

Just to clarify audits were performed and although not all documents were gathered because of the voluminous amount of data, Inspector reviewed various items such as bills of lading, daily reports maintained by staff etc. to ascertain that there is adequate record keeping by applicant to verify their processes and production.

Days grazing and dry matter intake were verified as well and inspector obtained a recap sheet that Farm provided after reviewing data regarding, grazing and DMI. Animal groups will have met the 120 days of grazing and then some as the pastures are still viable and they are still in their defined grazing seasons. There were no variances for the farm this year. Please see attachment.

Per the Farm representatives, the blue tag animals and / or breeder stock that cannot still be considered in organic status are totally removed from the farm when they become ineligible because they may need treatment. So they are removed and treated and either sent to Texas or sold or disposed of and considered "removed" from the High Plains herd. This way the animals on site are always organic.

OSP / appendices and various updates (field histories, maps) provided by the farm at the inspection were turned into the CDA office on Friday 9/18/15 so they are not attached to these files. Please refer to the hard bound farm binders for those updates.

Attachments

Crops:

Audits

Forage test results

Livestock:

Audits

DMI/ grazing recap sheet.

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

CDA/DPI

**Organic Crop Production Inspection Report**

Operation's Name: Aurora Organic Farms – High Plains		Person Interviewed: Brent Cannell	
Physical Address: 28520 WCR 72 Gill, CO 80624		Others Present for Inspection: Emily Orr _____ J.D. Rozo _____ Dawn Wobig, Dan Placke _____	
Type of Inspection: <input type="checkbox"/> New Applicant <input checked="" type="checkbox"/> Continuation		Has a Current Copy of NOP Standards? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Inspector: (b) (6), (b) (7)(C) in attendance		Date: 9/15/2015	Time In: 9:00a.m. Time Out: 5:30p.m.

General and Farm Plan Information**Has any of the demographic or contact information changed?** ☐ Yes ☒ No

If yes, list the changes: Farm has added (b) (4) acre corner called (b) (4) (see updated map) _____

☒ **Verify crops and acreages listed in OSP** ☒ **Crops Harvested at time of inspection**

- Describe changes/discrepancies (if applicable):

Crops are part of grazing system. In 2015 – (b) (4) alfalfa haylage, hay. (b) (4) alfalfa hay.
(b) (4) and (b) (4) Hay and green chop (b) (4) Hay were harvested as well _____

☒ **All Organic** ☐ **Split** **Total Acres Farmed** (b) (4) **Owned:** (b) (4) **Rented:** (b) (4)
Acres added this year (should be included in Total farmed): (b) (4)

Acres Organic (including fallow) (b) (4) **Acres Conventional** _____

Section 2: History and Eligibility

NOP Rule §205.202

Is all ground requested for certification eligible? ☒ Yes ☐ No

(Verify compliant with NOP §205.202 Land Requirements)

Comments: _____

☒ **If new acreage is listed, verify Field History Sheet or Land Use Affidavit is found in plan**☒ **Map(s) accurate and complete?**

- Describe changes/discrepancies:

Farm has updated map _____

Section 3: Seeds

NOP Rule §205.204

☒ **Verify operation consistent with Section 3 of OSP**

- Describe changes/discrepancies: _____

Are current organic certificates available for all organic seeds purchased? ☐ Yes ☐ No☒ **Inspect seed labels** ☐ N/A

- If non-organic seeds were used - verify reason and required documentation

Comments: _____

Part A. ☒ **Verify source of organic seedlings and review current organic certificate(s)** ☒ N/A

Comments: _____

Part B. ☒ **Verify operation consistent with greenhouse part of OSP** ☒ N/A (no greenhouse)

- Describe changes/discrepancies: _____

☐ **Verify compliant with §205.206(f)** ☐ **No treated lumber**

Part C. ☒ **Verify operation consistent with split operation part of OSP** ☒ N/A

- Any issues of concern for commingling or contamination? _____

Part D. ☐ **Verify perennial stock** ☒ N/A

- If non-organic planting stock was used, then verify reason and required documentation

