promote growth.
- 2). Provide feed supplements or additives in amounts above those needed for adequate nutrition and health maintenance for the species at its specific stage of life.
- 3). Feed plastic pellets for roughage.
- 4). Feed formulas containing urea, or manure.
- 5). Feed mammalian or poultry slaughter by-products to mammals or poultry.
- 6). Use feed, feed additives, and feed supplements in violation of the Federal Food, Drug, and Cosmetic Act.
- (7) Provide feed or forage to which any antibiotic including ionophores has been added; or
- (8) Prevent, withhold, restrain, or otherwise restrict ruminant animals from actively obtaining feed grazed from pasture during the grazing season, except for conditions as described under §205.239(b) and (c).

(c) During the grazing season, producers shall:

- (1) Provide not more than an average of 70 percent of a ruminant's dry matter demand from dry matter fed (dry matter fed does not include dry matter grazed from residual forage or vegetation rooted in pasture). This shall be calculated as an average over the entire grazing

season for each type and class of animal. Ruminant animals must be grazed throughout the entire grazing season for the geographical region, which shall be not less than 120 days per calendar year. Due to weather, season, and/or climate, the grazing season may or may not be continuous.

(2) Provide pasture of a sufficient quality and quantity to graze throughout the grazing season and to provide all ruminants under the organic system plan with an average of not less than 30 percent of their dry matter intake from grazing throughout the grazing season: *Except, That,*

(i) Ruminant animals denied pasture in accordance with §205.239(b)(1) through (8), and §205.239(c)(1) through (3), shall be provided with an average of not less than 30 percent of their dry matter intake from grazing throughout the periods that they are on pasture during the grazing season;

(ii) Breeding bulls shall be exempt from the 30 percent dry matter intake from grazing requirement of this section and management on pasture requirement of §205.239(c)(2); *Provided, That,* any animal maintained under this exemption shall not be sold, labeled, used, or represented as organic slaughter stock.

(d) Ruminant livestock producers shall:

(1) Describe the total feed ration for each type and class of animal. The description must include:

(i) All feed produced on-farm;

(ii) All feed purchased from off-farm sources;

(iii) The percentage of each feed type, including pasture, in the total ration; and

(iv) A list of all feed supplements and additives.

(2) Document the amount of each type of feed actually fed to each type and class of animal.

(3) Document changes that are made to all rations throughout the year in response to seasonal grazing changes.

(4) Provide the method for calculating dry matter demand and dry matter intake.

#### **5). §205.238 Livestock Health Care Practice Standard.**

a). The producer must establish and maintain preventive livestock healthcare practices including:

1). Selection of species and types of livestock with regard to suitability for site-specific conditions and resistance to prevalent diseases and parasites.

2). Provision of a feed ration sufficient to meet nutritional requirements including vitamins, minerals, protein, and/or amino acids, fatty acids, energy sources, and fiber

(ruminant).

3). Establishment of appropriate housing, pasture conditions, and sanitation practices to minimize the occurrence and spread of diseases and parasites.

4). Provision of conditions which allow for exercise, freedom of movement and reduction of stress appropriate to the species.

5). Performance of physical alterations as needed to promote animal's welfare and in a manner that minimizes pain and stress.

6). Administration of vaccines and other veterinary biologics.

b). When preventative practices and veterinary biologics are inadequate to prevent sickness, a producer may administer synthetic medications, Provided that, such medications are allowed under NOP regulation §205.603. Parasiticides allowed under §205.603 may be used on:

1). Breeder stock, when used prior to the last third of gestation but not during lactation for progeny that are to be sold, labeled, or represented as organically produced.

2). Dairy stock, when used a minimum of 90 days prior to the production of milk, or milk products that are to be sold, labeled, or represented as organic.

c). The producer of an organic livestock operation must not:

1). Sell, label, or represent as organic any animal or edible product derived from any animal treated with antibiotics, any substance that contains a synthetic substance not allowed under NOP regulation §205.603, or any substance that contains a nonsynthetic substance prohibited in NOP regulation §205.604.

2). Administer any animal drug other than vaccinations, in the absence of illness.

3). Administer hormones for growth promotion.

4). Administer synthetic parasiticides on a routine basis.

5). Administer synthetic parasiticides to slaughter stock.

6). Administer animal drugs in violation of the Federal Food, Drug, or Cosmetic Act.

7). Withhold medical treatment from a sick animal in order to maintain its organic status. All appropriate medications must be used to restore an animal to health when methods acceptable to organic production fail.

d). Livestock treated with a prohibited substance must be clearly identified and shall not be sold, labeled, or represented as organically produced.

## **6. §205.239 Livestock Living Conditions**

### **§ 205.239 Livestock living conditions.**

(a) The producer of an organic livestock operation must establish and maintain year-round livestock living conditions which accommodate the health and natural behavior of animals, including:

(1) Year-round access for all animals to the outdoors, shade, shelter, exercise areas, fresh air, clean water for drinking, and direct sunlight, suitable to the species, its stage of life, the climate, and the environment: Except, that, animals may be temporarily denied access to the outdoors in accordance with §§205.239(b) and (c). Yards, feeding pads, and feedlots may be used to provide ruminants with access to the outdoors during the non-grazing season and supplemental feeding during the grazing season. Yards, feeding pads, and feedlots shall be large enough to allow all ruminant livestock occupying the yard, feeding pad, or feedlot to feed simultaneously without crowding and without competition for food. Continuous total confinement of any animal indoors is prohibited. Continuous total confinement of ruminants in yards, feeding pads, and feedlots is prohibited.

(2) Poultry must have access to the outdoors.

(a) Outside access and door spacing must be designed to promote and encourage outside access for all birds on a daily basis, weather permitting. Producers must provide access to the outdoors at an early age in order encourage (train) birds to go outdoors. Pullets must be provided with outside access from the age of 6 weeks providing they are fully feathered and weather permits. Broilers must be provided with outside access from the age of 4 weeks providing they are fully feathered and weather permits. Once layers are accustomed to going outdoors, a brief confinement period to allow for nest box training is permitted.

(b) Birds may not be confined to the house merely due to a “threat” of an outbreak of disease. There must be a documented occurrence of an outbreak in the region or relevant migratory pathway, or state or federal advisory in order to confine birds.

(c) Producers must maintain records documenting periods of confinement.

(3) For all ruminants, management on pasture and daily grazing throughout the grazing season(s) must meet the requirements of §205.237, except as provided for in paragraphs (b), (c), and (d) of this section.

(4) Appropriate clean, dry bedding. When roughages are used as bedding, they shall have been organically produced in accordance with this part by an operation certified under this part, except as provided in §205.236(a)(2)(i), and, if applicable, organically handled by operations certified to the NOP.

(5) The use of yards, feeding pads, feedlots and laneways that shall be well-drained, kept in good condition (including frequent removal of wastes), and managed to prevent runoff of

wastes and contaminated waters to adjoining or nearby surface water and across property boundaries.

(b) The producer of an organic livestock operation may provide temporary confinement or shelter for an animal because of:

(2) The animal's stage of life: Except, that lactation is not a stage of life that would exempt ruminants from any of the mandates set forth in this regulation;

(3) Conditions under which the health, safety, or well-being of the animal could be jeopardized;

(4) Risk to soil or water quality;

(5) Preventive healthcare procedures or for the treatment of illness or injury (neither the various life stages nor lactation is an illness or injury);

(6) Sorting or shipping animals and livestock sales: *Provided*, that, the animals shall be maintained under continuous organic management, including organic feed, throughout the extent of their allowed confinement;

(7) Breeding: Except, that, bred animals shall not be denied access to the outdoors and, once bred, ruminants shall not be denied access to pasture during the grazing season; or

(8) 4–H, Future Farmers of America and other youth projects, for no more than one week prior to a fair or other demonstration, through the event and up to 24 hours after the animals have arrived home at the conclusion of the event. These animals must have been maintained under continuous organic management, including organic feed, during the extent of their allowed confinement for the event.

(c) The producer of an organic livestock operation may, in addition to the times permitted under §205.239(b), temporarily deny a ruminant animal pasture or outdoor access under the following conditions:

(1) One week at the end of a lactation for dry off (for denial of access to pasture only), three weeks prior to parturition (birthing), parturition, and up to one week after parturition;

(2) In the case of newborn dairy cattle for up to six months, after which they must be on pasture during the grazing season and may no longer be individually housed: *Provided*, That, an animal shall not be confined or tethered in a way that prevents the animal from lying down, standing up, fully extending its limbs, and moving about freely;

(3) In the case of fiber bearing animals, for short periods for shearing; and

(4) In the case of dairy animals, for short periods daily for milking. Milking must be scheduled in a manner to ensure sufficient grazing time to provide each animal with an average of at least 30 percent DMI from grazing throughout the grazing season. Milking frequencies or duration practices cannot be used to deny dairy animals pasture.

(d) Ruminant slaughter stock, typically grain finished, shall be maintained on pasture for each day that the finishing period corresponds with the grazing season for the geographical

location: Except, that, yards, feeding pads, or feedlots may be used to provide finish feeding rations. During the finishing period, ruminant slaughter stock shall be exempt from the minimum 30 percent DMI requirement from grazing. Yards, feeding pads, or feedlots used to provide finish feeding rations shall be large enough to allow all ruminant slaughter stock occupying the yard, feeding pad, or feed lot to feed simultaneously without crowding and without competition for food. The finishing period shall not exceed one-fifth (1/5) of the animal's total life or 120 days, whichever is shorter.

(e) The producer of an organic livestock operation must manage manure in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, heavy metals, or pathogenic organisms and optimizes recycling of nutrients and must manage pastures and other outdoor access areas in a manner that does not put soil or water quality at risk.

7). § 205.240 Pasture practice standard.

The producer of an organic livestock operation must, for all ruminant livestock on the operation, demonstrate through auditable records in the organic system plan, a functioning management plan for pasture.

(a) Pasture must be managed as a crop in full compliance with §§ 205.202, 205.203(d) and (e), 205.204, and 205.206(b) through (f). Land used for the production of annual crops for ruminant grazing must be managed in full compliance with §§ 205.202 through 205.206. Irrigation shall be used, as needed, to promote pasture growth when the operation has irrigation available for use on pasture.

(b) Producers must provide pasture in compliance with § 205.239(a) (2) and manage pasture to comply with the requirements of: § 205.237(c)(2), to annually provide a minimum of 30 percent of a ruminant's dry matter intake (DMI), on average, over the course of the grazing season(s); § 205.238(a)(3), to minimize the occurrence and spread of diseases and parasites; and § 205.239(e) to refrain from putting soil or water quality at risk.

(c) A pasture plan must be included in the producer's organic system plan, and be updated annually in accordance with § 205.406(a). The producer may resubmit the previous year's pasture plan when no change has occurred in the plan. The pasture plan may consist of a pasture/rangeland plan developed in cooperation with a Federal, State, or local conservation office: Provided, That, the submitted plan addresses all of the requirements of § 205.240(c) (1) through (8). When a change to an approved pasture plan is contemplated, which may affect the operation's compliance with the Act or the regulations in this part, the producer shall seek the certifying agent's agreement on the change prior to implementation. The pasture plan shall include a description of the:

1) List the grass types and acreage of pasture provided per animal to ensure that the feed requirements of § 205.237 are being met.

2) List the average amount of time that animals are grazing on pasture on a daily basis for their different stages of life:

- 3) List the circumstances under which animals will be temporarily confined and for how long they will be confined.
- 4) List the cultural and management practices to be used to ensure pasture of a sufficient quality and quantity is available to graze throughout the grazing season and to provide all ruminants under the organic system plan, except exempted classes identified in § 205.239(c) (1) through (3), with an average of not less than 30 percent of their dry matter intake from grazing throughout the grazing season.
- 5) List the Grazing season for the livestock operation's regional location.
- 6) Show Location and size of pastures, including maps giving each pasture its own identification.
- 7) List the types of grazing methods to be used in the pasture system.
- 8) Show the location and types of fences, except for temporary fences, and the location and source of shade and the location and source of water.

#### **E). Production (Wild Crop Harvesting Practice Standard)**

- 1). A wild crop that is intended to be sold, labeled or represented as organic must be harvested from a designated area which has had no prohibited substance (NOP regulation §205.105) applied to it for a period of 3 years immediately preceding the harvest of the wild crop.
- 2). A wild crop must be harvested in a manner that ensures that such harvesting or gathering will not be destructive to the environment and will sustain the growth and production of the wild crop.

#### **F). Organic Handling / Processing Requirements**

##### **1). Handling Requirements**

- a). Mechanical or biological methods, including but not limited to cooking, baking, curing, heating, drying, mixing, grinding, churning, separating, distilling, extracting, slaughtering, cutting, fermenting, eviscerating, preserving, dehydrating, freezing, chilling, or otherwise manufacturing, and the packaging, canning, jarring, or otherwise enclosing food in a container, may be used to process an organically produced agricultural product for the purpose of retarding spoilage or otherwise preparing the agricultural product for market.
- b). Nonagricultural substances allowed under NOP regulation §205.605 and non organically produced agricultural products allowed under NOP §205.606 may be used:
  - 1). In or on a processed agricultural product intended to be sold, labeled, or represented as "Organic", pursuant to NOP regulation §205.301(b), if not commercially available in organic form.

2). In or on an agricultural product intended to be sold, labeled, or represented as “Made with Organic (Specified Food Group(s))” pursuant to NOP regulation §205.301(c).

c). The handler of an organic handling operation must not use in or on agricultural products intended to be sold, labeled, or represented as "100 percent organic", “organic”, or “made with organic (specified ingredient or food group(s))”, or in or on any ingredients labeled as organic.

1). Practices prohibited under paragraphs (e) and (f) of NOP regulation §205.105.

2). A volatile synthetic solvent or other synthetic processing aid not allowed under section §205.605, Except that, non organic ingredients in products labeled “made with organic (specified ingredient or food group(s))” are not subject to this requirement.

## **2). Facility Pest Management Practice Standard**

a). The producer or handler of an organic facility must use management practices to prevent pests, including but not limited to:

1). Removal of pest habitat, food sources, and breeding areas.

2). Prevention of access to handling facilities.

3). Management of environmental factors such as temperature, light, humidity, atmosphere, and air circulation, to prevent pests.

b). Pests may be controlled through:

1). Mechanical or physical controls including but not limited to traps, light or sound; or

2). Lures and repellents using nonsynthetic substances consistent with the National List (provided).

c). If the practices provided for in paragraphs (a), and (b) of this section are not effective to prevent or control pests, a nonsynthetic or synthetic substance consistent with the National List may be applied.

d). If the practices provided for in paragraphs (a), (b), or (c) of this section are not effective to prevent or control facility pests, a synthetic substance not on the National List may be applied, provided, the handler and Global Culture agree on the substance, method of application and measures taken to prevent contact of the organically produced products or ingredients with the substance used.

e). The handler of an organic handling operation who applies a nonsynthetic, or synthetic substance to prevent or control pests must update the operation’s organic handling plan to reflect the use of such substance and methods of application. The updated Organic Plan must include a list of all measures taken to prevent contact of the organically produced products or ingredients with the substance used.

f). Notwithstanding the practices provided for in paragraphs (a),(b)(c) and (d) of this section, a handler may otherwise use substances to prevent or control pests as required by Federal, State, or local laws and regulations, provided, measures are taken to prevent contact of the organically produced products or ingredients with the substance used.

**3). Commingling and Contact with Prohibited Substance Prevention Practice Standard.**

a). A handler of an organic handling operation must implement measures necessary to prevent commingling of organic and non-organic products and protect organic products from contact with prohibited substances.

b). The following are prohibited for use in the handling of any organically produced agricultural product or ingredient labeled in accordance with subpart (d) of this part:

1). Packaging materials, and storage containers or bins that contain a synthetic fungicide, preservative, or fumigant.

2). The use, or reuse of any bag or container that has been in contact with any substance which might compromise the organic integrity of any organically produced product or ingredient placed in it, unless such reusable bag or container has been thoroughly cleaned and poses no risk of contact of the organically produced product or ingredient with the substance used.

**G). VARIANCES**

Temporary variances from the requirements of production (crops, or livestock), handling (processing), and wild crop harvesting may be obtained by establishment by the AMS Administrator, pursuant to NOP regulation §205.290.

**H). LABELS, LABELING, AND MARKET INFORMATION**

Make sure to submit all labels to Global Culture for prior approval before going to print to make sure they comply with the NOP Labeling Regulations. This can save you time and money.

**1). Use of the Term “Organic”.**

a). The term “Organic” may only be used on labels and in labeling of raw or processed agricultural products including ingredients that have been produced and handled in accordance with NOP regulations §205.300, through §205.311. The term “Organic” may not be used in a product name to modify a non-organic ingredient in the product.

b). To be sold, labeled, or represented as “Organic” or “Made with Organic (Specified Food Group(s))”, the product must be produced and handled without the use of prohibited substances, nonagricultural substances, non-organic substances, excluded methods, ionizing radiation, or sewage sludge.

c). For products labeled “100 Percent Organic”, they must contain 100 percent

organically produced ingredients without use of processing aids, (excluding water and salt).

d). For products labeled “Organic”, they must contain at least 95% organic ingredients with the minor 5% remaining ingredients from lists found at §205.605 and/or §205.606 if unavailable in organic form (excluding water and salt). Identify each organic ingredient with the word “Organic” or with an asterisk or other reference mark which is then defined below the ingredient statement to indicate the ingredient is organically produced.

e). For products labeled “Made with Organic (Specified Ingredients or Food Group(s))” in the ingredient statement, they must contain at least 70% organic ingredients, (excluding water and salt). Identify each organic ingredient in the ingredient statement with the word “Organic” or with an asterisk or other reference mark which is defined below the ingredient statement to indicate the ingredient is organically produced.

f). On the information panel, below the information identifying the handler or distributor of the product with city, state and zip code listed of the handler, identify Global Culture as the certifying agent. The complete statement must read:

### **Certified Organic by Global Culture**

“Certified Organic by Global Culture” must be directly under the information identifying the handler distributor of the product with the city, state and zip code listed of the handler with nothing in between.

In addition to but not in lieu of, you may choose to use our logo as follows:



If you choose to use the Global Culture logo, and the USDA Organic Seal, Global Culture’s logo can not be larger than the USDA Organic Seal.

## **2. Calculating the percentage of organically produced ingredients.**

- (a) The percentage of all organically produced ingredients in an agricultural product sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))," or that include organic ingredients must be calculated by:
- (1) Dividing the total net weight (excluding water and salt) of combined organic ingredients at formulation by the total weight (excluding water and salt) of the finished product.
  - (2) Dividing the fluid volume of all organic ingredients (excluding water and salt) by the fluid volume of the finished product (excluding water and salt) if the product and ingredients are liquid. If the liquid product is identified on the principal display panel or information panel as being reconstituted from concentrates, the calculation should be made on the basis of single-strength concentrations of the ingredients and finished product.
  - (3) For products containing organically produced ingredients in both solid and liquid form,

dividing the combined weight of the solid ingredients and the weight of the liquid ingredients (excluding water and salt) by the total weight (excluding water and salt) of the finished product.

(b) The percentage of all organically produced ingredients in an agricultural product must be rounded down to the nearest whole number.

(c) The percentage must be determined by the handler who affixes the label on the consumer package and verified by the certifying agent of the handler. The handler may use information provided by the certified operation in determining the percentage.

### **3). The USDA Organic Seal**

(a) The USDA Seal may be used on raw or processed agricultural products that meet the requirements for "100% percent organic" or "Organic" as described in the labeling regulations and not on products that contain less than 95% organic ingredients. It may be used anywhere on the label and/or packaging.



(b) The USDA seal must replicate the form and design of the above example and must be printed legibly and conspicuously:

(1) On a white background with a brown outer circle and with the term, "USDA," in green overlaying a white upper semicircle and with the term, "organic," in white overlaying the green lower half circle; or

(2) On a white or transparent background with black outer circle and black "USDA" on a white or transparent upper half of the circle with a contrasting white or transparent "organic" on the black lower half circle.

(3) The green or black lower half circle may have four light lines running from left to right and disappearing at the point on the right horizon to resemble a cultivated field.

### **4). Allowed and Prohibited Substances, Methods, and Ingredients in Organic Production and Handling.**

To be sold or labeled as "100 Percent Organic", "Organic", or "Made with Organic (Specified Ingredients or Food Group(s))", the product must be produced and handled without the use of:

a). Prohibited substances (provided as appendix A) (NOP regulations §205.600).

b). Ionizing radiation, as described in Food and Drug Administration regulation, 21 CFR 179.26.

c). Sewage sludge.

All non-organic agricultural ingredients in products labeled as “organic” must be found on the list at §205.606 AND must be demonstrated as commercially unavailable in organic form. We have Commercial Availability forms available for your documentation purposes. Ask our office for them if needed.

## **V). APPLICATION FOR CERTIFICATION PROCEDURE**

### **A). Initial Application, Non-refundable Application Fee and Certification Agreement.**

An applicant seeking USDA National Organic Program certification through Global Culture as a Producer of Crops or Livestock, Handler/Processor, or as a Wild-Crop Harvester must first complete and submit to Global Culture an Initial Application containing a signed Certification Agreement, along with a deposit (refer to Fee Schedule) to begin the certification process. The Initial Review portion is non-refundable and the Inspection Fee is refundable if the application withdraws from the application process at least one week prior to the scheduled on-site inspection. The applicant must also submit a Crop, Livestock, Processor/Handler and/or Wild Harvest - Organic System Plan (whichever is applicable to scope being certified) to our office for a review.

### **B). Application Review:**

Upon receipt of the items in paragraph 1 above, Global Culture will:

- 1). Review the application to assure completeness. Any missing information will be requested to be included at this point.
- 2). Upon review of application, we will determine if applicant appears to comply or may be able to comply with the applicable requirements of the NOP regulations. Other supporting documents may be asked for at that time.
- 3). Determine whether any conflict of interest exists between applicant and Global Culture, requiring Global Culture to reject the application, and return the initial application materials, as well as the non-refundable application fee if a conflict of interest is determined to in fact exist. Global Culture will without delay notify the applicant of the cause of conflict of interest in writing.
- 4). Determine if applicant had previously applied to another certifying agent and had received notice of non-compliance or denial of certification from the prior certifying agent, has submitted documentation to support the correction of any non-compliance identified in the notification of non-compliance or denial of certification. We will ask for those documents.
- 5). If Global Culture determines that the application is acceptable, the applicant shall be promptly notified and an on-site inspection of the operation will be scheduled at the convenience of the parties. The on-site inspection will assist in determining whether or not the applicant will qualify for certification. Inspection fee charge is to be paid to

Global Culture with the possible addition of a travel/mileage charge fee before inspections are carried out.

6). An applicant for certification may withdraw their application at any time. An applicant who withdraws their application shall be liable for the costs of services up to the time of withdrawal. An applicant that voluntarily withdraws their application prior to the issuance of a notice of noncompliance will not be issued a notice of noncompliance.

## **VI. ON-SITE INSPECTION STANDARDS AND PROCEDURES**

### **A). Standards**

The purpose of the on-site inspection is to verify:

- 1). The applicant's compliance or ability to comply with the National Organic Program regulations (NOP regulations), and the Organic Foods Production Act of 1990 ("the ACT").
- 2). That the information contained in the application, including the Organic System Plan, accurately reflects the practices used or to be used by the applicant for certification or by the certified operation; and
- 3). That prohibited substances have not been and are not being applied to the operation through means which, at the discretion of Global Culture, may include the collection and testing of soil, water, waste, seeds, plant tissue, and plant, animal, and processed product samples.

To complete the purpose of the on-site inspection, the inspector will evaluate the applicant's operations through their observations and may collect samples of tissue, soil or water for testing, take photographs, review the applicants Organic System Plan, documents and records of the operation as determined to be necessary by Global Culture and/or the inspector to make conclusions within the scope of the applicant's application.

### **B). Procedures**

#### **1). Prior to the Inspection:**

- a). The inspector will be provided with the application, and all related information submitted by the applicant. In addition, the inspector will receive comments, and specific concerns, or questions, if any, from Global Culture staff to assist the inspector in their on-site inspection.
- b). The inspector and the applicant will be provided with a copy of Global Culture's Organic System Manual - Certification Procedures.
- c). The inspector will be provided with a copy of the previous on-site inspection report and notify the inspector of it's decision regarding certification of the production or handling operation site inspected by the inspector and any of the requirements for the

correction of any existing non-compliance.

d). Any differences in the understanding between the applicant and Global Culture regarding the production/handling practices required for certification will be discussed for clarification at that time.

## **2). On-Site Inspection**

a). Global Culture will conduct an initial on-site inspection of each production unit, facility, and site that produces or handles organic products and that is included in an operation for which certification is requested. An on-site inspection shall be conducted annually thereafter for each certified operation that produces or handles organic products for the purpose of determining whether to approve the request for certification or whether the certification of the operation should continue.

b). A certifying agent may conduct additional on-site inspections for certification and certified operations to determine compliance with the Act and the NOP regulations.

c). The Administrator or State organic program's governing State Official may require that additional inspections be performed by Global Culture for the purpose of determining compliance with the Act, and the NOP regulations.

d). Additional inspections may be announced, or unannounced at the discretion of Global Culture or as required by the Administrator or State Organic Program's governing State Official.

e). Costs of additional inspections, including inspection fees, and travel may be charged to the applicant.

## **3). Scheduling of the On-Site Inspection:**

a). The initial on-site inspection will be conducted within a reasonable time following a determination by Global Culture that the applicant appears to comply, or may be able to comply with the requirements of Subpart C of the NOP regulations, except that the initial inspection may be delayed for up to 6 months to comply with the requirement that the inspection be conducted when the land, facilities, and activities that demonstrate compliance or capacity to comply can be observed.

b). All on-site inspections must be conducted when an authorized representative of the operation who is knowledgeable about the operation is present and activities that demonstrate the operation's compliance with or capability to comply with the applicable provisions of Subpart C of the NOP regulations can be observed, except that this requirement does not apply to unannounced on-site inspections.

## **4). Verification of Information.**

The on-site inspectors must verify:

a). The operation's compliance or capability to comply with the Act and the NOP

regulations.

b). That the information contained in the application, including the Organic System Plan accurately reflects the practices used or to be used by the applicant for certification or by the certified operation.

c). That prohibited substances have not been, and are not being applied to the operation through means which, at the discretion of Global Culture, may include the collection and testing of soil, water, waste, seeds, crop, plant tissue and/or plant, animal and processed products samples.

#### **5). Exit Interview:**

The inspector must conduct an exit interview with an authorized representative of the operation who is knowledgeable about the inspected operation to confirm the accuracy and completeness of inspection observations and information gathered during the on-site inspection. The inspector may address the need for any additional information as well as discuss and document any issues of concern that he has identified.

#### **6). Documents to the Inspected Operation:**

a). At the time of the inspection, the inspector shall provide the operation's authorized representative with a receipt for any samples taken by the inspector. There shall be no charge to the inspector for the samples taken.

b). A copy of the on-site inspection report and any test results will be sent to the inspected operation by Global Culture at a later date.

### **VII). RECORD KEEPING BY CERTIFIED OPERATIONS**

A certified operation must maintain records concerning the production, handling, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 Percent Organic", Organic, or "Made with Organic (Specified Food Group(s))".

a). Such records must:

- 1). Be adapted to the particular business that the certified operation is conducting.
- 2). Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited.
- 3). Be maintained for not less than 5 years beyond their creation.
- 4). Be sufficient to demonstrate compliance with the Act, and the NOP regulations.

b). The certified operation must make such records available for inspection and copying during normal business hours by an authorized representative of the NOP Secretary, the applicable State program's State Official, and/or a representative of Global Culture.

## **VIII). GRANTING OR DENIAL OF CERTIFICATION**

### **A). Granting Certification**

Within a reasonable time after completion of the on-site initial inspection, the certifier will review the on-site inspection report, the results of any analyses for substances conducted, and any and all information requested from or supplied by the applicant. If the Global Culture determines that the Organic System Plan (OSP) and all practices, procedures and activities of the applicant's operation are in compliance with the requirements of the NOP and that the applicant is able to conduct operations in accordance with their OSP, certification shall be granted. An applicant's OSP may be modified at any time upon request to Global Culture. If an applicant deviates from their previously approved OSP without written approval from Global Culture, the applicant is no longer in compliance with NOP regulations and could be subject to suspension or revocation of certification.

The certification may include requirements for the correction of noncompliances within a specified time period as a condition of continued certification.

### **B). Notice to Inspector**

Regarding the certification decision, the inspector of the inspected operations shall be notified of any decision regarding certification, including the granting or denial of certification, and any notice of noncompliance(s).

### **C). Notice of Granting Certification and Payment of Annual Fees.**

Notice of granting certification shall be made within a reasonable amount of time to the applicant along with a request for payment of the annual fee as set forth in Global Culture's published Fee Schedule.

### **D). Certificate of Organic Operation**

The organic certificate issued by Global Culture shall specify:

- 1). Name and address of the certified operation.
- 2). Effective date of certification.
- 3). Date of most recent update or revised date (if applicable)
- 4). Categories of organic operation including: Production of Crops, Wild Crops, Livestock, Processor, Handler by the certified operation, location, acreage (if applicable) and products certified.
- 5). Certificate number.
- 6). Name, address, and telephone number of the certifying agent.

- 7). Signature of a Global Culture representative.
- 8). A written verification that the production or handling operation's organic certification continues in effect until:
  - a). Surrendered by the organic operation,
  - b). Suspended or Revoked by the certifying agent, the State organic program's governing State Official, or the USDA NOP Administrator.

**E). Notification of Noncompliance, Notification of Suspension or Revocation and Notification of Denial of Certification.**

**1). Notification of Noncompliance**

a). When Global Culture has reason to believe based on the initial review of the application materials submitted by applicant, the on-site inspection reports filed by the inspector, results of any testing completed, or any other materials submitted, (NOP regulations §205.402, and §205.404), that an applicant is not able to comply or is not in compliance with the requirements of this manual and/or the NOP regulations, Global Culture will provide a written notification of noncompliance to the applicant. When correction of a noncompliance is not possible, a notification of noncompliance and proposed suspension or revocation, or a notification of denial of certification may be combined in one notification. The notification will be mailed without delay to the applicant operation, State Organic Program official, and the USDA/AMS/NOP Administrator, and shall provide:

- 1). A description of each noncompliance.
  - 2). The facts upon which the Notification of Noncompliance is based.
  - 3). The date by which the applicant must rebut or correct each noncompliance and submit supporting documentation of each such correction when correction is possible.
- b). Upon receipt of such Notification of Noncompliance, the applicant may:
- 1). Correct noncompliances and submit a description of the corrective actions taken with supporting documentation to Global Culture, or
  - 2). Correct noncompliances and submit a new application to another certifying agent, provided that, the applicant must include a complete application, the notification of noncompliance received from Global Culture, and a description of the corrective actions taken with supporting documents, or
  - 3). Submit written information to Global Culture to rebut the noncompliance described in the notice of noncompliance.
- c). Upon receipt of the submitted rebuttal or response from applicant, Global Culture will without delay:

- 1). Evaluate the applicant's corrective actions taken and supporting documentation submitted or the written rebuttal, conduct an on-site inspection if necessary, and
  - a). When the corrective action or rebuttal is sufficient for the applicant to qualify for certification, issue the applicant an approval, or
  - b). When the corrective action or rebuttal is not sufficient for the applicant to qualify for certification, issue the applicant a written notice of denial of certification.
  - d). Global Culture will issue a written notice of denial of certification to an applicant who fails to respond to the notification of noncompliance.
  - e). Global Culture will provide notice of approval or denial to the USDA/AMS/NOP Administrator and /or the State Organic Program.

