### Proposed Schedule – CDA Renewal Audit (NP7219PZA) August 7 – 11, 2017 Revised 08 01 17

Date	Day	Location	Hours	Review Activity	Participants	Lodging
Aug 7, 2017	Mon	<ul> <li>Depart Washington</li> <li>Broomfield, CO</li> </ul>	20	<ul> <li>Travel from DC to CO – UA403(IAD →DEN) Depart: 08:33, Arrive: 10:24</li> <li>Drive to Broomfield, CO</li> <li>Opening Meeting – 1:00 PM</li> </ul>	NOP: Graham Davis / Penny Zuck	Aloft Broomfield/Denver 8300 Arista Place Broomfield, Co 80021 303.635.2000 \$178/\$69
Aug 8, 2017	Tues	<ul> <li>Broomfield, CO</li> <li>Greeley, CO</li> </ul>	16	<ul> <li>Conduct Office Audit</li> <li>Witness Audit Crops/Handling – Hungenberg Produce, Inc. – 8 AM</li> </ul>	NOP: Graham Davis / Penny Zuck	Aloft Broomfield/Denver 8300 Arista Place Broomfield, Co 80021 303.635.2000
Aug 9, 2017	Wed	<ul> <li>Fort Lupton, CO</li> <li>Longmont, CO</li> </ul>	16	<ul> <li>Witness Audit Livestock/Handling - Colorado Egg</li> <li>Witness Audit Processing – Madhava Honey</li> </ul>	NOP: Graham Davis / Penny Zuck	Aloft Broomfield/Denver 8300 Arista Place Broomfield, Co 80021 303.635.2000
Aug 10, 2017	Thurs	CDA Office     Broomfield,     CO	16	<ul> <li>Continue Office Audit</li> <li>Closing Meeting - PM</li> </ul>	NOP: Graham Davis / Penny Zuck	Aloft Broomfield/Denver 8300 Arista Place Broomfield, Co 80021 303.635.2000
Aug 11, 2017	Fri	• Travel from CO to DC	12	<ul> <li>Travel from CO to DC – UA712 (IAD →DEN) Depart: 11:05, Arrive: 16:25</li> </ul>	NOP: Graham Davis / Penny Zuck	NA

TBD = To be determined NA = Not applicable LC = Lars Crail



### Agricultural Marketing Service Livestock, Poultry and Seed Program Quality Assessment Division

Company Information:				
Company Name:	Colorado Department of Agriculture (CDA)			
Est. No.:	FMMI# 3123219	COMMUNICS		
Street Address:	305 Interlocken Parkway	Tony Antos		
City, State, Zip:	Broomfield, CO 80021			
Contact:	Mitch Yergert			
Phone:	303.869.9052			
Email:	cda.organic@state.co.us	Condition March		
Program:	National Organic Program			
Comments:	NP7219PZA - Renewal Assessment			

#### **Audit Objectives:**

To verify compliance with the USDA organic regulations, 7 CFR 205, as amended, and NOP Policy requirements (NOP Handbook). To conduct a renewal assessment.

#### Audit Scope:

The company's quality manual including personnel, processes, procedures, facilities, and related records since June 2015.

### Audit Criteria & Reference Documents:

7 CFR Part 205 National Organic Program, Final Rule, dated December 21, 2000; As amended. NOP Policy requirements (NOP Handbook)

NOP 2000, General Accreditation Policies and Procedures

NP7219PZA QAD 1415 Form Audit Plan and Cost Estimate

Approved by <u>SER</u> SR Date Approved: 03 05 14



The second NT

### Agricultural Marketing Service Livestock, Poultry and Seed Program Quality Assessment Division

Company Name: Colorado Department of Agriculture (CDA) Audit Team and Responsibilities							
Auditor:	Title:	Responsibility:					
Penny Zuck	Auditor	Responsible for all areas of audit to include Scheduling. Conducting Opening and Closing Meetings; Review of certification process an procedures; and completing final report.					
Graham Davis	Auditor	Assist with audit, as needed.					
and any		the constant patricipant part is a superior of the superior superior of the superior s					

Audit Schedule						
Date:	Time:	Activity:	Location:	Auditor		
		See Attached Audit Schedule	e	nu de ser		
deprets	and related	adanet, processes, procedures, feelilities.	v autour motore pe			
	<u> </u>			CARE ONLY		
<u></u>						
		Concerning of the second second	II MARANA SALA			
	Bobuens a	Prinal Rula, Gated December 11, 2000; -	a sustaine Provinsia et	nombor (Sur. Gus-cur mu.		
		nd Procedures	a abroad nonsolograph	through through		

NP7219PZA QAD 1415 Form Audit Plan and Cost Estimate

Approved by <u>SER</u> SR Date Approved: 03 05 14



### Agricultural Marketing Service Livestock, Poultry and Seed Program Quality Assessment Division

Company Name:	Colorado Departm		e (CDA	.)		
		Cost Estimate				
Audit Time:	Auditor 1:	Auditor 2:	20 1. S.	Rate:		Amount:
Onsite Audit						
Travel	12.00	12.00	\$	108.00	\$	2,592.00
Pre-Audit	8.00	8.00	\$	108.00	\$	1,728.00
Audit	28.00	28.00	\$	108.00	\$	6,048.00
Post-Audit	8.00	8.00	\$	108.00	\$	1,728.00
Desk Audit Only	2ek		\$	108.00	\$	1019
Per Diem:	Auditor 1:	Auditor 2:		Rate:		Amount:
Per Diem Days				n/a		
Lodging	712.00	712.00	\$	- 2	\$	1,424.00
M&IE	345.00	345.00	\$	-	\$	690.00
Associated Costs:	Auditor 1:	Auditor 2:	No Constant	Cost:	199	Amount:
Airfare	700.00	700.00	\$	1,400.00	\$	1,400.00
Local Transportation			\$	-	\$	-
Room Tax	59.45	59.45	\$	118.90	\$	118.90
Rental Car	525.00		\$	525.00	\$	525.00
Parking	50.00	50.00	\$	100.00	\$	100.00
POV Miles	60.00	26.75	\$	0.560	\$	48.58
Administrative	1.00	1.00	\$	108.000	\$	216.00
Miscellaneous	100.00	100.00	\$	200.00	\$	200.00
Credit	n/a	n/a	\$		\$	-
=	2V		GRAN	<b>ND TOTAL</b>	\$	16,818.48

I have reviewed the audit plan and cost estimate; and agree to them. I realize	that the actual audit
and cost may differ from this document. Additionally, I realize that audit cost	ts associated with a
corrective action audit are not included in this estimate.	
ColorADO Dept. of Agriculture	1 1
Mitchell Jersert Mitchell Cons	- 7/14/17
Client (Auditee) Name: Client (Auditee) Signature:	Date;
0.0	
P. Zuk	7/7/2017
Lead Auditor Signature:	Date:

#### \*The QA Division meets the requirements outlined in 5 CFR 2635.703, Use of nonpublic information.

NP7219PZA QAD 1415 Form Audit Plan and Cost Estimate



### Agricultural Marketing Service Livestock, Poultry and Seed Program Quality Assessment Division

Company Information:				
Company Name:	Colorado Department of Agriculture (CDA)			
Est. No.:	FMMI# 3123219	COMMUNICS		
Street Address:	305 Interlocken Parkway	Tony Antos		
City, State, Zip:	Broomfield, CO 80021			
Contact:	Mitch Yergert			
Phone:	303.869.9052			
Email:	cda.organic@state.co.us	Condition March		
Program:	National Organic Program			
Comments:	NP7219PZA - Renewal Assessment			

#### **Audit Objectives:**

To verify compliance with the USDA organic regulations, 7 CFR 205, as amended, and NOP Policy requirements (NOP Handbook). To conduct a renewal assessment.

#### Audit Scope:

The company's quality manual including personnel, processes, procedures, facilities, and related records since June 2015.

### Audit Criteria & Reference Documents:

7 CFR Part 205 National Organic Program, Final Rule, dated December 21, 2000; As amended. NOP Policy requirements (NOP Handbook)

NOP 2000, General Accreditation Policies and Procedures

NP7219PZA QAD 1415 Form Audit Plan and Cost Estimate

Approved by <u>SER</u> SR Date Approved: 03 05 14



The second NT

### Agricultural Marketing Service Livestock, Poultry and Seed Program Quality Assessment Division

Company Name: Colorado Department of Agriculture (CDA) Audit Team and Responsibilities							
Auditor:	Title:	Responsibility:					
Penny Zuck	Auditor	Responsible for all areas of audit to include Scheduling. Conducting Opening and Closing Meetings; Review of certification process an procedures; and completing final report.					
Graham Davis	Auditor	Assist with audit, as needed.					
and any		the constant patricipant part is a superior of the superior superior of the superior s					

Audit Schedule						
Date:	Time:	Activity:	Location:	Auditor		
		See Attached Audit Schedule	e	nu de ser		
deprets	and related	adanet, processes, procedures, feelilities.	v autour motore pe			
	<u> </u>			CARE ONLY		
<u></u>						
		Concerning of the second second	II MARANA SALA			
	Bobuena a	Prinal Rula, Gated December 11, 2000; -	a sustaine Prosideres	nombor (Sur. Gus-cor mu.		
		nd Procedures	a abroad nonsolograph	through through		

NP7219PZA QAD 1415 Form Audit Plan and Cost Estimate

Approved by <u>SER</u> SR Date Approved: 03 05 14



### Agricultural Marketing Service Livestock, Poultry and Seed Program Quality Assessment Division

Company Name:	Colorado Departm		e (CDA	.)		
		Cost Estimate				
Audit Time:	Auditor 1:	Auditor 2:	20 1. S.	Rate:		Amount:
Onsite Audit						
Travel	12.00	12.00	\$	108.00	\$	2,592.00
Pre-Audit	8.00	8.00	\$	108.00	\$	1,728.00
Audit	28.00	28.00	\$	108.00	\$	6,048.00
Post-Audit	8.00	8.00	\$	108.00	\$	1,728.00
Desk Audit Only	2ek		\$	108.00	\$	1019
Per Diem:	Auditor 1:	Auditor 2:	ST LAPER	Rate:		Amount:
Per Diem Days				n/a		
Lodging	712.00	712.00	\$	- 2	\$	1,424.00
M&IE	345.00	345.00	\$	-	\$	690.00
Associated Costs:	Auditor 1:	Auditor 2:	No Constant	Cost:	199	Amount:
Airfare	700.00	700.00	\$	1,400.00	\$	1,400.00
Local Transportation			\$	-	\$	-
Room Tax	59.45	59.45	\$	118.90	\$	118.90
Rental Car	525.00		\$	525.00	\$	525.00
Parking	50.00	50.00	\$	100.00	\$	100.00
POV Miles	60.00	26.75	\$	0.560	\$	48.58
Administrative	1.00	1.00	\$	108.000	\$	216.00
Miscellaneous	100.00	100.00	\$	200.00	\$	200.00
Credit	n/a	n/a	\$		\$	-
=	<u>1</u> 22		GRAN	<b>ND TOTAL</b>	\$	16,818.48

I have reviewed the audit plan and cost estimate; and agree to them. I realize	that the actual audit
and cost may differ from this document. Additionally, I realize that audit cost	ts associated with a
corrective action audit are not included in this estimate.	
ColorADO Dept. of Agriculture	1 1
Mitchell Jersert Mitchell Cons	- 7/14/17
Client (Auditee) Name: Client (Auditee) Signature:	Date;
0.0	
P. Zuk	7/7/2017
Lead Auditor Signature:	Date:

#### \*The QA Division meets the requirements outlined in 5 CFR 2635.703, Use of nonpublic information.

NP7219PZA QAD 1415 Form Audit Plan and Cost Estimate

## **National Organic Program**

## **File Review Worksheets**

# Note: Please submit this completed form in MSWord format

	SECTION I – Certifier Information <u>Table of Contents</u> <u>Closing Meeting Findings</u>							
	Description	Completed by the Certifier (Include page or section number of quality/program manual as applicable)	Auditor Comments					
		General						
1	Name and Type of Business Entity (Incorporated, LLC, Partnership, etc)	Colorado Department of Agriculture, Organic Program Governmental Entity						
2	List the locations (City, State, and Country) where key activities occur and are performed. Also complete Table 9	Broomfield, Colorado, USA						
3	List any names and types (organic and nonorganic) of accreditations obtained.	USDA National Organic Program accreditation, Crop, Livestock, Handling scopes, Wild Crop						
4	List the types (organic and nonorganic) of certifications and business services offered.	Organic Certification, Organic Export Documentation under Organic Trade Arrangements						

	1	SECTION I – Certifier Information Table of Contents Closing Meeting Findings	
5	List the states (US only) and countries where NOP certification currently occurs Note the number of operations certified to the NOP at the time of the assessment. Operations may hold more than one certification scope. Therefore the total number of certified operations might not be the sum of certification scopes issued.	Colorado         Total:214NOP certified operations         Crop:141         Wild-crop:1         Livestock: _10         Handlers: _86         Grower Groups:0         Approximate Handler Types:         Processors:79         Distributors:7         Traders/Brokers:0         Retailers: _0         The 214 was at the time of our previous assessment in 2015. So this number is correct.	214 operations doesn't seem correct if CDA isn't accepting applications for new operations and they only had 204 certified operations in 2016.
7	Indicate the number of certified operations on January 2 for all years since the prior assessment. Also include the year of the prior assessment.	Jan 2, 2015 214 Jan 2, 2016 204 Jan 2, 2017 203 Currently 210 operations – there is a discrepancy in the numbers that will be corrected.	

	SECTION I – Certifier Information <u>Table of Contents</u> <u>Closing Meeting Findings</u>		
		Certification Process	
8	What does the certifier provide to applicants on the initial application? $\S$ 205.501(a)(8)	Please See Attachment A, Organic Certification Application Packet Documents	
9	How are the information, documentation, and/or forms provided to those inquiring about certification? (i.e, hard copy, electronic, etc.)?	Sent upon request electronically, via email (not done at this time due to moratorium on new applicants for program). Will send via USPS if email not available.	
10	Who (job title/position description) conducts the initial review for completeness and ability to comply? <u>Table 8</u>	Program Manager (A. Stafford until 5/15/2017; M. Yergert 5/16/2017 forward), Program Assistant (A. Mack); (b) (6), (b) (inspector), (b) (6), (b) (inspector), (b) (6), (b) (inspector)	
11	What is the certifier's process for identifying the legal status of clients?	Request legal status as part of OSP and review against Colorado Dept. of State Website (see Attachment B Organic System Plan Review)	
12	Who (job title/position description) reviews labels? Is a checklist used by the reviewer/approver? What records are maintained for approved labels?	Program Manager (A. Stafford until 5/15/2017; M.Yergert 5/16/2017 forward), Program Assistant (A. Mack) review labels. No Checklist is maintained; instructions are included in Organic System Plan Review (Attachment B), status of review maintained in Module 50 for retail products; Module 10, 12, 17 for input labels; copies of all labels are maintained in the operation's electronic OSP folder.	