Comments: _____

- If newly planted verify source; if non-organic verify management compliant with §205.204(a)(4)

Comments: _____

Part A. ☒ **Verify operation consistent with this section of OSP**

- Describe changes/discrepancies: has updated field histories as to what what applied this year _____

Review all fertility inputs

Are all products being used listed in the OSP? ☒ Yes ☐ No

Are all products used listed on the "Materials Review Sheet"? ☒ Yes ☐ No

Are all products allowed for use (National List restrictions being followed?) ☒ Yes ☐ No

- Describe changes/discrepancies: _____

☐ Yes ☐ No ☒ N/A

Letter from compost manufacturer provided? ☐ Yes ☐ No ☒ N/A

If produced on site, is documentation available? ☐ Yes ☐ No ☒ N/A

Comments: _____

Part C. If raw manure was used, verify compliant with NOP §205.203 (c)(1)(i), (ii) and (iii).

☒ Yes ☐ No ☐ N/A

Did you verify manure records? (Application AND harvest dates) ☐ Yes ☐ No ☒ N/A

Collect documentation

Has the 90 day preharvest interval met? ☐ Yes ☐ No ☒ N/A

Has the 120 day preharvest interval met? ☐ Yes ☐ No ☒ N/A

Comments: not applicable as aged manure program is from pastures and crops are not for human consumption. _____

Part D. Is soil erosion a problem? ☐ Yes ☒ No ☐ N/A

Comments: _____

Water Use. Is water quality a problem? ☐ Yes ☒ No ☐ N/A

Comments: _____

Section 6: Crop Management

NOP Rule §205.205, 205.206, 205.601, 205.602

☒ **Verify operation consistent with this section of OSP.**

- Describe changes/discrepancies:

Part A. Crop Rotation

Is there a crop rotation program compliant with 205.205?

☒ Yes ☐ No ☐ N/A

Comments: _____

Part B. Weed Management – NOP Rule 205.206

Is there evidence of restricted or prohibited strategies/inputs used for weed management?

☐ Yes ☒ No ☐ N/A

Comments: _____

Part C. Pest Management – NOP Rule 205.206

Is there evidence of restricted or prohibited strategies/inputs used for pest management?

☐ Yes ☒ No ☐ N/A

Comments: _____

Part D. Disease Management – NOP Rule 205.206

Is there evidence of restricted or prohibited strategies/inputs used for disease management?

☐ Yes ☒ No ☐ N/A

Comments: _____

Review all crop protection inputs

Are all products being used listed in the OSP? ☒ Yes ☐ No

Are all products used listed on the "Materials Review Sheet"? ☒ Yes ☐ No

Are all products allowed for use (National List restrictions being followed?) ☒ Yes ☐ No

- Describe changes/discrepancies: Did not have to use protective inputs this year but material appendices are current.

Section 7: Maintenance of Organic Integrity

NOP RULE §205.201(a)(5) and 205.202(c)

Part A. ☒ Verify operation consistent with Part A (adjoining land use) of this section of the OSP.

- Describe the measures taken by the operation to maintain organic integrity (n/a is not acceptable for the operation to have listed in the OSP):

Farm has signs up and agreements with neighbors, utilities, gas and oil people. Farm has strategies in place in case of problems.

Is roadside spraying an issue? ☐ Yes ☒ No ☐ N/A

Comments: Works with Weld County on weed issues.

Are Buffer zones adequate? ☒ Yes ☐ No (if No, clearly describe buffer and potential contamination concerns)

Additional buffer zones needed?

Comments:

Part B. ☒ Parallel/Split Operations

- Describe changes/discrepancies:

N/A all organic at this time. _____

Any issues of concern regarding commingling or cross-contamination (e.g. parallel/split production or transitional production)? ☐ Yes ☒ No ☐ N/A

Comments: _____

Part C. ☒ Equipment

- Describe changes/discrepancies:

Does custom harvesting occur at operation? ☒ Yes ☐ No If yes, please verify cleaning logs or affidavits are used by custom harvester. (This includes seed cleaners.)