**2). The Notice of Denial will include the following:**

- a). A description of each noncompliance for which correction is not possible;
- b). The facts upon which the notification of denial is based;
- c). Notice of applicant's failure to respond to a prior written Notice of Noncompliance/ Notice of Denial within specifically stated days, typically 30 days.

**3). Proposed Suspension or Revocation**

When rebuttal is unsuccessful or correction of the noncompliance is not completed within the prescribed time period, Global Culture or the State Organic Program's governing State official shall send the certified operation a written notification of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the noncompliance. When correction of a noncompliance is not possible, the notification of noncompliance and the proposed suspension or revocation of certification may be combined in one notification. The notification of proposed suspension or revocation of certification shall state:

- a). The reason(s) for the proposed suspension or revocation.
- b). The proposed effective date of such suspension or revocation.
- c). The impact of a suspension or revocation on future eligibility for certification.
- d). The right to request mediation pursuant to NOP regulation §205.663 or to file an appeal pursuant to NOP regulation §205.681.

**4). Suspension or Revocation**

- a). If the certified operation fails 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, Global Culture or the State organic program's governing

State official shall send the certified operation a written notification of suspension or revocation.

b). Global Culture or State organic program's governing State official must not send a notification of suspension or revocation to a certified operation that has requested mediation pursuant to NOP §205.663 or filed an appeal pursuant to NOP §205.681, while final resolution of either is pending.

### **5). Willful Violations**

If Global Culture or State organic program's governing State official has reason to believe that a certified operation has willfully violated the ACT or regulations in this part, Global Culture or State organic program's governing State official 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.

### **6). Eligibility**

a). A certified operation whose certification has been suspended under this section may at any time, unless otherwise stated in the notification of suspension, submit a request to the Secretary for reinstatement of its certification. The request must be accompanied by evidence demonstrating correction of each noncompliance and corrective actions taken to comply with and remain in compliance with the ACT and the regulations in this part.

b). A certified operation or a person responsibly connected with an operation whose certification has been revoked may be ineligible to receive certification for a period of (5) years following the date of such revocation, EXCEPT, That, the Secretary may, when in the best interest of the certification program, reduce or eliminate the period of ineligibility.

### **7). Applicant's Rights upon Receiving a Notice of Denial of Certification**

An applicant receiving a Notice of Denial of Certification has various rights including:

a). To reapply for certification at any time with any certifying agent. When applicant submits a new application to a certifying agent other than Global Culture, the applicant must include a copy of the written Notice of Noncompliance/or Denial and include a description of the actions taken, with supporting documentation, to correct the noncompliance noted in the written notice.

b). Within (30) days of the date of the written notice or within 30 days from receipt of the notification (whichever occurs later) the applicant has the right to:

1). Request mediation pursuant to NOP §205.663, or if applicable to the State Organic Program; or

2). File an appeal of the denial of certification pursuant to NOP §205.681, or if applicable, pursuant to a State Organic Program.

**8). Miscellaneous:**

- a). Notice of Denial of Certification will be mailed by certified mail, to the applicant, USDA/AMS/NOP Administrator and/or the State Organic Program official.
- b). If Global Culture has reason to believe that an applicant for certification has willfully made a false statement or otherwise purposefully misrepresented the applicant's operation or its compliance requirements of this manual, Global Culture may deny certification without first issuing a notification of noncompliance.
- c). If Global Culture receives a new application for certification which includes a notification of noncompliance or a notice of denial of certification, the application will be treated as a new application process and Global Culture will begin a new application process as outlined in this manual.

**9). Violations of the Act: In addition to Suspension or Revocation, any Certified Operation that:**

- a). Knowingly sells or labels a product as organic, except in accordance with the Act, shall be subject to a civil penalty of not more than \$11,000.00 per violation as per §205.662(g)(1).
- b). Makes a false statement under the Act to the Secretary, a State Official, or to a certifying agent shall be subject to the provisions of section 1001 of title 18, United States Code.

**10). Investigation of Certified Operations.**

(a) Global Culture will investigate complaints of noncompliance or issues of concern with the Act or regulations of this part concerning production and handling operations certified as organic requested by the USDA NOP Administrator and/or State Organic Program. Global Culture may investigate complaints of noncompliance or issues of concern with the Act or regulations of this part concerning production and handling operations certified as organic requested by the public. Global Culture will notify the USDA NOP Program Manager and/or the State Organic Program Manager of all compliance proceedings and actions taken pursuant to this part.

If it turns out that the investigation goes beyond the investigative expertise and/or capability of Global Culture, the investigation will be turned over to the NOP Appeals Team.

(b) Global Culture is obliged to report violations of health or safety to the appropriate local, State, and/or Federal officials. Organic certification shall not be granted or continued when current health or safety inspection have not been granted or renewed for the facility.

(c) A State organic program's governing State official may investigate complaints of noncompliance with the Act or regulations in this part concerning organic production or handling operations in the State.

## **IX. CONTINUANCE OF ORGANIC CERTIFICATION.**

Once certified, a production or handling operation's organic certification continues in effect until surrendered by the organic operation, or suspended or revoked by Global Culture, the State Organic Program's governing state official, and/or the USDA/AMS/NOP Administrator.

### **A). Annual Updated Organic System Plan and Payment of Fees:**

To continue as a certified operation, a certified operation must annually pay the certification fees and submit an updated Organic System Plan (OSP), which includes:

- 1). 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 year and:
- 2). Any additions or deletions to the previous year's Organic System Plan, intended to be undertaken in the coming year, detailed pursuant to NOP §205.200.
- 3). Any additions to or deletions from the information regarding the applicant's business name, address, telephone number, cell number, fax number, email address and/or the person authorized to act on the applicant's behalf.
- 4). An update on the correction of any noncompliance previously identified by Global Culture as requiring correction for continued certification; and
- 5). Any other information deemed necessary by Global Culture to determine compliance with the ACT, the NOP regulations, and this manual.

### **B). Annual On-Site Inspection:**

Following receipt of the updated Organic System Plan and any materials submitted by the certified operation, Global Culture will within a reasonable time arrange and conduct an on-site inspection of the certified operation. When it is impossible for Global Culture to conduct the annual on-site inspection following receipt of the certified operation's annual update of information, Global Culture may allow continuation of certification and issue an updated certificate of organic operation on the basis of the information submitted and the most recent on-site inspection conducted during the previous 12 months, provided that, the annual on-site inspection is conducted within the first 6 months following the certified operation's scheduled date of annual renewal.

### **C). Notice of Noncompliance:**

If Global Culture has reason to believe, based on the on-site inspection and a review of the information submitted by the certified operation that the operation is not complying with the requirements of the Act, and the NOP regulations, Global Culture will provide written notification of noncompliance to the operation.

### **D). Issuance of Updated Certificate of Organic Operation:**

If Global Culture determines that the certified operation is complying with the Act and the NOP regulations, as well as the standards of this manual, and that any of the information specified on the certificate of organic operation has changed, Global Culture will issue an updated or revised certificate as provided for under NOP §205.404(b).

**X). INSPECTION AND TESTING OF AGRICULTURAL PRODUCT TO BE SOLD OR LABELED “ORGANIC”.**

**A). Inspection and testing of agricultural product to be sold or labeled “Organic”**

- 1). All agricultural products that are to be sold, labeled, or represented as “100 Percent Organic”, “Organic”, or “Made with Organic (Specified Ingredients or Food Group(s))” must be made accessible by certified organic production or handling operations for examination by the Administrator, the applicable State Organic Program’s governing State official, or Global Culture.
- 2). The Administrator, applicable State Organic Program’s governing State official, or the Global Culture representative may require pre-harvest or post harvest testing of any agricultural product to be sold, labeled, or represented as “100 Percent Organic”, “Organic”, or “Made with Organic (Specified Ingredient or Food Group(s))” when there is reason to believe that the agricultural input or product has come into contact with a prohibited substance, has been produced using excluded methods or for any other reason. Such tests must be conducted by the applicable State Organic Program’s governing State official, or Global Culture at their own expense.
- 3). The test sample collection pursuant to paragraph (2) of this section (above) must be performed by an inspector representing the Administrator, applicable State Organic Program’s governing State official, or a Global Culture representative. Sample integrity will be maintained throughout the chain of custody, and residue testing will be performed in an accredited laboratory. Global Culture will use an accredited lab. Chemical analysis will be made in accordance with the methods described in the most current edition of the Official Methods of Analysis of the AOAC International or other current applicable validated methodology determining the presence of contaminants in agricultural products.
- 4). Results of all analyses and tests performed under this section:
  - a). Will be provided to the Administrator, except that, where a State Organic Program exists, all test results and analyses shall be provided to the State organic program’s governing State official by Global Culture; and
  - b). Will be available for public access, unless the testing is part of an ongoing compliance investigation.
- 5). If test results indicate a specific agricultural product contains pesticide residues or environmental contaminants that exceed the Food and Drug Administration’s or the Environmental Protection Agency’s regulatory tolerances, Global Culture will promptly report such data to the Federal health agency whose regulatory or action level has been

exceeded.

### **B). Exclusion from Organic Sale**

When residue testing detects prohibited substances at levels that are greater than 5 percent of the Environmental Protection Agency's tolerance level for the specific residue detected or unavoidable residual environmental contamination, the agricultural product must not be sold, labeled, or represented as organically produced. The Administrator, the applicable State organic program's governing State official, or the certifying agent may conduct an investigation of the certified operation to determine the cause of the prohibited substance contamination.

### **C). Emergency Pest or Disease Treatment**

When a prohibited substance is applied to a certified operation due to a Federal or State emergency pest or disease treatment program and the certified operation otherwise meets the requirements of the Act and applicable State laws, the certification status of the operation shall not be affected as a result of the application of the prohibited substance, provided that:

- 1). Any harvested crop or plant part to be harvested that has contact with a prohibited substance applied as the result of a Federal or State emergency pest or disease program cannot be sold, labeled, or represented as organically produced; and
- 2). Any livestock that are treated with a prohibited substance applied as the result of a Federal or State emergency pest or disease program or product derived from such treated livestock cannot be sold, labeled, or represented as organically produced, except that,
  - a). 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
  - b). The offspring of gestating mammalian breeder stock treated with a prohibited substance may be considered organic; provided that, the breeder stock was not in the last third of gestation on the date that the breeder stock was treated with the prohibited substance.

## **XI). Requirements For Export of U.S. Raw and Processed Agricultural Products to Japan**

To be authorized to issue export certificates for Japan, Global Culture, a USDA accredited certifying agent, will:

1. Incorporate the compliance requirements of the applicable export arrangement into its quality manual under the heading "Requirements for export of U.S. organic raw and processed agricultural products to Japan".

2. Notify its clients or program participants of the compliance requirements for each applicable export arrangement by letter or electronic mail within 14 days of notification by NOP.
3. Prepare and implement procedures designed to ensure compliance with the applicable export arrangement.
4. Assign a unique identification number to each export certificate. The unique identification number begins with an acronym designating Global Culture as (GLO), and the country code for the specific export arrangement. Japan has the country code JP. So in this case the unique number assigned would be GLOJP and then the date of issuance. So as an example, it would read as follows: GLOJP07-20-13.
5. Keep a paper-based or electronic control log that records and tracks the disposition of each export certificate including those issued, voided or destroyed.
6. Designate a staff person to authorize the issuance of the export certificate and attest to its authenticity by affixing his/her signature to the certificate. The designated person is responsible for all aspects of the issuance of the export certificate, including ensuring security of blank export certificates and oversight of the control log.

The designated Global Culture staff person to authorize the export certificate and attest to its authenticity by affixing his/her signature to the certificate is Linda Van Hook. The designated back-up Global Culture staff individual to ensure uninterrupted issuance of export certificates is Kathy Horgan.

Export arrangements with other countries may require the prohibition of certain practices or substances allowed under the NOP. In order to facilitate acceptance of the product by the importing country, a compliance statement declaring the applicable prohibitions must be entered into the remarks section of the export certificate. Compliance statement for Japan is listed below:

Country: Japan

Country Code: JP

Compliance Statement:

“Products covered under this export certificate are not known to be produced with alkali-extracted humic acid or lignin sulfonate as a flotation agent.”

## **XII). Requirements for export of U.S. organic raw and processed agricultural products to Taiwan.**

To be authorized to issue export certificates for Taiwan, Global Culture, a USDA accredited certifying agent, will:

1. Incorporate the compliance requirements of the applicable export arrangement into its quality manual under the heading "Requirements for export of U.S. organic raw and processed agricultural products to Taiwan”.

2. Notify its clients or program participants of the compliance requirements for each applicable export arrangement by letter or electronic mail within 14 days of notification by NOP.
3. Prepare and implement procedures designed to ensure compliance with the applicable export arrangement.
4. Assign a unique identification number to each export certificate. The unique identification number must begin with an acronym designating Global Culture (GLO) and the country code for the specific export arrangement. Taiwan has the country code TW. So in this case the unique number assigned would be GLOTW and then the date of issuance. So as an example, it would read as follows: GLOTW07-20-13.
5. Keep a paper-based or electronic control log that records and tracks the disposition of each export certificate including those issued, voided or destroyed.
6. Designate a staff person to authorize the issuance of the export certificate and attest to its authenticity by affixing his/her signature to the certificate. The designated person is responsible for all aspects of the issuance of the export certificate, including ensuring security of blank export certificates and oversight of the control log.

The designated Global Culture staff person to authorize the export certificate and attest to its authenticity by affixing his/her signature to the certificate is Linda Van Hook. The designated back-up Global Culture staff individual to ensure uninterrupted issuance of export certificates is Kathy Horgan.

Export arrangements with other countries may require the prohibition of certain practices or substances allowed under the NOP. In order to facilitate acceptance of the product by the importing country, a compliance statement declaring the applicable prohibitions must be entered into the remarks section of the export certificate. Compliance statements for Taiwan are listed below:

Country: Taiwan

Country Code: TW

Compliance Statements:

For Processed Products and Crops:

"Organic agricultural products and organic processed products, accompanied by this certificate, were produced or processed using zero prohibited substances."

For Livestock and meat products:

"Organic livestock products, accompanied by this certificate, were managed and produced without the use of systemic pain killers or analgesics, including the use of Lidocaine or Procaine.



# *Certificate of Training*

This is to certify that

Linda Van Hook

participated in the

National Organic Program  
Accredited Certifying Agent Training

January 31, 2017

*Cheri Courtney*

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Cheri Courtney, Director  
Accreditation and International Activities Division  
National Organic Program

*Certificate of Attendance*

is presented to

*Linda Van Hook*

*Global Culture*

for participation in the

*Professional Development Training for  
Accredited Certification Agencies*

sponsored by the

**ACA** *Accredited Certifiers Association*

*Hilton Portland Executive Tower, Portland, OR  
February 1 – 2, 2017*

*Accredited Certifiers Association* • PO Box 472 • Port Crane, NY 13833

*Certificate of Attendance*

*is presented to*

*Chris Van Hook*

*Global Culture*

*for participation in the*

*Professional Development Training for  
Accredited Certification Agencies*

*sponsored by the*



*Accredited Certifiers Association*

*Hilton Desoto, Savannah, GA*

*January 14 – 15, 2016*

*Accredited Certifiers Association*

*PO Box 472*

*Port Crane, NY 13833*

*Certificate of Attendance*

*is presented to*

*Linda Van Hook*

*Global Culture*

*for participation in the*

*Professional Development Training for  
Accredited Certification Agencies*

*sponsored by the*



*Accredited Certifiers Association*

*Hilton Desoto, Savannah, GA*

*January 14 – 15, 2016*

*Accredited Certifiers Association*

▪ *PO Box 472*

▪ *Port Crane, NY 13833*



# Certifier Contract

## Materials Review Contract and Recognition Agreement

This establishes an agreement between Global Culture, a USDA and/or CFIA Accredited Certification Body ("CB"), and Organic Materials Review Institute ("OMRI") for the services described below.

**Section 1. Duration:** This agreement is valid until canceled in writing by either party with 30 days prior notice but no later than June 30, 2018.

**Section 2. Qualifications:** CB recognizes the standing, qualifications and quality of the OMRI review process and therefore has chosen to recognize OMRI decisions as an integral part of its compliance process. To meet the needs of the CB under its accreditation, OMRI will:

- 2.1 provide the CB upon request with a copy of the report from OMRI's Internal Audit it will perform annually in relation to OMRI's ISO-17065 accreditation.
- 2.2 provide documentation of the qualifications of its personnel upon request from the CB.

**Section 3. Services:**

- 3.1 OMRI shall publish the *OMRI Products List*® and *OMRI Canada Products List*®, which contain products for organic production or processing and handling reviewed for compliance with National Organic Program (NOP) standards and/or Canadian Organic Standards, and the most current *OMRI Standards Manual(s)*® and *OMRI Policy Manual*®.
- 3.2 CB will accept these lists and use them as a tool when verifying organic compliance within the organic certification program.

**Section 4. Limitations:** The *OMRI Products List* and/or *OMRI Canada Products List* will not function as the sole source of materials review, and OMRI Listed® status will not automatically convey an operator's allowance to use any given product. Additionally, the CB reserves the right to perform additional materials reviews and limit the use of OMRI Listed materials when such limitations are required by the NOP or CFIA, or as deemed necessary for compliance or other reasons.

**Section 5. Indemnity:** CB shall defend, indemnify, and hold OMRI, its officers, employees, and agents harmless from and indemnify OMRI against any and all liability, losses, expenses (including reasonable attorney's fees), or claims for injury or damages arising out of the performance of this agreement but only in proportion to and to the extent such liability, loss expense, attorney's fees or claims for injury or damages are caused by or result from negligent or intentional acts or omissions of the certifier, its officers, agents, or employees.

- 5.1 OMRI shall defend, indemnify, and hold CB, its officers, employees, and agents harmless from and against any and all liability, losses, expenses, (including reasonable attorney's fees), or claims for injury or damages arising out of the performance of this agreement but only in proportion to and to the extent such liability, loss expense, attorney's fees or claims for injury or damages are caused by or result from negligent or intentional acts or omissions of OMRI, its officers, agents, or employees.

**Section 6. Insurance:** OMRI shall maintain a current errors and omissions insurance policy at all times of no less than \$1,000,000.

**Section 7. Dispute Resolution:** The parties agree to seek to resolve any disputes that arise in enforcing this agreement through binding arbitration. Such arbitration or any legal action must be filed in Lane County, Oregon. In addition, the parties agree that the substantive and procedural law of the State of Oregon shall apply to any legal dispute whether in arbitration or in a court. If a dispute arises between the parties that results in arbitration or the filing of a legal action, the prevailing party shall be entitled to recover its attorney fees and all costs, including all costs related to witness, deposition costs, and similar costs.

**Section 8. Confidentiality:** Whereas the review of products often requires access to confidential information, OMRI will maintain any confidentiality agreements with the suppliers of information for the review of such products, making such information available to specifically identified personnel of the CB or to the National Organic Program or other applicable regulatory body only when required under a judicial proceeding, disagreement with CB or a materials review organization about product compliance, request from the applicable regulatory body, third party audit (such as one required for the accreditation of CB), or other legal proceedings. This clause is subject to the confidential information provisions in OMRI's contracts with the parties who provide the confidential information according to the *OMRI Policy Manual*®.

- 8.1 Any information provided to OMRI by CB and identified as confidential will only be used by OMRI to inform discussions between itself and CB. OMRI will hold as confidential under its internal confidentiality system any information identified as confidential by CB and will not disclose said information beyond its internal system. Such information may be used by OMRI to initiate an investigation of any OMRI Listed® product associated with the information, but the information itself cannot be used to make any status change decisions under the OMRI Review Program.
- 8.2 CB agrees to protect as confidential any information received by OMRI and identified as confidential. CB will not disclose said information to the public or to anyone not employed by CB or not covered by organizational confidentiality policies.

**Section 9. Extent of Agreement:** This agreement constitutes the entire agreement between the parties regarding the subject matter herein. The parties agree that any prior written or oral discussions regarding this contract are of no force or effect if not stated in this agreement. Any modification of this agreement shall be made in writing and must be signed by the authorized representatives of both parties.

- 9.1 This agreement and any License Agreement that may be entered into by the parties may be subject to additional contract addenda. Such addenda must be signed and agreed to by appropriate personnel representing both OMRI and CB in order to become effective.

**Section 10. Fees:** The non-refundable fee is \$99. Upon receipt of payment this agreement is considered in effect.

**Section 11. Subscription requirement:** CB must remain an OMRI Certifier Subscriber as described under the terms and conditions.

For purposes of executing this agreement a document signed and transmitted electronically or by facsimile shall be treated as an original document. The signature of and party thereon shall be treated as an original signature.

(b) (4)

Signed  
Linda VanHook  
Name of CB Representative

Date  
Global Culture

Name of CB

(b) (4)

Peggy Miars, Executive Director / CEO, OMRI

5/17/17

Date



# Certifier Contract Addendum

## Use Agreement for Direct Data Export

This serves as an Addendum to the agreement between Global Culture, a USDA or CFIA Accredited Certifying Body ("CB"), and Organic Materials Review Institute ("OMRI") for the services described below. This addendum will serve exclusively as a supplement to a current OMRI Certifier Contract and will only become valid when signed by a currently contracted CB and ratified by an appropriate OMRI representative.

**Section 1. Duration:** This agreement is valid until canceled in writing by either party with 30 days prior notice but no later than June 30, 2018.

**Section 2. Qualifications:** CB accepts full responsibility for the use of OMRI's proprietary data, and will ensure that said data is never misused or misrepresented in any way. To protect OMRI proprietary data from misuse, CB will:

- 2.1 use OMRI data exports exclusively for material review and certification work conducted by personnel within the signing organization.
- 2.2 keep all OMRI data exports confidential.
- 2.3 accept full responsibility for the use and application of the data export with regard to clients and certified operations.

**Section 3. Services:**

- 3.1 OMRI will provide CB with a quarterly database export of OMRI proprietary data as a spreadsheet or in another usable format as it becomes available.
- 3.2 The *OMRI Products List*® and *OMRI Canada Product List*® contain products for organic production or processing and handling reviewed for compliance with National Organic Program standards or Canada Organic Regime standards, the most current *OMRI Standards Manuals*® and the *OMRI Policy Manual*®. If the export includes the *OMRI Products List(s)*, CB will accept these lists and use them as tools when verifying organic compliance within the CB's organic certification program

**Section 4. Limitations:** The *OMRI Products Lists* and other data exports will not function as the sole source of materials review. Inclusion on an *OMRI Products List* will not automatically convey an operator's allowance to use any given product. Additionally, CB reserves the right to perform its own additional materials reviews and limit the use of OMRI Listed materials when such limitations are required by the applicable regulatory body or deemed necessary by CB for compliance or other reasons.

**Section 5. Indemnity:** CB shall defend, indemnify, and hold OMRI, its officers, employees, and agents harmless from and indemnify OMRI against any and all liability, losses, expenses (including reasonable attorney's fees), or claims for injury or damages arising out of the performance of this agreement but only in proportion to and to the extent such liability, loss expense, attorney's fees or claims for injury or damages are caused by or result from negligent or intentional acts or omissions of CB, its officers, agents, or employees.

- 5.1 OMRI shall defend, indemnify, and hold CB, its officers, employees, and agents harmless from and against any and all liability, losses, expenses, (including reasonable attorney's fees), or claims for injury or damages arising out of the performance of this agreement but only in proportion to and to the extent such liability, loss expense, attorney's fees or claims for injury or damages are caused by or result from negligent or intentional acts or omissions of OMRI, its officers, agents, or employees.

**Section 6. Terms:** The terms and conditions of the OMRI Certifier Contract are incorporated in this Addendum by this reference. This Addendum is subject to those terms and conditions as if fully set forth herein.

**Section 7. Fees:** Any additional technical support or changes to the export may be billed at \$150 per hour in accordance with the Certifier Subscription Service Agreement.

**Section 8. Subscription requirement:** CB must remain an OMRI Certifier Subscriber as described under the terms and conditions in Service Agreement

For purposes of executing this agreement a document signed and transmitted electronically or by facsimile shall be treated as an original document. The signature of and party thereon shall be treated as an original signature.

(b) (4) \_\_\_\_\_ 5-17-17  
 Signed Date  
 Linda VanHook \_\_\_\_\_  
 Name of CB Representative Name of CB

(b) (4) \_\_\_\_\_ 5/17/17  
 Signed Date  
 Peggy Miers, Executive Director / CEO, OMRI

Please send the OMRI spreadsheet export to the following recipients:

Name \_\_\_\_\_ Email \_\_\_\_\_  
 Name \_\_\_\_\_ Email \_\_\_\_\_

# Invoice



PCO  
106 School Street, Suite 201  
Spring Mills, PA 16875

PH: 814-422-0251 ext: 305 FX: 814-422-0255  
accounting@paorganic.org

| DATE     | INVOICE # |
|----------|-----------|
| 01/04/17 | 33357     |

| File # |
|--------|
| N/A    |

**BILL TO**

Global Culture  
PO Box 1640  
Crescent City, CA 95531

| TERMS  | DUE DATE |
|--------|----------|
| Net 30 | 02/03/17 |

| DESCRIPTION                                                                                                                               | QTY | RATE   | AMOUNT |
|-------------------------------------------------------------------------------------------------------------------------------------------|-----|--------|--------|
| Annual Material Review Service Fee. \$1 per number of certified clients or operations, OR a value of \$150.00 (Whichever value is higher) |     | 150.00 | 150.00 |

Please make check payable to PCO

A 1.5% Interest Charge Will Be Added to All Invoices Over 30 Days Past Due

To make a credit card payment, call our office at (814) 422-0251  
Or pay online, visit [www.paorganic.org/paymyinvoice](http://www.paorganic.org/paymyinvoice)



|                          |          |
|--------------------------|----------|
| Total Due                | \$150.00 |
| Payments/Credits Applied | \$0.00   |
| Balance Due              | \$150.00 |



Like us on Facebook: [www.facebook.com/PAOrganic](http://www.facebook.com/PAOrganic)



## PCO Materials List Recognition Agreement

This Agreement (the "Agreement") is between Pennsylvania Certified Organic (PCO), a Pennsylvania non-profit corporation with its address at 106 School Street, Suite 201, Spring Mills, PA 16875, 814-422-0251, pco@paorganic.org, and Accredited Certifying Agent (ACA) Global Culture, PO Box 1640, Crescent City, CA 95531, 707-464-6913, kathy@globalculture.us, linda@globalculture.us, for the resources and services described below. This Agreement is effective as of the date that initial payment is received by PCO (See Section 4, Fees). This Agreement shall continue in effect until terminated by either party with 30 days' notice in writing.

### 1. Resources provided to ACA:

- a. PCO Approved Materials List – This list includes brand name materials that PCO has reviewed since three years prior to January 1 of the current year (e.g. the 2017 list includes materials reviewed since January 1, 2014). PCO will provide updates to this list as new materials are reviewed and approved and existing listed materials are removed. ACA may distribute the PDF version of the list among clients, either by email or by printing and mailing. ACA may not post it on the internet or otherwise make it available to the public. The spreadsheet (XLS) version of the list is provided only to subscribing ACA for internal use.
- b. PCO Material Review Policy Manual – This manual contains the policies used by PCO to review each specific type of material and includes what documentation from the manufacturer is required for PCO to perform the review. Review decisions are based on information that PCO has gathered from manufacturers as part the review of the material for PCO-certified operations. PCO does not perform inspections of manufacturers or additional testing of manufactured products.

### 2. Liabilities, Dispute Resolution, and Indemnification Clause

- a. PCO has evaluated these materials to the best of its ability with the information available at the time. A PCO-approved status will not automatically convey an operator's allowance to use any given product. The ACA reserves the right to perform additional materials reviews and limit the use of PCO listed materials. ACA accepts responsibility for any and all liability, losses, expenses, or claims for injury or damages arising out of the performance of this Agreement. Except as specifically set forth in this agreement, PCO makes no warranty to ACA or any other person or entity, whether express, implied, or statutory, as to the merchantability, or fitness for any particular purpose of any service provided by PCO hereunder or described herein, or as to any other matter, all of which warranties are hereby expressly excluded and disclaimed.
- b. All disputes arising under this Agreement, which cannot first be settled amicably and satisfactorily between the parties, shall be finally settled under the rules of arbitration of the American Arbitration Association by a mutually agreeable arbitrator selected by the parties. If the parties cannot agree upon a single arbitrator, the matter shall be submitted to a board of three arbitrators. Each party shall appoint one arbitrator and the two arbitrators so selected shall appoint a third arbitrator. The law of the Commonwealth of Pennsylvania, including the provisions of the Uniform Commercial Code as in effect in the Commonwealth of Pennsylvania, shall govern all questions of procedure in cases where the aforementioned rules offer no guidance. The arbitration shall be conducted in Centre County, Pennsylvania. The arbitration board shall have the authority but not the obligation to award the costs of arbitration and reasonable attorneys' fees to the prevailing party; however, if the arbitration board does not award such costs and fees, each party will be responsible for its costs incurred in arbitration, except that the costs and fees imposed by the arbitration board for its expenses shall be borne equally by the parties. The parties agree to accept the decision of the board of arbitrators, and judgment upon any award rendered by the board may be entered in a court of competent jurisdiction.
- c. ACA shall defend, indemnify and hold harmless PCO from and against all losses, damages, liabilities, deficiencies, actions, judgments, interest, awards, penalties, fines, costs or expenses of whatever kind (including reasonable attorneys' fees and court costs) arising out of or relating to this Agreement or PCO's services provided hereunder. This obligation shall survive termination of this Agreement.

Pennsylvania Certified Organic (PCO)

pco@paorganic.org • www.paorganic.org • 106 School Street, Ste 201 • Spring Mills, PA 16875 • 814.422.0251 • fax 814.422.0255

PCO Materials List Recognition Agreement V4, 2/19/16

**3. Service provided to ACA:**

- a. ACA will use the PCO Approved Materials List as an indicator of which materials PCO has reviewed and approved according to the National Organic Program regulations and PCO material review policy, and may accept PCO's review decisions at ACA's discretion. ACA agrees to take responsibility for the decision to accept PCO's material review decisions. PCO is not responsible for damages resulting from ACA's acceptance of PCO's material review decisions. Clients of ACA that contact PCO for material information will be referred back to the ACA.
- b. ACA may request the review of a new material not on the PCO Approved Materials List. Upon completion of each review, PCO will provide an infosheet for each material with the review decision and any applicable restrictions. Once PCO has provided the infosheet, PCO is not obligated to provide updates to ACA regarding any new information or changes to the ingredients. To receive an update, ACA may request an additional review of the material, or perform the review themselves using the manufacturer contact info provided in the original infosheet. As a courtesy, PCO may inform ACA that new information is available on a previously requested material. PCO reserves the right to refuse a material review request submitted by an ACA.

**4. Fees:**

- a. The annual fee for service is \$1 multiplied by the number of operations certified by ACA as reported to National Organic Program or \$150 (whichever is greater). PCO will invoice ACA at the time of initial subscription and annually in the first week of January. ACA agrees to pay according to invoice terms. It is the ACA's responsibility to notify PCO of any discrepancies on the invoice, including contact information.
- b. ACA will be charged \$60 for material review requests. At the end of each quarter, PCO will send an invoice to ACA that reflects the fee for all completed material reviews during that quarter. ACA agrees to pay according to invoice payment terms. PCO reserves the right to discontinue this service for lack of payment.