	SECTION I – Certifier Information <u>Table of Contents Closing Meeting Findings</u>			
13	How are inspectors selected or assigned for inspections? Who assigns inspectors?	Inspectors are selected from staff multiple field inspectors based on training completed, assigned geographical area, and number of consecutive inspections at the same operation. All assigned by Program Manager with information from the inspector supervisor and lead inspector. There are 4 inspectors designated for ruminant livestock inspections.		
14	Are inspectors employees or independent contractors?	Employees		
15	Did all certified operations for each calendar year since the prior onsite audit receive inspections?	Yes		
16	Who (job title/position description) reviews the inspection results/report for an initial inspection?	Program Manager, Program Assistant		
17	Who (job title/position description) makes the certification decision for an initial inspection?	Program Manager, Program Assistant		
18	Provide a brief description of the annual update process. $\underline{\$ \ 205.406 \ Table}$ $\underline{3}$	Please see Attachment C Organic System Plan Update Procedures		
19	Who (job title/position description) reviews the inspection report, results of analysis conducted (as applicable), and information requested from and provided by continuing operation?	Program Manager, Program Assistant		

31 	SECTION I – Certifier Information			
	]	Table of Contents Closing Meeting Findings		
20	Explain the process and documents for providing an initial and an annual cost estimate for certification.	The fee schedule is sent out with the OSP for update or application, when application or update is received, a letter with estimated inspection fees is sent.		
	Minor Is	sue, Noncompliance, and Adverse Action Process		
21	Who (job title/position description) makes the determination on whether to issue a minor issue, noncompliance, proposed adverse action, and adverse	Program Manager, Program Assistant		
22	When operations submit corrective actions or a rebuttal, who (job title/position description) reviews the materials and determines whether they are adequate? <u>Table 8</u>	Program Manager, Program Assistant		
23	How many minor issues have been issued since the last onsite audit?	~300		
24	How many noncompliances have been issued since the last onsite audit?	96		

	SECTION I – Certifier Information <u>Table of Contents</u> <u>Closing Meeting Findings</u>		
25	How many proposed suspensions have been issued since the last onsite audit?	19	
26	How many proposed revocations have been issued since the last onsite audit?	0	
27	How many certification denials have been issued since the last onsite audit?	1 (Red Mountain Ranch)	
28	How many suspensions have been issued since the last onsite audit?	8	
29	How many revocations have been issued since the last onsite audit?	0	
30	How many certified operations are currently appealing issued proposed adverse actions?	3	
31	How many settlement agreements were established with operations since the prior onsite audit?	2015: 0 2016: 2 2017: 0	

έ: 	SECTION I – Certifier Information <u>Table of Contents Closing Meeting Findings</u>		
32	Are settlement agreements in accordance with the guidance provided by the NOP training module? <u>http://www.ams.usda.gov/NOPTraining</u> (Click on Appeals Update)	Yes	
		Material Input Review	
33	Does your organization offer material input program services (i.e. issue certificates for organic material inputs)?	No	
34	What is the certifier's process for conducting material reviews and making determinations on allowable vs. prohibited substances for those substances that have not been reviewed and approved by another entity? (See Policy Memo 11-4. This includes another certifier, the EPA, or an ISO Guide 17065 accredited material evaluation program.)	Please see Attachment D – Input Materials Review Policy	
35	Where in your Quality or Program Manual is your material input procedures described?	In the Input Materials Review Policy (Attached)	
36	Does your organization approve liquid nitrogen fertilizers (LNF) with a nitrogen content greater than 3%?	Only in conjunction with a particular operation's OSP, and not without verification of inspection by an MRO, per NOP Guidance 5012	

	SECTION I – Certifier Information <u>Table of Contents</u> <u>Closing Meeting Findings</u>		
		Pesticide Residue Sampling	
37	Number of pesticide residue tests conducted during the calendar years since the last assessment.	2015: 11 2016: 5 2017: 0	
38	Was all pesticide sampling conducted by the certifier? If not, explain.	Yes	
39	Describe your organization's annual sampling program.	A crop is selected for sampling in discussion with the CDA lab. Operations growing the selected crop are chosen, and inspectors assigned.	
40	Names of labs conducting pesticide residue analysis for your organization? Are all the labs ISO 17025 accredited?	Pacific Agricultural Laboratory (PAL), who is ISO 17025 accredited, and Colorado Department of Agriculture Laboratory, also ISO 17025 accredited	
41	Are all inspectors equipped and trained to collect samples? What equipment and documents are provided to them?	Yes, PAL Chain of Custody or CDA Residue Testing Form, for equipment, please see Attachment L, Sampling Equipment List, taken from CDA Residue Sampling Procedures and Guidelines (Field Services document)	
	Other	Accreditation and Certification Information	
42	Describe your organization's record keeping system. For example, all electronic database, all paper documents, hybrid system, etc	Electronic document control system housed on shared drive, administered by the program manager	

1	SECTION I – Certifier Information <u>Table of Contents</u> Closing Meeting Findings		
43	Does your organization contract or partner with any organizations to conduct certification or accreditation services on your behalf (e.g. inspections, inspector evaluations)? If so, briefly summarize here and complete Table 9.	No	
44	How many unannounced inspections were conducted since the prior onsite audit? § 205.403(a)(2)(i-iii)	2015: 10 2016: 11 2017: (4 assigned so far in 2017)	
45	Describe how your unannounced inspections are selected.	Selected based on complaint, risk assessment, and random selection	
46	Number of surrenders since the last onsite audit?	2015: 10 2016: 10 2017: 2	
47	Do you certify Private Label operations that do not physically handle organic products but contract with co-packers?	No operations that are exclusively private label. A few operations certified for processing may have a few items produced by another certified organic facility.	
48	Describe your organization's external and internal training program for NOP certification staff and contractors (if applicable)?	2 annual in-house trainings with full organic staff, spring generally April, utilizes information from annual NOP training held at ACA meeting.	

	]	SECTION I – Certifier Information Table of Contents Closing Meeting Findings
49	Describe your annual certification personnel performance evaluation program? Are annual performance evaluations conducted on all certification personnel? Are annual field evaluations conducted on all inspectors?	Annual performance evaluation based on state HR criteria. All personnel annually evaluated, all inspectors receive annual field evaluations.
50	Do any certified operations import or export organic products under established organic trade agreements (equivalency, recognition, or export arrangement)?	Yes
51	Does your organization have the following:	
	Quality Manual	Yes (not names as such, CDA Policies and Procedures Manual)
	Organizational Chart	Yes
2	Program Manual	Yes (not names as such, CDA Policies and Procedures Manual)
	Standard Operating Procedures	Yes
	Control List of documents and	Yes
52	When was the date of the most recent annual review? Who conducted the review?	October 13, 2016, conducted by Don Brooks, Field Services Supervisor, CDA

How to complete this audit planning worksheet – see instructions below the section tables.

Date:7/10/17				
Audited Party	Colorado	Accreditation	Graham Davis	
	Department of	Mgr.(AM)		
	Agriculture (CDA)			
State/Country	Colorado	Lead Auditor	Penny Zuck	
Audit ID	NP7219PZA	2 <sup>nd</sup> Auditor		
Audit or Assessment	Renewal	Technical Assistant	Graham Davis	
Type (Renewal,				
Compliance, Mid-				
term, etc)				
Audit Activity Dates	August 7-11, 2017	Evaluator		
Audit Plan and Cost		Reviewer's name:		
Estimate Review Date		(Completed by NOP		
(Completed by NOP		Lead Auditor, NOP		
Lead Auditor, NOP		Management, or LPS		
Management, or LPS		Supervisor)		
Supervisor)				

Section 1: General Audit Information (Completed by Lead Auditor)

Section 2: Audit Planning Information (Completed by Lead Auditor)

Accreditation Activity	Review of all policies and procedures; implementation of corrective
Focus (e.g. Handling,	actions for prior noncompliances; material review process; adverse
Crops, Livestock,	action process; international trade; sampling and unannounced
Material review,	inspections.
Adverse Action	
Procedures, Residue	
sampling actions,	
Annual Audit	
Priorities, etc)	
Commodity Focus	NA
(grains, wine, fruit,	
dairy products, etc)	
Certified Operation	All scopes for WA and/or RA according to NOP 2000
Type Focus (e.g. Fruit	
Packing facilities,	
Brokers, Reinstated	
operations, Dairies,	

Proposed Audit	Witness Audits of all scopes; Certification File Reviews; Corrective
Methods or Activities	Action Verification
(e.g. Corrective	
Actions Verification,	
Witness and/or	
Review Audits, Desk	
Audits, etc.)	

## Section 3: Noncompliance Corrective Action Verification (Completed by AM) Completed by the AM Date: \_\_\_\_\_

NC ID	Audit,	Description of NC/CA or hyperlink			
	Settlement				
	Agreement				
	or other				
NP5159RKA	2015 Mid- term	NP5159RKA.NC1 – Accepted. 7 CFR §205.501(a)(21), states that certifiers must "Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary." NOP 2613, Responding to Results from Pesticide Residue Testing, Section 5.3.1.a.2 instructs certifiers that when the pesticide test analysis results indicate detection below 5 percent of the EPA tolerance, but above .01 ppm, they are required to assess why the residue is present.			
		<b>2015 Comments</b> : The certifier correctly issued a letter to an operation to investigate the source of contamination (Chlorpropham .592 mg/g) including a date by which the operation was to respond. The operation did not respond by the specified date and the certifier did not conduct a follow up. Therefore, the certifier was unable to assess why the residue was present and to determine if a noncompliance should be issued to the operation.			
		<b>2015 Corrective Action:</b> CDA updated their Organic Policy and Procedure Manual regarding procedures when residue tests show positive results below 5% of the EPA tolerance. CDA will issue a notice of noncompliance to operations that do not respond to their letter of investigation within the time period stated in the letter. A notice of noncompliance was sent to the operation regarding no response to the letter investigating the source of the contamination.			
		NP5159RKA.NC2 – Accepted. 7 CFR §205.501(a)(21), states that certifiers must "Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary." NOP 4009, "Who Needs to be Certified?" provides clarification to certifiers regarding the certification requirements for operations that produce or handle agricultural products to be sold, labeled or represented as organic.			

	<b>2015 Comments:</b> During the witness audit of a fruit producer, the auditor identified that one of the apple orchards listed in the operation's OSP should be considered a separate certified entity. Under the current arrangement between the orchard owner and the certified operation, the orchard owner is under contract to sell his harvested fruit to the certified operation, but the certified operation does not manage the orchard (i.e. conduct cultural practices, pay labor, etc.), does not purchase and apply inputs, and does not maintain all the records that demonstrate compliance to the regulations.
	<b>2015 Corrective Action:</b> CDA issued a notice of noncompliance to the fruit producer, identifying that contracted farming operations are not allowed to be certified under another entity's certificate. CDA provided training for inspectors on June 26, 2015, regarding NOP Instruction 4009 and a Training Attendance sign-in sheet was submitted.
	<b>NP5159RKA.NC3</b> – <b>Accepted</b> . 7 CFR §205.403(c)(1) states that, "The on-site inspection of an operation must verify: The operation's compliance or capability to comply with the Act and the regulations in this part"
	<b>2015 Comments:</b> During a witness audit, the inspector did not fully verify whether the contracted or rented fields in the operator's OSP were under the control (management) of the certified operation.
	<b>2015 Corrective Action:</b> A new inspection report cover sheet was created to be used in conjunction with new OSP module system being developed. Included in the cover sheet is a question specifically requesting information regarding control/management of rented portions of the certified operation. CDA trained inspectors on April 7, 2016, regarding use of new inspection forms and the cover letter.
	NP5159RKA.NC4 – Accepted. 7 CFR §205.403(d) states that during an exit interview, "the inspector mustaddressany issues of concern."
	<b>2015 Comments</b> : During a witness audit of a split and parallel operation, the inspector did not identify as an issue of concern the lack of adequate controls to prevent contamination of products or fields. The storage of pesticides and fertilizers did not have a clear separation of approved and unapproved input materials. Input materials were located at spray rig filling stations in drums that were unlabeled. Brand names and sources are not listed on the OSP Input List; instead, some materials are listed with a generic identification: e.g. garlic oil, manganese, iron, sodium bicarbonate.

	<b>2015 Corrective Action:</b> CDA updated the Crop OSP Module 10 Soil.Ferility Inputs and Module 12 Weed.Pest.Disease Inputs to require the operation to include product names and manufacturers, to ensure full information (rather than just generic names) are included in the OSP. CDA also provided training on June 26, 2015, to inspectors regarding identifying issues of concern during inspections.
	<b>NP5159RKA.NC5</b> - 7 CFR §205.402(a)(2) states that "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"
	<b>2015 Comments</b> : The certifier approved a "Made with Organic ***" granola cereal label that displayed the word "organic" on the front panel with no "Made with Organic" phrase.
	<b>2015 Corrective Action:</b> CDA issued a notice of noncompliance to the operation for the noncompliant cereal label. CDA updated the Organic System Plan Review Procedures Rev B 6.7 manual stating that the CDA logo, and USDA seal may not be used on the label of products certified to the "Made with Organic ***" labeling category. Training on label review is planned for June 17, 2016.
	<b>NP5159RKA.NC6</b> – <b>Accepted</b> . 7 CFR §205.403(e)(1) states that "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."
	<b>2015 Comments</b> : During a witness audit, a pesticide residue sample was obtained and proper sampling procedures were followed, with the exception that the operator was not provided a receipt.
	<b>2015 Corrective Action:</b> CDA updated the Sampling Form to clearly indicate that the pink sheet stays with the operation when samples are taken to serve as a receipt. Training was conducted on June 26, 2015, for all organic inspectors. The proper use of sampling forms, including leaving a copy with the operation as a receipt, was presented during the training.
	NP1595RKA.NC7 – Accepted. 7 CFR §205.662(c) states, "Proposed suspension or revocation. The notification of a proposed suspensionshall state: (3) The impact of a suspension"
	<b>2015 Comments</b> : The auditor reviewed three letters of Notice of Proposed Suspension (NoPS) issued to clients. Two of the three letters issued do not explain the impact of the NoPS as stated in 205.100(a) "each production or handling operationthat 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 (specified ingredients or food group(s))" must be certified" The auditor noted a discrepancy between the letters issued to clients and the CDA NoPS template, which actually does include language stating that "the operation will be unable to sell, or label its product as organic."
	<b>2015 Corrective Action:</b> The notice of proposed suspension and combined notice of noncompliance and proposed suspension letter templates were updated to specifically state the impact of suspension. CDA created a document control system to ensure only the most current version of documents and letter templates are used in the future. Inspectors were trained on document control during the April 7, 2016 training.
	<b>NP1595RKA.NC8</b> – <b>Accepted</b> . 7 CFR §205.510(b)(2) states, "Records created by the certifying agent regarding applicants for certification and certified operations must be maintained for not less than 10 years beyond their creation."
	<ul> <li>2015 Comments: In at least 3 files that were reviewed, the records of registered e-mails sent to the clients were not available during the audit. Currently, CDA sends registered e-mails from individual employee accounts and the delivery receipt required per 7 CFR §205.660(d) is not always retained (either electronically or as a hard copy).</li> <li>2015 Corrective Action: CDA adjusted the Policy and Procedures Manual to clearly outline the current process for issuance of notices, and created a new requirement to save the documentation that the noncompliance was received by the operation. A copy of the documentation is saved electronically in the operation's Company Specific Information folder in the shared organic folder on the CDA server. Training was provided to the Program Manager and Certification Specialist on May 19, 2016.</li> </ul>
AIA16120RK	AIA16120RK.NC1 – Rebutted and accepted
	AIA16120RK.NC2 –Accepted— 7 CFR § 205.501(a)(3) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670."
	<b>2016 Comments:</b> <i>CDA did not conduct adequate surveillance of a crop operation including its website to ensure compliance with the USDA organic regulations. The following issues were identified:</i>
	• CDA did not issue a noncompliance to the operation for its use of the word "organic" in the company name and labels on uncertified products.