Is chlorine being used to sanitize equipment and/or tools? ☐ Yes ☒ No

If yes, verify rate being used: _____ Verify max rate listed on label: _____

Comments _____

Part D. ☒ Harvest

- Describe changes/discrepancies: _____

☒ Harvest by applicant ☒ Custom harvest

☒ Verify cleaning procedures and any relevant documentation if equipment is used for both organic and non-organic crops.

Comments _____

Part E. ☒ Post- Harvest Handling

Is this section completed in such a way that accurately reflects what is occurring post-harvest?

☒ Yes ☐ No

Comments: No post harvest handling- mixing of feed material is to make rations for cattle only. _____

Part F. ☒ Storage

• Describe changes/discrepancies: _____

Any prohibited materials stored in or near organic crop storage? ☐ Yes ☒ No

Comments: _____

Are labels included for all storage crop inputs? ☐ Yes ☐ No ☒ N/A

Are these materials on the "Materials Review Sheet"? ☐ Yes ☐ No ☒ N/A

Part G. ☒ Transportation

• Describe changes/discrepancies: _____

Is the inspection and cleanliness of transport units verified and documented?

☒ Yes ☐ No ☐ N/A

Comments: _____

Section 8: Record Keeping System

NOP RULE § 205.103

Please use the Crop Traceability Audit Form and the Mass In and Out Balance Form to conduct your audits. Conduct both audits using a commodity/finished product of your choice. It is preferred that you use 2 different commodities/ingredients.

Traceability Audit: Were all documents complete and accessible? ☒ Yes ☐ No ☐ N/A

If no, explain missing components: _____

Mass In and Out Balance: Was their sufficient documentation to show that the amount of product produced correlates with the amount of product sold? ☒ Yes ☐ No ☐ N/A

Comments: crops are for feed consumption. No crops are sold _____

Other Comments: _____

Section 9: Noncompliances – Conditions – Review Questions

Please address the issues noted below, with particular attention to the following:

For Non-compliances, please review the response provided, and verify if practices match the response. If not, please note discrepancies.

For Conditions, please identify if adjustment required is made, and, if noted in the OSP, if practices match the OSP. If not, please note discrepancies.

If additional information was requested to be collected or clarified at inspection, please note what was collected, or what clarification was provided.

If any of these issues were specifically addressed elsewhere in this report, please note where in the report the issue was addressed.

Issue	Response
Clarify/obtain info on how operation ensures milk withholding periods (on cows treated with a substance that requires a withholding period)	No substances used requiring withholding. Animals that are no longer eligible for organic status because they need to have a conventional treatment are removed from herd((sold or culled).This ensures there will be no such period necessary.
Obtain records of any current "blue tagged" animals on site (treated with antibiotics – Appx 4, p20 of 22)	None on premises. The animals that would go into Blue tag status are sent to Texas facility, then tagged there.
Any examples/records of non-organic breeder stock currently on site (animal treated w/ prohibited substance to be kept as breeder; calf can be organic Appx 4, p.2)	None on premises. Removed from herd. Get tagged in Texas
Obtain copies of any Forage Test Results (nutrition)	See attached copies for (b) (4)
Confirm at least 120 days grazing	Animals currently grazing will have met 120 day grazing period as of 9/21/15 per records reviewed. See DMI / grazing spreadsheet attached to livestock report

Recommended Sampling

NOP §205.402, 205.403

☒ None ☐ Samples Obtained

- Number of samples taken _____
- Sample Type: ☐ Crop _____ ☐ Vegetation ☐ Soil ☐ Other
- Reason for sample(s) obtained: _____

What type of receipt was provided? _____

Labeling

NOP §205.300

Are labels used for sale of the crops? ☐ Yes ☒ No

Review all labels

Are all labels being used included in the label file? ☐ Yes ☐ No

Do the labels appear to meet §205.300? ☐ Yes ☐ No

- Describe changes/discrepancies: _____

Does not use labels. _____

- List labels that were added during inspection: _____

Exit Interview Instructions

NOP §205.403(d)

The purpose of an exit interview is to give the applicant and the reviewer a recap of your inspection, make the operation aware of any possible issues of concern, and let the applicant ask any questions they may have about the certification process.