ACA Representative Signature: **(b) (4)** Date: 1.10.17  
ACA Representative Name and Title: LINDA VAN HOOK, Exec. Director  
PCO Representative Signature: Date:  
PCO Representative Name and Title:

**From:** [Global Culture - Linda Van Hook](#)  
**To:** [AMS - NOPAppeals](#)  
**Cc:** [Lopez, JasonJ - AMS](#)  
**Subject:** GLO Annual Report 4-14-17 Exhibit I  
**Date:** Thursday, March 8, 2018 3:58:24 AM  
**Attachments:** [Conflict of Interest Form 2016- Truman Boren.pdf](#)  
[Conflict of Interest Form 2017 Cindy Douglas.doc](#)  
[Conflict of Interest Form 2017 Chaponica Trimmell.pdf](#)  
[Conflict of Interest Form 2017 Chris Van Hook.pdf](#)  
[Conflict of Interest Form 2017 Kathy Horgan.pdf](#)  
[Conflict of Interest Form 2017 Linda Van Hook.pdf](#)  
[Conflict of Interest Form 2017 Matthew Molyneaux.doc](#)  
[Conflict of Interest Form 2017- Sarah Coppini.pdf](#)

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GLO Annual Report 4-14-17 Exhibits I is attached.

Linda Van Hook  
Global Culture  
315 Meigs Road, Ste. A-404  
Santa Barbara, CA 93109  
Tel (707) 464-6913, Fax (888) 493-7818  
[Linda@globalculture.us](mailto:Linda@globalculture.us)



GLOBAL CULTURE  
Crescent City, CA 95531  
(707) 464-6913 ♦ Fax (888) 494-7818  
info@globalculture.us

Mailing Address: 315 Meigs Road, Ste A 404 Santa Barbara, CA 93109

**Global Culture Policy Form For Maintaining the Prevention Of  
Conflicts of Interest Throughout the Global Culture Certifying Program**

I, **Truman Boren** hereby agree to all of the

Print name here

following policies, and procedures for the prevention of conflicts of interest throughout the Global Culture Organic certifying program. I have read, and fully understand that these policies will be in full effect for myself, and all individuals who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations regarding certification, make certification decisions and all parties responsibly connected to Global Culture's Organic Certifying Program. I will be required to disclose any food, or agriculture related business interests including business interests of any immediate family members, that may cause a conflict of interest.

Following I will list any food and/or agriculture-related business interests, including business interests of immediate family members, that may cause a conflict of interest.

NA

For my part, I will prevent conflict of interests by:

- 1). Not certifying or inspecting a production or handling operation if I currently hold or have held, a commercial interest in the production or handling operation, including an immediate family interest or the provision of consulting services, within the 12 month period prior to the application for certification.
- 2). I will notify Global Culture's Executive Director and exclude myself from work, discussions, and decisions in all stages of the certification process and the monitoring of certified production or handling operations for all entities in which I currently or have held a commercial interest, including an immediate family interest or the provision of consulting services, within

the 12 month period prior to the application for certification.

3). Under no circumstances will I accept payment, gifts, or favors of any kind, other than prescribed fees, from any business I inspect and or certify, or that I am otherwise involved with the certification process of.

4). I will not give advice, or provide consultancy services to certification applicants, or certified operations, for overcoming identified barriers to certification.

5). I fully realize that I will be asked to complete an annual conflict of interest disclosure report each year.

6). By signing this form, I am accepting the responsibility of, and liability of keeping myself free of conflict of interests while working in any capacity with Global Culture in its Organic Certifying Operations, and I fully realize that Global Culture expects me to maintain the highest standards by doing so.

***Truman Boren***

***3/28/16***

\_\_\_\_\_  
E- Signature of Employee / Contractor

\_\_\_\_\_  
Date

**(b) (6)**

\_\_\_\_\_  
Linda Van Hook, Executive Director

*3.29.16*

\_\_\_\_\_  
Date



GLOBAL CULTURE  
 315 Meigs Road, Ste A404  
 Santa Barbara, CA 93109  
 (707) 464-6913 ♦ Fax (888) 494-7818  
 Info@globalculture.us

**Global Culture Policy Form For Maintaining the Prevention Of  
 Conflicts of Interest Throughout the Global Culture Certifying Program**

I, \_\_\_\_\_ Cindy Douglas \_\_\_\_\_ hereby  
 agree to all of the

Print name here

following policies, and procedures for the prevention of conflicts of interest throughout the Global Culture Organic certifying program. I have read, and fully understand that these policies will be in full effect for myself, and all individuals who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations regarding certification, make certification decisions and all parties responsibly connected to Global Culture’s Organic Certifying Program. I will be required to disclose any food, or agriculture related business interests including business interests of any immediate family members, that may cause a conflict of interest.

Following I will list any food and/or agriculture-related business interests, including business interests of immediate family members, that may cause a conflict of interest.

\_\_\_\_\_ Tutti Frutti Farms – employee  
 of \_\_\_\_\_  
 \_\_\_\_\_

For my part I will, prevent conflict of interests by:

- 1). Not certifying or inspecting a production or handling operation if I currently hold or have held, a commercial interest in the production or handling operation, including an immediate family interest or the provision of consulting services, within the 12 month period prior to the application for certification.

2). I will notify Global Culture's Executive Director and exclude myself from work, discussions, and decisions in all stages of the certification process and the monitoring of certified production or handling operations for all entities in which I currently or have held a commercial interest, including an immediate family interest or the provision of consulting services, within the 12 month period prior to the application for certification.

3). Under no circumstances will I accept payment, gifts, or favors of any kind, other than prescribed fees, from any business I inspect and or certify, or that I am otherwise involved with the certification process of.

4). I will not give advice, or provide consultancy services to certification applicants, or certified operations, for overcoming identified barriers to certification.

5). I fully realize that I will be asked to complete an annual conflict of interest disclosure report each year.

6). By signing this form, I am accepting the responsibility of, and liability of keeping myself free of conflict of interests while working in any capacity with Global Culture in it's Organic Certifying Operations, and I fully realize that Global Culture expects me to maintain the highest standards by doing so.

**(b) (6)**

3/1/2017

---

Signature of Employee / Contractor

---

Date

*Linda Van Hook, Executive Director*

*3/8/17*



GLOBAL CULTURE  
 Crescent City, CA 95531  
 (707) 464-6913 ♦ Fax (888) 494-7818  
 globalculture@earthlink.net  
 Mailing Address: P.O. Box 1280, Pacifica, CA 94044

**Global Culture Policy Form For Maintaining the Prevention Of  
 Conflicts of Interest Throughout the Global Culture Certifying Program**

I, Chaponica Trimmell hereby agree to all of the  
Print name here

following policies, and procedures for the prevention of conflicts of interest throughout the Global Culture Organic certifying program. I have read, and fully understand that these policies will be in full effect for myself, and all individuals who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations regarding certification, make certification decisions and all parties responsibly connected to Global Culture's Organic Certifying Program. I will be required to disclose any food, or agriculture related business interests including business interests of any immediate family members, that may cause a conflict of interest.

Following I will list any food and/or agriculture-related business interests, including business interests of immediate family members, that may cause a conflict of interest.

NA  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

For my part I will, prevent conflict of interests by:

- 1). Not certifying or inspecting a production or handling operation if I currently hold or have held, a commercial interest in the production or handling operation, including an immediate family interest or the provision of consulting services, within the 12 month period prior to the application for certification.
- 2). I will notify Global Culture's Executive Director and exclude myself



GLOBAL CULTURE  
315 Meigs Road, Ste A404  
Santa Barbara, CA 93109  
(707) 464-6913 ♦ Fax (888) 494-7818  
info@globalculture.us

**Global Culture Policy Form For Maintaining the Prevention Of  
Conflicts of Interest Throughout the Global Culture Certifying Program**

I, **Chris Van Hook** hereby agree to all of the  
Print name here

following policies, and procedures for the prevention of conflicts of interest throughout the Global Culture Organic certifying program. I have read, and fully understand that these policies will be in full effect for myself, and all individuals who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations regarding certification, make certification decisions and all parties responsibly connected to Global Culture's Organic Certifying Program. I will be required to disclose any food, or agriculture related business interests including business interests of any immediate family members, that may cause a conflict of interest.

Following I will list any food and/or agriculture-related business interests, including business interests of immediate family members, that may cause a conflict of interest.

**I do not have any conflicts of interest with any agriculture business interests.**

For my part I will, prevent conflict of interests by:

- 1). Not certifying or inspecting a production or handling operation if I currently hold or have held, a commercial interest in the production or handling operation, including an immediate family interest or the provision of consulting services, within the 12 month period prior to the application for certification.
- 2). I will notify Global Culture's Executive Director and exclude myself from work, discussions, and decisions in all stages of the certification

process and the monitoring of certified production or handling operations for all entities in which I currently or have held a commercial interest, including an immediate family interest or the provision of consulting services, within the 12 month period prior to the application for certification.

3). Under no circumstances will I accept payment, gifts, or favors of any kind, other than prescribed fees, from any business I inspect and or certify, or that I am otherwise involved with the certification process of.

4). I will not give advice, or provide consultancy services to certification applicants, or certified operations, for overcoming identified barriers to certification.

5). I fully realize that I will be asked to complete an annual conflict of interest disclosure report each year.

6). By signing this form, I am accepting the responsibility of, and liability of keeping myself free of conflict of interests while working in any capacity with Global Culture in its Organic Certifying Operations, and I fully realize that Global Culture expects me to maintain the highest standards by doing so.

(b) (6)

3/1/17

Signature of Employee / Contractor  
Signed electronically

Date

(b) (6)

3.3.17

Linda Van Hook, Executive Director

Date



GLOBAL CULTURE  
 Crescent City, CA 95531  
 (707) 464-6913 ♦ Fax (888) 494-7818  
 globalculture@earthlink.net  
 Mailing Address: P.O. Box 1280, Pacifica, CA 94044

**Global Culture Policy Form For Maintaining the Prevention Of  
 Conflicts of Interest Throughout the Global Culture Certifying Program**

I, Kathy Horgan hereby agree to all of the  
 Print name here

following policies, and procedures for the prevention of conflicts of interest throughout the Global Culture Organic certifying program. I have read, and fully understand that these policies will be in full effect for myself, and all individuals who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations regarding certification, make certification decisions and all parties responsibly connected to Global Culture's Organic Certifying Program. I will be required to disclose any food, or agriculture related business interests including business interests of any immediate family members, that may cause a conflict of interest.

Following I will list any food and/or agriculture-related business interests, including business interests of immediate family members, that may cause a conflict of interest.

None -

For my part I will, prevent conflict of interests by:

1). Not certifying or inspecting a production or handling operation if I currently hold or have held, a commercial interest in the production or handling operation, including an immediate family interest or the provision of consulting services, within the 12 month period prior to the application for certification.

2). I will notify Global Culture's Executive Director and exclude myself

from work, discussions, and decisions in all stages of the certification process and the monitoring of certified production or handling operations for all entities in which I currently or have held a commercial interest, including an immediate family interest or the provision of consulting services, within the 12 month period prior to the application for certification.

3). Under no circumstances will I accept payment, gifts, or favors of any kind, other than prescribed fees, from any business I inspect and or certify, or that I am otherwise involved with the certification process of.

4). I will not give advice, or provide consultancy services to certification applicants, or certified operations, for overcoming identified barriers to certification.

5). I fully realize that I will be asked to complete an annual conflict of interest disclosure report each year.

6). By signing this form, I am accepting the responsibility of, and liability of keeping myself free of conflict of interests while working in any capacity with Global Culture in it's Organic Certifying Operations, and I fully realize that Global Culture expects me to maintain the highest standards by doing so.

**(b) (6)**

3/16/17

Date

**(b) (6)**

3.17.17

Linda Van Hook, Executive Director

Date



GLOBAL CULTURE  
 315 Meigs Road, Ste A404  
 Santa Barbara, CA 93109  
 (707) 464-6913 ♦ Fax (888) 494-7818  
 info@globalculture.us

**Global Culture Policy Form For Maintaining the Prevention Of  
 Conflicts of Interest Throughout the Global Culture Certifying Program**

I, LINJA VANHOOK hereby agree to all of the  
Print name here

following policies, and procedures for the prevention of conflicts of interest throughout the Global Culture Organic certifying program. I have read, and fully understand that these policies will be in full effect for myself, and all individuals who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations regarding certification, make certification decisions and all parties responsibly connected to Global Culture's Organic Certifying Program. I will be required to disclose any food, or agriculture related business interests including business interests of any immediate family members, that may cause a conflict of interest.

Following I will list any food and/or agriculture-related business interests, including business interests of immediate family members, that may cause a conflict of interest.

I Linja VanHook don't have any food or any agriculture-related business interest that may cause a conflict of interest.

For my part, I will prevent conflict of interests by:

- 1). Not certifying or inspecting a production or handling operation if I currently hold or have held, a commercial interest in the production or handling operation, including an immediate family interest or the provision of consulting services, within the 12 month period prior to the application for certification.
- 2). I will notify Global Culture's Executive Director and exclude myself

from work, discussions, and decisions in all stages of the certification process and the monitoring of certified production or handling operations for all entities in which I currently or have held a commercial interest, including an immediate family interest or the provision of consulting services, within the 12 month period prior to the application for certification.

3). Under no circumstances will I accept payment, gifts, or favors of any kind, other than prescribed fees, from any business I inspect and or certify, or that I am otherwise involved with the certification process of.

4). I will not give advice, or provide consultancy services to certification applicants, or certified operations, for overcoming identified barriers to certification.

5). I fully realize that I will be asked to complete an annual conflict of interest disclosure report each year.

6). By signing this form, I am accepting the responsibility of, and liability of keeping myself free of conflict of interests while working in any capacity with Global Culture in its Organic Certifying Operations, and I fully realize that Global Culture expects me to maintain the highest standards by doing so.

(b) (6)

Signature of Employee / Contractor / Owner

3.1.17

Date

(b) (6)

Chris Van Hook, Legal Consultant

3/3/17

Date



GLOBAL CULTURE  
 315 Meigs Road, Ste A404  
 Santa Barbara, CA 93109  
 (707) 464-6913 ♦ Fax (888) 494-7818  
 Linda@globalculture.us

**Global Culture Policy Form For Maintaining the Prevention Of  
 Conflicts of Interest Throughout the Global Culture Certifying Program**

I, Matthew Molyneaux hereby agree to all of the  
Print name here

following policies, and procedures for the prevention of conflicts of interest throughout the Global Culture Organic certifying program. I have read, and fully understand that these policies will be in full effect for myself, and all individuals who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations regarding certification, make certification decisions and all parties responsibly connected to Global Culture’s Organic Certifying Program. I will be required to disclose any food, or agriculture related business interests including business interests of any immediate family members, that may cause a conflict of interest.

Following I will list any food and/or agriculture-related business interests, including business interests of immediate family members, that may cause a conflict of interest.

None  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

For my part I will, prevent conflict of interests by:

- 1). Not certifying or inspecting a production or handling operation if I currently hold or have held, a commercial interest in the production or handling operation, including an immediate family interest or the provision of consulting services, within the 12 month period prior to the application for certification.
  
- 2). I will notify Global Culture’s Executive Director and exclude myself

from work, discussions, and decisions in all stages of the certification process and the monitoring of certified production or handling operations for all entities in which I currently or have held a commercial interest, including an immediate family interest or the provision of consulting services, within the 12 month period prior to the application for certification.

3). Under no circumstances will I accept payment, gifts, or favors of any kind, other than prescribed fees, from any business I inspect and or certify, or that I am otherwise involved with the certification process of.

4). I will not give advice, or provide consultancy services to certification applicants, or certified operations, for overcoming identified barriers to certification.

5). I fully realize that I will be asked to complete an annual conflict of interest disclosure report each year.

6). By signing this form, I am accepting the responsibility of, and liability of keeping myself free of conflict of interests while working in any capacity with Global Culture in it's Organic Certifying Operations, and I fully realize that Global Culture expects me to maintain the highest standards by doing so.

**(b) (6)**

3-1-17

Signature of Employee / Contractor  
Signed electronically

Date

*Linda Van Hook*

3/8/17

Linda Van Hook, Executive Director

Date



GLOBAL CULTURE  
 Crescent City, CA 95531  
 (707) 464-6913 ♦ Fax (888) 494-7818  
 globalculture@earthlink.net  
 Mailing Address: P.O. Box 1280, Pacifica, CA 94044

**Global Culture Policy Form For Maintaining the Prevention Of  
 Conflicts of Interest Throughout the Global Culture Certifying Program**

I, Sarah Coppini hereby agree to all of the  
Print name here

following policies, and procedures for the prevention of conflicts of interest throughout the Global Culture Organic certifying program. I have read, and fully understand that these policies will be in full effect for myself, and all individuals who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations regarding certification, make certification decisions and all parties responsibly connected to Global Culture's Organic Certifying Program. I will be required to disclose any food, or agriculture related business interests including business interests of any immediate family members, that may cause a conflict of interest.

Following I will list any food and/or agriculture-related business interests, including business interests of immediate family members, that may cause a conflict of interest.

Coppini Lane Jerseys  
 \_\_\_\_\_  
 \_\_\_\_\_

For my part I will, prevent conflict of interests by:

1). Not certifying or inspecting a production or handling operation if I currently hold or have held, a commercial interest in the production or handling operation, including an immediate family interest or the provision of consulting services, within the 12 month period prior to the application for certification.

2). I will notify Global Culture's Executive Director and exclude myself

from work, discussions, and decisions in all stages of the certification process and the monitoring of certified production or handling operations for all entities in which I currently or have held a commercial interest, including an immediate family interest or the provision of consulting services, within the 12 month period prior to the application for certification.

3). Under no circumstances will I accept payment, gifts, or favors of any kind, other than prescribed fees, from any business I inspect and or certify, or that I am otherwise involved with the certification process of.

4). I will not give advice, or provide consultancy services to certification applicants, or certified operations, for overcoming identified barriers to certification.

5). I fully realize that I will be asked to complete an annual conflict of interest disclosure report each year.

6). By signing this form, I am accepting the responsibility of, and liability of keeping myself free of conflict of interests while working in any capacity with Global Culture in it's Organic Certifying Operations, and I fully realize that Global Culture expects me to maintain the highest standards by doing so.

**(b) (6)**

4-3-17  
Date

**(b) (6)**

Linda Van Hook, Executive Director

4.7.17  
Date

**From:** [Global Culture - Linda Van Hook](#)  
**To:** [AMS - NOPAppeals](#)  
**Subject:** Global Culture request to Appeal the Dec. 21, 2017 Notice of Proposed Suspension  
**Date:** Monday, January 22, 2018 3:11:42 AM  
**Attachments:** [AIA17191JL GLO NoNC 072117.pdf](#)  
[AIA17191JL GLO NoPS 112917.pdf](#)  
[Global Culture request to Appeal 2017 Proposed Suspension.pdf](#)

---

Dear Administrator, USDA, AMS, c/o Appeals Staff,

Global Culture is requesting an appeal at this time. I have attached the original NonCompliance, the Proposed Suspension of Accreditation, and Global Culture's request for an Appeal here for you.

Kind Regards,

Linda Van Hook  
Global Culture  
315 Meigs Road, Ste. A-404  
Santa Barbara, CA 93109  
Tel (707) 464-6913, Fax (888) 493-7818  
[Linda@globalculture.us](mailto:Linda@globalculture.us)



1400 Independence Avenue, SW.  
Room 2648-S, STOP 0268  
Washington, DC 20250-0268

JUL 21 2017

NOTICE OF NONCOMPLIANCE

Linda Van Hook  
Global Culture  
P.O. Box 1640315 Meigs Rd, Ste A 404  
Santa Barbara, CA 93109

Dear Ms. Van Hook:

On April 14, 2017, the United States Department of Agriculture (USDA), Agricultural Marketing Service (AMS), National Organic Program (NOP) notified Global Culture its 2017 annual report was due. The NOP granted Global Culture an extension on April 18, 2017 and accepted an extended submission date chosen by Global Culture on May 9, 2017. As of the date of this letter the NOP has not received a 2017 annual report from Global Culture. We have determined that Global Culture is noncompliant with the USDA organic regulations, 7 CFR Part 205, as follows:

**AIA17191JL.NC1** – 7 CFR §205.510(a) states, “(a) Annual report and fees. An accredited certifying agent must submit annually to the Administrator, on or before the anniversary date of the issuance of the notification of accreditation, the following reports and fees: (1) A complete and accurate update of information submitted pursuant to §§205.503 and 205.504; (2) Information supporting any changes being requested in the areas of accreditation described in §205.500; (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; (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 (5) The fees required in §205.640(a).”

**Comments:** *Global Culture has not submitted to the NOP the annual report due April 14, 2017. The NOP granted an extension of one week on April 18, 2017. On May 9, 2017, Global Culture informed the NOP it would submit its annual report on May 15, 2017. The NOP has not received the Global Culture annual report due April 14, 2017.*

Global Culture must submit corrective actions to [AIAInbox@ams.usda.gov](mailto:AIAInbox@ams.usda.gov) within 30 days from the date of this Notice. The corrective actions should indicate how each noncompliance will be corrected and how the Global Culture management system will be modified to prevent a recurrence of the noncompliance. If you wish to rebut the noncompliance, please submit objective evidence that supports your argument to the [AIAInbox@ams.usda.gov](mailto:AIAInbox@ams.usda.gov) within 30 days from the date of this Notice.



1400 Independence Avenue, SW.  
Room 2648-S, STOP 0268  
Washington, DC 20250-0268

**NOTICE OF PROPOSED SUSPENSION OF ACCREDITATION**

December 21, 2017

Linda Van Hook  
Global Culture  
PO Box 1640  
Santa Barbara, CA 93109

Dear Linda Van Hook:

On July 21, 2017, the National Organic Program (NOP) issued Global Culture a Notice of Noncompliance for not submitting the 2017 annual report due on April 14, 2017. A copy of the notice of noncompliance is enclosed for your reference. The notice required corrective actions to be submitted to the NOP on or before August 21, 2017. To date, the NOP has not received corrective actions to the noncompliance.

Global Culture has not submitted corrective actions to the noncompliance, and the NOP proposes to suspend Global Culture's accreditation as an NOP certifying agent effective 30 days from receipt of this letter. If the NOP suspends Global Culture's accreditation, you will be directed to cease all certification activities and make all client files available to the NOP pursuant to § 205.665(f) of the USDA organic regulations.

Pursuant to § 205.681 of the USDA organic regulations, Global Culture has the right to file an appeal of this proposed action within 30 days of receipt of this letter. Appeals must be submitted in writing to:

[NOPAppeals@ams.usda.gov](mailto:NOPAppeals@ams.usda.gov)

or

Administrator, USDA, AMS  
c/o NOP Appeals Staff  
1400 Independence Avenue, SW  
Room 2648-S, STOP 0268  
Washington, DC 20250

If you have questions regarding this proposed action, please contact your Accreditation Manager, Jason Lopez, at [JasonJ.Lopez@ams.usda.gov](mailto:JasonJ.Lopez@ams.usda.gov) or (202) 260-9445.

Sincerely,

A handwritten signature in blue ink that reads "Cheri Courtney". The signature is written in a cursive, flowing style.

Cheri Courtney  
Director Accreditation and International Activities Division  
National Organic Program



1400 Independence Avenue, SW.  
Room 2648-S, STOP 0268  
Washington, DC 20250-0268

Enclosure: AIA17191JL Notice of Noncompliance

cc: NOP Appeals



GLOBAL CULTURE  
315 Meigs Road, Ste A404  
Santa Barbara, CA 93109  
(707) 464-6913 ♦ Fax (888) 493-7818  
Linda@globalculture.us

January 21, 2018

RE: Notice of Proposed Suspension of Accreditation  
RE: Global Culture - Request of an Appeal

Dear AMS Administrator c/o the NOP Appeals Team,

We are requesting an appeal of the Notice of Proposed Suspension of Accreditation at this time. We ask that the decision be reexamined by the AMS Administrator's Office. The reason for this requests is so that all of the noncompliances can be resolved by Global Culture. We understand that we are late in getting our annual report to you. We ask that you take into account the many hardships that we encountered in 2017 and 2018. I won't go into these here at this time however I would like to explain if you will allow me to.

I have attached the Notice of Proposed Suspension of Accreditation as is required.

Kind Regards,

Linda Van Hook, Executive Director

Global Culture  
315 Meigs Road, Ste A404  
Santa Barbara, CA 93109

Linda@globalculture.us  
(707) 464-6913

**From:** [Global Culture - Linda Van Hook](#)  
**To:** [AMS - NOPAppeals](#)  
**Cc:** [Mathews, Clarissa - AMS](#)  
**Subject:** GLO Appeal Request-AP-36-18 GLO NoPropSus 012318  
**Date:** Saturday, February 3, 2018 2:17:18 AM  
**Attachments:** [Registered Notice of Proposed Suspension - GLO.msg](#)  
[GLO Appeal Request- AP-36-18 GLO NoPropSus 012318.docx](#)

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Dear Administrator, USDA, AMS, c/o Appeals Staff,

Global Culture is requesting an appeal at this time. Attached please find the original NonCompliance, the Proposed Suspension of Accreditation, and Global Culture's request for an Appeal including corrective actions and proposed resolution.

Please let me know if you have any questions at all.

Kind Regards,

Linda Van Hook  
Global Culture  
315 Meigs Road, Ste. A-404  
Santa Barbara, CA 93109

Tel (707) 464-6913, Fax (888) 493-7818  
[Linda@globalculture.us](mailto:Linda@globalculture.us)

**From:** [Reid John - AMS](#)  
**To:** [Linda@globalculture.us](mailto:Linda@globalculture.us)  
**Cc:** [AMS - AIAinbox](#)  
**Subject:** Registered: Notice of Proposed Suspension - GLO  
**Date:** Thursday, January 25, 2018 4:29:10 PM  
**Attachments:** [image001.jpg](#)  
[AP-36-18 GLO NoPropSus 012318.pdf](#)  
[AP-36-18 NoNC GLO 010518.pdf](#)

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This is a Registered Email® message from **Reid John - AMS**.

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Dear Ms. Van Hook:

Please see the attached Notice of Proposed Suspension. Global Culture has the right to file an appeal of this proposed action within 30 days of receipt of this letter. If you have questions regarding this proposed action, please contact your Accreditation Manager, Clarissa Mathews, at [Clarissa.mathews@ams.usda.gov](mailto:Clarissa.mathews@ams.usda.gov) or (202) 260-9447.

Respectfully,

*John A. Reid*



Program/Operations Analyst  
USDA | National Organic Program  
1400 Independence Avenue SW | 2649-S | Washington DC 20250  
**Main:** (202) 260-9452 | **Cell:** (202) 440-3550

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**NOTICE OF PROPOSED SUSPENSION OF ACCREDITATION**

Linda Van Hook  
Global Culture  
315 Meigs Road, Ste A 404  
Santa Barbara, CA 93109

Dear Ms. Van Hook:

On January 5, 2018, the National Organic Program (NOP) issued Global Culture a Notice of Noncompliance regarding two noncompliances (AP-36-18 .NC1 – NC2). A copy of the notice is enclosed for your reference. The notice required corrective actions to be submitted to the NOP on or before January 12, 2018. To date, the NOP has not received corrective actions to any of these noncompliances.

Due to Global Culture's failure to respond, the NOP proposes to suspend Global Culture's accreditation as an NOP certifying agent effective 30 days from receipt of this letter. If the NOP suspends Global Culture's accreditation, you will be directed to cease all certification activities and make all client files available to the NOP pursuant to § 205.665(f) of the USDA organic regulations.

Pursuant to § 205.681 of the USDA organic regulations, Global Culture has the right to file an appeal of this proposed action within 30 days of receipt of this letter. Appeals must be submitted in writing to:

[NOPAppeals@ams.usda.gov](mailto:NOPAppeals@ams.usda.gov)

or

Administrator, USDA, AMS  
c/o NOP Appeals Staff  
1400 Independence Avenue, SW  
Room 2648-S, STOP 0268  
Washington, DC 20250-0268



1400 Independence Avenue, SW.  
Room 2648-S, STOP 0268  
Washington, DC 20250-0268

If you have questions regarding this proposed action, please contact Clarissa Mathews, Accreditation Manager, at [Clarissa.Mathews@ams.usda.gov](mailto:Clarissa.Mathews@ams.usda.gov) or (202) 260-9447.

Sincerely,

A handwritten signature in blue ink that reads "Cheri Courtney". The signature is written in a cursive, flowing style.

Cheri Courtney  
Director, Accreditation and International Activities  
National Organic Program

Enclosure: Notice of Noncompliance AP-36-18

cc: NOP Appeals



1400 Independence Avenue, SW.  
Room 2648-S, STOP 0268  
Washington, DC 20250-0268

## NOTICE OF NONCOMPLIANCE

January 5, 2018

Linda Van Hook  
Global Culture  
315 Meigs Road, Ste A 404  
Santa Barbara, CA 93109

Dear Ms. Van Hook:

On December 21, 2017, the United States Department of Agriculture (USDA), Agricultural Marketing Service (AMS), National Organic Program (NOP) sent Global Culture (GLO) an email reminder that GLO's list of certified operations must be uploaded and successfully published in the INTEGRITY database by January 2, 2018. The notification also instructed GLO to email [AIAInbox@ams.usda.gov](mailto:AIAInbox@ams.usda.gov) by January 2, 2018 to inform the NOP that GLO's list of certified operations published in the INTEGRITY database is up-to-date. We have determined that GLO is noncompliant with the USDA organic regulations, 7 C.F.R. Part 205, as follows:

**AP-36-18.NC1** – 7 C.F.R. § 205.501(a)(21) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.” Specifically, NOP 2026 Instruction Submitting Annual Lists of Certified Operations states, “On January 2 of each calendar year, certifiers must submit a complete list of certified operations granted certification or continuing certification during the preceding year. Certifiers will use INTEGRITY to upload their client information. Lists may be submitted through INTEGRITY throughout the year, and must be received and successfully uploaded at a minimum by January 2. ... Certifiers that do not submit lists by January 2 will be out of compliance with § 205.501(a)(15)(ii) of the regulations ...”

**Comments:** *GLO last published its list of certified operations in the INTEGRITY database on January 3, 2017. This does not comply with the requirement to submit by January 2, 2018 a complete list of certified operations granted certification or continuing certification during 2017.*

**AP-36-18.NC2** – 7 C.F.R. § 205.501(a)(21) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.

**Comments:** *To date, the NOP has not received communication from GLO that its list of certified operations published in the INTEGRITY database is up-to-date. The communication was due to AIAInbox@ams.usda.gov by January 2, 2018.*

Within **7 days** from the date of this Notice, GLO must: 1-) successfully publish in the INTEGRITY database its current list of certified operations, and 2-) email [AIAInbox@ams.usda.gov](mailto:AIAInbox@ams.usda.gov) to inform the NOP that GLO’s list in INTEGRITY is up-to-date.

In addition, GLO must submit corrective actions to [AIAInbox@ams.usda.gov](mailto:AIAInbox@ams.usda.gov) within **30 days** from the date of this Notice. The corrective actions should indicate how each noncompliance has been corrected and how the GLO management system will be modified to prevent a recurrence of each noncompliance. If you wish to rebut a noncompliance, please submit objective evidence that supports your argument to the [AIAInbox@ams.usda.gov](mailto:AIAInbox@ams.usda.gov) within 30 days from the date of this Notice.

Please refer to [NOP 2608 Responding to Noncompliances](#) for further instruction. Failure to resolve this noncompliance may result in proposed suspension or revocation of GLO’s USDA accreditation.

If you have questions regarding this notice, please contact Clarissa Mathews, Accreditation Manager, at [Clarissa.Mathews@ams.usda.gov](mailto:Clarissa.Mathews@ams.usda.gov) or (202) 260-9447.