<ul> <li>CDA did not issue a noncompliance to the operation for use of the USDA seal on the website pages advertising uncertified products.</li> <li>2016 Corrective Actions: CDA has updated the Organic System Plan</li> </ul>
to specifically request website URL's from certified operations. All review personnel have been trained to review an operation's website for compliance with the USDA organic regulations, including organic marketing claims, use of the USDA organic seal, and the use of trade names with the word "organic" in them. CDA provided verification of staff training on these topics.

# Section 4: Compliance & Enforcement Division (Completed by AM)

Discuss	Date:			
Case ID	Description of issue, hyperlink, and specific request			
NOPC-253-17	C&E has one open case against A	Aurora High Plains Dairy, submitted by		
	Cornucopia Instit	itute on May12, 2017.		
38				

## Section 5: NOP Appeals Input (Completed by AM)

Discussed with NOP Appeals staff: \_\_\_\_Shannon Nally Yanessa\_\_\_Date: \_\_7/10/2017\_\_\_

Case ID	Description of issue, hyperlink, and specific request				
	One active appeal with CDA. The appellant is Berry Patch Farms. P:\Appeals\17-022 Berry Patch Farms				
	Also from Shannon, "I also wanted to pass along a general observation regarding CDA appeals. We have received several appeals involving CDA where mediation would be a good option to resolve a proposed adverse action. However, CDA has declined such mediation requests. I can be more specific if needed."				

# Section 6: Other AM Notes (Completed by AM)

Reference ID	Description of issue		
NP7162PZA (Compliance Audit- Aurora Dairy)	<ul> <li>NP7162PZA.F1 - 7 C.F.R. §205.670(d) states, "A certifying agent must, on an annual basis, sample and test from a minimum of five percent of the operations it certifies, rounded to the nearest whole number. A certifying agent that certifies fewer than thirty operations on an annual basis must sample and test from at least one operation annually"</li> <li>Comments: CDA did not conduct residue sample testing of at least 5% of the total operations in 2016.</li> <li>Auditor Notes: CDA did not conduct residue sampling during the Witness Audit as part of this Compliance Audit.</li> </ul>		

<b>NP7162PZA.F2</b> – 7 C.F.R. §205.662 (e)(1) states, "If the operation fails to correct the noncompliance, to resolve the issue through rebuttal or mediation, or to file an appeal of the proposed suspension, the certifying agent shall send the certified operation a written notification of suspension"
<b>Comments:</b> CDA accepted corrective actions from one operation it had issued a Notice of Proposed Suspension to in 2016. CDA also allowed three operations to voluntarily surrender after being issued a Notice of Proposed Suspension.
<b>NP7162PZA.F3</b> – 7 C.F.R. §205.663 states, "Any dispute with respect to denial of certification or proposed suspension or revocation of certification under this part may be mediated at the request of the applicant for certification or certified operation and with acceptance by the certifying agent. Mediation shall be requested in writing to the applicable certifying agent."
<b>Comments:</b> CDA issued a settlement agreement to an operation they had sent a Notice of Proposed Suspension without receiving arequest for mediation in writing.
<b>NP7162PZA.F4</b> – 7 C.F.R. §205. 402(a)(2) states, "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;" §205.206(e) states that an Organic System Plan must include, "Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations." <b>Comments:</b> For the witness audit, the auditors reviewed the operation's records maintained by CDA. The file contained a list of inputs, however CDA did not record the review of the materials and if they were allowed.
<b>Auditor Observations:</b> While reviewing the C&C file, a new electrolyte was asked for at IR and inspector said it was submitted, and it was added to the material list. There was no indication it was evaluated by CDA. The pending material review was not communicated to the operation at final review. The electrolyte currently being used was not on the current 2016 materials list, but was found in the 2015 file. No issues were listed in the exit interview.
<ul> <li>NP7162PZA.F5 – 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 2027, "Personnel Performance Evaluation," Section 3.2b states, "Inspectors should be evaluated during an onsite inspection by a supervisor or peer (another inspector) at least annually."</li> <li>Comments: CDA did not conduct field evaluations of all inspectors in 2016. Five of the twelve inspectors did not receive field evaluations.</li> </ul>
<b>NP7162PZA.F6</b> – 7 C.F.R. §205.403(d) states, "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-

	star to consider a The transmission exception is a defined at the second flow of the transmission of the second
	site inspection. The inspector must also address the need for any additional information as well as any issues of concern."
	<b>Comments:</b> During the witness audit the inspectors did not note items of concern and additional information requested of the operation in the exit interview. The inspectors verbally communicated concerns and additional information needed, but did not note the items in the exit interview.
	<b>NP7162PZA.F7</b> – 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 states, "If an operation plans to add new products, fields, operations, or labels to its OSP, then the certifier must first approve these changes and issue an updated certificate. A request to add new fields, animal species, or facilities would require an additional onsite inspection."
	<b>Comments:</b> A CDA inspector conducted the inspection of a new facility to be added to a certified operation's certification, however, an inspection report was not processed or reviewed by CDA and a decision was not issued to the certified operation.
	<b>NP7162PZA.F8</b> – 7 C.F.R. §205.403(b)(2) states, "All on-site inspections must be conducted when land, facilities, and activities that demonstrate the operation's compliance with or capability to comply with the applicable provisions of subpart C of this part can be observed, except that this requirement does not apply to unannounced on-site inspections.
	<b>Comments:</b> CDA conducted the annual inspection of a dairy operation during the non-grazing season. No additional inspections were conducted during the grazing season.
Annual Reports	P:\AIA\ACA-Active\CDA-CO\Ann Repts\2016\AnnualReportChecklist 2016 Update NOP 2024 GD.pdf
	P:\AIA\ACA-Active\CDA-CO\Ann Repts\2015\Ann Rpt docs\CDA Annual Report Checklist JL.pdf
	\\Ann Repts\2014\CDA Annual Report Checklist RGKreviewed.pdf

AM must insert links to the current certifier annual report folder, prior Auditor Checklists (NOP 2005 series) folder. AM may include other materials and links relevant to certifying agent that are deemed essential. For example: Any correspondence between AIA and ACA related to policy decisions or certifier questions that may be relevant to the audit.

### Purpose of Planning Worksheet:

This completed planning document serves as a record of the purpose, scope, objectives, and priorities of the audit or review.

This document will:

- 1. Record special instructions to the Lead Auditor in order for the Lead Auditor to plan and execute an audit or review of certifiers or other entities.
- 2. Be submitted by the Lead Auditor along with the completed NOP 2005 series checklists to the NOP or QAD upon completion of the audit or review.

### Instructions:

- 1. Lead Auditor is assigned.
- Lead Auditor retrieves a blank template of the Auditor Special Instructions:
   Z:\AIA\Templates\Audits\Planning and Preparation\Auditor Special Instructions 03 25
   16.docx
- 3. Lead Auditor partially completes Section 1, Auditor Special Instructions, with available information.
- 4. Lead Auditor sends a copy of the Auditor Special Instructions to the NOP Accreditation Manager (AM). The List of Accreditation Managers and their assigned certifying agents is located here: Z:\AIA\Management\ACA-AM List
- 5. AM will place the received copy of the Auditor Special Instructions into the Certifying Agent's electronic folder and will provide the Lead Auditor a link (full directory path) to the location of the document.
- 6. AM to complete Sections 3, Auditor Special Instructions, and will contact the various representatives of the NOP Divisions or sections (e.g. Appeals) to obtain information necessary to complete Sections 4, 5, and 6, Auditor Special Instructions. In Section 6, the AM identifies the most recent Annual report materials and the most recent audit checklists (NOP 2005 series). The AM may place links in the Sections of the Auditor Special Instructions document allowing the Lead Auditor to connect to the various documents and/or folders.
- 7. The AM will inform the Lead Auditor when Step 6 is complete.
- 8. The Lead Auditor reviews the information in the Auditor Special Instructions provided by the AM. The Lead Auditor uses the information and any information obtained from contact with the certifier (email or telephone) to draft Section 2 of the Auditor Special Instructions. When drafting Section 2, the Lead Auditor should use all available resources: Organic Integrity Database, Prior Auditor Checklists, Most Recent Annual Report, Audit Priorities, etc...)
- 9. Lead Auditor contacts AM to explain and discuss the proposed components of Section 2, Auditor Special Instructions. The AM may provide suggestions or guidance to the Lead Auditor. This step is the opportunity for the AM to clarify with the Lead Auditor any of the materials provided and any special instructions.
- 10. The Lead Auditor finalizes the Auditor Special Instructions.
- 11. The Lead Auditor submits the Auditor Special Instructions along with a draft engagement letter and draft QAD 1415 to the NOP Lead Auditor (Lars Crail) for review.

- 12. NOP Lead Auditor (Lars Crail) will review the draft documents and may request clarification of the information and/or request modifications and conduct an additional review if necessary.
- 13. NOP Lead Auditor (Lars Crail) will complete the bottom row of Section 1, Special Auditor Instructions, and will notify the Lead Auditor and AM when this is completed.



Quality Assessment Division 1400 Independence Avenue SW Room 3932-S Washington, DC 20250

July 12, 2017

Mitch Yergert Colorado Department of Agriculture 305 Interlocken Parkway Broomfield, CO 80021

Dear Mr. Yergert:

The Quality Assessment Division (QAD) has received notification from the National Organic Program (NOP) to conduct a renewal assessment of the Colorado Department Of Agriculture (CDA) organic certification program in accordance with the USDA organic regulations (7 CFR Part 205). In order to proceed, please provide us notification agreeing to this assessment. Notification must be received by **Thursday, July 20, 2017** and must be sent by e-mail to <u>AIAInBox@ams.usda.gov</u> and copied to Graham Davis, Graham.Davis@ams.usda.gov. If CDA does not agree to the assessment, then the QAD cannot proceed, and the NOP will be notified.

If CDA agrees to this assessment, the attached document, *GVD 1415A Form, Estimate of Audit Service*, needs your immediate attention. Costs incurred to conduct the assessment are the responsibility of CDA. The attached estimate outlines the projected cost for the assessment, minus any payments previously submitted to the QAD that have been credited to your account. If a payment was submitted to the QAD or NOP and is not reflected in the estimate, please contact the National Billing Office (<u>QAD.BusinessOps@ams.usda.gov</u>) to ensure your account is properly credited.

Colorado Department of Agriculture will be billed by the GV Division for the actual costs of the audit after the audit takes place. Payment may be made by cashier's check, money order, credit card, or electronic fund transfer. Specific information about the payment options is included as an attachment to this letter. **Please be sure to include your FMMI Customer Number** [3123219] with your payment.

To assist the QAD in scheduling the assessment in a timely and cost effective manner, completed and signed copies must be received by **Thursday**, **July 20**, **2017**:

- 1. Estimate of Audit Services, QAD 1415
- 2. Application for Service, LPS-109
- 3. Application for Accreditation, TM-10CG

If these documents are not received by the indicated date, then the assessment cannot proceed, and the QAD will notify the NOP. Please submit the signed copies to the <u>AIAInBox@ams.usda.gov</u>, <u>Graham.Davis@ams.usda.gov</u>, and <u>QAD.AuditService@ams.usda.gov</u>).

In order to be properly prepared for the assessment, please ensure that the following documents are available for review when we arrive to the CDA office:



Quality Assessment Division 1400 Independence Avenue SW Room 3932-S Washington, DC 20250

- 1. Procedures and checklist or form (if one is used) for how labels are reviewed and approved.
- 2. Procedures and checklist or form (if one is used) for how inputs, processing aids, and materials are reviewed and approved.
- 3. A list and the files of operations that surrendered their USDA organic certification.
- 4. A list of all samples that were collected to verify compliance to the standards since the previous assessment. The list should indicate: sample date; operation; item(s) sampled; reason for sampling; test results; and actions taken by STEL and the operations.
- 5. A list and the files where the operations were denied certification since the previous onsite assessment.
- 6. Files where the operations were issued a notice of proposed suspension and a list of the operations (if any) that were issued a notice of proposed suspension since the previous onsite assessment.
- 7. Files where the operations were issued a notice of proposed revocation and a list of the operations (if any) that were issued a notice of proposed revocation since the previous onsite assessment.
- 8. Files where operations were issued a notice of suspension or revocation and a list of operations (if any) that were issued a notice of suspension or revocation since the previous onsite assessment.
- 9. A list of complaints received about certified operations and their files. Include in the list how many investigations have been conducted since the previous onsite assessment and the outcome.
- 10. A list and information on any willful violations of the USDA organic regulations (if any) and the actions taken by CDA.
- 11. A list of operations and their files where the operations rebutted a notice of noncompliance and the follow-up actions taken by CDA.
- 12. A list of operations and their files where the operations requested mediation or appealed a certification decision and the results.
- 13. A list of operations that export products under any US organic trade agreements (e.g. Canada, Japan, EU, Korea, Taiwan) to include the countries they export to and how many import certificates or attestation statements were provided to those operations since the previous onsite assessment.
- 14. A list of certification personnel training since the previous onsite assessment.
- 15. Conflict of Interest and Confidentiality statements for certification personnel.
- 16. Certification personnel performance evaluations.
- 17. Certification personnel resumes or curriculum vitaes (CVs).
- 18. CDA's most current Annual Program Review and information on correction of any identified noncompliances.