Please remember to remind the applicant that as an inspector, you are there to report your findings and are unable to provide solutions or suggestions about how their operation can become or stay in compliance with the NOP rules.

Changes made to the OSP during the inspection

List changes made by the applicant: ☐ None

1. Page: _____ Change: _____
2. Page: _____ Change: _____
3. Page: _____ Change: _____
4. Page: _____ Change: _____
5. Page: _____ Change: _____
6. Page: _____ Change: _____
7. Page: _____ Change: _____

Comments: _____ Please see updated items in OSP appendices turned in after inspection. _____

Additional documents needed

List below any documents that the operation was unable to supply at the inspection that may be needed to make a final determination on their organic certification:

1. _____
2. _____
3. _____
4. _____
5. _____

Comments: _____ none _____

Please do not ask for these documents to be sent to you or into the office; the final reviewer may do that.

Issues of concern (cite the standard)

NOP §205.403(d)

1. _____

2. _____

3. _____

4. _____

5. _____

6. _____

Comments _____ none _____

Other

_____ reoresenatives of farm present, did exit interview and read over inspection
report. _____

****If new applicant complete a full narrative in addition to the inspection form****

The information contained in this report is confidential between the inspector, the inspected party and the certification agent. This report does not constitute certification or consultation, nor should it be used for promotional purposes. All compliance assessments are made in reference to the standards and policies of the above-mentioned certification agent, and are based on the inspector's observations, review of documents and operator interview.

(b) (6)

Representative of Operation Signature

9/17/15
Date

(b) (6), (b) (7)(C)

Inspector Signature

9/15/15
Date

Attachments:

☒ Farm Questionnaire
☒ Field Maps
☒ Complete Field Histories
☒ Other (specify) audit items

Pre- Inspection Time _____ hour(s)

Driving Time _____ hour(s)

Inspection Time _____ hours(s)

Inspection Narrative

Mileage _____

Write-up Time _____ hour(s)

****If new applicant complete a full narrative in addition to the inspection form****

The information contained in this report is confidential between the inspector, the inspected party and the certification agent. This report does not constitute certification or consultation, nor should it be used for promotional purposes. All compliance assessments are made in reference to the standards and policies of the above-mentioned certification agent, and are based on the inspector's observations, review of documents and operator interview.

See signed sheet

Representative of Operation Signature

Date

(b) (6), (b) (7)
(C)

Inspector Signature

9/15/15
Date

Attachments: X____ Farm Questionnaire
 X____ Field Maps
 X____ Complete Field Histories
 X____ Other (specify) audit items _____

Pre- Inspection Time _____ hour(s)

Driving Time _____ hour(s)

Inspection Time _____ hours(s)

Inspection Narrative

Write-up Time _____ hour(s)

Mileage _____

*please
see
expenses
page
sheet*

Mass In and Out Balance Form

Company Aof - High Plains Date 9/15/15

Perform a mass in and out balance on an ingredient that is used in multiple finished products. If there is a product/ingredient that is used in both a non-organic and organic form, choose that product to audit.