Sincerely,



for cc

Cheri Courtney  
Director, Accreditation and International Activities  
National Organic Program

cc: AIA Inbox



GLOBAL CULTURE  
Linda Van Hook  
315 Meigs Road, Ste A 404  
(805) 453-6566 ♦ Fax (888) 493-7818  
Linda@globalculture.us

Administrator, USDA, AMS  
c/o NOP Appeals Staff  
1400 Independence Avenue, SW  
Room 2648-S. STOP 0268  
Washington, DC 20250-0268

February 2, 2018

RE: AP-36-18 GLO NoPropSus 012318 : (AP-36-18.NC1, AP-36-36-18.NC2)

Dear Administrator, USDA, AMS, c/o Appeals Staff,

Global Culture is requesting an appeal at this time for AP-36-18 GLO NoPropSus 012318.

**Proposed Resolution and Corrective Actions to the NonCompliances AP-36-18.NC1, AP-36-36-18.NC2 are as follows:**

AP-36-18.NC1 - §205.501 General requirements for accreditation.

(a) A private or governmental entity accredited as a certifying agent under this subpart must:  
(21) Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.

Specially, NOP 2026 – Submitting a complete list of certified operation granted certification or continuing certification during the preceding year by January 2 of each year.

### **Corrective Actions and Proposed Resolutions**

Global Culture received the Notice of Noncompliance for not publishing our GLO list of certified operations to the Organic Integrity Database, on January 2, 2018 deadline which is required each year based on NOP 7 CFR 205.501 (a)(15)(ii) .

- 1). GLO's list of certified operations was successfully published in INTEGRITY on 2/2/18. Although it was published past the deadline date of Jan. 2, 2018, it is now up to date.
- 2). Evidence of this can be seen by going to the INTEGRITY Database and viewing listings of the certified operations by GLO.
- 3). To prevent this re-occurrence of not publishing GLO's list of certified operations into the INTEGRITY Database by the due date of January 2, of each year please see the following corrective actions and proposed preventative actions taken below:

- Linda Van Hook contacted Stacy Swartwood with questions and assistance with the INTEGRITY Database, Reviewed NOP posted instructions on how to work with the INTEGRITY Database. By getting more practice entering data into the INTEGRITY as well as more frequently, it will help with the annual Jan. 2 submission.
- Global Culture will continue to sign up for all Webinars for INTEGRITY and review past ones and instructions and slides of INTEGRITY.
- Global Culture Organic System Manual Certification Procedures has now been revised.
- GLO will more closely follow the policy stated in our Global Culture Organic System Manual Certification Procedures more carefully. GLOs policy below, can be found on page 4 and 5 of Global Culture Organic System Manual Certification Procedures. See in bold the portion that has been revised:

## **II). GLOBAL CULTURE GENERAL POLICIES:**

In carrying out its certifying responsibilities, Global Culture adheres to the following policies:

- 1). Global Culture uses the most current NOP standards as the basis for its certification procedure. A copy of the NOP regulation is provided to the applicant for his review at the beginning of the certification process. Please note that the most current National Organic Program Regulatory Text can be found at [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop). Global Culture takes all steps necessary to evaluate applicant conformance with the applicable NOP and SOP regulations. Global Culture will comply with, implement, and carry out any other terms and conditions determined by the AMS administrator, or SOP representative to be necessary.
- 2). Global Culture will not make false or misleading claims about its accreditation status, the USDA accreditation program for certifying agents, or the nature or qualities of products labeled as organically produced.
- 3). Global Culture will provide sufficient information to persons seeking certification to enable them to comply with applicable requirements of the Act and NOP regulations. The most current USDA NOP Regulations can be found at the following link:  
[www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)
- 4). All requirements, applications, on-site inspections and decisions regarding certification are confined to matters specifically related to the scope of the certification being sought.
- 5). Global Culture accepts certification decisions made by other certifying agents who have been accredited to the USDA National Organic Program pursuant to NOP regulation §205.500.
- 6). Global Culture does not exclude from participation in, or deny the benefits of, the NOP to any person due to discrimination on the basis of race, color, national origin, gender, religion, age, disability, political beliefs, sexual orientation, marital, or family status.

7). Global Culture will maintain strict confidentiality with respect to its clients and will not disclose to third parties (with the exception of the Secretary of Agriculture and/or the applicable SOP Official or their authorized representatives) any business-related information concerning any client obtained while implementing the regulations in this part, except as provided for in section §205.504(b)(5).

8). Global Culture will accept all applications for certification that fall within its scope of accreditation and geographic inspection radius 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.

9). Global Culture will submit to the Administrator a copy of:

a). Any notice of denial of certification issued pursuant to NOP regulation §205.405, notification of noncompliance, notice of noncompliance correction, notification of proposed suspension or revocation, and notice of suspension or revocation sent pursuant to NOP regulation §205.662 simultaneously with its issuance.

**b). A list of GLO's certified operations will be submitted to the NOP on or before January 2 of each year through the organic INTEGRITY Database. NOP will be notified by GLO that GLO's List of certified operations was published and up to date.**

10). Global Culture will 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.

11). Global Culture will pay and submit fees to AMS in accordance with NOP regulation §205.640.

12). Global Culture will provide the inspector, prior to each on-site inspection with the previous year's on-site inspection reports and notify the inspector of its decision regarding certification of the production or handling operation site inspected by the inspector and of any requirements for the correction of minor noncompliance.

Please let us know if you have any questions, suggestion or concerns. We look forward to hearing from you.

Kind Regards,

Linda Van Hook  
Global Culture  
Linda@globalculture.us

**From:** [Nally Yanessa, Shannon - AMS](#)  
**To:** [linda@globalculture.us](mailto:linda@globalculture.us)  
**Cc:** [Courtney, Cheri - AMS](#); [Yang, RobertH - AMS](#)  
**Subject:** Appeal received (Sent Registered)  
**Date:** Thursday, January 25, 2018 3:06:25 PM  
**Attachments:** [Ack GlobalCulture APL-018-18.pdf](#)

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Dear Linda,

The Agricultural Marketing Service has received your appeal of the proposed suspension of Global Culture's accreditation. Please see the attached letter for information.

Thank you,  
Shannon

**Shannon Nally Yanessa**

Assistant Director, Standards Division  
National Organic Program  
U.S. Department of Agriculture  
(202) 260-9285 (direct)



1400 Independence Ave. SW  
Room 2648-S, STOP 0268  
Washington, D.C. 20250

January 25, 2018

Linda Van Hook  
Global Culture  
PO Box 1640  
Santa Barbara, CA 93109  
Transmitted via email: [linda@globalculture.us](mailto:linda@globalculture.us)

**Re: Appeal Acknowledgement, APL-018-18**

Dear Ms. Van Hook:

This letter acknowledges Global Culture's appeal of the December 21, 2017 Notice of Proposed Suspension of Accreditation issued by the National Organic Program (NOP). Your appeal was received via e-mail by the Agricultural Marketing Service (AMS) on January 22, 2017, and will be expeditiously reviewed and decided by persons not involved with the action being appealed.

We invite you to provide the Appeals Team with any additional information you believe would support your case **within 10 days of receipt of this letter.**

Control Number APL-018-18 has been assigned to this appeal. Please use this number on all correspondence regarding this appeal. All written communications related to this appeal must be sent to the address above by a delivery service which provides dated receipts. You may also use email; the Appeals Inbox is: [NOPAppeals@ams.usda.gov](mailto:NOPAppeals@ams.usda.gov).

During the appeals process, Global Culture's USDA organic accreditation remains valid. As such, you must remain in full compliance with the USDA organic regulations, and will continue to operate under the oversight of the NOP. Please note that you may file additional appeals if you receive any additional adverse action notices.

Sincerely,

A handwritten signature in black ink that reads "Shannon Nally Yanessa". The signature is written in a cursive, flowing style.

Shannon Nally Yanessa  
NOP Appeals Team  
[NOPAppeals@ams.usda.gov](mailto:NOPAppeals@ams.usda.gov)  
202-260-9293

Cc: National Organic Program, Accreditation & International Activities Division

**From:** [Nally Yanessa, Shannon - AMS](#)  
**To:** [Linda@globalculture.us.rpost.org](mailto:Linda@globalculture.us.rpost.org)  
**Cc:** [Cheri.Courtney@ams.usda.gov.rpost.org](mailto:Cheri.Courtney@ams.usda.gov.rpost.org); [RobertH.Yang@ams.usda.gov.rpost.org](mailto:RobertH.Yang@ams.usda.gov.rpost.org)  
**Subject:** Closure of Global Culture appeal  
**Date:** Wednesday, May 16, 2018 9:28:44 AM  
**Attachments:** [Closure-GlobalCulture APL-018-18.pdf](#)  
[regdata.txt](#)

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Dear Ms. Van Hook,

The USDA Agricultural Marketing Service has closed Global Culture's appeal of the Notice of Proposed Suspension of Accreditation. Please see the attached letter for information.

Regards,  
Shannon

**Shannon Nally Yanessa**

Assistant Director, Standards Division  
National Organic Program  
U.S. Department of Agriculture  
(202) 260-9285 (direct)



1400 Independence Ave. SW  
Room 2607-S, STOP 0262  
Washington, D.C. 20250

May 7, 2018

Linda Van Hook  
Global Culture  
PO Box 1640  
Santa Barbara, CA 93109  
Transmitted via email: [linda@globalculture.us](mailto:linda@globalculture.us)

**Re: Appeal Closure, APL-018-18**

Dear Ms. Van Hook:

On January 22, 2018, and February 8, 2018, the Agricultural Marketing Service received separate appeals from Global Culture. Each appeal addressed a separate Notice of Proposed Suspension of Accreditation, issued by the National Organic Program on December 21, 2017 and January 23, 2018. These appeals were combined into one appeal proceeding, APL-018-18.

On April 14, 2018, Global Culture's accreditation as a U.S. Department of Agriculture organic certifying agent expired. The accreditation expired because Global Culture failed to renew its accreditation in accordance with the requirements in the USDA organic regulations (§ 205.510(c)). Given that Global Culture is no longer accredited, appeal APL-018-18 is now moot, and we are closing the file without further action.

I wish you the best in your future work.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Sheats".

Michael Sheats  
National Organic Program Appeals Program  
Division Director, Agriculture Analytics Division  
Livestock, Poultry, and Seed Programs  
Agricultural Marketing Service

cc: National Organic Program



# National Organic Program (NOP) Appeal APL-034-18

**Appellant:**  
Ecocert SA – Turkey  
Aude Bonnet  
Scheme Manager Organic Certification  
BP 47  
32600 L'Isle-Jourdain  
France  
[Aude.bonnet@ecocert.com](mailto:Aude.bonnet@ecocert.com)

## **NOP ADVERSE ACTION**

→ **PLEASE RETURN TO NOP:**  
**(202) 720-3252**

Ecocert SA  
BP 47  
32600 L'Isle Jourdain  
France

Administrator, USDA, AMS  
c/o NOP Appeals Staff  
1400 Independence Avenue, SW  
Room 2095-S, STOP 0203  
Washington, DC 20250

**Subject: Appeal to the Notice of Noncompliance and Proposed Suspension of accreditation – Ecocert SA Turkey, received on April 10, 2018**

May 10, 2018

Dear Sir, Madam,

Ecocert SA received a Notice of Noncompliance and Proposed Suspension of Accreditation – Ecocert SA Turkey (“Notice”) from the Agricultural Marketing Service, National Organic Program (“NOP”) on April 10, 2018. Ecocert SA (“Ecocert”) hereby appeals this decision and requests it to be withdrawn and reissued as a Notice of Noncompliance.

**1. NOP failure to follow noncompliance procedure**

Ecocert notes that the NOP issued a proposed suspension without providing Ecocert an opportunity to rebut or correct each noncompliance as provided for under 7 CFR 205.665(a). Ecocert notes that 205.665(c) states that a proposed suspension shall be issued when rebuttal or correction of the noncompliances is not completed within the prescribed time period. NOP failed to provide an opportunity for Ecocert to rebut or correct each noncompliance. NOP has not followed the noncompliance procedures outlined under 7 CFR 205.665.

The Notice is written as a combined notification of noncompliance and proposed suspension. Ecocert considers that a combined notification of noncompliance and proposed suspension is not appropriate, insofar as the NOP did not provide Ecocert with an opportunity to rebut or correct the noncompliances, and the notice does not state that correction of the noncompliances notified in the Notice is not possible, nor does the notice provide any information as to whether NOP believes it is not possible. Ecocert believes that NOP issued the combined notice in error and requests that the Notice is withdrawn and reissued as a Notice of Noncompliance. This would provide Ecocert with the opportunity, as provided in 205.665(a), to rebut or correct each noncompliance.

Furthermore, the proposed suspension of Ecocert's satellite office in Izmir, Turkey, is purportedly based on "*evidence of repeated violations of the USDA organic regulations*", although

- (i) the Notice does not identify what are the repeated violations and
- (ii) Ecocert has never been notified earlier, neither orally, nor in writing, of any noncompliance regarding the issues mentioned in the Notice linked to :
  - "*organic cracked corn aboard a vessel that departed Turkey on January 18, 2018 en route to Stockton, California*"; and
  - "*commodities aboard two other vessels reviewed by the NOP*".

Regarding the latter, the Notice does not reference the names of the concerned vessels, nor gives any other elements enabling Ecocert to identify the vessels. This needs to be clarified to Ecocert.

2. Regarding the non-compliances specifically

The memorandum attached to this letter (Annex 2) details Ecocert analysis and corrective actions on the noncompliances AP-137-18.NC1 to AP-137-18.NC6.

The analysis of the findings referenced as the basis of these noncompliances leads us to believe that four out of the six noncompliances are not well-founded.

Regarding the two remaining noncompliances, i.e. AP-137-18.NC4 to AP-137-18.NC5, Ecocert is strongly committed to implementing corrective actions to improve the integrity of the organic control system. Ecocert believes that the proposed corrective and preventive actions fully comply with the USDA organic requirements and will avoid recurrence of these two noncompliances.

We will, of course, remain available to answer any questions and provide any additional information required in this process.

Sincerely,

Aude Bonnet  
Scheme Manager Organic Agriculture  
Ecocert SA



**Attachments:**

*ANNEX 1: Copy of the Notice of Noncompliance and Proposed Suspension of accreditation – Ecocert SA Turkey*

*ANNEX 2: Memorandum on the non-compliances AP-137-18.NC1 to AP-137-18.NC6*

**NOTICE OF NONCOMPLIANCE AND PROPOSED SUSPENSION OF  
ACCREDITATION – ECOCERT SA TURKEY**

April 10, 2017

Aude Bonnet  
Scheme Manager Organic Certification  
Ecocert SA  
BP 47 - 32600  
L'Isle-Jourdain  
FRANCE

Dear Ms. Bonnet:

As an accredited certifying agent for the USDA, Agricultural Marketing Service (AMS), National Organic Program (NOP), Ecocert SA (ECO) is required to demonstrate its ability to fully comply with, and implement, its organic certification program. On March 8, 2018, the NOP received a request for information on the source of organic cracked corn aboard a vessel that departed Turkey on January 18, 2018 en route to Stockton, California, from the USDA Animal and Plant Health Inspection Service (APHIS). Based on the response documents provided by ECO, the NOP determined that ECO did not comply with the USDA organic regulations in its certification of a shipment of cracked corn from Turkey to the United States. Additional evidence submitted by ECO for commodities aboard two other vessels reviewed by the NOP, also demonstrated that ECO did not comply with the USDA organic regulations.

Based on evidence of repeated violations of the USDA organic regulations, the NOP hereby proposes suspension of ECO's satellite office in Izmir, Turkey pursuant to 7 C.F.R. §205.665(c), effective 30 days from the date of this notice.

**AP-137-18.NC1** - 7 C.F.R. §205.501(a)(9) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Maintain all records pursuant to §205.510(b) and make all such records available for inspection and copying during normal business hours by authorized representatives of the Secretary and the applicable State organic program's governing State official;"

**Comments:** *ECO Turkey does not collect sufficient records to maintain a clear audit trail of imported and exported products. Transaction certificates issued by ECO for corn grown in Russia, Moldova, and Kazakhstan imported to Turkey indicate the corn was certified to the European Union organic regulations. Transaction certificates issued for the export of the same corn state it is certified to the USDA organic regulations.*

**AP-137-18.NC2** - 7 C.F.R. §205.501(a)(21) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary."

**Comments:** *In the August 11, 2017 letter to certifiers, the NOP instructed all certifiers overseeing operations handling certain commodities from Kazakhstan, Moldova, Romania, Russia, Turkey,*

*and Ukraine to obtain information in advance of a shipment, and to provide such notification to the NOP. ECO Turkey did not notify the NOP of five transaction certificates issued by ECO for shipments of corn from Russia, Moldova, and Kazakhstan to Turkey.*

- a. *Certificate 168759RU1800w001 issued for 3,136,616 kg of “Crop 2017, Organic Corn (b) (4)”, lot number 41-17; departing from the Russian Federation on December 17, 2017 with a destination of Trabzon, Turkey.*
- b. *Certificates 168759RU1800w020 issued for 3,042,496 kg of “Crop 2017, Organic Corn (b) (4)”, lot number 43-17; departing the Russian Federation on December 24, 2017 with a destination of Trabzon, Turkey.*
- c. *Certificate 168759RU1800w021 issued for 3,124,416 kg of “Crop 2017, Organic Corn (b) (4)”, lot number 47-17; departing from the Russian Federation on January 6, 2018 with a destination of Trabzon, Turkey.*
- d. *Certificate 90531KZ1800w05 issued for 16,500,000 kg of “Crop 2016, Organic Corn (b) (4)”, lot number 1179-16; departing Ukraine on January 6, 2018 with a destination of Trabzon or Samsun, Turkey.*
- e. *Certificate 165296MD1800w12 issued for 4,967,060 kg of “Crop 2017, Organic Corn (WTA)”, lot number A044-17; departing the Republic of Moldova on December 24, 2017 with a destination of Trabzon, Turkey.*

**AP-137-18.NC3** - 7 C.F.R. §205.501(a)(1) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Have sufficient expertise in organic production or handling techniques to fully comply with and implement the terms and conditions of the organic certification program established under the Act and the regulations in this part;...”

**Comments:** *ECO is not verifying the organic integrity of products they issue transaction certificates for. The audit trail reviewed by the NOP, does not include the change of ownership of commodities, and the organic status of product is not consistently reported in transaction certificates. In the transaction certificates issued by ECO, corresponding to holds 1, 2, 3, and 4, of the vessel which departed Turkey on January 18, 2018 en route to Stockton, California, the following issues were observed.*

- *All four transaction certificates for the corn leaving Turkey listed a seller who was different than the buyer of the corn when it entered Turkey. ECO did not provide evidence showing the transfer of ownership of the corn from when it entered Turkey to when it was exported to the US.*
- *None of the transaction certificates issued by ECO for the vessel en route to Stockton, California indicated the country in which the product was produced.*
- *While the previous transaction certificates for the corn entering Turkey referenced the European Union organic regulations, the transaction certificates issued by ECO all referenced certification to the USDA NOP organic regulations.*
- *ECO submitted an investigative plan to the NOP which stated that interpreters would be needed for some inspections conducted in Russia. When asked, ECO clarified that not all of its inspectors speak the local language, and documents are collected in English, Turkish, and Russian.*

**AP-137-18.NC4** - 7 C.F.R. §205.501(a)(1) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Have sufficient expertise in organic production or handling techniques to fully comply with and implement the terms and conditions of the organic certification program established under the Act and the regulations in this part;...”

**Comments:** *ECO issued a transaction certificate for a certified operation to export corn when the operation was not certified for the production of corn and corn was not listed on their certificate.*

- *Corn in holds 2, 3 and 5, of the January 18, 2018 corn shipment from Turkey, originated from an operation whose current organic certificate did not include corn.*

**AP-137-18.NC5** - 7 C.F.R. §205.402(a)(2) state, “Upon acceptance of an application for certification, a certifying agent must:... Determine by a review of the application materials whether the applicant appears to comply or may be able to comply with the applicable requirements of subpart C of this part;”

**Comments:** *ECO did not require sufficient documentation to verify land was eligible for organic certification. During the review of the inspection report of an operation in Kazakhstan exporting organic corn, the inspector noted in the report that there were no field history records or a prior land use verification for the farm requesting certification.*

**AP-137-18.NC6** - 7 C.F.R. §205.501(a)(21) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.” NOP 2601 *The Organic Certification Process* section 3.4 states, “The inspector will review each production unit, facility, and site where the operation produces or handles organic products. The inspection includes... Reconciliation of the volume of organic products produced or received with the amount of organic products shipped, handled and/or sold, also known as trace-back audits or in-out balances;...”

**Comments:** *In response to the NOP’s request for documentation on two previous vessels transporting commodities to the U.S. and for the vessel that departed January 18, 2018 from Turkey, ECO failed to provide evidence of inspector in-out balance calculations of their certified operations to ensure that the amount of corn and soybeans harvested and sold as organic by the operations did not exceed the amount which they could reasonably expect to produce.*

## **APPEAL RIGHTS**

The NOP proposes to suspend ECO’s Turkey Office’s accreditation as a NOP certifying agent effective 30 days from receipt of this letter. If the NOP suspends ECO’s Turkey Office’s accreditation, you will be directed to cease all certification activities and make all client files available to the NOP pursuant to §205.665(f) of the USDA organic regulations.

Pursuant to §205.681 of the USDA organic regulations, ECO has the right to file an appeal of this proposed action within 30 days of receipt of this letter. Appeals must be filed in writing to:

Administrator, USDA, AMS  
c/o NOP Appeals Staff  
1400 Independence Avenue, SW  
Room 2095-S, STOP 0203



1400 Independence Avenue, SW.  
Room 2648-S, STOP 0268  
Washington, DC 20250-0268

Washington, DC 20250

If the NOP suspends ECO's Turkey Office's accreditation you may, at any time, submit a request to the Secretary for reinstatement of your accreditation. The request must be accompanied by evidence demonstrating correction of each noncompliance and corrective actions taken to comply with and remain in compliance with the Organic Foods Production Act and the USDA organic regulations. If the NOP suspends ECO's Turkey Office's accreditation, you will be directed to cease all certification activities and make all client files available to the NOP pursuant to §205.665(f) of the USDA organic regulations.

If you have questions regarding this proposed action, please contact Rebecca Claypool, Accreditation Manager, at [Rebecca.E.Claypool@ams.usda.gov](mailto:Rebecca.E.Claypool@ams.usda.gov) or (202) 440-1999.

Sincerely,

A handwritten signature in blue ink that reads "Cheri Courtney". The signature is written in a cursive, flowing style.

Cheri Courtney  
Director, Accreditation and International Activities Division  
National Organic Program

cc: Betsy Rakola, Director, Compliance & Enforcement Division

Enclosures:

## ANNEX 2: Memorandum on the non-compliances AP-137-18.NC1 to AP-137-18.NC6

(Ecocert SA response in blue – list of appendix available at the end of the document)

**AP-137-18.NC1** - 7 C.F.R. §205.501(a)(9) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Maintain all records pursuant to §205.510(b) and make all such records available for inspection and copying during normal business hours by authorized representatives of the Secretary and the applicable State organic program's governing State official;”

**Comments:** *ECO Turkey does not collect sufficient records to maintain a clear audit trail of imported and exported products. Transaction certificates issued by ECO for corn grown in Russia, Moldova, and Kazakhstan imported to Turkey indicate the corn was certified to the European Union organic regulations. Transaction certificates issued for the export of the same corn state it is certified to the USDA organic regulations.*

Ecocert does not understand the grounds on which this noncompliance is based:

1. NOP comments state that “*Ecocert does not collect sufficient records to maintain a clear audit trail of imported and exported products*”. However, Ecocert SA (“Ecocert”) was never asked for such records neither in writing nor orally. On March 8, 2018, the NOP requested information regarding transaction certificates and farm origin for organic cracked corn, conveyed from Turkey, via (b) (4). Ecocert provided those records. Ecocert maintains the necessary records to show a clear audit trail. Those records are available to the NOP for inspection and copying as required under 7 CFR 205.501(a)(9).
2. Ecocert SA issued EU transaction certificates for organic corn grown in Russia, Moldova, and Kazakhstan imported to Turkey. European Union (“EU”) transaction certificates indicate compliance with the EU organic regulations but have no reference to the USDA organic regulations. NOP transaction certificates are not required under the USDA organic regulations and NOP transaction certificates were not issued for the corn shipped from Russia, Moldova, and Kazakhstan into Turkey. On March 15, 2018, Ecocert SA provided information to the NOP regarding the organic cracked corn’s compliance with USDA organic regulations, conveyed from Turkey, via (b) (4). On March 19, 2018, the NOP issued a letter to (b) (4) stating that the organic cracked corn was certified organic.

Ecocert believes that there may have been a misunderstanding due to the fact that Ecocert mentioned the EU organic regulations (also known as EOS) transaction certificates in its communication to the NOP, which may have led to confusion. Ecocert clearly understands that all organic products shipped to the U.S. must comply with the USDA organic regulations. Ecocert clearly understands that compliance with the EU organic regulations does not mean that the product complies with the USDA organic regulations.

In order to maintain a clear audit trail before issuing NOP transaction certificates, Ecocert Turkey gathers and verifies the following:

- The coherence and the completion of the transaction documents are verified in term of quantities, lot numbers, and change of ownership. The transaction documents received and checked are the commercial invoice(s) or purchase slip or/and delivery slip as well as the transport documents such as AWB, CMR, Bill of lading or other equivalent transport documents.
- In case of transport between countries, Ecocert also requests phytosanitary certificates and/or fumigation related documents to make sure the organic integrity of products is maintained at the border.
- Ecocert checks that the suppliers of the products are NOP certified by obtaining their main certificates. Transaction certificates are also requested. If they were not issued, a cross-check verification with the supplier's certifying agent is conducted to ensure NOP certification of organic products supplied.
- As per the NOP requirements, sampling at consignment is also requested for grains leaving Turkey for the U.S. Ecocert also requests sampling of grains before their entrance in Turkey.
- To make sure the audit trail is complete, the client's internal records including identification of lot numbers and product quantities are also requested. Mainly it corresponds to the internal record for receipts and sales of products, the processing records and the harvest records.
- Finally, Ecocert Turkey keeps track of the volume of products that is bought, produced, stored and sold by each operator. The objective being to make sure that the quantity sold does not exceed the quantities bought and produced. Before issuing transaction certificates, Ecocert Turkey conducts an in and out balance exercise based on these records. In [appendix A](#), you will find an example of these records for one invoice of corn included in the (b) (4).

These verifications are in compliance with the NOP Interim Instruction NOP4013 section 3.1 *Certification requirements* page 4 – *Audit Trail records*:

*“Certifiers must verify that an operation’s records meet the requirements under the USDA organic regulations, [...], and provide a complete audit trail allowing the certifier to trace products back to the last certified handler to verify organic integrity (7 CFR 205.403(c)(2), § 205.201(a)(4) and (6)).*

*The USDA organic regulations describe general recordkeeping requirements for certified operations. The regulations also give certifiers authority to require operations to provide any additional information necessary to evaluate and confirm compliance with the regulations (7 CFR 205.201(a)(6)). The following are examples of records that certifiers may require, as a best practice, in order to verify the organic integrity of imported products and ensure compliance with the regulations:*

- *Organic certificates for each product or ingredient received.*
- *Invoices and purchase orders with information identifying the specific product(s), such as lot numbers, quantities, and supply chain entities.*
- *Shipping documents, such as booking sheets or bills of lading, with information such as lot numbers, product volume, handling instructions and the name of the last certified organic operation.*
- *Weigh tickets, receipts, and tags*
- *Clean truck/container affidavit for bulk product verifying that truck/container was thoroughly cleaned and poses no risk of contact with prohibited substances.*
- *Phytosanitary certificates from the last country of export.*

- *Receiving records showing organic status, quantity of organic product received, and source of product.*
- *Certificates of Analyses or Product Specification Sheets.*
- *Product inventory and storage records.*
- *NOP Import Certificates.*
- *TraceNet certificates (Applies to products certified in India to the USDA organic standards).*
- *Attestation statements (Applies to products certified to the Canadian organic standards)."*

In the example of the (b) (4) which we understand to be the “vessel that departed Turkey on January 18, 2018, en route to Stockton, California” mentioned in this noncompliance, the NOP transaction certificates were issued for the transactions between the exporter in Turkey and the importer in the USA. [Appendix B](#) contains all the records that were collected and verified prior to the issuance of the concerned NOP transaction certificates.

**AP-137-18.NC2** - 7 C.F.R. §205.501(a)(21) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.”

**Comments:** *In the August 11, 2017, letter to certifiers, the NOP instructed all certifiers overseeing operations handling certain commodities from Kazakhstan, Moldova, Romania, Russia, Turkey, and Ukraine to obtain information in advance of a shipment, and to provide such notification to the NOP. ECO Turkey did not notify the NOP of five transaction certificates issued by ECO for shipments of corn from Russia, Moldova, and Kazakhstan to Turkey.*

- Certificate 168759RU1800w001 issued for 3,136,616 kg of “Crop 2017, Organic Corn (b) (4)”, lot number 41-17; departing from the Russian Federation on December 17, 2017, with a destination of Trabzon, Turkey.*
- Certificates 168759RU1800w020 issued for 3,042,496 kg of “Crop 2017, Organic Corn (b) (4)”, lot number 43-17; departing the Russian Federation on December 24, 2017, with a destination of Trabzon, Turkey.*
- Certificate 168759RU1800w021 issued for 3,124,416 kg of “Crop 2017, Organic Corn (b) (4)”, lot number 47-17; departing from the Russian Federation on January 6, 2018, with a destination of Trabzon, Turkey.*
- Certificate 90531KZ1800w05 issued for 16,500,000 kg of “Crop 2016, Organic Corn (b) (4)”, lot number 1179-16; departing Ukraine on January 6, 2018, with a destination of Trabzon or Samsun, Turkey.*
- Certificate 165296MD1800w12 issued for 4,967,060 kg of “Crop 2017, Organic Corn (b) (4) lot number A044-17; departing the Republic of Moldova on December 24, 2017, with a destination of Trabzon, Turkey.*

#### Regarding the instruction made by the NOP to certifiers:

The NOP comments above refer to a letter dated August 11, 2017. The NOP letter dated August 11, 2017, is directed to accredited certifiers that certify handling operations that import into the U.S. The August 11, 2017 letter states: “If you certify handling operations that directly receive imported organic corn, soy, edible dry beans, wheat, flax, or sunflower meal from Kazakhstan, Moldova, Romania, Russia, Turkey, and Ukraine, you must enact the following control and reporting measures for those handling operations”. Therefore Ecocert believes the reference to the August 11, 2017 letter may be incorrect.

The NOP issued a letter dated July 11, 2017 (please see [appendix C](#)) that was addressed to certifiers of “organic handlers of corn, soy, wheat, dry edible beans, sunflower meal, and flax whose businesses are located in Kazakhstan, Moldova, Romania, Russia, Turkey, and Ukraine.”, among them Ecocert.

The July 11, 2017 letter states, in point 3, to :

*“Submit copies of all verification documentation (examples in 1c above); sample test results; and transaction certificate and/or NOP import certificate for each shipment to the NOP Accreditation and International Activities Division (AIAInbox@ams.usda.gov) **simultaneously with its issuance to the certified operation.**”* (emphasis added)

#### Regarding the transaction certificates referenced in the comments of this noncompliance

The five transaction certificates referenced in the comments of this non-compliance i.e. transaction certificates number 168759RU1800w001, 168759RU1800w020, 168759RU1800w021, 90531KZ1800w05 and 165296MD1800w12, were issued according to the European Union organic regulations. These transaction certificates were issued for transactions between Kazakhstan, Russia, Moldova on one hand and Turkey on the other hand, and not for import into the U.S. Ecocert is not aware that there is a requirement for NOP transaction certificates between third countries that are not shipping the referenced commodities directly into the U.S. Ecocert could implement NOP requirements for third-country transactions if that becomes an NOP requirement.