We request the following items prior to arrival at your offices. Please submit the following items electronically by **Friday July 28, 2017** to the USDA Cloud Vault (instructions will be sent to you). For Items 1 - 3 and 7; please submit these tables in a file(s) formatted to MSWord:



Quality Assessment Division 1400 Independence Avenue SW Room 3932-S Washington, DC 20250

- Complete the attached Table 8. For the last three columns, i.e. COI, Confidentiality, and Perf Eval, indicate the dates these records were last completed. An employee or contractor resume may be used as a substitute for filling in the other columns (e.g. education, training, job description, etc...). If resumes or CVs are used, state: "See Resume or CV" in the appropriate column. Do not submit the resume or CV; please have those records available for the auditors review at your office.
- 2. Complete or update attached Table 9 for all locations where certification and accreditation activities occur.
- 3. Complete the attached Section I table. If procedures are detailed in CDA's Quality Manual, Certification Program Manual, and/or work instructions, please indicate the Section I table the reference number and section or page number.
- 4. A list of all quality control documents for USDA organic certification. Please indicate the control number (if applicable), title of the document, description of the document, and language.
- 5. A current edition of the CDA Quality Manual and/or NOP Certification Manual with all Standard Operating Procedures, Work Instructions, and certification templates (e.g. OSP, Inspection Report, Notice of Noncompliance, etc...).
- 6. The following certification files (a-j):
  - a. Boulder Altan Alma Organic Farm, Boulder, CO (Crops, Handling)
  - b. Jones Farms Organics, Hooper, CO (Crops)
  - c. Morton's Orchards, Palisade, CO (Crops, Handling)
  - d. Monroe Organic Farms, Kersey, CO (Crops)
  - e. White Buffalo Farm, Paonia, CO (Crops, Handling)
  - f. Earthstar Farms, Boulder, CO (Crops, Handling, Wild Crops)
  - g. Bieser Creek Cattle, Glade Park, CO (Livestock,
  - h. C & C Cattle Co., Brush, CO (Crops, Livestock)
  - i. Twisted Root Organic Farm, Paonia, CO (Crops, Livestock)
  - j. Yoder Farms, Trinidad, CO (Crops, Handling, Livestock)

For the purpose of the audit, the files should contain <u>at a minimum</u> the following items (limited to the most recent 1-2 years):

- **a.** Complete OSP (including labels, material/input lists, product(s) composition, etc...)
- **b.** Current Organic Certificate.
- **c.** Most recent inspection report(s)
- **d.** Notices issued during the last certification cycle (e.g. Minor Issues, Noncompliances, Proposed Adverse Actions, etc...)
- e. Review Checklist(s) and certification decision for the last certification cycle (e.g initial review, certification decision documentation, label reviews, materials reviews, etc...)
- f. Initial application (if applicable)



Quality Assessment Division 1400 Independence Avenue SW Room 3932-S Washington, DC 20250

- g. Internal Control System (ICS) quality manual(s) or document(s) (only for grower groups)
- 7. Complete the attached NOP 2005 Table 1 and Table 2 using the files in #6, a-j
- 8. For all proposed witness or review audits conducted during this onsite assessment, please send the following documents for each operation:
  - **a.** Organic System Plan
  - **b.** Internal Control System (ICS) quality manual(s) or document(s) (only for grower groups)
  - c. Most recent Inspection Report
  - **d.** All notifications to the operation since the last inspection.
  - e. Organic certificate
  - f. Inspector's resume or CV (for Witness Audits only)
  - g. Inspector's current contact information (for Witness Audits only)
  - **h.** Inspector instructions.
- 9. Please be prepared to provide an update on all corrective actions accepted by the NOP for prior issued noncompliances

If any of the above documents or records were sent to the NOP with your current Annual Report and have not changed, please indicate so and the auditors will use those records.

If you have questions or concerns regarding this request, please contact me at 202-692-0047 or <u>Graham.Davis@ams.usda.gov</u>.

Sincerely,

Graham Davis Auditor USDA, AMS, LPS, QAD (Attached)

Enclosure: QAD 1415A Form "Estimate of Audit Services" LPS-109 Form "Application for Services" TM-10CG, "Application for Accreditation" NOP 2005, Section 1 NOP 2005, Table 1 NOP 2005, Table 2 NOP 2005, Table 8 NOP 2005, Table 9



Quality Assessment Division 1400 Independence Avenue SW Room 3932-S Washington, DC 20250

CC: Penny Zuck, Auditor AIAInbox Quality Assessment Division (QAD)

### **Attachment 1: Payment Options**

Clients have four payment options: (1) check; (2) money order; (3) credit card; and (4) electronic funds transfer. Information about each option is outlined below.

**Check or Money Order:** Checks and money orders must be made payable to "USDA, AMS, LPS, QAD." Your FMMI Customer Number <u>must</u> be placed on the memo section of the check or money order.

Checks and money orders are mailed to a lock box at the U.S. Bank. Checks and money orders may be sent by overnight mail or regular mail, using the appropriate mailing address below. Please note that checks and money orders sent by regular mail may not be received in a timely manner. Questions may be directed to US Bank Customer Service at (314) 418-6635.

*Overnight Mailing Address:* U.S. Bank Attn: Government Lock Box 790304 1005 Convention Plaza St. Louis, MO 63101 *Regular Mail Address:* USDA, AMS, LPS, QAD PO Box 790304 St. Louis, MO 63179-0304

Please note: Effective October 1, 2012 the lockbox bank (U.S. Bank in St. Louis) no longer processes checks drawn from foreign banks with no identifiable U.S. affiliated bank or those with the words "Payable in U. S. Dollars" or "U.S. Dollars" imprinted on them. When the lockbox bank receives these checks, they are sent to the Billings and Collections Team (BCT) in Minneapolis, MN. BCT bundles these checks together and sends them to CITI Bank for processing. CITI Bank will not confirm the deposit of any such check until all of the checks in the bundle have fully cleared. This process may take anywhere from 3 to 21 business days.

Payments that are not cleared in a timely manner may result in the issuance of dunning notices, demand letters, and/or the assessment of interest fees. Clients that make payments by checks drawn from foreign banks are encouraged to make future payments using other options such as issuing checks from U.S. banks (or foreign banks with U.S. affiliates), paying via credit card, or using the Pay.Gov system.

### Credit Card:



Quality Assessment Division 1400 Independence Avenue SW Room 3932-S Washington, DC 20250

Credit card, debit card and bank account payments are now being accepted through PAY.GOV. If you need assistance please contact the National Billing Office, (501)312-2962 or <u>QAD.BusinessOps@ams.usda.gov</u>

Be advised of the following Pay.Gov payment limits:

### **Credit Cards**

• Up to a total of \$24,999.99 for all transactions with one or more U.S. Government agencies conducted on the same day using the same credit card.

### **Debit Cards**

• No limit except for the funds available in your account.

### **Bank Accounts**

• Up to \$99,999.999.99 per transaction, limited by the funds available in the account.

To submit payment, follow these steps:

- Step 1: Go to <u>www.pay.gov</u>
- **Step 2:** Click on "Make a Payment"
- **Step 3:** Enter "AMS" in the search box under #2 at the bottom of the screen
- **Step 4:** Select "continue to the form" under USDA AMS Account Statements
- Step 5: On Accepted Payment Methods screen, click on "continue to the Form".
- **Step 6:** Fill out the AMS form
- Step 7: Select payment method
- **Step 8:** Enter payment information.
- Step 9: Review and submit payment
- Step 10: Check box to receive email confirmation
- **Step 11:** Enter all email addresses to receive payment confirmation
- **Step 12:** Check the payment authorization box.
- Step 13: Click "Submit"

Please enter this address for payment confirmation to AMS, LPS, QAD: QAD.BusinessOps@ams.usda.gov



Quality Assessment Division 1400 Independence Avenue SW Room 3932-S Washington, DC 20250

### **Electronic Fund Transfers (EFT):**

The USDA has implemented procedures for Electronic Fund Transfers (EFT) through the Federal Reserve Bank. Any fees associated with the transfer are the responsibility of the remitter; please check with your financial institution to make sure there are no surprises.

The following information should be included with your payment. We also request that you send an email of this information to make sure we are able to identify the payment. The information can be sent to <u>ABShelpline@aphis.usda.gov</u>:

- 1. Organization Name / Company Name
- 2. FMMI Customer number
- 3. Purpose of payment
- 4. Contact name and number

**Automated Clearing House (ACH)** transactions are processed through Remittance Express by the Federal Reserve Bank of Richmond. The process accepts information in the Cash Concentration and Disbursement (CCD) or the Corporate Trade Exchange (CTX) formats. You will need the following information to remit a payment:

ABA: Name on Account:



USDA, Marketing and Regulatory Programs (MRP), Agricultural Marketing Service (AMS) (b) (6)

Account Number:

**Wire transfers** are processed through the Federal Reserve Bank of New York. You will need the following information to remit a payment.

ABA: Name on Account: Account Number:

(b) (6) USDA, Agricultural Marketing Service (AMS) (b) (6)

**International wire transfers**, remitters should send through a US bank or a correspondent bank before going to the Federal Reserve.

		Table 10 - Ma	terial Narrative						
	For a descri	ption of the Mater	ial Review Syste	em see Section 1					
Certification person	r's process for verification of material inputs (e.g. nel interviewed, documents or records reviewed, etc) of samples were selected and why they were selected.	CDA utilizes the Organii and Generic Materials I certified organic operat or for general identifica will be provided annual required documentatio renewed every 5 years	.ist. CDA will ONLY rev cion as part of an oper tion as approved by C ly with a list of materi n that must be submit	view input materials i ation s OSP. CDA doe DA. Certifier creates ials nearing renewal c tted for renewal; as n	n conjunction with ar s not review input m a Material Review list lates and oted above, input ma	n applicant for organi aterials on behalf of t for each operation.	c certification or a input manufacturer Certified operation		
§205.501(a)(8)	Does the Organic Systems Plan template section for materials comply with 205.201(a)(2)	Yes							
§205.403(c)(2)	Does the Inspection Report template adequately record verification of allowed materials?	Yes							
§205.501(a)(9)	Are there adequate records that demonstrate the request, review, decision, and notification for material inputs?								
§§205.501(a)(1), 205.501(a)(4), 205.501(a)(5)	Does the staff conducting the material reviews have the appropriate training, experience, and/or education to conduct the reviews along with appropriate resources?	CDA allows their inspec WSDA's lists of approve Manager can approve r	d products but will re	view and approval no	on-listed materials. O				
Auditor's assessme	ent of the material review and recording system.	CDA has a good system approved materials. CD when a material is not ( master list of approved	A has detailed instruction of the second sec	tions in their Input M ved. Lists for each op	aterials Review Polic eration are reviewed	y for how reviews are annually. In June of 2	e to be conducted		
		Material Review	v Sampled Even	ts					
	Client File, Internal List, Other (or N/A)	Boulder Altan Alma	Boulder Altan	Monroe Organic Farm	Twisted Root				
	Material (name) Material Use	Black Gold Potting Soil	Planet Ultra Dishwashing Liquid	Neptune Harvest Fish and Seaweed	Dipel DF				
	Certifier Determination (approved/unapproved)	potting soil approved	cleaning product approved	fertilizer approved	insecticide approved				
Regulation:	Question:		Indicate: y = '	'yes" or n = "no" wit	h compliance to the	regulations			
§205.501(a)(9)	Certifier Determination basis (e.g. OMRI, Other Certifier, Certifier Review, National List, NOP Guidance, etc)	OMRI	Certifier Review	OMRI	OMRI				
§205.501(a)(9)	Decision recorded and Decision maker identified?	Yes (Amy Stafford)	Yes (Amy Stafford)	Yes (Alyssa Mack)	Yes (Alyssa Mack)				
§205.501(a)(9)	Operator was notified of Decision?	Yes	Yes	Yes	Yes				
§205.501(a)(3)	Approval Decision was issued with appropriate conditions or restrictions? E.g. annotations, etc	N/A	Yes restricted, must have water rinse	N/A	Yes restricted 205.206				
§205.501(a)(1) and (4), §205.105(a)	Are all synthetic substances and ingredients listed in §205.601 or §205.603?	Yes	Yes	Yes	Yes				
	Is the material free of nonsyntheic substances prohibited in §205.602 or §205.604?	Yes	Yes	Yes	Yes				
	Are the nonag substances used in/on processed products in §205.605	N/A	N/A	N/A	N/A				
§205.501(a)(1) and (4), §205.105(d)	Are the ag substances used in/on processed products in §205.606?	N/A	N/A	N/A	N/A				
	Is the material and its ingredients produced without Excluded Methods (except for vaccines)?	Yes	Yes	Yes	N/A				
§205.501(a)(1) and (4), §205.105(f)	Is the material and its ingredients produced without Ionizing radiation?	Yes	Yes	Yes	N/A				
§205.501(a)(1) and (4), §205.105(g)	Is the material and its ingredients produced without sewage sludge?	Yes	Yes	Yes	N/A				
205.402(a)(2),	Are the materials and inputs used in compliance with the NL and annotations?								
205.406(c) Comments (Provide comments for any "no" responses):		Yes	Yes	Yes	N/A	l	1		

If the material/review is compliant with all questions, then mark a y = "y in this row only.	s" Yes	Yes	Yes	Yes			
---	-----------	-----	-----	-----	--	--	--



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 1 of 164

National Organic Program Accreditation Assessment Checklist		
Date:	August 7-11, 2017	
Assessment Identifier:	NP7219PZA	
Assessment Activity:	Documentation Adequacy Review	
(select one)	Pre-decisional Assessment	
	□ Initial Assessment	
	□ Mid-Term Assessment	
	$\sqrt{\text{Renewal Assessment}}$	
	Compliance Assessment	
4	□ Other	
	Company Information	
Name of Company:	Colorado Department of Agriculture	
Company Address:	305 Interlocken Parkwy	
City, State, Zip:	Broomfield, CO 80021	
Contact Name:	Mitch Yergert	
Title:	Director, Division of Plant Industry	
Phone No.:	303.869.9074	
Email Address:	Mitchell.yergert@state.co.us	
Location(s) of Program	Broomfield, CO	
Activities:	7 CED Dart 205 Matianal Organia Dragman Einel Dala datad	
Standards Applied:	7 CFR Part 205 National Organic Program, Final Rule, dated December 21, 2000; as amended.	
Scope of Program Activities:	Crops; Handling; Livestock; Wild Crops. Since the prior on site assessment: June 8-12, 2015	
Activities:	assessment. June 0-12, 2013	

NOP 2005 NOP Accreditation Assessment Checklist Rev08



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/2015 Page 2 of 164

Country(ies) of	
<b>Operation:</b>	
	Assessment Team
Team Leader:	Penny Zuck
Second Auditor:	Graham Davis
Other (Identify Role):	NA



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 3 of 164

# **TABLE OF CONTENTS**

		_
<u>§ 205.402(a)(1)</u>		
60. <u>§ 205.406(b)</u> (Schedule	61.	62.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 4 of 164

Subpart F—Accreditation of Certifying Agents Closing Meeting Findings					
-					
	· · · · · · · · · · · · · · · · · · ·	Í			
	~				



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 5 of 164

		24
		<u>§ 205.504(c)(1)</u>
<u>§ 205.504(a)(3)(i)</u>	<b>121.</b> <u>§ 205.504(b)(2)</u>	
	<u>§ 205.504(b)(6)</u>	
		23
	<u>§ 205.504(a)(3)(i)</u>	



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 6 of 164

Subpart G—Administrative Closing Meeting Findings					
<u>§ 205.642</u>					
Compliance					
	<b></b>	r			
<u>§ 205.661(a)</u>		<u> </u>			
<u>§ 205.663</u>					
	nd testing of agricultural produ	cts to be sold or labeled as			
	ganic," or "made with organic				
<u>§ 205.672(a)</u>					

NOP 2005 NOP Accreditation Assessment Checklist Rev08



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/2015 Page 7 of 164

	Worksheets and Findings				
Table 1	General Certification File Review Information				
Table 2	Summary of Certification File Review Information				
Table 3	Summary of Full File Reviews				
Table 4	Notice of Noncompliance / Adverse Action Worksheet				
Table 5	Notice of Noncompliance / Denial of Certification				
Table 6a	Label Review Worksheet - "100% Organic" or "Organic"				
Table 6b	Label Review Worksheet - "Made with Organic"				
Table 6c	Label Review Worksheet – All other labels reviewed				
Table 7a	Sample Testing Worksheet – General Information				
Table 7b	Sample Testing and Reporting Information				
Table 8	Personnel Information Worksheet				
<b>Findings</b>	Closing Meeting Findings				



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 8 of 164

# 1. PLANNING AND SCHEDULING OF THE ASSESSMENT

- Contact the NOP Accreditation and International Activities (AIA) Division Accreditation Manager and determine the scope of the assessment and the onsite assessment plan.
- □ Send an email using the appropriate template to schedule the onsite assessment. This should be done as early as possible. Planning of foreign assessments should start at least <u>6 months</u> before the anticipated assessment date. Scheduling of domestic assessments should start no later than <u>3 months</u> before the anticipated assessment date.
- Once the assessment date is scheduled with the accredited certifying agent (certifier), select the satellite office(s) and witness audit site(s) to be visited during the assessment. Check the AIA database and/or previous audit checklists for operations where witness inspections and review audits took place to avoid visiting the same operations.
- □ After the assessment sites and onsite schedule have been finalized, complete the audit plan, cost estimate, and appropriate letter regarding the assessment. Send these documents to the NOP Lead Auditor for review and approval.
- □ Send the above information via email using the appropriate template. *Remember to include attachments in the email and copy all of the personnel listed on the letter.*

# 2. PRE-ASSESSMENT ACTIVITIES

- Verify that the LPS-109 Application for Service is on file and is the current version. This does not apply to the pre-decisional assessment.
- Verify that form TM-10CG Application for Accreditation is on file and is the current version. This applies to initial and renewal applications only.
- □ Obtain and review the most recent copy of program documentation from the company.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 9 of 164

Title of	
documentation:	
Date or revision	
number of	
documentation:	

□ Review the previous audit report.