The purpose of an in and out balance is to verify that the amount purchased corresponds to the amount sold. This can be for a specified time period (September – December) or for a certain amount that was ordered (beginning and ending inventories)

Product (b) (4)

Question	Answer
1. Define period being reviewed. (Today to when the product was purchased, or Sept to Dec.)	<u>2nd</u> <u>July 2015</u> <u>Cultures</u>
2. Define unit(s) of measure.	<u>(b) (4)</u>
3. Obtain Beginning Inventory Obtain Ending (current) Inventory	<u>(b) (4)</u>
4. Add in purchases of product if necessary.	<u>n/a</u>
5. How much of the ingredient has been sold?	<u>0</u> <u>(b) (4)</u>
6. What is the expected yield? (Look at recipe or batch sheet).	<u>(b) (4)</u>
7. Does the expected yield and amount sold correlate? (Yes or no, explain reason for variation).	<u>Yes</u> <u>(b) (4)</u> <u>(b) (4)</u> <u>(b) (4)</u>

1. To determine the amount of ingredient that was **processed** during a given time period:
Beginning inventory – ending inventory + received = quantity of ingredient used for processing

2. To determine the amount of finished product **produced** during the same time period:
Current product inventory – beginning finished product inventory + Sales = finished product

3. You will have to multiply the quantity of ingredients used for processing by a predetermined conversion factor or the actual yield in order to compare ingredient in versus product out in the final formula.

The “organic ingredient in” **MUST EQUAL OR EXCEED** “organic finished product out”; #7 above must be answered.

9-15-15

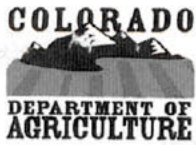


9-15-15

Replaces: 00

Report Date & Farm Location

Production Records



Crop Traceability Form

Company AOF - High Plains Date 9/15/15

Perform a traceability test by choosing one crop from the **previous season**. The purpose of an audit is to verify that input consumption can be traced and out-going product can be traced back. If this is an initial certification, trace a transitional crop from last season and view any possible records that the producer has prepared for expected year's organic production.

List the records you used to find the answer to each question. Please see the back of this form as a guide.

Crop: Alfalfa hay

(b) (4)

Question	Document Name	Link	Additional Information
1. Does the producer have organic seed /seedlings or non-organic seed documentation and organic certificates?	<u>July 25 2011 field was added to CSP</u>		
2. Does the producer have input (fertility, pest control, etc...) records?	<u>yearly summary</u>		
3. Are there planting and cultivating records available?	<u>spreadsheet</u>		
4. Does the producer have harvest records?	<u>field history spreadsheet</u>		
5. Do storage records show field numbers, date of harvest, and amount harvested?	<u>spreadsheet</u>		
6. Does the producer have shipping records?	<u>not shipped</u>		
7. Does the producer have sales records?	<u>to be fed to dairy animals</u>		

Do you have copies of all records?

1. Is the system functional, current and accessible?

yes

yes

(b) (4)



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9-15-15

(b) (6)



(b) (4)



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9-16-11

(b) (6)



Clean Farm Implement/Truck Affidavit Statement

(b) (4)



(b) (4), (b) (6)



VS:

**CONFIDENTIAL
BUSINESS INFORMATION**

9-15-15

(b) (6)



Clean Farm Implement/Truck Affidavit Statement

(b) (4)



(b) (4)



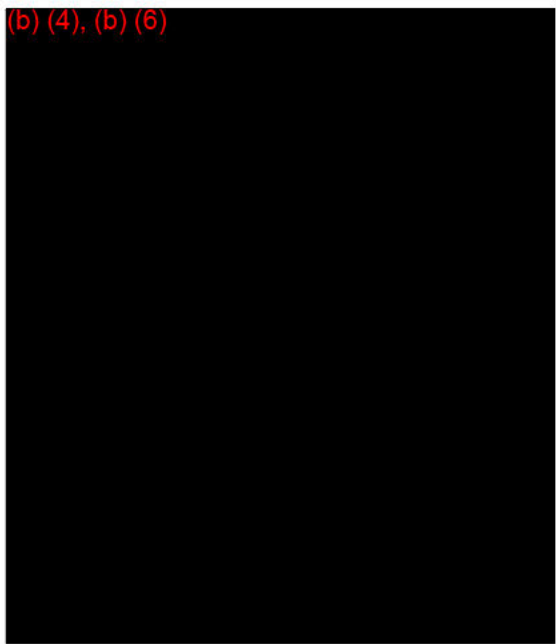
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9-15-15

(b) (6)