As detailed in our comments to the first noncompliance, transaction certificates are not mandatory according to the USDA organic regulations. For these transactions, the operation did not request NOP transaction certificates, the products were not being imported into the U.S. and therefore “copies of all verification documentation (examples in 1c above); sample test results; and transaction certificate and/or NOP import certificate” were not provided to NOP.

The NOP comments above reference a request “to obtain information in advance of a shipment, and to provide such notification to the NOP.” This NOP comment to obtain information in advance of a shipment has never been formalized to Ecocert outside of this Notice.

**AP-137-18.NC3** - 7 C.F.R. §205.501(a)(1) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Have sufficient expertise in organic production or handling techniques to fully comply with and implement the terms and conditions of the organic certification program established under the Act and the regulations in this part;...”

**Comments:** *ECO is not verifying the organic integrity of products they issue transaction certificates for. The audit trail reviewed by the NOP, does not include the change of ownership of commodities, and the organic status of product is not consistently reported in transaction certificates. In the transaction certificates issued by ECO, corresponding to holds 1, 2, 3, and 4, of the vessel which departed Turkey on January 18, 2018, en route to Stockton, California, the following issues were observed.*

*All four transaction certificates for the corn leaving Turkey listed a seller who was different than the buyer of the corn when it entered Turkey. ECO did not provide evidence showing the transfer of ownership of the corn from when it entered Turkey to when it was exported to the US.*

This noncompliance concerns the data provided by Ecocert to NOP regarding the (b) (4) (b) (4) (the vessel which we understand to be the “vessel that departed Turkey on January 18, 2018, en route to Stockton, California” mentioned in the noncompliance).

As shown in [appendix D](#), NOP requested that Ecocert provide the following information:

1. On March 8, 2018, NOP requested Ecocert to provide **production farm code and production origin for 4 invoices** of Cracked corn from (b) (4). Ecocert was also asked if there was **NOP transaction certificates** issued or requested for these loads and for the farm and country of origin.

Ecocert replied on March 12, 2018, with

- a “summary table” linking the 4 invoices and production farms,
- the 4 NOP transaction certificates issued by Ecocert for this shipment,
- the main certificates of the concerned production farms.

2. On March 12, 2018, NOP requested Ecocert to provide the **transaction and phytosanitary certificates for the transactions between third countries and Turkey**.

Ecocert replied on March 13, 2018, with

- The EU organic regulations (EOS) transaction certificates that were issued between third countries (no NOP transaction certificates were sent because there were issued for EOS certification only),
- The requested phytosanitary certificates.

3. Finally, on March 13, 2018, NOP requested **further information on one of the concerned production farm** (b) (4) as the corn was not listed on his certificate.

Ecocert replied on March 15, 2018, with the confirmation of the organic integrity of the organic corn from this producer.

Ecocert Turkey did perform a full audit trail and quantity verification prior to issuing NOP transaction certificates for this shipment. All records from the farm to the final exporter were requested to the operations and verified by Ecocert Turkey which allowed us to identify clearly when the transfer of ownership occurred. [Appendix B](#) details all the different transactions that occurred for those goods, including the one showing the change of ownership.

Ecocert provided the link between final exporter invoices and the producers as per NOP request. Ecocert provided all of the information that NOP requested. The NOP did not request full traceability and therefore this information was not provided. This results in the change of ownership not being detailed in the documentation Ecocert sent to NOP.

Ecocert considers that all the requests from NOP were adequately answered at the time, and that NOP could have requested additional information including the change of ownership at any time. Indeed, all the traceability documentation was available at Ecocert Turkey office.

*None of the transaction certificates issued by ECO for the vessel en route to Stockton, California indicated the country in which the product was produced.*

As of today, there is neither an existing template of transaction certificate provided by the NOP nor required data to be included in this document according to the USDA organic regulations.

The only official equivalent document that is provided by the NOP is the “NOP Import certificate” and this official template does not include the country in which the product was produced.

Ecocert NOP transaction certificate template does not include the country in which the product was produced. We do not see any reason to change this template until this is being made a requirement in the USDA organic regulations.

*While the previous transaction certificates for the corn entering Turkey referenced the European Union organic regulations, the transaction certificates issued by ECO all referenced certification to the USDA NOP organic regulations.*

#### Regarding the absence of NOP transaction certificates for transactions of corn entering Turkey

NOP transaction certificate is not a document covered by the USDA organic regulations. Transaction certificates are therefore not mandatory under the USDA organic regulations. The absence of a NOP transaction certificate is not evidence that the product is noncompliant with the USDA organic regulations.

For the (b) (4), we confirm that Ecocert issued transaction certificates for the corn entering Turkey referencing European Union organic regulations. Those EU transaction certificates do not indicate that the product was compliant with USDA organic regulations. Additional review and verification is conducted to evaluate compliance with USDA organic regulations when the product is shipped to the U.S. This in fact occurred to verify that the organic corn on the (b) (4) complied with USDA organic regulations.

#### Regarding the verification done to ensure full traceability and compliance to the USDA organic regulations before issuance of the NOP transactions certificates

As explained in our comments to the first noncompliance, Ecocert Turkey gathers and verifies many documents to confirm the integrity of products when transaction certificates are issued. It includes transaction documents (such as invoice(s), transport documents, phytosanitary, etc.), supplier guarantees (suppliers main certificates, transaction documents, etc.), sampling, client’s internal records necessary to trace the goods, etc.

Also, a systematic verification of the in and out volumes of products is done at each level of the supply chain.

Records are available in [appendix A & B](#).

*ECO submitted an investigative plan to the NOP which stated that interpreters would be needed for some inspections conducted in Russia. When asked, ECO clarified that not all of its inspectors speak the local language, and documents are collected in English, Turkish, and Russian.*

Ecocert believes that there may have been a misunderstanding in our communications with NOP regarding this point. Following the submission of our investigative plan a conference call with NOP took place on March 28, 2018. During this meeting, we discussed the use of interpreters in our investigative plan.

In order to maximize the effectiveness of its investigations, Ecocert assigned some of its best international inspectors to conduct the critical inspections in the area together with an inspector from Ecocert Turkey. Although Ecocert Turkey inspectors assigned in the area speak the local language, such as Russian, the international inspectors don't. This is why we also planned to mandate an interpreter in order to avoid any misunderstanding during inspections when interviewing the local personnel and reviewing the documentation.

In addition, at the Ecocert Turkey office, some people also speak Russian or Ukrainian and can, if necessary, translate the documents that are provided in such language by the clients.

This practice seems compliant to the NOP, according to us. Please clarify otherwise.

**AP-137-18.NC4** - 7 C.F.R. §205.501(a)(1) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Have sufficient expertise in organic production or handling techniques to fully comply with and implement the terms and conditions of the organic certification program established under the Act and the regulations in this part;..."

**Comments:** *ECO issued a transaction certificate for a certified operation to export corn when the operation was not certified for the production of corn and corn was not listed on their certificate.*

*Corn in holds 2, 3 and 5, of the January 18, 2018, corn shipment from Turkey, originated from an operation whose current organic certificate did not include corn.*

We believe the case mentioned in this noncompliance is the operator (b) (4), based in Kazakhstan, which was one of the suppliers of the corn that was shipped to the U.S. in the (b) (4). Please clarify if you are referring to another vessel.

(b) (4) produced organic corn in 2016 but did not produce organic corn in 2017. During the 2017 inspection, the Ecocert inspector noted that organic corn from the 2016 harvest was in storage at the farm level. However, an Ecocert Turkey certification officer only mentioned the 2017 crops and did not include the remaining stock of 2016 harvested organic corn in the Ecocert software. That is why organic corn was not included on the 2017 NOP certificate.

For the (b) (4), when Ecocert Turkey conducted its traceability exercises prior to the issuance of NOP transaction certificates, the person in charge identified that part of the organic corn came from the operator (b) (4) and records showed that it concerned the stock remaining from the 2016 harvest.

Ecocert Turkey performed the following verification prior to the issuance of the NOP transaction certificates:

- In our internal software, Ecocert, the person in charge verified that the 2016 organic corn was recorded as compliant with the NOP regulations at the farm level,
- In our internal record of the quantities of products available at farm level an in-out balance was performed for this producer to confirm that there were sufficient quantities of 2016 organic corn remaining in stock at the farm,
- The 2017 inspection report was reviewed to confirm that remaining stock had been observed on the farm.

Ecocert Turkey missed checking the master certificate of the production farm to confirm that the corn was also indicated on the master organic certificate.

### Corrective actions

Ecocert will update its procedure to include a systematic verification of the master certificates of all Ecocert operators involved in the supply chains instead of the direct suppliers only. This procedure will be finalized by July 31, 2018.

By August 15, 2018, Ecocert will communicate to all staff responsible for issuing transaction certificates, to apply this new procedure.

In addition, by May 31, 2018, a reminder will be sent to Ecocert Turkey to detail how to record the remaining stock of products from past harvests in the Ecert software.

**AP-137-18.NC5** - 7 C.F.R. §205.402(a)(2) state, “Upon acceptance of an application for certification, a certifying agent must:... Determine by a review of the application materials whether the applicant appears to comply or may be able to comply with the applicable requirements of subpart C of this part;”

**Comments:** *ECO did not require sufficient documentation to verify land was eligible for organic certification. During the review of the inspection report of an operation in Kazakhstan exporting organic corn, the inspector noted in the report that there was no field history records or a prior land use verification for the farm requesting certification.*

We believe the operation based in Kazakhstan mentioned in this noncompliance is (b) (4) (b) (4) Initial inspection was performed from September 1 to September 2, 2016, and a recognition of land as organic was requested by the operator.

Before approving the land as organic under USDA regulations, Ecocert Turkey made the following verification:

- Verification of the records of the 3 previous years
- Verification of an attestation from authorities confirming that no cultivation of land was performed for the past 3 years ([appendix E](#))
- Visual verification of the fields
- 3 Sampling of leaves taken on the fields ([appendix F](#))
- Interviews of employees confirming that company stopped cultivating the farm between 2013 and 2016 for economic reason

At the time of the inspection, the attestation from authorities, confirming that no prohibited substances were used for the past 3 years, was not available to the inspector. This document is mandatory under EU organic regulations so the inspector indicated an EU regulations finding on that point.

In addition, even though the crop register for previous 36 months was available, the Ecocert inspector indicated in his report that it was not signed by the operator. Having records signed by the operator is a common practice in the area and is required locally. This was also indicated as an EU regulations finding.

Missing documentation was provided by the operator on February 22, 2017 and approved by Ecocert Turkey on February 24, 2017. Associated records are available in [appendix E](#).

In the September 1-2, 2016 inspection report, the information provided regarding the verification done to confirm the eligibility of the land for organic certification was not clear. Communications between the Ecocert certification officer and inspector clarified the situation and, after reception

of the necessary corrective actions from the operator, Ecocert Turkey made the decision to certify the land as organic. This is consistent with 7 CFR 205.404(a) where the certifying agent shall grant certification if the certifying agent determines the operation is compliant with the USDA organic requirements.

The inspector that performed the 2016 inspection for (b) (4) had just joined Ecocert Turkey as an inspector in 2016. Previously, he was working for the certifier IMO-CONTROL Sertifikasyon Ticaret Limited. He had just been trained on Ecocert tools and rules few months before the inspection and was still getting use to them. We understand this to be the main reason behind the lack of clarity in the comments of the inspection report at that stage. Since then, improvement on the quality of his reports has been noticed.

### Corrective actions

On February 26 to March 2, 2018, Ecocert Turkey organized a one-week training for all inspectors that included the following topics:

- Review of the procedure 'P15(EC-NOP)Inspection' detailing how to record inspection reports in Ecert,
- Recognition of land as organic.

Training proofs and P15(EC-NOP) are available in [appendix G](#).

In addition, Ecocert will update its internal policy in order to better describe the verification that must be done to confirm the eligibility of land as organic. This guideline will then be communicated to all the staff for an immediate application by July 31, 2018.

Finally, supervision of Ecert inspection report contents will be reinforced in order to verify that reports are properly completed. In case of need, additional actions will be implemented.

**AP-137-18.NC6** - 7 C.F.R. §205.501(a)(21) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary." NOP 2601 *The Organic Certification Process* section 3.4 states, "The inspector will review each production unit, facility, and site where the operation produces or handles organic products. The inspection includes... Reconciliation of the volume of organic products produced or received with the amount of organic products shipped, handled and/or sold, also known as trace-back audits or in-out balances;..."

**Comments:** *In response to the NOP's request for documentation on two previous vessels transporting commodities to the U.S. and for the vessel that departed January 18, 2018, from Turkey, ECO failed to provide evidence of inspector in-out balance calculations of their certified operations to ensure that the amount of corn and soybeans harvested and sold as organic by the operations did not exceed the amount which they could reasonably expect to produce.*

Ecocert is not aware of any request from NOP for this information.

During inspections, in-out balance exercises have systematically been performed at least once a year, sometimes more often, for all the actors/intermediaries of the concerned shipments.

[Appendix H](#), contains a table summarizing, for each of the operations involved in the supply chain of (b) (4), the exercises that were recorded in 2017. The associated records are also available in this appendix.

In addition, as mentioned in our reply of the noncompliance NC1, Ecocert Turkey office follows the quantities that are entering and leaving for each operator in order to be able to conduct in-out balance prior to the issuance of transaction certificates and all transactions are recorded on a day by day basis in dedicated tables (Please see an example in [appendix A](#)).

Any time an in-out balance is planned on-site, these records are provided to the inspector in order to cross-check the quantities produced/received, sold and remaining in stock. It also allows the inspector to verify that the list of transactions are complete according to on-site available records.

In order to give more visibility on the verification performed by inspectors, Ecocert will give further guidance to inspectors on how to formalize that verification in the inspection report, before July 31, 2018.

### List of appendix:

Appendix A - Product flow tables for one invoice o (b) (4)

Appendix B

B.1 (b) (4) product flow and document overview

B.2 (b) (4) product flow and documents - Associated records

Appendix C - Letter from NOP to accredited certifiers - 2017.07.11

Appendix D - Emails between Ecocert and NOP on the (b) (4)

Appendix E

E.1 - Translated official confirmation letter (b) (4)

E.2 - 2013 to 2016 crop register (b) (4)

Appendix F - Analytical report (b) (4)

Appendix G

G.1 - Training proofs on organic land recognition and on inspection reporting

G.2 - P15(EC-NOP) Inspection

Appendix H

H.1 - (b) (4) List of 2017 balance and traceability exercises

H.2 - (b) (4) balance and traceability records

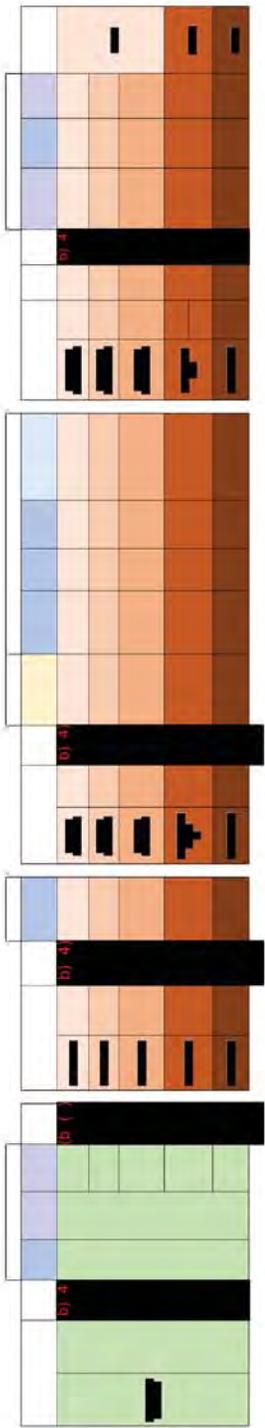
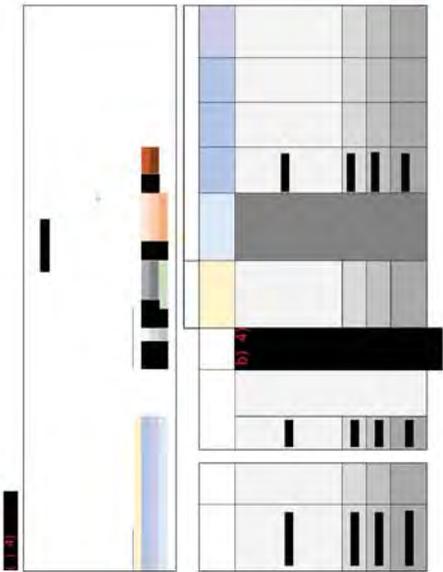














1400 Independence Avenue, SW.  
Room 2642-South, STOP 0268  
Washington, DC 20250-0268

July 11, 2017

Dear USDA Accredited Certifier,

The U.S. Agricultural Marketing Service (AMS) National Organic Program (NOP) has determined that certain shipments of corn and soy, shipped from Turkey, were fraudulently labeled as organic. In order to eliminate any additional fraudulent shipments and protect the integrity of the organic system, AMS-NOP is implementing additional control measures.

Thank you for your continued efforts ensuring the integrity of organic corn imports by instituting the control measures requested by the AMS-NOP over the past 6 months. In order to continue these efforts, we are revising the control measures as follows:

- Including USDA organic handlers of soy, wheat, dry edible beans, sunflower meal, and flax.
- Revising the locations of certified handlers to those located in the following countries: Kazakhstan, Moldova, Romania, Russia, Turkey, and Ukraine.
- Requiring additional verification of certification documentation and submission to the NOP.

Certifiers must enact the following control and reporting measures for all certified USDA organic handlers of corn, soy, wheat, dry edible beans, sunflower meal, and flax whose businesses are located in Kazakhstan, Moldova, Romania, Russia, Turkey, and Ukraine:

1. Conduct at least one unannounced inspection from the period of December 1, 2016 to December 1, 2017. The unannounced inspection may serve as the client's annual inspection if the unannounced inspection covers the entire Organic System Plan. The unannounced inspection may contribute to the five percent annual quota requirement stated in [NOP 2609 Unannounced Inspections](#). During the unannounced inspection, the certifier will:
  - a. Verify product flows, traceability, and audit trails established by the operator;
  - b. Identification of responsible parties in the supply chain and verification of certification for each according to [NOP 4009 Who Needs to be Certified?](#) and [NOP 5031 Certification Requirements for Handling Unpackaged Organic Products](#) (ie: handlers transferring product from rail car containers into ship containers must be certified);

- c. Verification of audit trail documents, such as phytosanitary, bill of lading (BOL), and fumigation documentation;
  - d. Conduct sampling, according to item 2 below.
2. Sample and analyze for presence of pesticide residues for all shipments (consignments) of organic food and feed commodities (as listed above) being exported to the U.S. The certifier must take at least one representative sample of each shipment.
  - a. Sampling should be conducted according to [NOP 2610 Sampling Procedures for Residue Testing](#), laboratory selection should be conducted according to [NOP 2611 Laboratory Selection Criteria for Pesticide Residue Testing](#), samples should be tested for the list at [NOP 2611-1 Prohibited Pesticides for NOP Residue Testing](#), and certifiers should respond to results according to instruction [NOP 2613 Responding to Results from Pesticide Residue Testing](#).
  - b. Sampling handling and sample shipment may not be conducted by the certified operation. The certifier must maintain the chain of custody of each sample.
3. Submit copies of all verification documentation (examples in 1c above); sample test results; and transaction certificate and/or NOP import certificate for each shipment to the NOP Accreditation and International Activities Division ([AIAInbox@ams.usda.gov](mailto:AIAInbox@ams.usda.gov)) simultaneously with its issuance to the certified operation.
4. If noncompliances are issued to certified organic handlers of these commodities, immediately send a copy of the noncompliance to the NOP Accreditation and International Activities Division ([AIAInbox@ams.usda.gov](mailto:AIAInbox@ams.usda.gov)).
5. Document the full actions and results as a result of this letter in two reports issued to the NOP. One report must be submitted to [AIAInbox@ams.usda.gov](mailto:AIAInbox@ams.usda.gov) by October 1, 2017, and the final report must be submitted to the [AIAInbox@ams.usda.gov](mailto:AIAInbox@ams.usda.gov) by December 1, 2017. The reports must include:
  - a. The list of operations under the certifier's control that handle, process, or broker corn, soy, wheat, dry edible beans, sunflower meal, and flax certified to the USDA organic standard in the following countries: Kazakhstan, Moldova, Romania, Russia, Turkey, and Ukraine.
  - b. The laboratory, or laboratories, selected for sample criteria and how it meets the requirements of [NOP 2611 Laboratory Selection Criteria for Pesticide Residue Testing](#).
  - c. For each operation inspected during the period beginning December 1, 2016 and ending December 1, 2017, list:
    - i. Inspections carried out;
    - ii. Sampling and analysis;
    - iii. Issues and Noncompliances found;
    - iv. Corrective actions and/or adverse actions issued;
    - v. The results of each corrective action and/or adverse action issued (such as certification, continued certification, proposed suspension, etc.)

The NOP encourages certifiers to issue transaction certificates and NOP import certificates when proper documentation is obtained and verified. If documentation obtained from the certified



1400 Independence Avenue, SW.  
Room 2642-South, STOP 0268  
Washington, DC 20250-0268

operation is inadequate to verify the valid certification of the product being shipped, the certifier should not issue the transaction certificate and/or NOP import certificate. Organic operations that accept organic products without proper verification are not in compliance with the USDA organic regulations and proper enforcement actions must be taken by certifiers when these types of violations are identified.

Please revisit the webinar [Organic Integrity in the Supply Chain: Training for Certified Handlers](#).

Thank you for your cooperation and timely response in instituting these control measures to ensure organic compliance. If you have any questions regarding these investigations, please contact me at [Cheri.Courtney@ams.usda.gov](mailto:Cheri.Courtney@ams.usda.gov) or (202) 720-8491.

Sincerely,

A handwritten signature in blue ink that reads "Cheri Courtney". The signature is written in a cursive, flowing style.

Cheri Courtney  
Accreditation and International Activities Division Director  
National Organic Program

## Love, Kelsey - AMS

---

**From:** Rakola, Betsy - AMS <Betsy.Rakola@ams.usda.gov>  
**Sent:** Friday, March 16, 2018 3:05 PM  
**To:** BONNET Aude  
**Cc:** Courtney, Cheri - AMS; Yang, RobertH - AMS  
**Subject:** RE: (b) (4)

Thank you, Aude. We appreciate the update and any additional clarity you are able to provide regarding this situation.

Sincerely,

Betsy Rakola

Director, Compliance and Enforcement, USDA-AMS-NOP  
202-720-3252

---

**From:** BONNET Aude [mailto:aude.bonnet@ecocert.com]  
**Sent:** Thursday, March 15, 2018 5:05 PM  
**To:** Rakola, Betsy - AMS <Betsy.Rakola@ams.usda.gov>  
**Subject:** M/V Mountpark letter

Dear Betsy,

I thank you for letting Ecocert know your concerns on the cracked corn coming from the vessel (b) (4)

Following Mark questions, I have made some investigation on the farmer (b) (4) and here is the result:

(b) (4) was audited by Ecocert in September 2016. At that time, corn was not harvested, was visible on-field and verifications were done on this ongoing production.

After the inspection, it took E.Turkey further months to finalize the certification process and as a consequence, the certificate was issued only in February 24 of 2017 (see also copy attached). This certificate included the 2016 harvested corn as it was verified and compliant to NOP.

Once certified, E.Turkey issued TCs for this operator for the 2016 harvested corn.

In 2017, this farmer stopped the production of corn. Our auditor confirmed it during its audit and indicated in Ecert the remaining stock of 2016 harvested corn that was still available at the farm level.

Unfortunately, during the review, E.Turkey only mentioned the 2017 crops and missed to add the remaining stock of 2016 harvest on the certificate. That is why the corn is missing on the actual NOP certificate.

I hope this explanation will clarify the situation.

Note that I am still reviewing the transaction documents at the farmer level and reviewing the quantity of corn still in stock to make sure there is no inconsistency at this level. Once this is done and if everything is in order, Ecocert was thinking, under USDA approval, to update the NOP certificate to include the corn again.

Bien cordialement,  
Kind regards,



Aude BONNET

*Scheme Manager Organic Agriculture*

[Ecocert SA - BP 47 - 32600 - L'Isle-Jourdain - France]  
T [+33 (0) 5 62 07 52 06] – M (b) (6) - F [+33 (0) 5 62 07 66 19]  
[aude.bonnet@ecocert.com](mailto:aude.bonnet@ecocert.com)  
[www.ecocert.com](http://www.ecocert.com)

-----Message d'origine-----

De : Rakola, Betsy - AMS [mailto:Betsy.Rakola@ams.usda.gov]

Envoyé : mercredi 14 mars 2018 18:45

À : BONNET Aude <aude.bonnet@ecocert.com> Cc : Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>; Yang, RobertH - AMS <RobertH.Yang@ams.usda.gov> Objet : (b) (4)

Dear Aude,

Please see the attached letter which the NOP issued on the (b) (4). Based on the information submitted by EcoCert, we have serious concerns about the organic integrity of the product. Please note that the US phytosanitary service has also identified potential violations which may require emergency action on the part of the shipper.

Sincerely,

Betsy Rakola

Director, Compliance and Enforcement  
USDA Agricultural Marketing Service, National Organic Program  
1400 Independence Ave, SW; Room 2959-S  
Washington, DC 20250  
202-260-8657  
Betsy.Rakola@ams.usda.gov

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1400 Independence Avenue, S.W.  
Room 2648-S, STOP 0268  
Washington, D.C. 20250-0268

March 12, 2018

Via Registered Email

David Meeker  
Penny Newman Grain Company  
1805 Harbor Street  
Stockton, CA 95203  
[dmeeker@penny-newman.com](mailto:dmeeker@penny-newman.com)

Dear Mr. Meeker:

The USDA National Organic Program (NOP) has identified potential violations of the USDA organic regulations involving a shipment of soybeans en route to the (b) (4) (b) (4) Stockton, CA. This notice relates to a shipment of 19,850.2 metric tons of cracked corn in holds 2, 3, and 4 aboard the (b) (4), which departed the port of San Francisco on or about March 12, 2018 en route to (b) (4). Our investigation of this shipment gives us reason to believe that the corn was not produced in accordance with the USDA organic regulations. Specifically, the information provided to the USDA-accredited certifying agent EcoCert S.A. indicates that the corn was harvested in 2016 by the operation (b) (4) of the North-Kazakhstan region, (b) (4) (also referred to as (b) (4) (b) (4). However, (b) (4) was not certified to the USDA organic regulations in 2016. Rather, it was first certified on February 24, 2017. In addition, the USDA's [Organic INTEGRITY Database](#) does not list corn as one of the products which (b) (4) is certified to produce.

Given this information, as a certified operation and seller of organic product in the United States, we urge you to exercise due diligence to ensure that any product you are intending to represent as organic is compliant with the regulations. Sale, representation or distribution of non-organic corn as organic may result in civil penalties of up to \$11,000 per violation.

If you have questions regarding this notice, please contact Betsy Rakola, Director, NOP Compliance and Enforcement Division at (202) 720-3252 or [Betsy.Rakola@ams.usda.gov](mailto:Betsy.Rakola@ams.usda.gov).

Sincerely,

A handwritten signature in blue ink that reads "Ruihong Guo".

Ruihong Guo, Ph.D.  
Acting Deputy Administrator  
National Organic Program

cc: Aude Bonnet – EcoCert, S.A., [aude@ecocert.com](mailto:aude@ecocert.com)  
Deborah Mansfield – Primus Labs, [PrimusOrganic@primuslabs.com](mailto:PrimusOrganic@primuslabs.com)




---

## CERTIFICATE OF ORGANIC OPERATION

---

Issued by ECOCERT SA to

(b) (4)

(b) (4)

The following products and activities are certified to the USDA organic regulations, 7 CFR Part 205.

*Any reference to the organic production mode has to respect the rules as determined in Subpart D of the Rule. Any other rules of labelling as determined by national food acts have to be followed.*

**Scope:** Crops

**Date of initial NOP certification:** 24 February 2017

**Category of certification: NOP "100% organic" product (205.301a)**

### **CROPS AND CROPS RAW PRODUCTS**

---

Corn  
Soybean  
Sunflowers

Once certified, a production or handling operation's organic certification continues in effect until surrendered, suspended or revoked. A certification operation must annually request the continuation of its certification by following the section 205.406 of the NOP.

The authenticity and validity of this document can be verified on [www.ecocert.com](http://www.ecocert.com).

**Issued in** L'ISLE JOURDAIN

**On:** 24 February 2017

**Renewal due date:**

**(when the certified operation must submit its annual update)**

1st May 2017

A handwritten signature in black ink, appearing to read "Philippe Thomazo".

**Philippe THOMAZO**  
General Manager of Ecocert SA

## Confirmation

12.07.2016

The following detailed information belongs to all fields of (b) (4). Any kind of chemical substances, including pesticides, herbicides, fertilisers; hormones and treated GMO seeds are not used on these fields of the farm from 04/2013 till now.

| No | Field no                    | ha         | Crop (2013-2015) |
|----|-----------------------------|------------|------------------|
|    | Agricultural area - (b) (4) | (b) (4) ha |                  |
| 1  | (b) (4)                     | (b) (4)    | Fallow           |
| 2  | (b) (4)                     | (b) (4)    | Fallow           |
| 3  | (b) (4)                     | (b) (4)    | Fallow           |
| 4  | (b) (4)                     | (b) (4)    | Fallow           |
| 5  | (b) (4)                     | (b) (4)    | Fallow           |

Head of Agriculture and Veterinary Department

(b) (4)

A.Saburov



I hereby declare that I have translated the Russian original document into English Language accurately. Certified Translator **Burak Sanver** Fahrettin Kerim Gökay Cad. No:298 B-Blok K:1 D.27 Sahrayıcedit Kadıköy / İstanbul **Date: February 15<sup>th</sup>, 2017**

I verify that this translation is translated from Russian to English by **Burak Sanver**, certified translator of our public notary who is staying at the given address. 15<sup>th</sup> day of February two Thousand Seventeen.