□ Review the previous corrective actions report, as applicable.

□ Review previous notices of noncompliance issued to the certifier.

□ Receive approval to conduct the assessment activity by obtaining a signed copy of the audit plan and cost estimate from the client.

#### Audit Schedule:

Date	Day	Location	Hour	Review Activity	Participants	Lodging
			S			
Aug 7, 2017	Mon	<ul> <li>Depart Washington</li> <li>Broomfield, CO</li> </ul>	20	<ul> <li>Travel from DC to CO – UA403(IAD →DEN) Depart: 08:33, Arrive: 10:24</li> <li>Drive to Broomfield, CO</li> <li>Opening Meeting – 1:00 PM</li> </ul>	NOP: Graham Davis / Penny Zuck	Aloft Broomfield/Denver 8300 Arista Place Broomfield, Co 80021 303.635.2000 \$178/\$69
Aug 8, 2017	Tues	<ul> <li>Broomfield, CO</li> <li>Greeley, CO</li> </ul>	16	<ul> <li>Conduct Office Audit</li> <li>Witness Audit Crops/Handling – Hungenberg Produce, Inc. – 8 AM</li> </ul>	NOP: Graham Davis / Penny Zuck	Aloft Broomfield/Denver 8300 Arista Place Broomfield, Co 80021 303.635.2000
Aug 9, 2017	Wed	<ul> <li>Fort Lupton, CO</li> <li>Longmont, CO</li> </ul>	16	<ul> <li>Witness Audit Livestock/Handling - Colorado Egg</li> <li>Witness Audit Processing – Madhava Honey</li> </ul>	NOP: Graham Davis / Penny Zuck	Aloft Broomfield/Denver 8300 Arista Place Broomfield, Co 80021 303.635.2000
Aug 10, 2017	Thurs	• CDA Office Broomfield, CO	16	<ul> <li>Continue Office Audit</li> <li>Closing Meeting - PM</li> </ul>	NOP: Graham Davis / Penny Zuck	Aloft Broomfield/Denver 8300 Arista Place Broomfield, Co 80021



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 10 of 164

						303.635.2000
Aug 11, 2017	Fri	• Travel from CO to DC	12	• Travel from CO to DC – UA712 (IAD →DEN) Depart: 11:05, Arrive: 16:25	NOP: Graham Davis / Penny Zuale	NA
				- • <b>r</b>	Zuck	



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 11 of 164

### 3. ONSITE ASSESSMENT ACTIVITIES

#### **Opening Meeting**

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

- □ Introduction of participants and their roles.
- □ Confirmation of assessment objectives, scope, and criteria.
- Confirmation of assessment timetable and any other relevant arrangement.
- **Review the assessment plan. Have there been any changes since it was approved?** 
  - 🛛 No
  - $\Box$  Yes What are the changes?
- Review the program documentation. Have there been any changes since the last assessment?
   No
  - $\Box$  Yes What are the changes?
- Have findings from previous assessments been addressed? (if applicable)
   Yes
   No
- □ Methods and procedures to be used to conduct the assessment.
- Confirmation of auditee's representative and formal communication channels.
- Confirmation that auditee will be kept informed of assessment process during the assessment.



- □ Confirmation that the resources and facilities needed by the assessment team are available.
- □ Confirmation of confidentiality matters.
- □ Confirmation of relevant work safety, emergency, and security procedures for the assessment team.
- □ Confirmation of the availability, roles, and identities of guides.
- Provide the method of reporting, and explain that findings (if any are identified) will not be classified as to severity.
   Determination of whether a finding is a noncompliance will be made by the NOP reviewer.
- □ Provide an opportunity for the client to ask questions.
- Explain the conditions under which the audit would be terminated.
- Explain that audit findings and associated information is releasable under the Freedom of Information Act (FOIA).

#### Complete the following Attendance List:

Name	Title or Position	Opening	<u>Closing</u>
Graham Davis	USDA-NOP	XX	XX
Penny Zuck	USDA-NOP	XX	XX
Mitch Yearget	CDA	XX	XX
Janis Kieft	CDA	XX	XX
Alyssa Mack	CDA	XX	XX

NOP 2005 NOP Accreditation Assessment Checklist Rev08



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 13 of 164

Don Brooks	CDA	XX	XX
Barb Terry	CDA	XX	XX
Barb Rosenbach	CDA	XX	
Duane Sinning	CDA		XX

#### **From Engagement Letter:**

In order to be properly prepared for the assessment, please ensure that the following documents are available for review when we arrive to the CDA office:

- 1. Procedures and checklist or form (if one is used) for how labels are reviewed and approved.
- 2. Procedures and checklist or form (if one is used) for how inputs, processing aids, and materials are reviewed and approved.
- 3. A list and the files of operations that surrendered their USDA organic certification.
- 4. A list of all samples that were collected to verify compliance to the standards since the previous assessment. The list should indicate: sample date; operation; item(s) sampled; reason for sampling; test results; and actions taken by STEL and the operations.
- 5. A list and the files where the operations were denied certification since the previous onsite assessment.
- 6. Files where the operations were issued a notice of proposed suspension and a list of the operations (if any) that were issued a notice of proposed suspension since the previous onsite assessment.
- 7. Files where the operations were issued a notice of proposed revocation and a list of the operations (if any) that were issued a notice of proposed revocation since the previous onsite assessment.
- 8. Files where operations were issued a notice of suspension or revocation and a list of operations (if any) that were issued a notice of suspension or revocation since the previous onsite assessment.
- 9. A list of complaints received about certified operations and their files. Include in the list how many investigations have been conducted since the previous onsite assessment and the outcome.
- 10. A list and information on any willful violations of the USDA organic regulations (if any) and the actions taken by CDA.
- 11. A list of operations and their files where the operations rebutted a notice of noncompliance and the follow-up actions taken by CDA.
- 12. A list of operations and their files where the operations requested mediation or appealed a certification decision and the results.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 14 of 164

- 13. A list of operations that export products under any US organic trade agreements (e.g. Canada, Japan, EU, Korea, Taiwan) to include the countries they export to and how many import certificates or attestation statements were provided to those operations since the previous onsite assessment.
- 14. A list of certification personnel training since the previous onsite assessment.
- 15. Conflict of Interest and Confidentiality statements for certification personnel.
- 16. Certification personnel performance evaluations.
- 17. Certification personnel resumes or curriculum vitaes (CVs).
- 18. CDA's most current Annual Program Review and information on correction of any identified noncompliances.

	SECTION I – Certifier Information <u>Table of Contents</u> <u>Closing Meeting Findings</u>			
	Description	Completed by the Certifier (Include page or section number of quality/program manual as applicable)	Auditor Comments	
		General		
1	Name and Type of Business Entity (Incorporated, LLC, Partnership, etc)	Colorado Department of Agriculture, Organic Program Governmental Entity		
2	List the locations (City, State, and Country) where key activities occur and are performed. Also complete Table 9	Broomfield, Colorado, USA		



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 15 of 164

	SECTION I – Certifier Information <u>Table of Contents Closing Meeting Findings</u>			
3	List any names and types (organic and nonorganic) of accreditations obtained.	USDA National Organic Program accreditation, Crop, Livestock, Handling scopes, Wild Crop – we are going to discontinue wild crop certification at the end of 2017.	Only certify one and will contact them this year to let them know they aren't going to continue to certify them. They are certified for 2017.	
4	List the types (organic and nonorganic) of certifications and business services offered.	Organic Certification, Organic Export Documentation under Organic Trade Arrangements		
5	List the states (US only) and countries where NOP certification currently occurs.	Colorado		



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 16 of 164

		<b>ION I – Certifier Information</b>		
	Table of Contents Closing Meeting Findings			
			-	
6	Note the number of operations certified to the NOP at the time of the assessment. Operations may hold more than one certification scope. Therefore the total number of certified operations might not be the sum of certification scopes issued.	Total:       214       NOP certified operations         Crop:       141       Wild-crop:       1         Livestock:       10       141       141         Wild-crop:       1       1       141         Wild-crop:       1       1       141         Wild-crop:       1       1       1         Livestock:       10       1       1         Handlers:       86       6       6         Grower Groups:       0       0       1         Approximate Handler Types:       Processors:       79       1         Distributors:       7       7       1       Traders/Brokers:       0       1         Retailers:       0       1       <	Issue one certificate with all the scopes	
7	Indicate the number of certified operations on January 2 for all years since the prior assessment. Also include the year of the prior assessment.	Jan 2, 2015214 Jan 2, 2016 204 Jan 2, 2017203		
		Certification Process		



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 17 of 164

	SECTION I – Certifier Information <u>Table of Contents Closing Meeting Findings</u>			
8	What does the certifier provide to applicants on the initial application? $\S 205.501(a)(8)$	Please See Attachment A, Organic Certification Application Packet Documents		
9	How are the information, documentation, and/or forms provided to those inquiring about certification? (i.e, hard copy, electronic, etc.)?	Sent upon request electronically, via email (not done at this time due to moratorium on new applicants for program). Will send via USPS if email not available.		
10	Who (job title/position description) conducts the initial review for completeness and ability to comply? <u>Table 8</u>	Program Manager (M.Yergert), Program Assistant (A. Mack), Janis Kieft – is the new program manager as of August 7 <sup>th</sup> .		
11	What is the certifier's process for identifying the legal status of clients?	Request legal status as part of OSP and review against Colorado Dept. of State Website (see Attachment BOrganic System Plan Review)		
12	Who (job title/position description) reviews labels? Is a checklist used by the reviewer/approver? What records are maintained for approved labels?	Program Manager (M. Yergert), Program Assistant (A. Mack) review labels. No Checklist is maintained; instructions are included in Organic System Plan Review (Attachment B), status of review maintained in Module 50, copies of all labels are maintained in the operation's electronic OSP folder.		



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 18 of 164

	SECTION I – Certifier Information <u>Table of Contents Closing Meeting Findings</u>			
13	How are inspectors selected or assigned for inspections? Who assigns inspectors?	Inspectors are selected from staff multiple field inspectors based on training completed, assigned geographical area, and number of consecutive inspections at the same operation. All assigned by Program Manager.		
14	Are inspectors employees or independent contractors?	Employees	12 staff inspectors	
15	Did all certified operations for each calendar year since the prior onsite audit receive inspections?	Yes	Asked for a list of all operations and when they were last inspected.	
16	Who (job title/position description) reviews the inspection results/report for an initial inspection?	Program Manager, Program Assistant		
17	Who (job title/position description) makes the certification decision for an initial inspection?	Program Manager, Program Assistant		
18	Provide a brief description of the annual update process. <u>§ 205.406 Table 3</u>	Please see Attachment C Organic System Plan Update Procedures		



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 19 of 164

		<b>ION I – Certifier Information</b> Contents <u>Closing Meeting Findings</u>	
19	Who (job title/position description) reviews the inspection report, results of analysis conducted (as applicable), and information requested from and provided by continuing operation? <u>Table 8</u>	Program Manager, Program Assistant	
20	Explain the process and documents for providing an initial and an annual cost estimate for certification.	The fee schedule is sent out with the OSP for update or application, when application or update is received, a letter with estimated inspection fees is sent.	
	Minor Issue, Nor	compliance, and Adverse Action Process	
21	Who (job title/position description) makes the determination on whether to issue a minor issue, noncompliance, proposed adverse action, and adverse action? Table 8	Program Manager, Program Assistant	
22	When operations submit corrective actions or a rebuttal, who (job title/position description) reviews the materials and determines whether they are adequate? <u>Table 8</u>	Program Manager, Program Assistant	
23	How many minor issues have been issued since the last onsite audit?	~300	Called "conditions of certification".