(b) (4), (b) (6)



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9-15-15

(b) (6)



Foray



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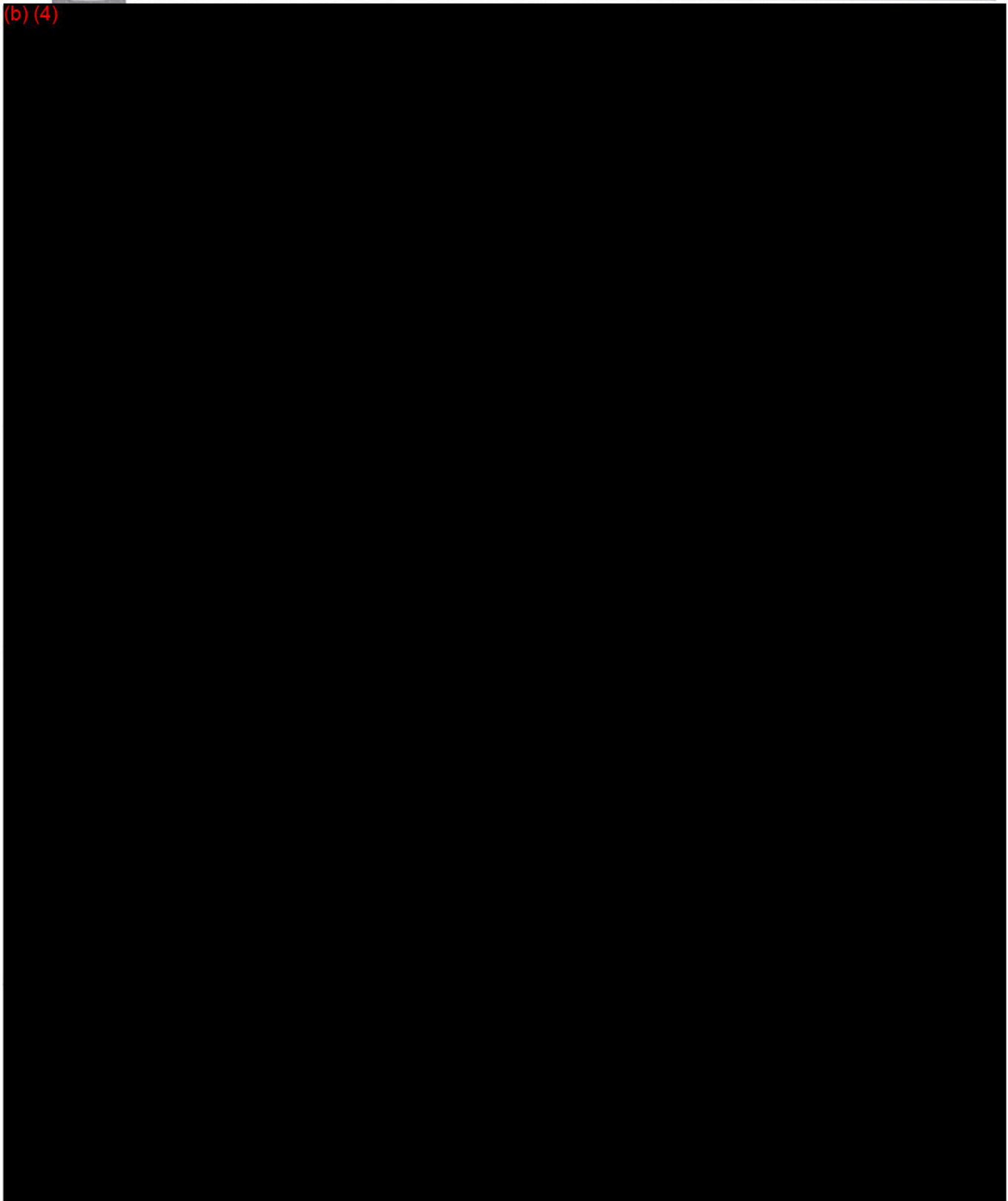
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(b) (6)