Подтверждение

12.07.2016

Учетки указано ниже детали 04/2013 приводится в действие с ТОО «Агрофирма (b) (4) (b) (4) с сегодняшнего Дня с даты, указанной в входе любого химического вещества, наркотики, гормоны, удобрение и семена (то, который был использован).

| № | Номер поля                          | га      | Урожай 2013-2015 года |
|---|-------------------------------------|---------|-----------------------|
|   | сельский район - (b) (4) (b) (4) га |         |                       |
| 1 | (b) (4)                             | (b) (4) | целина                |
| 2 |                                     |         | целина                |
| 3 |                                     |         | целина                |
| 4 |                                     |         | целина                |
| 5 |                                     |         | целина                |

начальник отдела  
сельского хозяйства и ветеринарии  
тайыншинского района



А.Сабуров



Total harvest

| No | Name<br>орын | ка<br>га | Product<br>өнім   | Барлығы<br>туқым<br>(тонна) | Барлығы<br>көң<br>(тонна) | March<br>Март 2013 | April<br>Апрель 2013 | May<br>Май 2013 | June<br>Июнь 2013 | July<br>Июль 2013 | August<br>Август 2013 | September<br>Сентябрь 2013 | October<br>Октябрь 2013 | November<br>Ноябрь 2013 | December<br>Декабрь 2013 | Всего<br>урожая<br>(тонна) |
|----|--------------|----------|-------------------|-----------------------------|---------------------------|--------------------|----------------------|-----------------|-------------------|-------------------|-----------------------|----------------------------|-------------------------|-------------------------|--------------------------|----------------------------|
| 1  | (b)(4)       | (b)(4)   | Раптус<br>жайылым | -                           | -                         | Мониторинг         | Мониторинг           | Мониторинг      | Мониторинг        | Мониторинг        | Мониторинг            | Мониторинг                 | Мониторинг              | Мониторинг              | Мониторинг               | -                          |
| 2  |              | (4)      | жайылым           | -                           | -                         | Мониторинг         | Мониторинг           | Мониторинг      | Мониторинг        | Мониторинг        | Мониторинг            | Мониторинг                 | Мониторинг              | Мониторинг              | Мониторинг               | -                          |
| 3  |              |          | жайылым           | -                           | -                         | Мониторинг         | Мониторинг           | Мониторинг      | Мониторинг        | Мониторинг        | Мониторинг            | Мониторинг                 | Мониторинг              | Мониторинг              | Мониторинг               | -                          |
| 4  |              |          | жайылым           | -                           | -                         | Мониторинг         | Мониторинг           | Мониторинг      | Мониторинг        | Мониторинг        | Мониторинг            | Мониторинг                 | Мониторинг              | Мониторинг              | Мониторинг               | -                          |
| 5  |              |          | жайылым           | -                           | -                         | Мониторинг         | Мониторинг           | Мониторинг      | Мониторинг        | Мониторинг        | Мониторинг            | Мониторинг                 | Мониторинг              | Мониторинг              | Мониторинг               | -                          |

Сарниций Анатоли Францевич



October 2014 - December 2014

| No | Name<br>№ орын | № га | Product<br>өнім    | Барлығы<br>тұным<br>(тонна) | Барлығы<br>нең<br>(тонна) | March<br>Март<br>2014 | April<br>Апрель<br>2014 | May<br>Май<br>2014 | June<br>Июнь<br>2014 | July<br>Июль<br>2014 | August<br>Август<br>2014 | Sept<br>Сентябрь<br>2014 | October<br>Октябрь<br>2014 | November<br>Ноябрь<br>2014 | December<br>Дектябрь<br>2014 | Всего<br>урнак<br>(тонна) |
|----|----------------|------|--------------------|-----------------------------|---------------------------|-----------------------|-------------------------|--------------------|----------------------|----------------------|--------------------------|--------------------------|----------------------------|----------------------------|------------------------------|---------------------------|
| 1  | (b)(4)         |      | Pasture<br>жайылым | -                           | -                         | Monitoring            | Monitoring              | Monitoring         | Monitoring           | Monitoring           | Monitoring               | Monitoring               | Monitoring                 | Monitoring                 | Monitoring                   | -                         |
| 2  |                |      | жайылым            | -                           | -                         | Monitoring            | Monitoring              | Monitoring         | Monitoring           | Monitoring           | Monitoring               | Monitoring               | Monitoring                 | Monitoring                 | Monitoring                   | -                         |
| 3  |                |      | жайылым            | -                           | -                         | Monitoring            | Monitoring              | Monitoring         | Monitoring           | Monitoring           | Monitoring               | Monitoring               | Monitoring                 | Monitoring                 | Monitoring                   | -                         |
| 4  |                |      | жайылым            | -                           | -                         | Monitoring            | Monitoring              | Monitoring         | Monitoring           | Monitoring           | Monitoring               | Monitoring               | Monitoring                 | Monitoring                 | Monitoring                   | -                         |
| 5  |                |      | жайылым            | -                           | -                         | Monitoring            | Monitoring              | Monitoring         | Monitoring           | Monitoring           | Monitoring               | Monitoring               | Monitoring                 | Monitoring                 | Monitoring                   | -                         |

\* Names of field locations

*Handwritten signature*

14/1/2015

March April May June July August Sept. Oct. Nov. Dec.

| № | орын    | № га | Produced өнім өлшемі | Барлығы түңым (тонна) | Барлығы көң (тонна) | Март 2015  | Апрель 2015 | Май 2015   | Июнь 2015  | Июль 2015  | Август 2015 | Сентябрь 2015 | Октябрь 2015 | Ноябрь 2015 | Декабрь 2015 | Всего урпаал (тонна) |
|---|---------|------|----------------------|-----------------------|---------------------|------------|-------------|------------|------------|------------|-------------|---------------|--------------|-------------|--------------|----------------------|
| 1 | (b) (4) |      | Барлығы              | -                     | -                   | Мониторинг | Мониторинг  | Мониторинг | Мониторинг | Мониторинг | Мониторинг  | Мониторинг    | Мониторинг   | Мониторинг  | Мониторинг   | -                    |
| 2 |         |      | Барлығы              | -                     | -                   | Мониторинг | Мониторинг  | Мониторинг | Мониторинг | Мониторинг | Мониторинг  | Мониторинг    | Мониторинг   | Мониторинг  | Мониторинг   | -                    |
| 3 |         |      | Барлығы              | -                     | -                   | Мониторинг | Мониторинг  | Мониторинг | Мониторинг | Мониторинг | Мониторинг  | Мониторинг    | Мониторинг   | Мониторинг  | Мониторинг   | -                    |
| 4 |         |      | Барлығы              | -                     | -                   | Мониторинг | Мониторинг  | Мониторинг | Мониторинг | Мониторинг | Мониторинг  | Мониторинг    | Мониторинг   | Мониторинг  | Мониторинг   | -                    |
| 5 |         |      | Барлығы              | -                     | -                   | Мониторинг | Мониторинг  | Мониторинг | Мониторинг | Мониторинг | Мониторинг  | Мониторинг    | Мониторинг   | Мониторинг  | Мониторинг   | -                    |

Monit-orig / no action

*Handwritten signature*

Оценки по данным сайта

| № | Имя ориг | № га | Продукт ориг | Барыгы түкүм (тонна) | Барыгы көч (тонна) | Март 2016                  | Апрель 2016                        | Май 2016                            | Июнь 2016  | Июль 2016  | Август 2016 | Сентябрь 2016         | Октябрь 2016          | Ноябрь 2016 | Декабрь 2016 | Всего урожая (тонна) |
|---|----------|------|--------------|----------------------|--------------------|----------------------------|------------------------------------|-------------------------------------|------------|------------|-------------|-----------------------|-----------------------|-------------|--------------|----------------------|
|   |          |      |              |                      |                    |                            |                                    |                                     |            |            |             |                       |                       |             |              |                      |
| 1 | (6) (4)  |      |              |                      |                    |                            | соқа                               | Обработка почвы + Посев 0,025 тн/га | Мониторинг | Мониторинг | Мониторинг  | Мониторинг            | Сбор урожая 5,5 тн/га | Дыскинг     |              | 38,896               |
| 1 |          |      |              |                      |                    | пәхәтә + ертилдәер 2 тн/га | Обработка почвы + Посев 0,015 т/га | Мониторинг                          | Мониторинг | Мониторинг | Мониторинг  | Сбор урожая 2,2 тн/га | Диск тырма            |             |              | 8,416                |
| 1 |          |      |              |                      |                    |                            | соқа                               | Обработка почвы + Посев 0,08 тн/га  | Мониторинг | Мониторинг | Мониторинг  | Мониторинг            | Сбор урожая 3,2 тн/га | Дыскинг     |              | 28,857               |
| 2 |          |      |              |                      |                    |                            | соқа                               | Обработка почвы + Посев 0,025 тн/га | Мониторинг | Мониторинг | Мониторинг  | Мониторинг            | Сбор урожая 5,5 тн/га | Дыскинг     |              | 35,822               |
| 3 |          |      |              |                      |                    |                            | соқа                               | Обработка почвы + Посев 0,08 тн/га  | Мониторинг | Мониторинг | Мониторинг  | Мониторинг            | Сбор урожая 3,2 тн/га | Дыскинг     |              | 18,621               |
| 4 |          |      |              |                      |                    |                            | соқа                               | Обработка почвы + Посев 0,025 тн/га | Мониторинг | Мониторинг | Мониторинг  | Мониторинг            | Сбор урожая 5,5 тн/га | Дыскинг     |              | 22,963               |
| 5 |          |      |              |                      |                    |                            | соқа                               | Обработка почвы + Посев 0,025 тн/га | Мониторинг | Мониторинг | Мониторинг  | Мониторинг            | Сбор урожая 5,5 тн/га | Дыскинг     |              | 15,967               |
| 5 |          |      |              |                      |                    |                            | соқа                               | Обработка почвы + Посев 0,08 тн/га  | Мониторинг | Мониторинг | Мониторинг  | Мониторинг            | Сбор урожая 3,2 тн/га | Дыскинг     |              | 12,121               |

Handwritten signature

- ①: plowing, mowing
- ②: cultivation, sowing
- ③: soil estimation
- ④: monitoring / no action
- ⑤: monitoring / no action
- ⑥: harvesting
- ⑦: harvesting
- ⑧: harvesting

**ECOCERT IMO DENETIM VE BELGELENDIRME LTD. STI.**  
 attn. Mr. Gizem Pekdemir  
 2132/2 Sok. No:3 Kat:6 D:50  
 Bayrakli-IZMIR (Turkey)  
 TÜRKİE

**Person in charge** Mr. K. Mucuk - 638  
**ASM** Mr. K. Mucuk - 638

Report date 15.09.2016

**Analytical report**
**AR-16-SF-049388-01**

**Sample Code**
**724-2016-00048490**

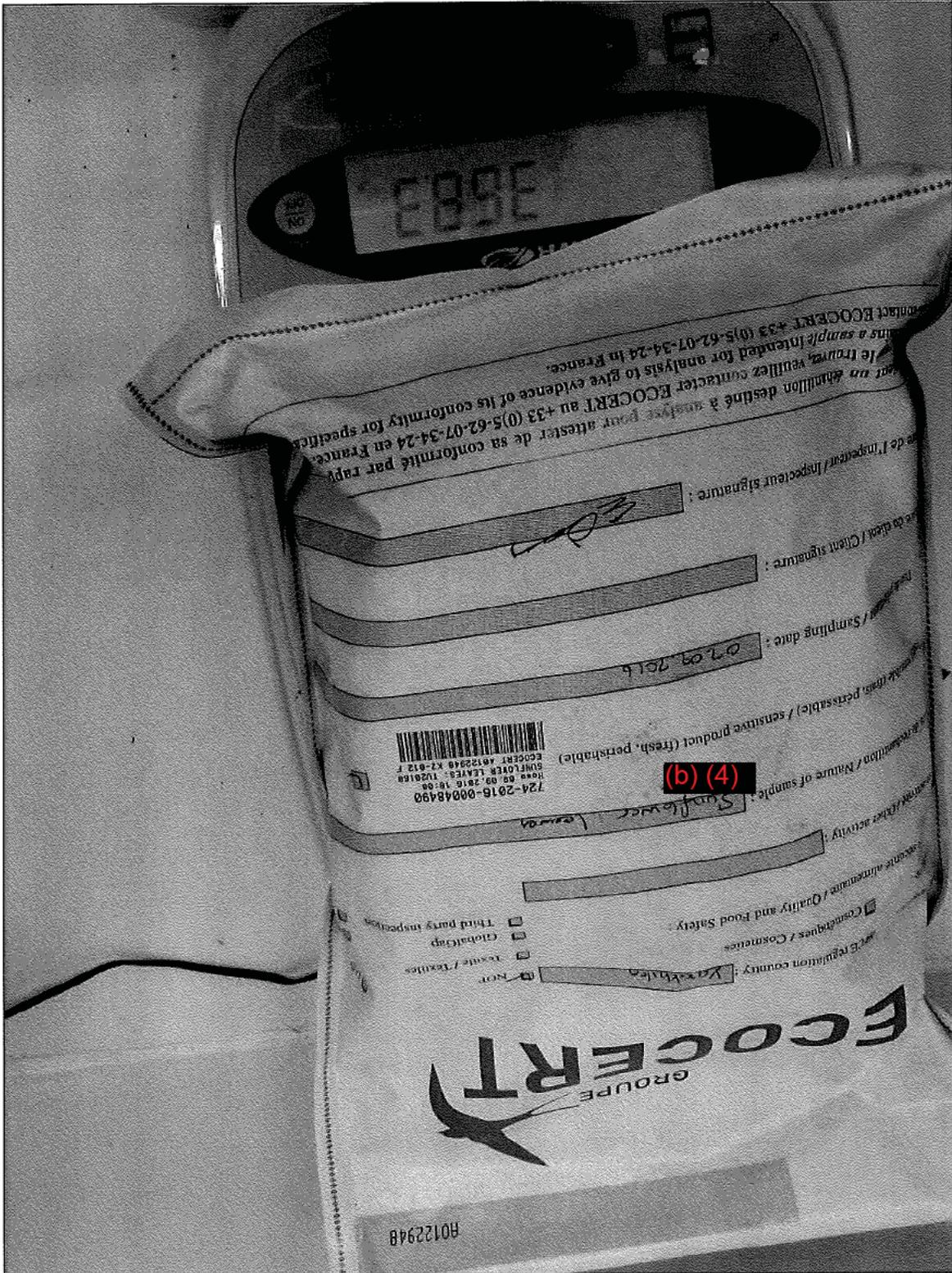
**Reference** SUNFLOWER LEAVES; TU20160908-01  
**Sample sender** Eurofins SOFIA GmbH Berlin Türkiye Şubesi  
**Prescriber** Mr. Gizem Pekdemir  
**Reception date time** 07.09.2016  
**Transport by** TNT  
**Purchase order date** 08.09.2016  
**Client sample code** ECOCERT (b) (4)  
**Start analysis** 08.09.2016  
**End analysis** 15.09.2016

| Analysis                                                      | Testcode      | Method                  |
|---------------------------------------------------------------|---------------|-------------------------|
| 35S promoter                                                  | GS005 / PGSA3 | Internal method         |
| NOS terminator                                                | GS125 / PGSA3 | Internal method         |
| FMV promoter                                                  | GS129 / PGSA3 | Internal method         |
| Glyphosate, Glufosinate, AMPA in food                         | SF00B         | Internal method         |
| Dithiocarbamates in food                                      | SF00C         | §64 LFGB<br>L00.00-49/2 |
| Chlormequat, mepiquat in food                                 | SF00G         | §64 LFGB L00.00-76      |
| Pesticide screening GC/MS in food with high water content     | SFLAK / PSFLK | Internal method         |
| Determination of acidic herbicides in dry and water rich food | SFLC0         |                         |
| Pesticide screening using LC/MS/MS in food                    | SFLD0 / PSFLK | LFGB L 00.00-113        |

**Test results**

| Parameter                                                        | Measurement         | Unit  | Result        | LOQ   |
|------------------------------------------------------------------|---------------------|-------|---------------|-------|
| <b>GS005: PCR</b>                                                |                     |       |               |       |
| Subcontracted to a Eurofins laboratory accredited for this test. |                     |       |               |       |
| 35S promoter ##                                                  | PCR                 |       | negative      |       |
| <b>GS125: PCR</b>                                                |                     |       |               |       |
| Subcontracted to a Eurofins laboratory accredited for this test. |                     |       |               |       |
| NOS terminator ##                                                | PCR                 |       | negative      |       |
| <b>GS129: PCR</b>                                                |                     |       |               |       |
| Subcontracted to a Eurofins laboratory accredited for this test. |                     |       |               |       |
| FMV promoter ##                                                  | PCR                 |       | negative      |       |
| <b>SF00B: LC-MS/MS // LA-LCMS-038 (#)</b>                        |                     |       |               |       |
| Glufosinate                                                      | LC-MS/MS            | mg/kg | <LOQ          | 0.01  |
| Glyphosate                                                       | LC-MS/MS            | mg/kg | <LOQ          | 0.01  |
| Aminomethylphosphonic acid (AMPA)                                | LC-MS/MS            | mg/kg | <LOQ          | 0.01  |
| <b>SF00C: SPME-GC-MS // LA-GC-014 (#)</b>                        |                     |       |               |       |
| Dithiocarbamates                                                 | SPME-GC-MS          | mg/kg | <LOQ          | 0.01  |
| <b>SF00G: LC-MS/MS // LA-LCMS-001 (#)</b>                        |                     |       |               |       |
| Chlormequat                                                      | LC-MS/MS            | mg/kg | <LOQ          | 0.005 |
| Mepiquat                                                         | LC-MS/MS            | mg/kg | <LOQ          | 0.005 |
| <b>SFLAK: GC-MS [GC-MS] // LA-GCLC-001 (#)</b>                   |                     |       |               |       |
| Screened pesticides                                              | GC-MS [GC-MS]       |       | <LOQ          |       |
| <b>SFLC0: LC-MS/MS [LC-MS/MS] // LA-LCMS-042 (#)</b>             |                     |       |               |       |
| Screened pesticides                                              | LC-MS/MS [LC-MS/MS] |       | <LOQ          |       |
| <b>SFLD0: LC-MS/MS [LC-MS/MS] // LA-LCMS-007 (#)</b>             |                     |       |               |       |
| Other screened pesticides                                        | LC-MS/MS [LC-MS/MS] |       | <LOQ          |       |
| Chlorantraniliprole                                              | LC-MS/MS [LC-MS/MS] | mg/kg | 0.012 ± 0.006 | 0.01  |





Proben Nummer: <<724-2016-00048490>>

**ECOCERT IMO DENETIM VE BELGELENDIRME LTD.** **Person in charge** Mr. K. Mucuk - 638  
**STI.** **ASM** Mr. K. Mucuk - 638  
attn. Mr. Gizem Pekdemir  
2132/2 Sok. No:3 Kat:6 D:50  
Bayrakli-IZMIR (Turkey)  
TÜRKEI

Report date 16.09.2016

**Analytical report**
**AR-16-SF-049598-01**

**Sample Code**
**724-2016-00048503**

**Reference** SOYBEAN LEAVES, TU 20160908-05  
**Sample sender** Eurofins SOFIA GmbH Berlin Türkiye Şubesi  
**Prescriber** Mr. Gizem Pekdemir  
**Reception date time** 07.09.2016  
**Transport by** TNT  
**Purchase order date** 08.09.2016  
**Client sample code** ECOCERT (b) (4)  
**Start analysis** 08.09.2016  
**End analysis** 16.09.2016

| Analysis                                                      | Testcode      | Method                  |
|---------------------------------------------------------------|---------------|-------------------------|
| 35S promoter                                                  | GS005 / PGSI4 | Internal method         |
| SAMS/ALS modification                                         | GS00L / PGSI4 | Internal method         |
| event CV127rec soybean                                        | GS01U / PGSI4 | Internal method         |
| event FG72 soybean                                            | GS03Q / PGSI4 | Internal Method         |
| CsVMV/pat(syn) modification                                   | GS04U / PGSI4 | Internal Method         |
| Agro border II                                                | GSAB2 / PGSI4 | Internal method         |
| Glyphosate, Glufosinate, AMPA in food                         | SF00B         | Internal method         |
| Dithiocarbamates in food                                      | SF00C         | §64 LFGB<br>L00.00-49/2 |
| Pesticide screening GC/MS in food with high water content     | SFLAK / PSFLK | Internal method         |
| Determination of acidic herbicides in dry and water rich food | SFLC0         |                         |
| Pesticide screening using LC/MS/MS in food                    | SFLD0 / PSFLK | LFGB L 00.00-113        |

**Test results**

| Parameter                                                        | Measurement     | Unit  | Result   | LOQ  |
|------------------------------------------------------------------|-----------------|-------|----------|------|
| <b>GS005: PCR</b>                                                |                 |       |          |      |
| Subcontracted to a Eurofins laboratory accredited for this test. |                 |       |          |      |
| 35S promoter ##                                                  | PCR             |       | negative |      |
| <b>GS00L: Real-time PCR</b>                                      |                 |       |          |      |
| Subcontracted to a Eurofins laboratory accredited for this test. |                 |       |          |      |
| SAMS/ALS modification ##                                         | Real-time PCR   |       | negative |      |
| <b>GS01U: Real-time PCR</b>                                      |                 |       |          |      |
| Subcontracted to a Eurofins laboratory accredited for this test. |                 |       |          |      |
| CV127 csr1-2 modification ##                                     | Real-time PCR   |       | negative |      |
| <b>GS03Q: Real-time PCR</b>                                      |                 |       |          |      |
| Subcontracted to a Eurofins laboratory accredited for this test. |                 |       |          |      |
| event FG72 soybean ##                                            | Real-time PCR   |       | negative |      |
| <b>GS04U: qualitative PCR</b>                                    |                 |       |          |      |
| Subcontracted to a Eurofins laboratory accredited for this test. |                 |       |          |      |
| CsVMV/pat(syn) modification ##                                   | qualitative PCR |       | negative |      |
| <b>GSAB2: Real-time PCR</b>                                      |                 |       |          |      |
| Subcontracted to a Eurofins laboratory accredited for this test. |                 |       |          |      |
| Agro border II ##                                                | Real-time PCR   |       | negative |      |
| <b>SF00B: LC-MS/MS // LA-LCMS-038 (#)</b>                        |                 |       |          |      |
| Aminomethylphosphonic acid (AMPA)                                | LC-MS/MS        | mg/kg | <LOQ     | 0.01 |
| Glufosinate                                                      | LC-MS/MS        | mg/kg | <LOQ     | 0.01 |
| Glyphosate                                                       | LC-MS/MS        | mg/kg | <LOQ     | 0.01 |
| <b>SF00C: SPME-GC-MS // LA-GC-014 (#)</b>                        |                 |       |          |      |
| Dithiocarbamates                                                 | SPME-GC-MS      | mg/kg | <LOQ     | 0.01 |
| <b>SFLAK: GC-MS [GC-MS] // LA-GCLC-001 (#)</b>                   |                 |       |          |      |
| Screened pesticides                                              | GC-MS [GC-MS]   |       | <LOQ     |      |

| Parameter                                            | Measurement            | Unit | Result | LOQ |
|------------------------------------------------------|------------------------|------|--------|-----|
| <b>SFLC0: LC-MS/MS [LC-MS/MS] // LA-LCMS-042 (#)</b> |                        |      |        |     |
| Screened pesticides                                  | LC-MS/MS<br>[LC-MS/MS] |      | <LOQ   |     |
| <b>SFLD0: LC-MS/MS [LC-MS/MS] // LA-LCMS-007 (#)</b> |                        |      |        |     |
| Screened pesticides                                  | LC-MS/MS<br>[LC-MS/MS] |      | <LOQ   |     |

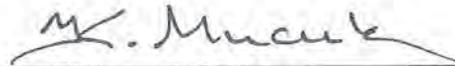
LOQ = Limit of Quantification

MRL = Maximum Residue Level

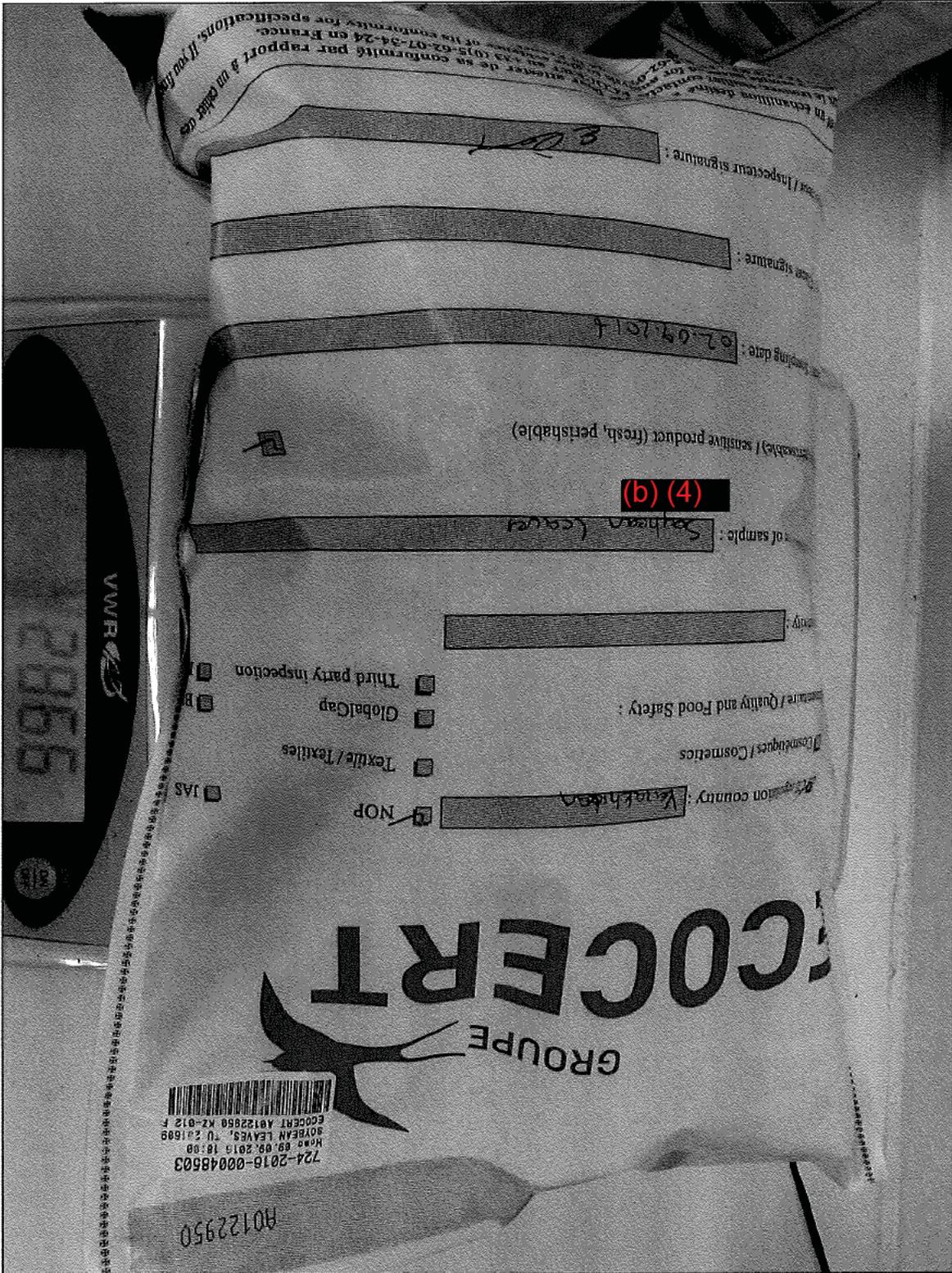
<LOQ = below limit of quantification

(#) = SOFIA (Berlin) is accredited for this test.

Signature



Analytical Service Manager (Kayhan Mucuk)



Proben Nummer: <<724-2016-00048503>>

**ECOCERT IMO DENETİM VE BELGELENDİRME LTD. Person in charge** Mr. K. Mucuk - 638  
**STI. ASM** Mr. K. Mucuk - 638  
 attn. Mr. Gizem Pekdemir  
 2132/2 Sok. No:3 Kat:6 D:50  
 Bayrakli-İZMİR (Turkey)  
 TÜRKİE

Report date 16.09.2016

**Analytical report**
**AR-16-SF-049645-01**

**Sample Code**
**724-2016-00048498**

**Reference** MAIZE LEAVES, TU 20160908-15  
**Sample sender** Eurofins SOFIA GmbH Berlin Türkiye Şubesi  
**Prescriber** Mr. Gizem Pekdemir  
**Reception date time** 07.09.2016  
**Transport by** TNT  
**Purchase order date** 08.09.2016  
**Client sample code** ECOCERT (b) (4)  
**Start analysis** 08.09.2016  
**End analysis** 16.09.2016

| Analysis                                                      | Testcode      | Method                  |
|---------------------------------------------------------------|---------------|-------------------------|
| 35S promoter                                                  | GS005 / PGSC9 | Internal method         |
| LY038 maize modification                                      | GS00K / PGSC9 | Internal method         |
| event GA21 maize                                              | GS010 / PGSC9 | Internal method         |
| RB7-MAR element                                               | GS02X / PGSC9 | Internal Method         |
| PMI/NOS modification                                          | GSR0H / PGSC9 | Internal method         |
| Glyphosate, Glufosinate, AMPA in food                         | SF00B         | Internal method         |
| Dithiocarbamates in food                                      | SF00C         | §64 LFGB<br>L00.00-49/2 |
| Chlormequat, mepiquat in food                                 | SF00G         | §64 LFGB L00.00-76      |
| Pesticide screening GC/MS in food with high water content     | SFLAK / PSFLK | Internal method         |
| Determination of acidic herbicides in dry and water rich food | SFLC0         |                         |
| Pesticide screening using LC/MS/MS in food                    | SFLD0 / PSFLK | LFGB L 00.00-113        |

**Test results**

| Parameter                                                        | Measurement   | Unit  | Result   | LOQ   |
|------------------------------------------------------------------|---------------|-------|----------|-------|
| <b>GS005: PCR</b>                                                |               |       |          |       |
| Subcontracted to a Eurofins laboratory accredited for this test. |               |       |          |       |
| 35S promoter ##                                                  | PCR           |       | negative |       |
| <b>GS00K: Real-time PCR</b>                                      |               |       |          |       |
| Subcontracted to a Eurofins laboratory accredited for this test. |               |       |          |       |
| LY038 maize modification ##                                      | Real-time PCR |       | negative |       |
| <b>GS010: Real-time PCR</b>                                      |               |       |          |       |
| Subcontracted to a Eurofins laboratory accredited for this test. |               |       |          |       |
| event GA21 maize ##                                              | Real-time PCR |       | negative |       |
| <b>GS02X: Real-time PCR</b>                                      |               |       |          |       |
| Subcontracted to a Eurofins laboratory accredited for this test. |               |       |          |       |
| Rb7 MAR element ##                                               | Real-time PCR |       | negative |       |
| <b>GSR0H: PCR</b>                                                |               |       |          |       |
| Subcontracted to a Eurofins laboratory accredited for this test. |               |       |          |       |
| PMI/NOS modification ##                                          | PCR           |       | negative |       |
| <b>SF00B: LC-MS/MS // LA-LCMS-038 (#)</b>                        |               |       |          |       |
| Glufosinate                                                      | LC-MS/MS      | mg/kg | <LOQ     | 0.01  |
| Glyphosate                                                       | LC-MS/MS      | mg/kg | <LOQ     | 0.01  |
| Aminomethylphosphonic acid (AMPA)                                | LC-MS/MS      | mg/kg | <LOQ     | 0.01  |
| <b>SF00C: SPME-GC-MS // LA-GC-014 (#)</b>                        |               |       |          |       |
| Dithiocarbamates                                                 | SPME-GC-MS    | mg/kg | <LOQ     | 0.01  |
| <b>SF00G: LC-MS/MS // LA-LCMS-001 (#)</b>                        |               |       |          |       |
| Chlormequat                                                      | LC-MS/MS      | mg/kg | <LOQ     | 0.005 |
| Mepiquat                                                         | LC-MS/MS      | mg/kg | <LOQ     | 0.005 |
| <b>SFLAK: GC-MS [GC-MS] // LA-GCLC-001 (#)</b>                   |               |       |          |       |
| Screened pesticides                                              | GC-MS [GC-MS] |       | <LOQ     |       |

| Parameter                                            | Measurement            | Unit  | Result         | LOQ  |
|------------------------------------------------------|------------------------|-------|----------------|------|
| <b>SFLC0: LC-MS/MS [LC-MS/MS] // LA-LCMS-042 (#)</b> |                        |       |                |      |
| Screened pesticides                                  | LC-MS/MS<br>[LC-MS/MS] |       | <LOQ           |      |
| <b>SFLD0: LC-MS/MS [LC-MS/MS] // LA-LCMS-007 (#)</b> |                        |       |                |      |
| Other screened pesticides                            | LC-MS/MS<br>[LC-MS/MS] |       | <LOQ           |      |
| Chlorantranilprole                                   | LC-MS/MS<br>[LC-MS/MS] | mg/kg | 0.010 ± 0.0050 | 0.01 |

LOQ = Limit of Quantification

MRL = Maximum Residue Level

Result +/- expanded measurement uncertainty (level of confidence 95%, coverage factor 2)

<LOQ = below limit of quantification

(#) = SOFIA (Berlin) is accredited for this test.