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 20 of 164

	SECTION I – Certifier Information <u>Table of Contents</u> <u>Closing Meeting Findings</u>		
24	How many noncompliances have been issued since the last onsite audit?	107	Count them as Notices of Noncompliance. Not individual noncomplinaces.
25	How many proposed suspensions have been issued since the last onsite audit?	22	
26	How many proposed revocations have been issued since the last onsite audit?	0	
27	How many certification denials have been issued since the last onsite audit?	1	
28	How many suspensions have been issued since the last onsite audit?	13	Find out the outcome of the remaining 9 proposed suspensions.
29	How many revocations have been issued since the last onsite audit?	0	
30	How many certified operations are currently appealing issued proposed adverse actions?	1	Berry Patch Farm



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 21 of 164

	SECTION I – Certifier Information <u>Table of Contents</u> <u>Closing Meeting Findings</u>		
31	How many settlement agreements were established with operations since the prior onsite audit?	2015: 0 2016: 2 2017: 2	Mike Kruse- BioFit N CDA proposed settlement agreement
32	Are settlement agreements in accordance with the guidance provided by the NOP training module? <u>http://www.ams.usda.gov/NOPTraining</u> (Click on Appeals Update)	Yes	
		Material Input Review	
33	Does your organization offer material input program services (i.e. issue certificates for organic material inputs)?	No	OMRI, WSDA, and their own.
34	What is the certifier's process for conducting material reviews and making determinations on allowable vs. prohibited substances for those substances that have not been reviewed and approved by another entity? (See Policy Memo 11-4. This includes another certifier, the EPA, or	Please see Attachment D – Input Materials Review Policy	
35	Where in your Quality or Program Manual is your material input procedures described?	In the Input Materials Review Policy (Attached)	
36	Does your organization approve liquid nitrogen fertilizers (LNF) with a nitrogen content greater than 3%?	Only in conjunction with a particular operation's OSP, and not without verification of inspection by an MRO, per NOP Guidance 5012	



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 22 of 164

	SECTION I – Certifier Information <u>Table of Contents</u> <u>Closing Meeting Findings</u>			
	Pe	esticide Residue Sampling		
37	Number of pesticide residue tests conducted during the calendar years since the last assessment.	2015: 11 2016: 3 2017: 18 + 1 pending	Made up from last year concentrated on alfalfa/forage crops where a lot of spraying may occur.	
38	Was all pesticide sampling conducted by the certifier? If not, explain.	Yes	Yes by inspectors	
39	Describe your organization's annual sampling program.	A crop is selected for sampling in discussion with the CDA lab. Operations growing the selected crop are chosen, and inspectors assigned		
40	Names of labs conducting pesticide residue analysis for your organization? Are all the labs ISO 17025 accredited?	Pacific Agricultural Laboratory (PAL), who is ISO 17025 accredited, and Colorado Department of Agriculture Laboratory, also ISO 17025 accredited		
41	Are all inspectors equipped and trained to collect samples? What equipment and documents are provided to them?	Yes, PAL Chain of Custody or CDA Residue Testing Form, for equipment, please see Attachment L, Sampling Equipment List, taken from CDA Residue Sampling Procedures and Guidelines (Field Services document)	Chain of custody form in place.	
	Other Accred	itation and Certification Information		



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 23 of 164

	SECTION I – Certifier Information <u>Table of Contents</u> <u>Closing Meeting Findings</u>			
42	Describe your organization's record keeping system. For example, all electronic database, all paper documents, hybrid system, etc	Electronic document control system housed on shared drive, administered by the program manager		
43	Does your organization contract or partner with any organizations to conduct certification or accreditation services on your behalf (e.g. inspections, inspector evaluations)? If so, briefly summarize here and complete Table 9.	No		
44	How many unannounced inspections were conducted since the prior onsite audit? § 205.403(a)(2)(i-iii)	2015: 10 2016: 11 2017: 2 (at least 9 more will be conducted prior to Dec. 31 <sup>st</sup> 2017)	Plan to conduct 11 by the end of the year. Focused inspections mostly (not annual inspections).	
45	Describe how your unannounced inspections are selected.	Selected based on complaint, risk assessment, and random selection		
46	Number of surrenders since the last onsite audit?	2015: 10 2016: 10 2017: 4		
47	Do you certify Private Label operations that do not physically handle organic products but contract with co-packers?	No operations that are exclusively private label. A few operations certified for processing may have a few items toll produced by another certified organic facility.	CDA certifies some processing who pack under private label arrangements. **Check Hope Promise	



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 24 of 164

	SECTION I – Certifier Information <u>Table of Contents</u> <u>Closing Meeting Findings</u>			
48	Describe your organization's external and internal training program for NOP certification staff and contractors (if applicable)?	2 annual in-house trainings with full organic staff, spring generally April, utilizes information from annual NOP training held at ACA meeting.	Two trainings in April	
49	Describe your annual certification personnel performance evaluation program? Are annual performance evaluations conducted on all certification personnel? Are annual field evaluations conducted on all inspectors?	Annual performance evaluation based on state HR criteria. All personnel annually evaluated, all inspectors receive annual field evaluations.	Annual field evals completed for this year.	
50	Do any certified operations import or export organic products under established organic trade agreements (equivalency, recognition, or export arrangement)?	Yes	Canada, EU, Japan, Korea. Have TM-11 approval.	
51	Does your organization have the following: If so, please indicate the document name and version.			
	Quality Manual	Yes (not names as such, CDA Policies and Procedures Manual)		
	Organizational Chart	Yes		
	Program Manual	Yes (not names as such, CDA Policies and Procedures Manual)		



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 25 of 164

	SECTION I – Certifier Information <u>Table of Contents</u> <u>Closing Meeting Findings</u>				
	Standard Operating Procedures	Yes			
26 V	Control List of documents and forms	Yes			
52	When was the date of the most recent annual review? Who conducted the review?	October 13, 2016, conducted by Don Brooks, Field Services Supervisor, CDA	Correct information.		



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 26 of 164

# **CERTIFIER OVERVIEW NARRATIVE:**

The Colorado Department of Agriculture (CDA) organic program is a state government certification program based in Broomfield, CO. It was initially accredited as a certifying agent by the USDA National Organic Program (NOP) on October 15, 2002. At the time of the audit, CDA provided organic certification for 287 operations in Colorado or contiguous land areas: crops (159), wild crops (1), livestock (16) and handling (111). The CDA is not currently accepting new clients for certification due to a moratorium imposed by the Colorado legislature. The moratorium was imposed because the legislature determined that the organic program resources (staffing) was at maximum capacity given its current client numbers and budget. There are no satellite offices, although staff inspectors (12) are distributed throughout the state and perform inspections for multiple CDA programs. The CDA organic program is administered by the Organic Program Manager with the assistance of an Organic Certification Specialist. The program is overseen by the Division Director of the CDA.

Current Accreditation – Type of Audit -Witness Audits -



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 27 of 164

#### 1. PROGRAM REQUIREMENTS

#### Exclusions: Sections not included or addressed in checklist

§ 205.502 Applying for Accreditation – Procedural requirements not addressed by auditors. § 205.505 Statement of Agreement – For reference only. If requirements are not met, cite to the appropriate section(s) of § 205.501.

§ 205.510(c) - (e) - AMS Administrator procedural requirements not addressed by auditors.

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

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

CHECKLIST	<b>Complies</b> <sup>1</sup>		es <sup>1</sup>	Remarks <sup>2</sup>
SECTION II	Yes	No	N/A	

**References:** 

NOP 2605 Reinstating Suspended Organic Operations

PM 11-4 Evaluation of Materials Used in Organic Crop, Livestock, and Handling Operations NOP 5031 Certification Requirements for Handling Unpackaged Organic Products

<sup>&</sup>lt;sup>1</sup> For each requirement, use an "X" to identify whether the certifier complies, does not comply, or that a requirement is not applicable.

<sup>&</sup>lt;sup>2</sup> Provide explanations and/or comments to present evidence of compliance or noncompliance, as applicable. If a requirement is not applicable include why it does not apply.

NOP 2005 NOP Accreditation Assessment Checklist Rev08



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 28 of 164

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

CHECKLIST		ompli	es1	Remarks <sup>2</sup>
SECTION II	Yes	No	N/A	
§§ 205.400(c) and 205.670(a) Is there any evidence that a certified operation denied access to a representative of the Administrator, State, or certifier? <u>Table of Contents</u>		х		



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 29 of 164

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



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 30 of 164

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

CHECKLIST	Complies <sup>1</sup> Yes No N/A		es <sup>1</sup>	Remarks <sup>2</sup>	
SECTION II			N/A		
§ 205.402(a)(1) Upon accepting applications does the certifier review the application for completeness? <u>Table of Contents</u>	х			Yes – as documented on <u>Table 3</u> the certifier reviewed all applications for completeness. No – as documented on <u>Table 3</u> the certifier did not review all applications for completeness. As appropriate, NCs have been identified on Table 3.	
§ 205.402(a)(2) Does the review include making a determination	X			Yes – as documented on	



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 31 of 164

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

CHECKLIST	CHECKLIST     Complies <sup>1</sup> SECTION II     Yes     No     N/A		es <sup>1</sup>	Remarks <sup>2</sup>
SECTION II			N/A	
whether the applicant is in compliance or can comply with the requirements? <u>Table of Contents</u>				Table 3 allapplicationsreviewed werereviewed by thecertifier forcompliance or theability to comply.No – asdocumented onTable 3 not allapplications werereviewed by thecertifier forcompliance or theability to comply.As appropriate,NCs have beenidentified on Table



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 32 of 164

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

CHECKLIST SECTION II	С	ompli	es <sup>1</sup>	Remarks <sup>2</sup>	
	Yes	No	N/A		
					3, Tables <u>6a</u> , <u>6b</u> , or
					<u>6c</u> .



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 33 of 164

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

CHECKLIST	С	Complies <sup>1</sup>		Remarks <sup>2</sup>	
SECTION II	Yes	No	N/A		
<b>3 205.402(a)(3)</b> Does the certifier verify that an applicant, who previously applied to another certifier and received a notification of noncompliance or denial of certification, has submitted documentation to support the correction of any noncompliances dentified in the notification of noncompliance or lenial of certification? <u>Table of Contents</u>	х			Yes – as documented on <u>Table 3</u> the certifier verified previous certification activities and results. No – as documented on <u>Table 3</u> the certifier did not verify previous certification activities and the results on all applications received. As appropriate, NCs have been identified on Table	



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 34 of 164

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

CHECKLIST	Complies <sup>1</sup> Yes No N/A		es <sup>1</sup>	Remarks <sup>2</sup>	
SECTION II			N/A		
§ 205.402(b)(1) Is the time from receiving the application materials and the review reasonable? <u>Table of Contents</u>	х			Yes – as documented on <u>Table 1</u> the time from receiving the application materials and the reviews were reasonable. No – as documented on <u>Table 1</u> the time from receiving the application materials and the reviews was not always reasonable.	
§ 205.402(b)(1) Is the time between receiving an application and	х			Yes – as documented on	



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 35 of 164

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

CHECKLIST		omplie	es <sup>1</sup>	Remarks <sup>2</sup>
SECTION II	Yes	No	N/A	
communicating the results of the review to an applicant reasonable? <u>Table of Contents</u>				Table 1the timefrom receiving theapplicationmaterials andcommunicating theresults wasreasonable.No – asdocumented onTable 1The timefrom receiving theapplicationmaterials andcommunicating theresults was notalways reasonable.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 36 of 164

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

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

CHECKLIST		omplie	es <sup>1</sup>	Remarks <sup>2</sup>
SECTION II	Yes	No	N/A	
<b>§§ 205.402(b)(2) and 205.403(e)(2)</b> Is a copy of the inspection report as approved by the certifier provided to that operation by the certifier? <u>Table of Contents</u>	X			Verified at witness audit of Colorado Egg.
§ 205.402(c) Did any clients withdraw their application(s) and if so, was the process in accordance with the requirements? <u>Table of Contents</u>				

### § 205.403 Inspection

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



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 37 of 164

CHECKLIST	C	Complies <sup>3</sup>		Complies <sup>3</sup>		Remarks <sup>4</sup>
SECTION III	Yes	No	N/A			
References:NOP 2609 Unannounced Inspections§ 205.403(a)(1)Does the certifier conduct initial onsite inspectionsof each production unit, facility, and site thatproduces or handles organic products and that isincluded in the operation for which certification is	X					
requested, on all applicants? Also see <u>Continuing Certification</u> (§ 205.406(b)) <u>Table of Contents</u>						
§§ 205.403(a)(2)(i)-(iii) Does the certifier conduct unannounced inspections on 5% of the total certified operations per year, or at least one (1) unannounced inspection per year if the certifier has less than 20 certified operations? <u>Table of Contents</u> § 205.504(b)(2) Unannounced Inspections <u>General Information Section</u>	х			Yes – the certifier conducted unannounced inspections on 5% of the total certified operations in or Yes – the certifier conducted at least one (1) unannounced inspection of a certified operation. <i>For either</i> <i>statement include</i> <i>objective evidence</i> ,		

<sup>&</sup>lt;sup>3</sup> For each requirement, use an "X" to identify whether the certifier complies, does not comply, or that a requirement is not applicable.

<sup>&</sup>lt;sup>4</sup> Provide explanations and/or comments to present evidence of compliance or noncompliance, as applicable. If a requirement is not applicable include why it does not apply.

NOP 2005 NOP Accreditation Assessment Checklist Rev08



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 38 of 164

# § 205.403 Inspection

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

		omplie	es <sup>3</sup>	Remarks <sup>4</sup>
SECTION III	Yes	No	N/A	
				including how many unannounced inspections were conducted, total number of certified operations, and the time period/year being discussed.
NOP 2609 Unannounced Inspections Are the certifier's written policies/procedures for conducting unannounced inspections and inspector access to certified facilities provided to all certified operations and inspectors? <u>Table of Contents</u> § 205.501(a)(8) § 205.504(b)(2) Unannounced Inspections				Yes – the certifier's written policies/ procedures for conducting unannounced inspections and inspector access to certified facilities was provided to all certified operations and inspectors. No – the certifier's written policies/



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 39 of 164

§ 205.403 Inspec	tion					
Based on a review of the Certification File Review Worksheets, information gathered during the review of the certification process, interviews, and Witness Audit Checklists.						
CHECKLIST	C	omplie	es <sup>3</sup>	Remarks <sup>4</sup>		
SECTION III	Yes	No N/A				
				procedures for conducting unannounced inspections and inspector access to certified facilities was not provided to all certified operations and/or inspectors. For either statement include objective evidence.		
NOP 2609 Unannounced Inspections						
Were unannounced inspections conducted following the guidance of NOP 2609 and the certifier's						
policies/procedures; and was the reason the						
operation was chosen for the unannounced						
inspection disclosed to the operation?						
Table of Contents General Information Section						
§ 205.403(b)(1)	2		а. — а	Yes – as		
Are all inspections conducted within a reasonable				documented on		
time after the determination that the applicant				Table 1 inspections		



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 40 of 164

§ 205.403 Inspection						
Based on a review of the Certification File Review Worksheets, information gathered during the review of the certification process, interviews, and Witness Audit Checklists.						
CHECKLIST	C	omplie	es <sup>3</sup>	Remarks <sup>4</sup>		
SECTION III	Yes	No	N/A			
appears to comply or can comply with the requirements? Table of Contents				were conducted within a reasonable time after the determination that the applicant appears to comply or could comply with the requirements. No – as documented on <u>Table 1</u> inspections were not always conducted within a reasonable time after the determination that the applicant appeared to comply or could comply with the requirements.		



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 41 of 164

# § 205.403 Inspection

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

the review of the certification process, interviews, and whitess Audit Checkhists.					
CHECKLIST	Complies <sup>3</sup>			<b>Remarks</b> <sup>4</sup>	
SECTION III	Yes	No	N/A		
§ 205.403(b)(2) Are all inspections conducted when an authorized representative of the operation who is <u>knowledgeable</u> about the operation is present <u>and</u> at a time when land, facilities, and activities that demonstrate the operation's compliance with or ability to comply with the applicable provisions of subpart C can be observed? <u>Table of Contents</u>	X				
§ 205.403(c)(1) Do all inspections verify the operation's compliance or ability to comply with the Act and the regulations? <u>Table of Contents</u>		Х		Labels, International agreements.	
§ 205.403(c)(2) Do all inspections verify that the information (including the OSP) provided in accordance with §§ 205.401, 205.406, and 205.200, accurately reflect the practices used or to be used by the applicant or certified operation? <u>Table of Contents</u>	Х				



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 42 of 164

#### § 205.403 Inspection

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

CHECKLIST		omplie	es <sup>3</sup>	Remarks <sup>4</sup>
SECTION III	Yes	No	N/A	
§ 205.403(c)(3) Do all inspections verify that the operation had not applied and is not applying prohibited substances? <u>Table of Contents</u> <u>Table 3</u>	X			
§ 205.403(d) Do inspectors conduct an exit interview with an authorized representative of the operation who is knowledgeable about the inspected operation to <u>confirm the accuracy and completeness</u> of inspection observations and information gathered during the onsite inspection? Does the exit interview(s) address the need for any <u>additional information</u> as well as any <u>issues of concern</u> ? <u>Table of Contents</u> <u>Table 3</u>	Х			



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/2015 Page 43 of 164

§ 205.404 Granting Co	ertifica	tion				
Based on a review of the Certification File Review Worksheets, information gathered during the review of the certification process, interviews, and Witness Audit Checklists.						
CHECKLIST		ompli	es <sup>5</sup>	Remarks <sup>6</sup>		
SECTION IV	Yes	No	N/A			
References:						
NOP 2603 Organic Certificates						
NOP 2605 Reinstating Suspended Organic Operations						
PM 11-4 Evaluation of Materials Used in Organic Cro	op, Liv	estock	, and H	andling Operations		

 <sup>&</sup>lt;sup>5</sup> For each requirement, use an "X" to identify whether the certifier complies, does not comply, or that a requirement is not applicable.
 <sup>6</sup> Provide explanations and/or comments to present evidence of compliance or noncompliance, as applicable. If a requirement is not applicable include why it does not apply.