(b) (4)



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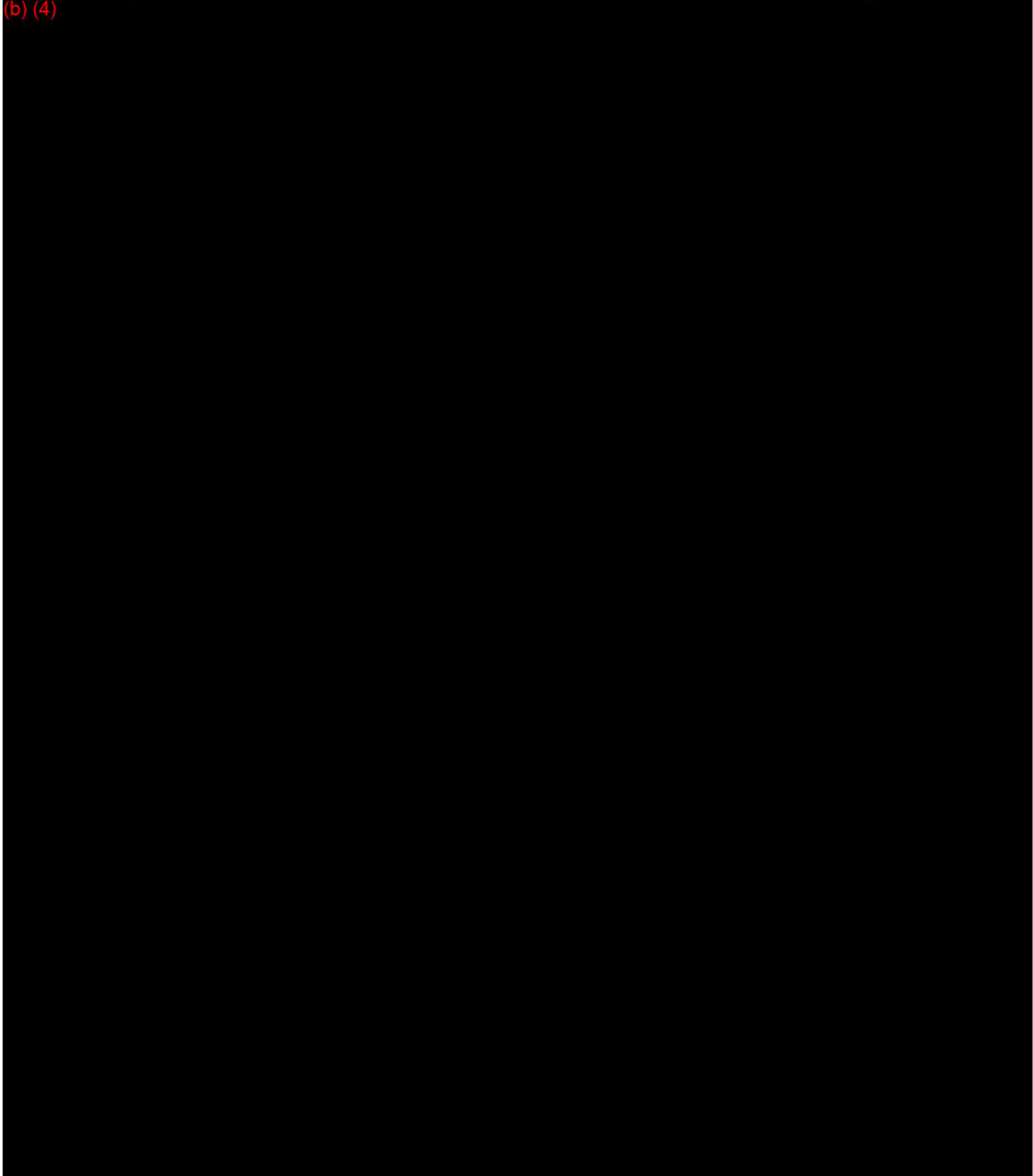