Signature



Analytical Service Manager (Kayhan Mucuk)



Proben Nummer: <<724-2016-00048498>>

# Attendance sheet



Code for the training : 6014

Generated on 04/05/2018

With this document, the Ecocert Group confirms that (the) attendee(s) listed hereunder completed the training detailed below.

## TRAINING

Axis : Technical

Type of training : Continuous training - Face to face

Training title : Inspection and reporting

Training details : Definitions of inspection types, Reporting on Ecert, Workshop

Training program :  [7.1-Kontrol Tan&#305;m&#305;.pptx](#)

 [7.2.1-Ürün Kategorileri.pptx](#)

 [7.2-Kontrol raporunun kalitesi.ppt](#)

Training location : Turkey - Izmir

Dates : From 02/03/2018 until 02/03/2018

Duration : 08h00

## TRAINER(S)

(b) (6) Sirin RUCHAN

Evaluation Manager

Ecocert Turkey

## PARTICIPANT(S)

| Participant       | Company        | Duration | Signature date |
|-------------------|----------------|----------|----------------|
| Bulent Ugur ALKAN | Ecocert Turkey | 08h00    | 27/03/2018     |
| (b) (6)           | Ecocert Turkey | 08h00    | 27/03/2018     |
| Buket OLMEZ CAYIR | Ecocert Turkey | 08h00    | 27/03/2018     |
| Cagla SEVIL       | Ecocert Turkey | 08h00    | 16/04/2018     |
| Didem AKKURT      | Ecocert Turkey | 08h00    | 26/03/2018     |
| (b) (6)           | Ecocert Turkey | 08h00    | 27/03/2018     |
| (b) (6)           | Ecocert Turkey | 08h00    | 27/03/2018     |
| (b) (6)           | Ecocert Turkey | 08h00    | 27/03/2018     |
| Erhan OZBUDAK     | Ecocert Turkey | 08h00    | 28/03/2018     |
| Hilal UZUNLAR     | Ecocert Turkey | 08h00    | 27/03/2018     |
| (b) (6)           | Ecocert Turkey | 08h00    | 27/03/2018     |
| Özgür ERDOGDU     | Ecocert Turkey | 08h00    | 09/04/2018     |
| (b) (6)           | Ecocert Turkey | 08h00    | 27/03/2018     |
| Oznur GEZER       | Ecocert Turkey | 08h00    | 27/03/2018     |
| (b) (6)           | Ecocert Turkey | 08h00    | 27/03/2018     |
| (b) (6)           | Ecocert Turkey | 08h00    | 27/03/2018     |
| (b) (6)           | Ecocert Turkey | 08h00    | 27/03/2018     |
| Tulin UNSAL       | Ecocert Turkey | 08h00    | 26/03/2018     |
| (b) (6)           | Ecocert Turkey | 08h00    | 27/03/2018     |

# Attendance sheet



Code for the training : 6012

Generated on 04/05/2018

With this document, the Ecocert Group confirms that (the) attendee(s) listed hereunder completed the training detailed below.

## TRAINING

Axis : Technical  
Type of training : Continuous training - Face to face  
Training title : Derogations  
Training details : Derogations of EOS,NOP and Turkish Organic Regulation  
Training program :  [Derogasyon \(&#304;stisnai &#304;zin\).pptx](#)  
Training location : Turkey - Izmir  
Dates : From 01/03/2018 until 01/03/2018  
Duration : 01h00

## TRAINER(S)

**(b) (6)** Sirin RUCHAN  
Evaluation Manager  
Ecocert Turkey

## PARTICIPANT(S)

| Participant       | Company        | Duration | Signature date |
|-------------------|----------------|----------|----------------|
| Bulent Ugur ALKAN | Ecocert Turkey | 01h00    | 27/03/2018     |
| <b>(b) (6)</b>    | Ecocert Turkey | 01h00    | 27/03/2018     |
| Buket OLMEZ CAYIR | Ecocert Turkey | 01h00    | 27/03/2018     |
| Cagla SEVIL       | Ecocert Turkey | 01h00    | 16/04/2018     |
| Didem AKKURT      | Ecocert Turkey | 01h00    | 26/03/2018     |
| <b>(b) (6)</b>    | Ecocert Turkey | 01h00    | 27/03/2018     |
| <b>(b) (6)</b>    | Ecocert Turkey | 01h00    | 27/03/2018     |
| <b>(b) (6)</b>    | Ecocert Turkey | 01h00    | 27/03/2018     |
| Erhan OZBUDAK     | Ecocert Turkey | 01h00    | 28/03/2018     |
| Hilal UZUNLAR     | Ecocert Turkey | 01h00    | 27/03/2018     |
| <b>(b) (6)</b>    | Ecocert Turkey | 01h00    | 27/03/2018     |
| Özgür ERDOGDU     | Ecocert Turkey | 01h00    | 09/04/2018     |
| <b>(b) (6)</b>    | Ecocert Turkey | 01h00    | 27/03/2018     |
| Oznur GEZER       | Ecocert Turkey | 01h00    | 27/03/2018     |
| <b>(b) (6)</b>    | Ecocert Turkey | 01h00    | 27/03/2018     |
| <b>(b) (6)</b>    | Ecocert Turkey | 01h00    | 27/03/2018     |
| <b>(b) (6)</b>    | Ecocert Turkey | 01h00    | 27/03/2018     |
| Tulin UNSAL       | Ecocert Turkey | 01h00    | 26/03/2018     |
| <b>(b) (6)</b>    | Ecocert Turkey | 01h00    | 27/03/2018     |

## 1. Introduction and Scope

This procedure applies to all activities under ESA accreditation or responsibilities ...

It details the management of inspection and the data that have to be filled in **Ecert online or offline ONLY**.

If you need more information about how to fill in these data in

**(b) (4)**

The inspection is under the responsibility of the Inspector.

## 2. Definitions of each type of Inspection

**Initial Inspection:** First inspection in which all requirements of the scheme are verified following the signature of client's contract.

**Annual Inspection:** inspection in which all requirements of the scheme are verified following the certification renewal of the client.

**Additional Inspection :** inspection in which requirements of the scheme are partially verified and that can be planned following risk analysis, identification of nonconformities, suspicion issue and some specific case (such as production at different seasons at the client level)

**Unannounced Inspection:** any kind of inspection for which operator should not be notified prior to the inspection.

## 3. Description and Rules to prepare the inspection

| Step | Description    | Related documents/ records                                                                                                             |
|------|----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| 1    | <b>(b) (4)</b> | Etool/Ecert<br><br>eCert help note on Extranet in eCert/User training/EN/f. Inspection and Certification Workflow/Inspection_Infportal |
| 2    | <b>(b) (4)</b> |                                                                                                                                        |

(b) (4)

**(b) (4)**

3

Etool  
Ecert  
Webcertificate  
OSP  
Last year's report  
Certification  
decisions

(b) (4)

**(b) (4)**

**4. Description and rules to perform the inspection**

The inspection has to be done according to the assignment to verify that the operation is in compliance (or able to comply) with the standards.

Inspection structure:

**(b) (4)**

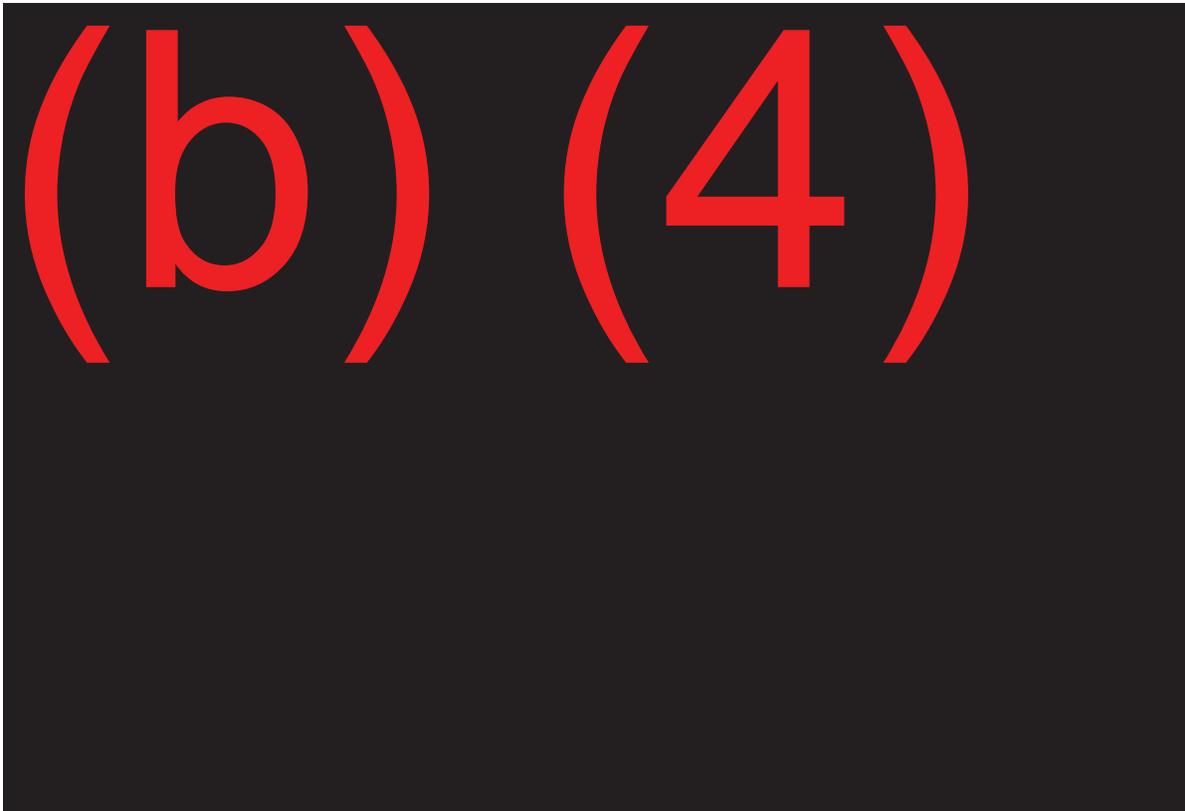
|   |                |  |
|---|----------------|--|
| 1 | <b>(b) (4)</b> |  |
| 2 |                |  |
| 3 |                |  |
| 4 |                |  |
| 5 |                |  |

|   |                |  |
|---|----------------|--|
|   | <b>(b) (4)</b> |  |
| 6 |                |  |
| 7 |                |  |
| 8 |                |  |

|    |                                                                                     |                         |
|----|-------------------------------------------------------------------------------------|-------------------------|
|    |  | TS01(EC-NOP)<br>annex 3 |
|    |                                                                                     | F 27(EC-NOP)            |
|    |                                                                                     | F 46(EC-NOP)            |
|    |                                                                                     |                         |
| 9  |                                                                                     | 118(EC-NOP)             |
| 10 |                                                                                     | TS01(EC-NOP)            |
|    |                                                                                     |                         |
| 11 |                                                                                     |                         |



**5. Description and rules to record the inspection result**



1

(b) (4)

2

3



3

3

(b) (4)

**(b) (4)**

3c

**(b) (4)**

(b) (4)

**(b) (4)**

**(b) (4)**

6

DI07(EC-NOP)

7



EcCert help note on  
Extranet in  
EcCert/User  
training/EN/f.  
Inspection and  
Certification  
Workflow/Inspection  
\_Infoportal

EcCert help note on  
Extranet in  
EcCert/User  
training/EN/f.  
Inspection and  
Certification  
Workflow/Memo

EcCert help note on  
Extranet in  
EcCert/User  
training/EN/f.  
Inspection and  
Certification  
Workflow/start  
page workflow

**(b) (4)**

9

(b) (4)

10

(b) (4)

**(b) (4)**

**(b) (4)**

**6. Modification**

| Modifications                                                                                                               |            |            |
|-----------------------------------------------------------------------------------------------------------------------------|------------|------------|
| Description of the modifications                                                                                            | Author     | Date       |
| First Version replaces P16 previous QM(V04)                                                                                 | I. Förster | 07.04.2008 |
| 2 <sup>nd</sup> version                                                                                                     | P. Berst   | 23.12.08   |
| 3 <sup>rd</sup> Sheet of deviations has to be signed                                                                        | A Faure    | 03/09/10   |
| 4 <sup>th</sup> version : fusion between P15 (EC) and P03 (NOP)                                                             | A Faure    | 06/10/10   |
| 5 <sup>th</sup> version: addition of grower group inspection                                                                | P. Berst   | 10/06/12   |
| 6 <sup>th</sup> version: EOS reference                                                                                      | A. Faure   | 04/04/13   |
| 7 <sup>th</sup> version : Addition of Ecert reference and Inspection report to be signed if issued at the end of the audit. | C. Godard  | 15/05/2015 |
| 8 <sup>th</sup> version: detail of ecert online/offline instructions                                                        | A. Bonnet  | 17/04/17   |

**LIST OF BALANCE AND TRACEABILITY EXERCISES RECORDED DURING INSPECTIONS**

| NAME OF OPERATOR | ACTIVITY         | TYPE OF INSPECTION | DATE OF INSPECTION | BALANCE (YES/NO), PRODUCT | TRACEABILITY (YES/NO), PRODUCT |
|------------------|------------------|--------------------|--------------------|---------------------------|--------------------------------|
| <b>(b) (4)</b>   | FARMING          | ANNUAL             | 17.18/09/2017      | <b>(b) (4)</b>            | <b>(b) (4)</b>                 |
|                  | FARMING          | ADDITIONAL         | 30/05/2017         |                           |                                |
|                  | FARMING          | ANNUAL             | 01/07/2017         |                           |                                |
|                  | FARMING          | ADDITIONAL         | 16.17/10/2017      |                           |                                |
|                  | FARMING/ EXPORT  | ANNUAL             | 03/08/2017         |                           |                                |
|                  | FARMING/ EXPORT  | ADDITIONAL         | 19.21/10/2017      |                           |                                |
|                  | EXPORT           | ANNUAL             | 09/01/2017         |                           |                                |
|                  | EXPORT           | ADDITIONAL         | 23/09/2017         |                           |                                |
|                  | EXPORT           | ANNUAL             | 07/09/2017         |                           |                                |
|                  | EXPORT           | ADDITIONAL         | 06/11/2017         |                           |                                |
|                  | PROCESS / EXPORT | ANNUAL             | 29/12/2017         |                           |                                |
|                  | PROCESS / EXPORT | ADDITIONAL         | 27/10/2017         |                           |                                |
|                  | PROCESS / EXPORT | ADDITIONAL         | 23.24/02/2017      |                           |                                |
|                  | FINANCIAL EXPORT | ANNUAL             | 28/09/2017         |                           |                                |
|                  | FINANCIAL EXPORT | ANNUAL             | 08/08/2017         |                           |                                |



Product Balance between needed and bought quantities

**FARMING BALANCE**

| Crop      | Year of harvest | Surface (Ha) | Estimated yield (t/ha) | Real production (t) | Realized yield (t/ha) | Conclusion |
|-----------|-----------------|--------------|------------------------|---------------------|-----------------------|------------|
| Barley    | 2016            | (b) (4)      |                        |                     |                       | OK         |
| Corn      | 2016            |              |                        |                     |                       | OK         |
| Sunflower | 2016            |              |                        |                     |                       | OK         |
| Wheat     | 2016            |              |                        |                     |                       | OK         |
|           |                 |              |                        |                     |                       | OK         |
|           |                 |              |                        |                     |                       | OK         |
|           |                 |              |                        |                     |                       | OK         |
|           |                 |              |                        |                     |                       | OK         |
|           |                 |              |                        |                     |                       | OK         |
|           |                 |              |                        |                     |                       | OK         |
|           |                 |              |                        |                     |                       | OK         |
|           |                 |              |                        |                     |                       | OK         |
|           |                 |              |                        |                     |                       | OK         |

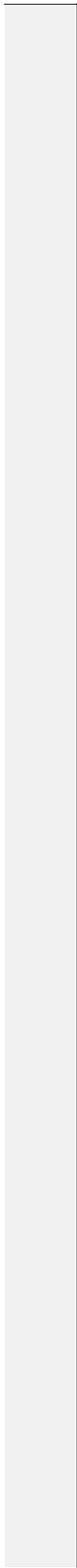
**Conclusion about farming balance**

Balance is ok, due to quality of seeds from previous year, realized yield less than estimated.

**WILD COLLECTION BALANCE**

| Crop | Year of harvest | Surface (Ha) of the collection area | Quantity harvested (ton) | Maximum harvest quantity allowed by authorities for the collection area (ton) (if applicable) | Potential harvest on the collection area (ton) | Conclusion |
|------|-----------------|-------------------------------------|--------------------------|-----------------------------------------------------------------------------------------------|------------------------------------------------|------------|
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |







# TRACEABILITY ASSESSMENT FORM

**FOR EOS / NOP :** fill in this form depending on result to below questions.  
**For JAS:** this form must be filled in every year for JAS products.

Traceability system checked last year (Y-1)?

If yes, test(s) carried out: case 1a, case 1b and/or case 2 ?

1a, 1b

Conclusion : reliability ok ?

(b) (4)

Significant change(s) to the system?

if the system was fully checked last year (Y-1) , considered to be reliable and there is no change this year (Y), it is not necessary to checked it again this year.

### 1. Is there an existing external traceability system?

(b) (4)

a. Is an upward external traceability test possible?

Identification of the lot(s) checked:

(b) (4)

b. Is an external downward traceability test possible?

(b) (4)

Identification of the lot(s) checked:

(b) (4)

c. Comments, calculations:

(b) (4)

### 2. Is there an existing internal traceability system?

(b) (4)

a. Is an internal traceability test possible?

Identification of the lot(s) verified:

(b) (4)

b. Comments, calculations:

(b) (4)

### 3. Traceability records available:

|                             |                |
|-----------------------------|----------------|
| Crop logbook                | yes            |
| Livestock logbook           | No             |
| Technical processing sheets | Not applicable |
| Identification of the lots  | yes            |
| Lot/batch number            | Not applicable |
| Grading records (for JAS)   | Not applicable |

Other

(b) (4)

### 4. Conclusion

Is the traceability system reliable?

(b) (4)

Strong points:

(b) (4)

Weak points (breach of traceability)

(b) (4)





Product Balance between needed and bought quantities

**FARMING BALANCE**

| Crop | Year of harvest | Surface (Ha) | Estimated yield (t/ha) | Real production (t) | Realized yield (t/ha) | Conclusion |
|------|-----------------|--------------|------------------------|---------------------|-----------------------|------------|
| NA   |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |

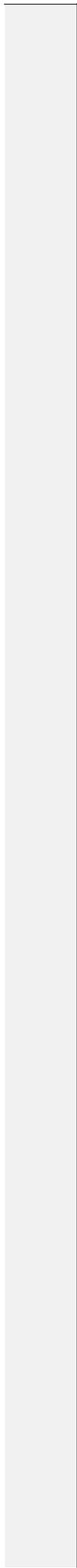
**Conclusion about farming balance**

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**WILD COLLECTION BALANCE**

| Crop | Year of harvest | Surface (Ha) of the collection area | Quantity harvested (ton) | Maximum harvest quantity allowed by authorities for the collection area (ton) (if applicable) | Potential harvest on the collection area (ton) | Conclusion |
|------|-----------------|-------------------------------------|--------------------------|-----------------------------------------------------------------------------------------------|------------------------------------------------|------------|
| NA   |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |







# TRACEABILITY ASSESSMENT FORM

**FOR EOS / NOP :** fill in this form depending on result to below questions.  
**For JAS:** this form must be filled in every year for JAS products.

Traceability system checked last year (Y-1)?

If yes, test(s) carried out: case 1a, case 1b and/or case 2 ?

Last year was first certification year. Organic exportation activity had not started.

Conclusion : reliability ok ?

Significant change(s) to the system?

If the system was fully checked last year (Y-1), considered to be reliable and there is no change this year (Y), it is not necessary to checked it again this year.

**1. Is there an existing external traceability system?** (b) (4)

a. Is an upward external traceability test possible? (b) (4)

Identification of the lot(s) checked:  
(b) (4)

b. Is an external downward traceability test possible? (b) (4)

Identification of the lot(s) checked:  
(b) (4)

c. Comments, calculations:  
(b) (4)

**2. Is there an existing internal traceability system?** (b) (4)

a. Is an internal traceability test possible? (b) (4)

Identification of the lot(s) verified:  
(b) (4)

b. Comments, calculations:  
(b) (4)

**3. Traceability records available:**

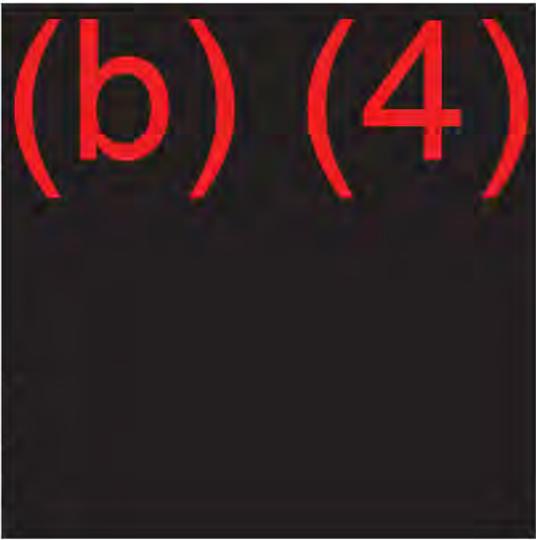
|                             |                |
|-----------------------------|----------------|
| Crop logbook                | yes            |
| Livestock logbook           | No             |
| Technical processing sheets | Not applicable |
| Identification of the lots  | yes            |
| Lot/batch number            | Not applicable |
| Grading records (for JAS)   | Not applicable |

Other (b) (4)

**4. Conclusion**  
Is the traceability system reliable? (b) (4)

Strong points:  
(b) (4)

Weak points (breach of traceability)  
(b) (4)





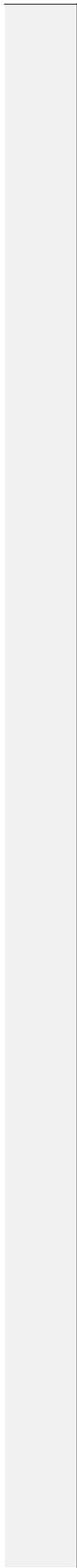














# TRACEABILITY ASSESSMENT FORM

**FOR EOS / NOP :** fill in this form depending on result to below questions.  
**For JAS:** this form must be filled in every year for JAS products.

Traceability system checked last year (Y-1)?

If yes, test(s) carried out: case 1a, case 1b and/or case 2 ?

no traceability last year because there was no activity (initial inspection)

Conclusion : reliability ok ?

Significant change(s) to the system?

**if the system was fully checked last year (Y-1) , considered to be reliable and there is no change this year (Y), it is not necessary to checked it again this year.**

## 1. Is there an existing external traceability system?

(b) (4)

a. Is an upward external traceability test possible?

Identification of the lot(s) checked:

(b) (4)

b. Is an external downward traceability test possible?

(b) (4)

Identification of the lot(s) checked:

(b) (4)

c. Comments, calculations:

(b) (4)

## 2. Is there an existing internal traceability system?

(b) (4)

a. Is an internal traceability test possible?

Identification of the lot(s) verified:

(b) (4)

b. Comments, calculations:

## 3. Traceability records available:

- Crop logbook
- Livestock logbook
- Technical processing sheets
- Identification of the lots
- Lot/batch number
- Grading records (for JAS)

(b) (4)

Other

## 4. Conclusion

Is the traceability system reliable?

(b) (4)

Strong points:

(b) (4)

Weak points (breach of traceability)

(b) (4)











**EXPORTATION BALANCE**

| Reference period |              | PRODUCT NAME | PURCHASED QUANTITIES | Suppliers |                                 | Name of certification body | EXPORTED QUANTITIES (tons) |             |         |              | Conclusion | Difference (tons) |
|------------------|--------------|--------------|----------------------|-----------|---------------------------------|----------------------------|----------------------------|-------------|---------|--------------|------------|-------------------|
| from (date)      | until (date) |              |                      | Name      | Up to date certificate? (valid) |                            | initial stock              | final stock | Exports | Clients name |            |                   |
| 7/20/2017        | 8/15/2017    | Maize        | (b) (4)              |           | Ecocert                         | (b) (4)                    |                            |             | (b) (4) |              |            |                   |
|                  |              |              |                      |           |                                 |                            |                            |             |         |              | OK         | 0.00              |
|                  |              |              |                      |           |                                 |                            |                            |             |         |              | OK         | 0.00              |
|                  |              |              |                      |           |                                 |                            |                            |             |         |              | OK         | 0.00              |
|                  |              |              |                      |           |                                 |                            |                            |             |         |              | OK         | 0.00              |
|                  |              |              |                      |           |                                 |                            |                            |             |         |              | OK         | 0.00              |
|                  |              |              |                      |           |                                 |                            |                            |             |         |              | OK         | 0.00              |
|                  |              |              |                      |           |                                 |                            |                            |             |         |              | OK         | 0.00              |

**Conclusion about export balance**

# TRACEABILITY ASSESSMENT FORM

FOR EOS / NOP : fill in this form depending on result to below questions.  
For JAS: this form must be filled in every year for JAS products.

Traceability system checked last year (Y-1)?

If yes, test(s) carried out: case 1a, case 1b and/or case 2 ?

CASE1A

Conclusion : reliability ok ?

Significant change(s) to the system?

If the system was fully checked last year (Y-1) , considered to be reliable and there is no change this year (Y), it is not necessary to checked it again this year.

**1. Is there an existing external traceability system?**

a. Is an upward external traceability test possible?

Identification of the lot(s) checked:

(b) (4)

b. Is an external downward traceability test possible?

Identification of the lot(s) checked:

c. Comments, calculations:

**2. Is there an existing internal traceability system?**

a. Is an internal traceability test possible?

Identification of the lot(s) verified:

b. Comments, calculations:

**3. Traceability records available:**

|                             |                |
|-----------------------------|----------------|
| Crop logbook                | Not applicable |
| Livestock logbook           | Not applicable |
| Technical processing sheets | yes            |
| Identification of the lots  | yes            |
| Lot/batch number            | yes            |
| Grading records (for JAS)   | Not applicable |

Other

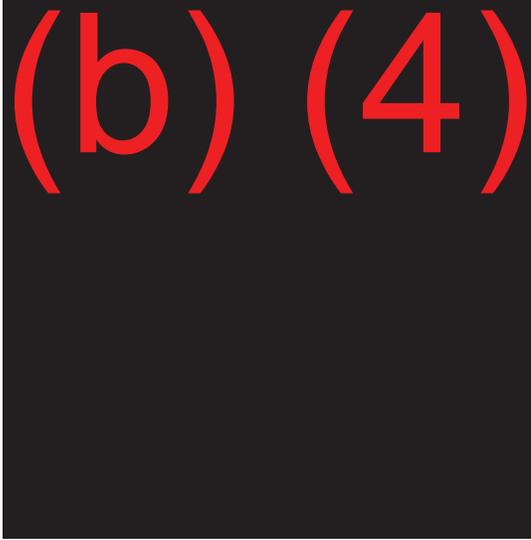
**4. Conclusion**

Is the traceability system reliable?

Strong points:

(b) (4)

Weak points (breach of traceability)





Product Balance between needed and bought quantities

**FARMING BALANCE**

| Crop      | Year of harvest | Surface (Ha) | Estimated yield (t/ha) | Real production (t) | Realized yield (t/ha) | Conclusion |
|-----------|-----------------|--------------|------------------------|---------------------|-----------------------|------------|
| Corn      | 2016            | (b) (4)      |                        |                     |                       | OK         |
| Soybean   | 2016            |              |                        |                     |                       | OK         |
| Sunflower | 2016            |              |                        |                     |                       | OK         |
|           |                 |              |                        |                     |                       |            |
|           |                 |              |                        |                     |                       | OK         |
|           |                 |              |                        |                     |                       | OK         |
|           |                 |              |                        |                     |                       | OK         |
|           |                 |              |                        |                     |                       | OK         |
|           |                 |              |                        |                     |                       | OK         |
|           |                 |              |                        |                     |                       | OK         |
|           |                 |              |                        |                     |                       | OK         |
|           |                 |              |                        |                     |                       | OK         |

**Conclusion about farming balance**

When it is considered with harvest quantities, environmental factors, soil yieldance, climate condition, agricultural applications; all realised harvest quantities are acceptable. All yield comparisons which are done between farm and neighbour farmers, all kept records by farm provide enough proof for consistency of realised yield.

**WILD COLLECTION BALANCE**

| Crop | Year of harvest | Surface (Ha) of the collection area | Quantity harvested (ton) | Maximum harvest quantity allowed by authorities for the collection area (ton) (if applicable) | Potential harvest on the collection area (ton) | Conclusion |
|------|-----------------|-------------------------------------|--------------------------|-----------------------------------------------------------------------------------------------|------------------------------------------------|------------|
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |







# TRACEABILITY ASSESSMENT FORM

**FOR EOS / NOP :** fill in this form depending on result to below questions.  
**For JAS:** this form must be filled in every year for JAS products.

Traceability system checked last year (Y-1)?

If yes, test(s) carried out: case 1a, case 1b and/or case 2 ?

1a and 1b

Conclusion : reliability ok ? **(b) (4)**

Significant change(s) to the system?

if the system was fully checked last year (Y-1), considered to be reliable and there is no change this year (Y), it is not necessary to checked it again this year.

### 1. Is there an existing external traceability system? **(b) (4)**

a. Is an upward external traceability test possible? **(b) (4)**

Identification of the lot(s) checked:  
**(b) (4)**

b. Is an external downward traceability test possible?

Identification of the lot(s) checked:  
**(b) (4)**

c. Comments, calculations:  
**(b) (4)**

### 2. Is there an existing internal traceability system? **(b) (4)**

a. Is an internal traceability test possible? **(b) (4)**

Identification of the lot(s) verified:  
**(b) (4)**

b. Comments, calculations:  
**(b) (4)**

### 3. Traceability records available:

|                             |                |
|-----------------------------|----------------|
| Crop logbook                | yes            |
| Livestock logbook           | No             |
| Technical processing sheets | Not applicable |
| Identification of the lots  | yes            |
| Lot/batch number            | Not applicable |
| Grading records (for JAS)   | Not applicable |

Other **(b) (4)**

### 4. Conclusion

Is the traceability system reliable? **(b) (4)**

Strong points:  
**(b) (4)**

Weak points (breach of traceability)  
**(b) (4)**



# TRACEABILITY ASSESSMENT FORM

**FOR EOS / NOP :** fill in this form depending on result to below questions.  
**For JAS:** this form must be filled in every year for JAS products.

Traceability system checked last year (Y-1)?

If yes, test(s) carried out: case 1a, case 1b and/or case 2 ?

1a and 1b

Conclusion : reliability ok ?

(b) (4)

Significant change(s) to the system?

if the system was fully checked last year (Y-1) , considered to be reliable and there is no change this year (Y), it is not necessary to checked it again this year.

## 1. Is there an existing external traceability system?

(b) (4)

a. Is an upward external traceability test possible?