NOP 2005 NOP Accreditation Assessment Checklist Rev08



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/2015 Page 44 of 164

<b>§ 205.404 Granting Ce</b> Based on a review of the Certification File Review W	orkshe	ets, inf						
the review of the certification process, interviews, and CHECKLIST	Complies <sup>5</sup>				l I			cklists. Remarks <sup>6</sup>
SECTION IV	Yes	No	N/A	Remarks				
§ 205.404(a) Does the certifier meet the requirements of § 205.404(a) by: reviewing the inspection report, sample results, and any additional information within a <u>reasonable time</u> after the inspection; granting certification in all cases where it is determined that the OSP and the applicant's operation are in compliance and is able to conduct operations in accordance with the plan; and (if the certification is granted and included requirements for the correction of minor noncompliances) <u>indicating</u> they have to be addressed within a specified time period as a condition of continued certification? <u>Table of Contents</u>	х			Yes – as documented on <u>Table 1</u> and <u>Table 3</u> the certifier met the requirements of § 205.404(a) by reviewing the inspection report and additional documents within a reasonable time; granting certification when the applicants were in compliance; and indicating minor NCs had to be addressed within a specified time period. No – as documented on <u>Table 1</u> and/or <u>Table 3</u> the certifier				
OP 2005 NOP Accreditation Assessment Checklist Rev08			A	did not meet the utequard provinsion Public § 205.404(a).				



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 45 of 164

§ 205.404 Granting Certification						
Based on a review of the Certification File Review Worksheets, information gathered during the review of the certification process, interviews, and Witness Audit Checklists.						
CHECKLIST	С	omplie	es <sup>5</sup>	<b>Remarks</b> <sup>6</sup>		
SECTION IV	Yes	No	N/A			
§ 205.404(b) Does the certifier issue a certificate of organic operation in all cases where certification is granted? <u>Table of Contents</u>	Х			Yes – as documented on <u>Table 3</u> the certifier issued a certificate in all cases where certification was granted. No – as documented on <u>Table 3</u> the certifier did not issue a certificate in all cases where certification was granted.		
§ 205.404(b)(1) – (4) Do certificates issued by the certifier contain the required information? Do certificates issued by the certifier contain the additional information and statements recommended by NOP 2603? Table of Contents	X			Yes – as documented on <u>Table 3</u> all certificates reviewed contained the required information.		



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 46 of 164

#### § 205.404 Granting Certification Based on a review of the Certification File Review Worksheets, information gathered during the review of the certification process, interviews, and Witness Audit Checklists. Complies<sup>5</sup> CHECKLIST Remarks<sup>6</sup> SECTION IV Yes No N/A No-as documented on Table 3 not all certificates contained the required information. (b)(1) Name and Address (b)(2) Effective Date (b)(3) Category (b)(4) Certifying Agent Information Although not identified as a NC as documented on Table 3 not all certificates contained the additional information and statements as



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/2015 Page 47 of 164

§ 205.404 Granting Certification					
Based on a review of the Certification File Review Worksheets, information gathered during the review of the certification process, interviews, and Witness Audit Checklists.					
CHECKLIST	CHECKLIST Complies <sup>5</sup>				
SECTION IV	SECTION IV Yes No	No	N/A		
				recommended by <u>NOP 2603</u> .	

§ 205.405 Denial of Certification					
Based on a review of the Certification File Review Worksheets (including Table 4 - Notice of Noncompliance/Adverse Action Worksheet). Document on the Certification File Review Worksheet, "Table 5 - Notice of Noncompliance/Denial of Certification."					
CHECKLIST SECTION V		Complies <sup>7</sup>		Remarks <sup>8</sup>	
		No	N/A		
References:	9993	833	NA 25		
NOP 2607 Disclosure of Information Concerning Ope					
NOP 4002 Enforcement of USDA Organic Regulation					
PM 11-4 Evaluation of Materials Used in Organic Cro	p, Liv	estock.	, and H	andling Operations	
§ 205.405(a)				Yes – as	
Does the certifier provide a written notification of				documented on	
noncompliance to all applicants in cases where there	X			Table 5 the certifier	
was a reason to believe, based on the review, that the				provided a written	
applicant was not able to comply or was not in	2			notification of	

 <sup>&</sup>lt;sup>7</sup> For each requirement, use an "X" to identify whether the certifier complies, does not comply, or that a requirement is not applicable.
 <sup>8</sup> Provide explanations and/or comments to present evidence of compliance or noncompliance, as applicable. If a requirement is not applicable include why it does not apply.

NOP 2005 NOP Accreditation Assessment Checklist Rev08



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 48 of 164

# § 205.405 Denial of Certification

		omplie	es <sup>7</sup>	Remarks <sup>8</sup>
SECTION V	Yes	No	N/A	
compliance with the requirements? <u>Table of Contents</u>				noncompliance to all <u>applicants</u> who were not able to comply or were not in compliance with the requirements.
§ 205.405(a) If the certifier issued any <u>combined notice</u> of noncompliance and denial of certification, does it meet the requirements for both notifications? <u>Table of Contents</u>			х	N/A – no combined notice(s) of noncompliance and denial of certification were issued by the certifier.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 49 of 164

# § 205.405 Denial of Certification

CHECKLIST	C	Complies <sup>7</sup>		Remarks <sup>8</sup>
SECTION V	Yes	No	N/A	
§ 205.405(a)(1) – (3) Do all notices of noncompliance that were issued contain the required information in accordance with §§ 205.405(a)(1) – (3)? <u>Table of Contents</u>		Х		No – as documented on <u>Table 5</u> , notices of noncompliance that were issued did not contain the required information. Some templates don't offer the option to rebut
§ 205.405(c)(1) In cases when the applicant provided corrective actions or a rebuttal, does the certifier: evaluate the rebuttal or corrective actions taken and supporting documentation;				Yes – as documented on <u>Table 5</u> , in cases when the <u>applicant</u> provided corrective actions or a rebuttal, the



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 50 of 164

# § 205.405 Denial of Certification

CHECKLIST	C	Complies <sup>7</sup>		Complies <sup>7</sup> Remarks	Remarks <sup>8</sup>
SECTION V	Yes	No	N/A		
issue the applicant an approval of certification if the corrective action or rebuttal is sufficient for the applicant to qualify for certification; or issue the applicant a written notice of denial of certification when the corrective action or rebuttal <u>is</u> <u>not</u> sufficient for the applicant to qualify for certification? <u>Table of Contents</u>				certifier took appropriate action in accordance with § 205.405(c)(1). No – as documented on <u>Table 5</u> , in cases when the <u>applicant</u> provided corrective actions or a rebuttal, the certifier did not always take appropriate action in accordance with § 205.405(c)(1).	



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 51 of 164

#### § 205.405 Denial of Certification

CHECKLIST	С	Complies <sup>7</sup>		Remarks <sup>8</sup>
SECTION V	Yes	No	N/A	
§ 205.405(c)(2) Does the certifier issue a written notice of denial of certification to all applicants that failed to respond to a notification of noncompliance? <u>Table of Contents</u>				Yes – as documented on <u>Table 5</u> , the certifier issued a written notice of denial of certification to applicants that failed to respond to the notification of noncompliance. No – as documented on <u>Table 5</u> , the certifier did not issue a written notice of denial of certification to applicants that failed to respond to the notification of noncompliance.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 52 of 164

# § 205.405 Denial of Certification

CHECKLIST	Complies <sup>7</sup>		Complies <sup>7</sup>	Remarks <sup>8</sup>
SECTION V	Yes No	No	N/A	
§ 205.405(c)(3) Does the certifier provide all notices of approval or denials to the Administrator? <u>Table of Contents</u>				Yes – as identified in $\S 205.501(a)(15)(i)$ , all notices of approval or denials were submitted to the Administrator. No – as identified in $\S 205.501(a)(15)(i)$ not all notices of approval or denials were submitted to the Administrator.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 53 of 164

# § 205.405 Denial of Certification

CHECKLIST	С	Complies <sup>7</sup>		Remarks <sup>8</sup>
SECTION V	Yes	No	N/A	
<pre>§§ 205.405(d), (d)(1) - (3) Do all issued denials of certification contain the required information in accordance with §§ 205.405(d), (d)(1) - (3)? Table of Contents</pre>				Yes – as documented on <u>Table 5</u> , all denials of certification contained the required information. No – as documented on <u>Table 5</u> , not all denials of certification contained the required information. N/A – the certifier did not issue any denials of certification.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 54 of 164

# § 205.405 Denial of Certification

Based on a review of the Certification File Review Worksheets (including Table 4 - Notice of Noncompliance/Adverse Action Worksheet). Document on the Certification File Review Worksheet, "Table 5 - Notice of Noncompliance/Denial of Certification."

CHECKLIST	C	ompli	es <sup>7</sup>	Remarks <sup>8</sup>
SECTION V	Yes	No	N/A	
§ 205.405(f) If the certifier received new applications for certification, which included a notification of noncompliance or a notice of denial of certification, does the certifier <u>treat the application as a new</u> <u>application</u> and begin a new application process? <u>Table of Contents</u>			X	

#### § 205.406 Continuation of Certification

Based on a review of the Certification File Review Worksheets, information gathered during a review of the certification process, interviews, and Witness Audit Checklists, describe the annual update process under "General information on Certification Process," Checklist Section I. Document requirement evaluations on the Certification File Review Worksheets and "Table 4 - Notice of Noncompliance/Adverse Action Worksheet" as applicable.

CHECKLIST	Complies <sup>9</sup>		es <sup>9</sup>	Remarks <sup>10</sup>
SECTION VI	Yes	No	N/A	

<sup>&</sup>lt;sup>9</sup> For each requirement, use an "X" to identify whether the certifier complies, does not comply, or that a requirement is not applicable.

<sup>&</sup>lt;sup>10</sup> Provide explanations and/or comments to present evidence of compliance or noncompliance, as applicable. If a requirement is not applicable include why it does not apply.

NOP 2005 NOP Accreditation Assessment Checklist Rev08



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 55 of 164

#### § 205.406 Continuation of Certification

Based on a review of the Certification File Review Worksheets, information gathered during a review of the certification process, interviews, and Witness Audit Checklists, describe the annual update process under "General information on Certification Process," Checklist Section I. Document requirement evaluations on the Certification File Review Worksheets and "Table 4 - Notice of Noncompliance/Adverse Action Worksheet" as applicable.

CHECKLIST	Complies <sup>9</sup>		es <sup>9</sup>	Remarks <sup>10</sup>
SECTION VI	Yes	No	N/A	

#### **References:**

NOP 2607 Disclosure of Information Concerning Operations Certified Under the NOP NOP 4002 Enforcement of the USDA Organic Regulations by Accredited Certifying Agents PM 11-4 Evaluation of Materials Used in Organic Crop, Livestock, and Handling Operations NOP 5031 Certification Requirements for Handling Unpackaged Organic Products

	0.0101	NEW NEW CONTRACTOR
§§ 205.406(a)(1) – (4) Do all certified operations submit an updated OSP and pay the annual certification fees as required by §§ 205.406(a)(1) – (4)?		Yes – as documented on <u>Table 3</u> , all certified operations
Table of Contents	Х	submitted an updated OSP and paid their annual certification fees as
		required.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 56 of 164

# § 205.406 Continuation of Certification

Based on a review of the Certification File Review Worksheets, information gathered during a review of the certification process, interviews, and Witness Audit Checklists, describe the annual update process under "General information on Certification Process," Checklist Section I. Document requirement evaluations on the Certification File Review Worksheets and "Table 4 - Notice of Noncompliance/Adverse Action Worksheet" as applicable.

CHECKLIST	Complies <sup>9</sup>		es <sup>9</sup>	Remarks <sup>10</sup>
SECTION VI	Yes	No	N/A	
§ 205.406(b) Following the receipt of an updated OSP does the certifier review it to see if the requirements of § 205.406(a) have been met? <u>Table of Contents</u>	Х			Yes – as documented on <u>Table 1</u> , after receipt the certifier reviewed all updated OSPs to see if they met the requirements.
<b>§§ 205.406(b) and 205.403(a)(1)</b> Following the receipt of an updated OSP does the certifier within a reasonable time arrange and	X			Yes – as documented on <u>Table 1</u> , after



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 57 of 164

# § 205.406 Continuation of Certification

Based on a review of the Certification File Review Worksheets, information gathered during a review of the certification process, interviews, and Witness Audit Checklists, describe the annual update process under "General information on Certification Process," Checklist Section I. Document requirement evaluations on the Certification File Review Worksheets and "Table 4 - Notice of Noncompliance/Adverse Action Worksheet" as applicable.

CHECKLIST	C	Complies <sup>9</sup>		Remarks <sup>10</sup>
SECTION VI	Yes	No	N/A	
conduct an onsite inspection? <u>Also see Onsite Inspection</u> (§ 205.403(a)(1)) <u>Table of Contents</u>				receipt of updated OSPs the certifier conducted an onsite inspection within a reasonable time.
§ 205.406(c) Does the certifier provide a written notification of noncompliance to all operations in accordance with § 205.662 if the certifier had reason to believe, based on the onsite inspection and a review of the information specified in § 205.404, that a certified operation is not complying with the requirements of the Act and the regulations? <u>Table of Contents</u> §205.662(a) <u>Table 3</u>				Yes – as documented on <u>Table 4</u> and <u>§ 205.662(a)</u> of this checklist, after the onsite inspection and a review of the information specified in § 205.404 the certifier issued a notification of noncompliance to operations that did not comply with the requirements.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 58 of 164

# § 205.406 Continuation of Certification

Based on a review of the Certification File Review Worksheets, information gathered during a review of the certification process, interviews, and Witness Audit Checklists, describe the annual update process under "General information on Certification Process," Checklist Section I. Document requirement evaluations on the Certification File Review Worksheets and "Table 4 - Notice of Noncompliance/Adverse Action Worksheet" as applicable.