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9-11-16 (b) (6)

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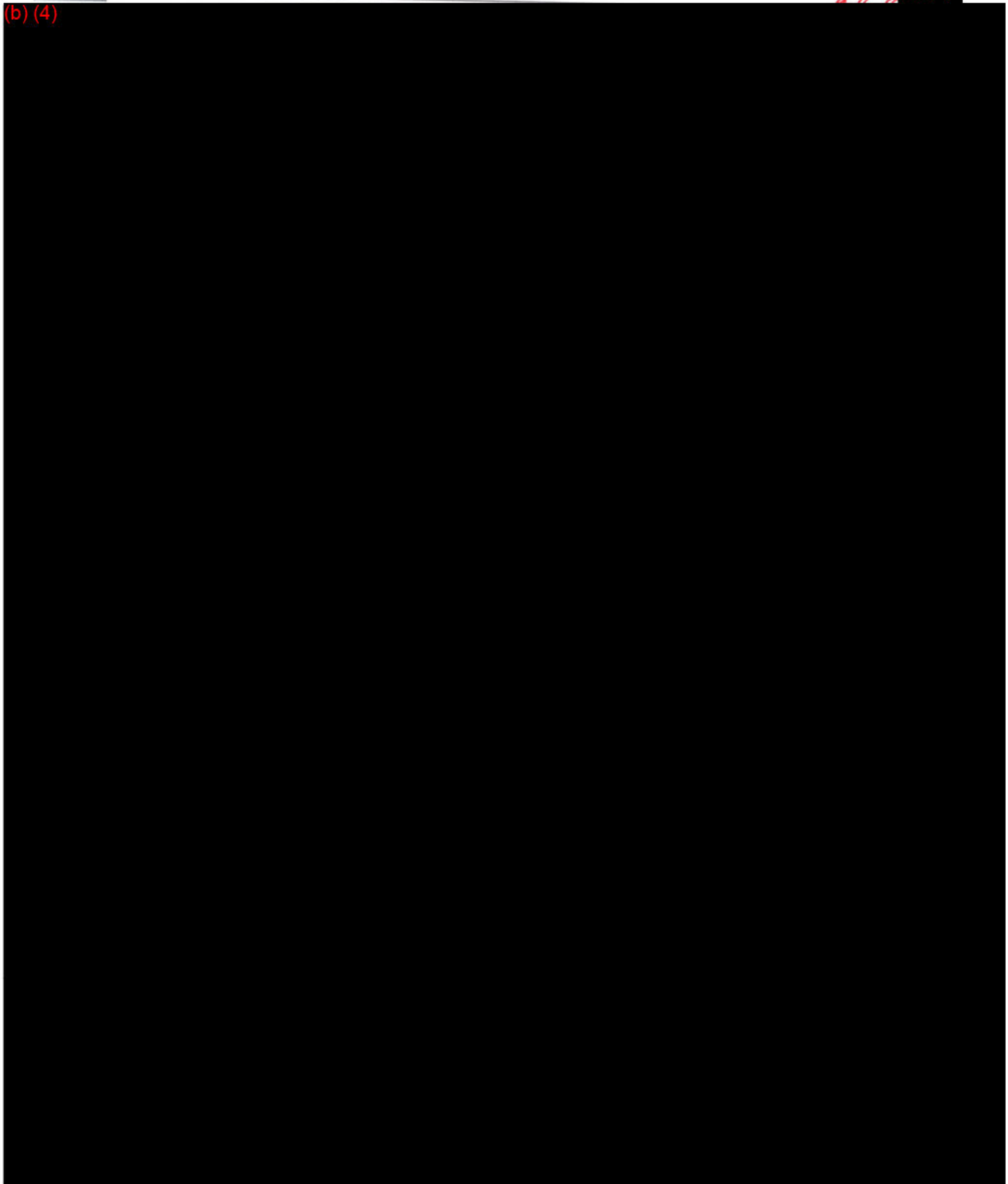
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(b) (4)

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(b) (6)



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