Identification of the lot(s) checked:

(b) (4)

b. Is an external downward traceability test possible?

(b) (4)

Identification of the lot(s) checked:

(b) (4)

c. Comments, calculations:

(b) (4)

## 2. Is there an existing internal traceability system?

(b) (4)

a. Is an internal traceability test possible?

Identification of the lot(s) verified:

(b) (4)

b. Comments, calculations:

(b) (4)

## 3. Traceability records available:

|                             |                |
|-----------------------------|----------------|
| Crop logbook                | yes            |
| Livestock logbook           | No             |
| Technical processing sheets | Not applicable |
| Identification of the lots  | yes            |
| Lot/batch number            | Not applicable |
| Grading records (for JAS)   | Not applicable |

Other

(b) (4)

## 4. Conclusion

Is the traceability system reliable?

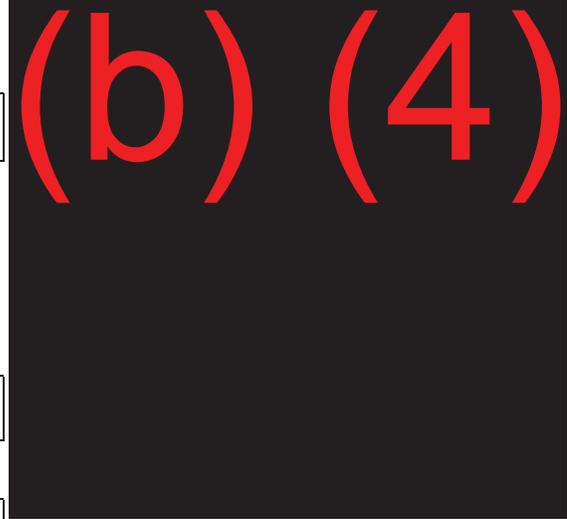
(b) (4)

Strong points:

(b) (4)

Weak points (breach of traceability)

(b) (4)





Product Balance between needed and bought quantities

**FARMING BALANCE**

| Crop | Year of harvest | Surface (Ha) | Estimated yield (t/ha) | Real production (t) | Realized yield (t/ha) | Conclusion |
|------|-----------------|--------------|------------------------|---------------------|-----------------------|------------|
| N/A  |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |

**Conclusion about farming balance**

|  |
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|  |
|--|

**WILD COLLECTION BALANCE**

| Crop | Year of harvest | Surface (Ha) of the collection area | Quantity harvested (ton) | Maximum harvest quantity allowed by authorities for the collection area (ton) (if applicable) | Potential harvest on the collection area (ton) | Conclusion |
|------|-----------------|-------------------------------------|--------------------------|-----------------------------------------------------------------------------------------------|------------------------------------------------|------------|
| N/A  |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |





Please see attachment for all details.



**EXPORTATION BALANCE**

| Reference period |              | PRODUCT NAME | PURCHASED QUANTITIES | Suppliers |                                 | Name of certification body | EXPORTED QUANTITIES (tons) |             |                 | Conclusion | Difference (tons) |
|------------------|--------------|--------------|----------------------|-----------|---------------------------------|----------------------------|----------------------------|-------------|-----------------|------------|-------------------|
| from (date)      | Until (date) |              |                      | Name      | Up to date certificate? (valid) |                            | initial stock              | final stock | Exports         |            |                   |
| 1.8.2016         | 31.12.2016   | Maize        | (b) (4)              |           |                                 | Ecocert                    | (b) (4)                    |             | (b) (4) (b) (4) | OK         | 0.00              |
|                  |              |              |                      |           |                                 |                            |                            |             |                 | OK         | 0.00              |
|                  |              |              |                      |           |                                 |                            |                            |             |                 | OK         | 0.00              |
|                  |              |              |                      |           |                                 |                            |                            |             |                 | OK         | 0.00              |
|                  |              |              |                      |           |                                 |                            |                            |             |                 | OK         | 0.00              |
|                  |              |              |                      |           |                                 |                            |                            |             |                 | OK         | 0.00              |
|                  |              |              |                      |           |                                 |                            |                            |             |                 | OK         | 0.00              |
|                  |              |              |                      |           |                                 |                            |                            |             |                 | OK         | 0.00              |

**Conclusion about export balance:**  
Please see attachment for all details.







Efficiency %:07



**EXPORTATION BALANCE**

| Reference period |              | PRODUCT NAME | PURCHASED QUANTITIES | Suppliers |                                 |  | Name of certification body | EXPORTED QUANTITIES (tons) |             |         |              | Conclusion | Difference (tons) |
|------------------|--------------|--------------|----------------------|-----------|---------------------------------|--|----------------------------|----------------------------|-------------|---------|--------------|------------|-------------------|
| from (date)      | Until (date) |              |                      | Name      | Up to date certificate? (valid) |  |                            | initial stock              | final stock | Exports | Clients name |            |                   |
| NA               |              |              |                      |           |                                 |  |                            |                            |             |         |              | OK         | 0.00              |
|                  |              |              |                      |           |                                 |  |                            |                            |             |         |              | OK         | 0.00              |
|                  |              |              |                      |           |                                 |  |                            |                            |             |         |              | OK         | 0.00              |
|                  |              |              |                      |           |                                 |  |                            |                            |             |         |              | OK         | 0.00              |
|                  |              |              |                      |           |                                 |  |                            |                            |             |         |              | OK         | 0.00              |
|                  |              |              |                      |           |                                 |  |                            |                            |             |         |              | OK         | 0.00              |
|                  |              |              |                      |           |                                 |  |                            |                            |             |         |              | OK         | 0.00              |
|                  |              |              |                      |           |                                 |  |                            |                            |             |         |              | OK         | 0.00              |

**Conclusion about export balance**



Product Balance between needed and bought quantities

**FARMING BALANCE**

| Crop | Year of harvest | Surface (Ha) | Estimated yield (t/ha) | Real production (t) | Realized yield (t/ha) | Conclusion |
|------|-----------------|--------------|------------------------|---------------------|-----------------------|------------|
| NA   |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |
|      |                 |              |                        |                     |                       | OK         |

**Conclusion about farming balance**

|  |
|--|
|  |
|--|

**WILD COLLECTION BALANCE**

| Crop | Year of harvest | Surface (Ha) of the collection area | Quantity harvested (ton) | Maximum harvest quantity allowed by authorities for the collection area (ton) (if applicable) | Potential harvest on the collection area (ton) | Conclusion |
|------|-----------------|-------------------------------------|--------------------------|-----------------------------------------------------------------------------------------------|------------------------------------------------|------------|
| NA   |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |





Processing fees are available.

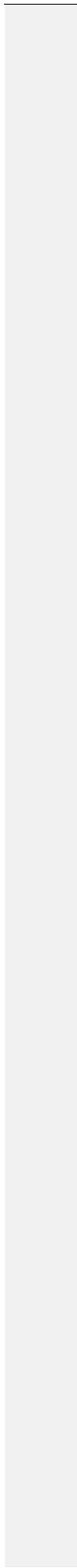


**EXPORTATION BALANCE**

| Reference period |              | PRODUCT NAME   | PURCHASED QUANTITIES | Suppliers |                                 | Name of certification body | EXPORTED QUANTITIES (tons) |             |         | Conclusion | Difference (tons) |
|------------------|--------------|----------------|----------------------|-----------|---------------------------------|----------------------------|----------------------------|-------------|---------|------------|-------------------|
| from (date)      | Until (date) |                |                      | Name      | Up to date certificate? (valid) |                            | initial stock              | final stock | Exports |            |                   |
| 26.11.2016       | 29.12.2017   | Corn           | (b) (4)              |           |                                 |                            | (b) (4)                    |             |         | (b) (4)    |                   |
| 26.11.2016       | 29.12.2017   | Wheat          |                      |           |                                 |                            |                            |             |         |            |                   |
| 26.11.2016       | 29.12.2017   | Soybean        |                      |           |                                 |                            |                            |             |         |            |                   |
| 26.11.2016       | 29.12.2017   | Flax           |                      |           |                                 |                            |                            |             |         |            |                   |
| 26.11.2016       | 29.12.2017   | Barley         |                      |           |                                 |                            |                            |             |         |            |                   |
| 26.11.2016       | 29.12.2017   | Sunflower      |                      |           |                                 |                            |                            |             |         |            |                   |
| 26.11.2016       | 29.12.2017   | Rapeseed       |                      |           |                                 |                            |                            |             |         |            |                   |
| 26.11.2016       | 29.12.2017   | Sunflower oil  |                      |           |                                 |                            |                            |             |         |            |                   |
| 26.11.2016       | 29.12.2017   | Chickpeas      |                      |           |                                 |                            |                            |             |         |            |                   |
| 26.11.2016       | 29.12.2017   | sunflower cake |                      |           |                                 |                            |                            |             |         |            |                   |
| 26.11.2016       | 29.12.2017   | Green lentil   |                      |           |                                 |                            |                            |             |         |            |                   |
| 26.11.2016       | 29.12.2017   | Red lentil     |                      |           |                                 |                            |                            |             |         |            |                   |

**Conclusion about export balance**

All suppliers are contracted farms and certificates are valid.



# TRACEABILITY ASSESSMENT FORM

**FOR EOS / NOP** : fill in this form depending on result to below questions.  
**For JAS** : this form must be filled in every year for JAS products.

Traceability system checked last year (Y-1)?

If yes, test(s) carried out: case 1a, case 1b and/or case 2 ?

1a

Conclusion : reliability ok ? (b) (4)

Significant change(s) to the system? (b) (4)

if the system was fully checked last year (Y-1) , considered to be reliable and there is no change this year (Y), it is not necessary to checked it again this year.

### 1. Is there an existing external traceability system? (b) (4)

a. Is an upward external traceability test possible? (b) (4)

Identification of the lot(s) checked:  
(b) (4)

b. Is an external downward traceability test possible? (b) (4)

Identification of the lot(s) checked:  
(b) (4)

c. Comments, calculations:  
(b) (4)

### 2. Is there an existing internal traceability system? (b) (4)

a. Is an internal traceability test possible? (b) (4)

Identification of the lot(s) verified:  
(b) (4)

b. Comments, calculations:  
(b) (4)

### 3. Traceability records available:

|                             |                |
|-----------------------------|----------------|
| Crop logbook                | yes            |
| Livestock logbook           | No             |
| Technical processing sheets | Not applicable |
| Identification of the lots  | yes            |
| Lot/batch number            | Not applicable |
| Grading records (for JAS)   | Not applicable |

Other (b) (4)

### 4. Conclusion

Is the traceability system reliable? (b) (4)

Strong points:  
(b) (4)

Weak points (breach of traceability)  
(b) (4)



# TRACEABILITY ASSESSMENT FORM

Traceability system checked last year (Y-1)?  Yes  No

If yes, test(s) carried out: case 1a, case 1b and/or case 2 ?

case 1a

Conclusion : reliability ok ?  (b) (4)  
Significant change(s) to the system?  (b) (4)

If the system was fully checked last year (Y-1) considered to be reliable and there is no change this year (Y) it is not necessary to checked it again this year.

### 1. Is there an existing external traceability system? (b) (4)

a. Is an upward external traceability test possible?  (b) (4)

Identification of the lot(s) checked:  
 (b) (4)

b. Is an external downward traceability test possible?  (b) (4)

Identification of the lot(s) checked:  
 (b) (4)

c. Comments, calculations:  
 (b) (4)

### 2. Is there an existing internal traceability system? (b) (4)

a. Is an internal traceability test possible?  (b) (4)

Identification of the lot(s) verified:  
 (b) (4)

b. Comments, calculations:  
 (b) (4)

**3. Traceability records available:**

|                             |                |
|-----------------------------|----------------|
| Crop logbook                | Not applicable |
| Livestock logbook           | Not applicable |
| Technical processing sheets | Not applicable |
| Identification of the lots  | yes            |
| Lot/batch number            | yes            |

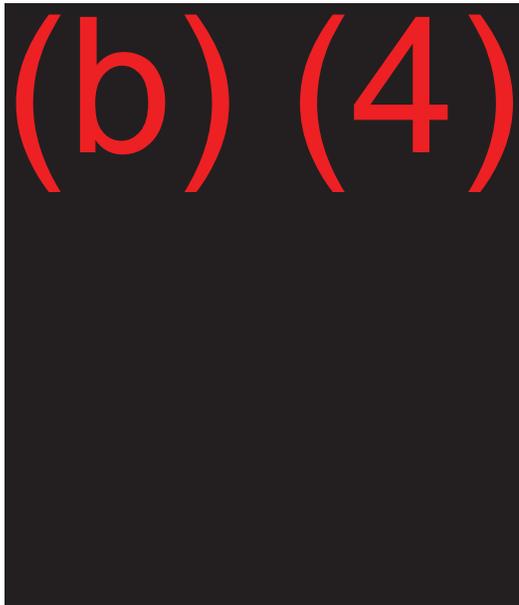
Other

### 4. Conclusion

Is the traceability system reliable?  (b) (4)

Strong points:  
 (b) (4)

Weak points (breach of traceability)  
 (b) (4)



# TRACEABILITY ASSESSMENT FORM

**FOR EOS / NOP :** fill in this form depending on result to below questions.  
**For JAS:** this form must be filled in every year for JAS products.

Traceability system checked last year (Y-1)?

If yes, test(s) carried out: case 1a, case 1b and/or case 2 ?

1a

Conclusion : reliability ok ? (b) (4)

Significant change(s) to the system?

if the system was fully checked last year (Y-1) , considered to be reliable and there is no change this year (Y), it is not necessary to checked it again this year.

**1. Is there an existing external traceability system?** (b) (4)

a. Is an upward external traceability test possible? (b) (4)

Identification of the lot(s) checked:  
(b) (4)

b. Is an external downward traceability test possible? (b) (4)

Identification of the lot(s) checked:  
(b) (4)

c. Comments calculations:  
(b) (4)

**2. Is there an existing internal traceability system?** (b) (4)

a. Is an internal traceability test possible? (b) (4)

Identification of the lot(s) verified:  
(b) (4)

b. Comments calculations:  
(b) (4)

**3. Traceability records available:**

|                             |                |
|-----------------------------|----------------|
| Crop logbook                | yes            |
| Livestock logbook           | No             |
| Technical processing sheets | Not applicable |
| Identification of the lots  | yes            |
| Lot/batch number            | Not applicable |
| Grading records (for JAS)   | Not applicable |

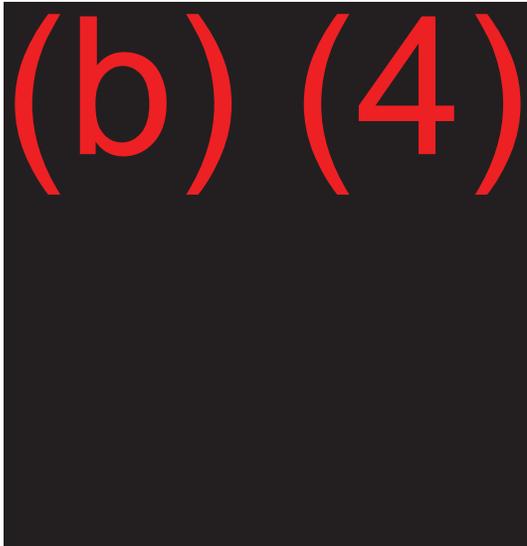
Other (b) (4)

**4. Conclusion**

Is the traceability system reliable? (b) (4)

Strong points:  
(b) (4)

Weak points (breach of traceability)  
(b) (4)





Product Balance between needed and bought quantities

**FARMING BALANCE**

| Crop         | Year of harvest | Surface (Ha) | Estimated yield (t/ha) | Real production (t) | Realized yield (t/ha) | Conclusion |  |
|--------------|-----------------|--------------|------------------------|---------------------|-----------------------|------------|--|
| Barley       | 2017            | (b) (4)      |                        |                     |                       | OK         |  |
| Chickpea     | 2017            |              |                        |                     |                       | OK         |  |
| Green lentil | 2017            |              |                        |                     |                       |            |  |
| Corn         | 2017            |              |                        |                     |                       |            |  |
| Pea          | 2017            |              |                        |                     |                       |            |  |
| Rapeseed     | 2017            |              |                        |                     |                       |            |  |
| Red lentil   | 2017            |              |                        |                     |                       |            |  |
| Soybean      | 2017            |              |                        |                     |                       |            |  |
| Sunflower    | 2017            |              |                        |                     |                       |            |  |
| Wheat        | 2017            |              |                        |                     |                       |            |  |
|              |                 |              |                        |                     |                       |            |  |
|              |                 |              |                        |                     |                       |            |  |

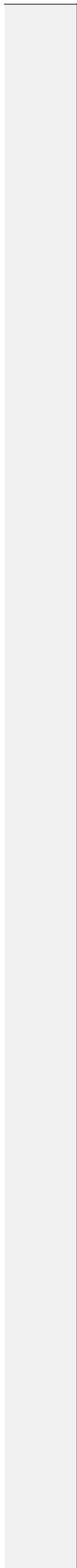
**Conclusion about farming balance**

When it is considered with harvest quantities, environmental factors, soil yields, climate condition, agricultural applications; all realised harvest quantities are acceptable. All yield comparisons which are done between WTA and neighbour farmers, all kept

**WILD COLLECTION BALANCE**

| Crop | Year of harvest | Surface (Ha) of the collection area | Quantity harvested (ton) | Maximum harvest quantity allowed by authorities for the collection area (ton) (if applicable) | Potential harvest on the collection area (ton) | Conclusion |
|------|-----------------|-------------------------------------|--------------------------|-----------------------------------------------------------------------------------------------|------------------------------------------------|------------|
| NA   |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |







**EXPORTATION BALANCE**

| Reference period |              | PRODUCT NAME | PURCHASED QUANTITIES | Suppliers                       |         | Name of certification body | EXPORTED QUANTITIES (tons) |             |         | Conclusion | Difference (tons) |              |
|------------------|--------------|--------------|----------------------|---------------------------------|---------|----------------------------|----------------------------|-------------|---------|------------|-------------------|--------------|
| from (date)      | Until (date) |              |                      | Up to date certificate? (valid) | Name    |                            | initial stock              | final stock | Exports |            |                   | Clients name |
| 4.08.2017        | 19.10.2017   | Corn         | (b) (4)              | (b) (4)                         | Ecocert | (b) (4)                    | (b) (4)                    | (b) (4)     | (b) (4) | (b) (4)    |                   |              |
| 4.08.2017        | 19.10.2017   | Sunflower    | (b) (4)              | (b) (4)                         | Ecocert | (b) (4)                    | (b) (4)                    | (b) (4)     | (b) (4) | (b) (4)    |                   |              |
| 4.08.2017        | 19.10.2017   | Pea          | (b) (4)              | (b) (4)                         | Ecocert | (b) (4)                    | (b) (4)                    | (b) (4)     | (b) (4) | (b) (4)    |                   |              |
|                  |              |              |                      |                                 |         |                            |                            |             |         |            | OK                | 0.00         |
|                  |              |              |                      |                                 |         |                            |                            |             |         |            | OK                | 0.00         |
|                  |              |              |                      |                                 |         |                            |                            |             |         |            | OK                | 0.00         |
|                  |              |              |                      |                                 |         |                            |                            |             |         |            | OK                | 0.00         |

**Conclusion about export balance**



Product Balance between needed and bought quantities

**FARMING BALANCE**

| Crop      | Year of harvest | Surface (Ha) | Estimated yield (t/ha) | Real production (t) | Realized yield (t/ha) | Conclusion |
|-----------|-----------------|--------------|------------------------|---------------------|-----------------------|------------|
| Corn      | <b>(b) (4)</b>  |              |                        |                     |                       | OK         |
| Sunflower |                 |              |                        |                     |                       | OK         |
| Wheat     |                 |              |                        |                     |                       | OK         |
|           |                 |              |                        |                     |                       |            |
|           |                 |              |                        |                     |                       | OK         |
|           |                 |              |                        |                     |                       | OK         |
|           |                 |              |                        |                     |                       | OK         |
|           |                 |              |                        |                     |                       | OK         |
|           |                 |              |                        |                     |                       | OK         |
|           |                 |              |                        |                     |                       | OK         |

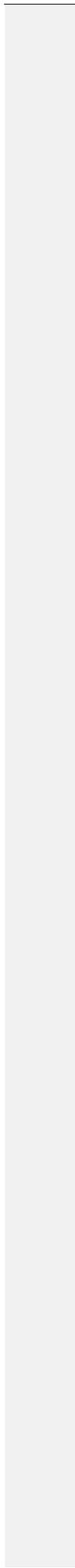
**Conclusion about farming balance**

When it is considered with harvest quantities, environmental factors, soil yieldance, climate condition, agricultural applications; all realised harvest quantities are acceptable. All yield comparisons which are done between farm and neighbour farmers, all kept records by farm provide enough proof for consistency of realised yield.

**WILD COLLECTION BALANCE**

| Crop | Year of harvest | Surface (Ha) of the collection area | Quantity harvested (ton) | Maximum harvest quantity allowed by authorities for the collection area (ton) (if applicable) | Potential harvest on the collection area (ton) | Conclusion |
|------|-----------------|-------------------------------------|--------------------------|-----------------------------------------------------------------------------------------------|------------------------------------------------|------------|
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |
|      |                 |                                     |                          |                                                                                               |                                                | OK         |







# TRACEABILITY ASSESSMENT FORM

**FOR EOS / NOP** : fill in this form depending on result to below questions.  
**For JAS** : this form must be filled in every year for JAS products.

Traceability system checked last year (Y-1)?

If yes, test(s) carried out: case 1a, case 1b and/or case 2 ?

1a and 1b

Conclusion : reliability ok ?

(b) (4)

Significant change(s) to the system?

if the system was fully checked last year (Y-1) , considered to be reliable and there is no change this year (Y), it is not necessary to checked it again this year.

## 1. Is there an existing external traceability system?

(b) (4)

a. Is an upward external traceability test possible?

Identification of the lot(s) checked:

(b) (4)

b. Is an external downward traceability test possible?

(b) (4)

Identification of the lot(s) checked:

(b) (4)

c. Comments, calculations:

(b) (4)

## 2. Is there an existing internal traceability system?

(b) (4)

a. Is an internal traceability test possible?

Identification of the lot(s) verified:

(b) (4)

b. Comments, calculations:

(b) (4)

## 3. Traceability records available:

|                             |                |
|-----------------------------|----------------|
| Crop logbook                | yes            |
| Livestock logbook           | No             |
| Technical processing sheets | Not applicable |
| Identification of the lots  | yes            |
| Lot/batch number            | Not applicable |
| Grading records (for JAS)   | Not applicable |

Other (b) (4)

## 4. Conclusion

Is the traceability system reliable?

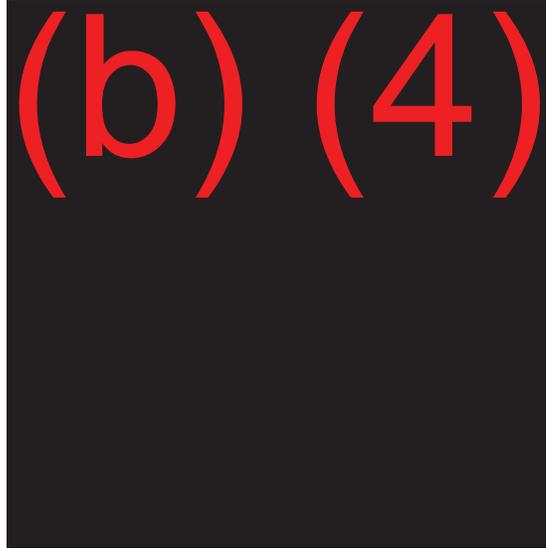
(b) (4)

Strong points:

(b) (4)

Weak points (breach of traceability)

(b) (4)



# TRACEABILITY ASSESSMENT FORM

**FOR EOS / NOP** : fill in this form depending on result to below questions.  
**For JAS**: this form must be filled in every year for JAS products.

Traceability system checked last year (Y-1)?

If yes, test(s) carried out: case 1a, case 1b and/or case 2 ?

Conclusion : reliability ok ?

Significant change(s) to the system?

if the system was fully checked last year (Y-1) , considered to be reliable and there is no change this year (Y), it is not necessary to checked it again this year.

### 1. Is there an existing external traceability system?

(b) (4)

a. Is an upward external traceability test possible?

Identification of the lot(s) checked:

(b) (4)

b. Is an external downward traceability test possible?

(b) (4)

Identification of the lot(s) checked:

(b) (4)

c. Comments, calculations:

(b) (4)

### 2. Is there an existing internal traceability system?

(b) (4)

a. Is an internal traceability test possible?

Identification of the lot(s) verified:

(b) (4)

b. Comments, calculations:

(b) (4)

### 3. Traceability records available:

|                             |                |
|-----------------------------|----------------|
| Crop logbook                | yes            |
| Livestock logbook           | No             |
| Technical processing sheets | Not applicable |
| Identification of the lots  | yes            |
| Lot/batch number            | Not applicable |
| Grading records (for JAS)   | Not applicable |

Other (b) (4)

### 4. Conclusion

Is the traceability system reliable?

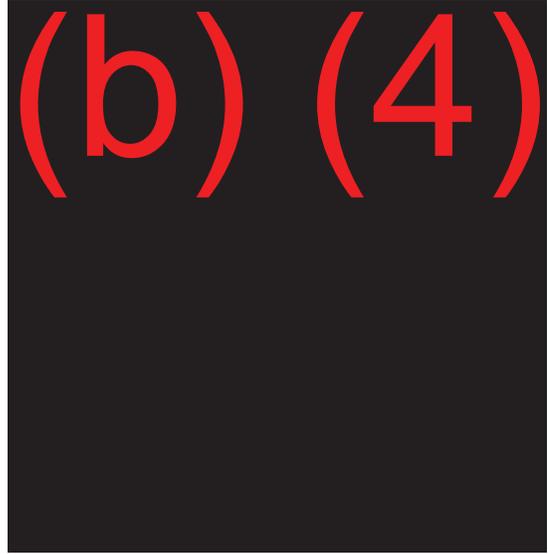
(b) (4)

Strong points:

(b) (4)

Weak points (breach of traceability)

(b) (4)





# National Organic Program (NOP) Appeal APL-021-18

**Appellant:**

**Ecocert ICO  
Vincent Morel, General Manager  
201 W. Main St., 2<sup>nd</sup> Floor  
Plainfield, Indiana 46168  
Vincent.morel@ecocert.com**

**NOP ADVERSE ACTION**

**→ PLEASE RETURN TO NOP:  
(202) 720-3252**

(b) (7)(A)

(b) (7)(A)

(b) (7)(A)

(b) (7)(A)

(b) (7)(A)

**NOTICE OF NONCOMPLIANCE AND PROPOSED SUSPENSION**

**January 12, 2017**

Mr. Jeffry Evard  
Ecocert ICO  
201 W. Main St., 2<sup>nd</sup> Floor  
Plainfield, Indiana 46168  
Email: [Jeffry.EVARD@ecocert.com](mailto:Jeffry.EVARD@ecocert.com)

Dear Mr. Evard:

As an accredited certifying agent for the USDA, Agricultural Marketing Service (AMS), National Organic Program (NOP), Ecocert ICO (ICO) is required to demonstrate its ability to fully comply with, and implement, its organic certification program. However, a recent complaint investigation by the NOP Compliance & Enforcement revealed serious noncompliances by ICO. On September 16, 2016, NOP received a complaint alleging that ICO granted certification to an operation previously suspended by Pro-Cert Organic Systems, Ltd, which had not been reinstated by the USDA. In 2014, the NOP identified eight operations which were suspended by Pro-Cert, to whom ICO had issued organic certificates without the operations undergoing reinstatement. This is a recurring area of noncompliance for ICO. Additionally, ICO staff made false statements to the NOP during the course of the investigation.

Due to the severity of these noncompliances, the NOP is issuing a combined notice of noncompliance and proposed suspension of EcoCert ICO's accreditation to the USDA organic regulations pursuant to 7 CFR §205.665(c), effective 30 days from the date of this notice.

**AIA7262RCA.NC1** - 7 C.F.R. §205.501(a)(13) states "A private or governmental entity accredited as a certifying agent under this subpart must: Accept the certification decisions made by another certifying agent accredited or accepted by USDA pursuant to §205.500."

**Comments:** *ICO certified a suspended operation without the NOP reinstatement process being completed. The operation's May 2014 application to ICO for organic certification stated in writing, that the operation was previously suspended. ICO granted certification of the operation on December 8, 2014. In September 2016, Pro-Cert notified ICO that the operation had been suspended in March 2014. ICO then requested additional information from Pro-Cert and stated that they would ensure the operation underwent the appropriate reinstatement process. ICO did not take action against the operation, until the NOP inquired about the operation's status in response to the complaint.*

In addition, ICO is noncompliant with the Organic Food Production Act, 7 USC Ch. 94 as follows:

**AIA7262RCA.NC2** – 7 USC §6519(a)(4) states “It shall be unlawful and a violation of this chapter for any person covered by this chapter to fail or refuse to provide accurate information (including a delay in the timely delivery of such information) required by the Secretary under this chapter.”

**Comments:** *ICO made false statements to the NOP in response to the investigation. When the NOP contacted ICO on April 19, 2017 regarding the complaint, ICO stated the operation was not certified by them. After further discussion, ICO acknowledged that the operation was certified by ICO, but that ICO had notified the operator of its determination to terminate certification in December 2016. The NOP requested a copy of the letter on May 22, 2017, and in response, ICO provided a copy of a letter addressed to the operator, titled “NOP – Termination of certification services contract with previous notice.” The date on the letter was Monday, May 22, 2017 [sic].*

*ICO later clarified that it had only communicated the termination of certification verbally to the operator and understood they would surrender voluntarily. ICO did not issue an official notice to the operator that their certification was invalid and suspended operations must be reinstated by the USDA. Instead ICO removed the operation from the INTEGRITY database in December 2016.*

## **APPEAL RIGHTS**

The NOP proposes to suspend ICO’s accreditation as a NOP certifying agent effective 30 days from receipt of this letter. If the NOP suspends ICO’s accreditation, you will be directed to cease all certification activities and make all client files available to the NOP pursuant to §205.665(f) of the USDA organic regulations.

Pursuant to §205.681 of the USDA organic regulations, ICO has the right to file an appeal of this proposed action within 30 days of receipt of this letter. Appeals must be filed in writing to:

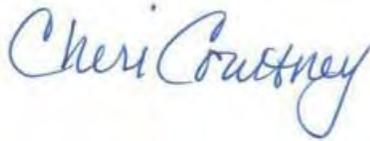
Administrator, USDA, AMS  
c/o NOP Appeals Staff  
1400 Independence Avenue, SW  
Room 2095-S, STOP 0203  
Washington, DC 20250

If the NOP suspends ICO’s accreditation you may, at any time, submit a request to the Secretary for reinstatement of your accreditation. The request must be accompanied by evidence demonstrating correction of each noncompliance and corrective actions taken to comply with and remain in compliance with the Organic Foods Production Act and the USDA organic regulations.

EcoCert ICO  
Notice of Noncompliance and Proposed Suspension  
Page 3

If you have questions regarding this notice, contact Rebecca Claypool, Accreditation Manager, at [Rebecca.Claypool@ams.usda.gov](mailto:Rebecca.Claypool@ams.usda.gov) or (202) 440-1999.

Sincerely,

A handwritten signature in blue ink that reads "Cheri Courtney". The signature is written in a cursive, flowing style.

Cheri Courtney  
Director, Accreditation and International Activities Division  
National Organic Program

cc: Valerie Schmale, Compliance & Enforcement Division

Enclosures: Evidence

(b) (7)(A)

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(b) (7)(A)

(b) (7)(A)

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