CHECKLIST	C	Complies <sup>9</sup>		Remarks <sup>10</sup>
SECTION VI	Yes	No	N/A	
				No – as documented on <u>Table 4</u> or Tables <u>6a</u> , <u>6b</u> , or <u>6c</u> , and <u>§ 205.662(a)</u> of this checklist after the onsite inspection and a review of the information specified in § 205.404 the certifier did not issue a notification of noncompliance to all operations that did not comply with the requirements.
§ 205.406(d) Does the certifier issue an updated certificate for all	X			Yes – as documented on

NOP 2005 NOP Accreditation Assessment Checklist Rev08



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 59 of 164

#### § 205.406 Continuation of Certification

Based on a review of the Certification File Review Worksheets, information gathered during a review of the certification process, interviews, and Witness Audit Checklists, describe the annual update process under "General information on Certification Process," Checklist Section I. Document requirement evaluations on the Certification File Review Worksheets and "Table 4 - Notice of Noncompliance/Adverse Action Worksheet" as applicable.

CHECKLIST		omplie	es <sup>9</sup>	<b>Remarks</b> <sup>10</sup>
SECTION VI	Yes	No	N/A	
certified operations that were in compliance with the Act and the regulations if any information specified on the previous certificate changed? <u>Table of Contents</u>				Table 3, the certifier issued updated certificates for all certified operations that were in compliance with the Act when any information specified on the previous certificate changed.

#### § 205.501 General Requirements for Accreditation



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/2015 Page 60 of 164

CHECKLIST	Co	mplie	s <sup>11</sup>	Remarks <sup>12</sup>
SECTION VII	Yes	No	N/A	
References: NOP 2000 Accreditation Policies and Procedures NOP 2026 Submitting Annual Lists of Certified Opera NOP 2606 Processing Requests for Temporary Varian NOP Appeals Procedure: Adverse Action Appeal Proc for Certification PM 11-8 California State Organic Program, Additiona 8 205 501(a)(1)	ices cess — (		ā	5.5.
§ 205.501(a)(1) Does the certifier have <u>sufficient expertise</u> in organic production or handling techniques to fully comply with and implement the terms and conditions of the organic certification program? <u>Table of Contents</u>	х			Yes – as documented on <u>Table 8</u> and personnel interviews conducted. (Auditor should revise statement as appropriate.)
§ 205.501(a)(2) Does the certifier <u>demonstrate the ability</u> to fully comply with the requirements for accreditation? <u>Table of Contents</u>	X			
<b>§205.501(a)(3)</b> Does the certifier <u>carry out the provisions</u> of the Act and the regulations, including the provisions of §§ 205.402 through 205.406 and 205.670? <u>Table of Contents</u>	Х			

 <sup>&</sup>lt;sup>11</sup> For each requirement, use an "X" to identify whether the certifier complies, does not comply, or that a requirement is not applicable.
 <sup>12</sup> Provide explanations and/or comments to present evidence of compliance or noncompliance, as applicable. If a requirement is not applicable include why it does not apply.

NOP 2005 NOP Accreditation Assessment Checklist Rev08



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/2015 Page 61 of 164

§ 205.501 General Requirement	ts for A	Accred	litatio	n
CHECKLIST SECTION VII			s <sup>11</sup>	Remarks <sup>12</sup>
SECTION VII	Yes	No	N/A	
§ 205.501(a)(4) Does the certifier use a <u>sufficient number of</u> <u>adequately trained personnel</u> , including inspectors and certification review personnel, to comply with and implement the organic certification program? <u>Table of Contents</u>	Х			Yes – as documented on Table and/or personnel interviews conducted, the certifier had a sufficient number of adequately trained personnel. (Auditor should revise statement as appropriate.)
§ 205.501(a)(5) Does the certifier ensure certification personnel <u>have</u> <u>sufficient expertise</u> in organic production or handling techniques to successfully perform the duties assigned? <u>Table of Contents</u>	X			Yes – as documented on <u>Table 8</u> , the certifier ensured certification personnel had sufficient expertise in organic production or handling techniques.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 62 of 164

§ 205.501 General Requirements for Accreditation					
CHECKLIST SECTION VII	Complies <sup>11</sup>			Remarks <sup>12</sup>	
SECTION VII	Yes	No	N/A		
§ 205.501(a)(6) Does the certifier conduct annual <u>performance</u> <u>evaluations</u> of all certification personnel in accordance with § 205.501(a)(6)? <u>Table of Contents</u>	х			Yes – as documented on <u>Table 8</u> , the certifier conducted performance evaluations of all certification personnel as required.	



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/2015 Page 63 of 164

§ 205.501 General Requirements for Accreditation					
CHECKLIST	Complies <sup>11</sup>			Remarks <sup>12</sup>	
SECTION VII	Yes	No	N/A		
<ul> <li>§ 205.501(a)(7)</li> <li>Does the certifier have <u>an annual program review</u> of its certification activities conducted by someone who has expertise to conduct the reviews?</li> <li>Does the certifier <u>implement measures to correct</u> any noncompliances that are identified in the evaluation? <u>Table of Contents</u></li> </ul>	Х				
§ 205.501(a)(8) Does the certifier provide sufficient information to persons seeking certification to enable them to comply with the Act and the regulations? <u>Table of Contents</u> <u>General Information Section</u>	X				
§ 205.501(a)(9) Does the certifier <u>maintain all records</u> pursuant to §205.510(b) and make all such records available for inspection and copying during normal business hours? <u>Table of Contents</u> <u>Table 7b</u>	х				



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/2015 Page 64 of 164

§ 205.501 General Requirements for Accreditation						
CHECKLIST	Complies <sup>11</sup>			Remarks <sup>12</sup>		
SECTION VII	Yes	No	N/A			
§ 205.501(a)(10) Does the certifier <u>maintain strict confidentiality</u> with respect to its clients and not disclose to third parties any business-related information concerning any client obtained while implementing the regulations, except as provided for in § 205.504(b)(5)? <u>Table of Contents</u> § 205.504(b)(4)	х					
Does the certifier prevent conflicts of interest by:	S	22				
§ 205.501(a)(11)(i) Not certifying a production or handling operation if the <u>certifier or a responsibly connected party</u> of such certifier has or has held a commercial interest in the production or handling operation? <u>Table of Contents</u> <u>Table 8</u> <u>Table 8</u> <u>Table 8 Findings</u>	x					



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/2015 Page 65 of 164

§ 205.501 General Requirements for Accreditation					
CHECKLIST	Co	Complies <sup>11</sup>		Complies <sup>11</sup> Remarks <sup>12</sup>	Remarks <sup>12</sup>
SECTION VII	Yes	No	N/A		
§ 205.501(a)(11)(ii) <u>Excluding any person, including contractors</u> , with conflicts of interest from work, discussions, and decisions in all stages of the certification process and the monitoring of certified operations for all entities in which such person has or has held a commercial interest. <u>Table of Contents</u> <u>Table 8</u> <u>Table 8</u> <u>Table 8 Findings</u>	х				
§ 205.501(a)(11)(iii) Not permitting any employee, inspector, contractor, or other personnel to accept payment, gifts, or favors of any kind, other than prescribed fees, from any business inspected. <u>Table of Contents</u>	Х				
§ 205.501(a)(11)(iv) Not giving advice or providing consultancy services, to certification applicants or certified operations, for overcoming identified barriers to certification. <u>Table of Contents</u> See <u>NOP 2614 Technical Assistance</u> , for guidance.	Х				
§ 205.501(a)(11)(v) Requiring all certification personnel and responsibly connected parties to complete an <u>annual conflict of</u> <u>interest disclosure report</u> .	X			Yes – as documented on <u>Table 8</u> , the certifier required all	



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 66 of 164

§ 205.501 General Requirements for Accreditation						
CHECKLIST	Co	mplie	s <sup>11</sup>	Remarks <sup>12</sup>		
SECTION VII	Yes	No	N/A			
<u>Table of Contents</u>				certification personnel and responsibly connected parties to complete an annual conflict of interest disclosure report.		



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 67 of 164

§ 205.501 General Requirements for Accreditation						
CHECKLIST SECTION VII	Co	Complies <sup>11</sup>		Complies <sup>11</sup>		Remarks <sup>12</sup>
SECTION VII	Yes	No	N/A			
§ 205.501(a)(11)(vi) Ensuring that the <u>decision to certify</u> an operation is made by a person different from those who conducted the review of documents and onsite inspection. <u>Table of Contents</u>	х			Yes – as documented on <u>Table 1</u> , the decision to certify an operation was made by a person different from those who conducted the review of documents and onsite inspection.		



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/2015 Page 68 of 164

A private or governmental entity accredited as a ce	rtifier	under	this s	ubpart must:
§ 205.501(a)(12)(i) <u>Reconsider a certified operation's application</u> for certification and, if necessary, perform a new onsite inspection when it is determined, within 12 months of certifying the operation that any person participating in the certification process and covered under § 205.501(a)(11)(ii) has or <u>had a conflict of</u> <u>interest</u> involving the applicant. <u>Table of Contents</u> <u>Table 8</u> <u>Table 8 Findings</u>			N/A	
§ 205.501(a)(12)(ii) <u>Refer a certified operation</u> to a different certifier for recertification and reimburse the operation for the cost of the recertification when it is determined that any person covered under § 205.501(a)(11)(i) at the time of certification of the applicant <u>had a conflict of</u> <u>interest</u> involving the applicant. <u>Table of Contents</u> <u>Table 8</u> <u>Table 8</u> <u>Table 8 Findings</u>			N/A	
§ 205.501(a)(13) <u>Accept the certification decisions</u> made by another certifier accredited or accepted by USDA. <u>Table of Contents</u>	X			



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 69 of 164

§ 205.501(a)(14) <u>Refrain from making false or misleading claims</u> about its accreditation status, the USDA accreditation program for certifiers, or the nature or qualities of products labeled as organically produced. <u>Table of Contents</u>	х		
§ 205.501(a)(15)(i) <u>Submit to the Administrator</u> a copy of: Any notice of denial of certification (§ 205.405); notification of noncompliance; notification of noncompliance correction; notification of proposed suspension or revocation; and notification of suspension or revocation (§ 205.662) simultaneously with its issuance. <u>Table of Contents</u> § 205.405(c)(3)	Х		Yes – as documented in § 205.405(c)(3) of the checklist and <u>Table 4</u> , the certifier submitted all notifications to the Administrator as required.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 70 of 164

§ 205.501(a)(15)(ii) <u>Submit to the Administrator</u> a list, on January 2 of each year, including the name, address, and telephone number of each operation granted certification during the preceding year. <u>Table of Contents</u>	X	
§ 205.501(a)(16) Charge applicants for certification and certified production and handling operations only those fees and charges for certification activities that it has filed with the Administrator (to include any fees charged for unannounced inspections). <u>Table of Contents</u> <u>Also see Fee Schedule</u>	X	
§ 205.501(a)(17) Pay and submit fees to AMS in accordance with § 205.640. <u>Table of Contents</u>	X	
§ 205.501(a)(18) <u>Provide the inspector</u> , prior to each onsite inspection, with previous onsite inspection reports, and <u>notify the inspector</u> of its decision regarding certification of the operation site inspected by the inspector and of any requirements for the correction of minor noncompliances. <u>Table of Contents</u>	X	



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/2015 Page 71 of 164

§ 205.501(a)(19) <u>Accept all production or handling applications</u> that fall within its area(s) of accreditation and certify all qualified applicants, to the extent of its administrative capacity to do so without regard to size or membership in any association or group. <u>Table of Contents</u>			Х	
§ 205.501(a)(20) Demonstrate its ability to <u>comply with a State's</u> <u>organic program</u> to certify organic production or handling operations within the State. <u>Table of Contents</u>			Х	
§ 205.501(a)(21) Comply with, implement, and <u>carry out any other</u> terms and conditions determined by the Administrator to be necessary. <u>Table of Contents</u>		Х		International agreements
§ 205.501(b)(1) A private or governmental entity accredited as a certifier under this subpart may establish a seal, logo, or other identifying mark to be used by production and handling operations certified by the certifier to indicate affiliation with the certifier. <i>Provided</i> , That, the certifier:           Does not require use of its seal, logo, or other identifying mark on any product sold, labeled, or represented as organically produced as a condition of certification. <u>Table of Contents</u>	Х			



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 72 of 164

§ 205.501(b)(2) Provided, That, the certifier:           Does not require compliance         with any production or handling practices other than those provided for in the Act and the regulations in this part as a condition of using its identifying mark. Table of Contents	X				
A private entity accredited as a certifier must:					
§ 205.501(c)(1) Hold the Secretary harmless for any failure on the part of the certifier to carry out the provisions of the Act and the regulations in this part. <u>Table of Contents</u>	X				
§ 205.501(c)(2) Furnish reasonable security, in an amount and according to such terms as the Administrator may by regulation prescribe, for the purpose of protecting the rights of operations certified by the certifier under the Act and the regulations. <u>Table of Contents</u>	X				
§ 205.501(c)(3) Transfer to the Administrator and make available to any applicable State organic program's governing State official all records or copies of records concerning the person's certification activities in the event that the certifier dissolves or loses its accreditation. <u>Table of Contents</u>	X				



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 73 of 164

§ 205.501(d) No private or governmental entity accredited as a certifier under this subpart shall exclude from participation in or deny the benefits of the National Organic Program to any person due to discrimination because of race, color, national origin, gender, religion, age, disability, political beliefs, sexual orientation, or marital or family status. <u>Table of Contents</u>	х					
--	---	--	--	--	--	--

# § 205.503 Applicant Information

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

CHECKLIST	Co	Complies <sup>13</sup>		Remarks <sup>14</sup>
SECTION VIII	Yes	No	N/A	

#### **References:**

NOP 2000 Accreditation Policies and Procedures

NOP Appeals Procedure: Adverse Action Appeal Process – Certified Operation or Applicant for Certification

A private or governmental entity seeking accreditation as a certifier must submit the following information:

<sup>&</sup>lt;sup>13</sup> For each requirement, use an "X" to identify whether the certifier complies, does not comply, or that a requirement is not applicable.

<sup>&</sup>lt;sup>14</sup> Provide explanations and/or comments to present evidence of compliance or noncompliance, as applicable. If a requirement is not applicable include why it does not apply.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 74 of 164

## § 205.503 Applicant Information

CHECKLIST	Complies <sup>13</sup>		s <sup>13</sup>	Remarks <sup>14</sup>
SECTION VIII	Yes	No	N/A	
§ 205.503(a) The business name, primary office location, mailing address, name of the person(s) responsible for the certifier'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; <u>Table of contents</u>	X			
§ 205.503(b) The name, office location, mailing address, and contact numbers (telephone, facsimile, and Internet address) for each of its organizational units, such as chapters or subsidiary offices, and the name of a contact person for each unit; <u>Table of contents</u>	X			



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 75 of 164

## § 205.503 Applicant Information

CHECKLIST	Complies <sup>13</sup>		s <sup>13</sup>	Remarks <sup>14</sup>
SECTION VIII	Yes	No	N/A	
§ 205.503(c) Each area of operation (crops, wild crops, livestock, or handling) for which accreditation is requested and the estimated number of each type of operation anticipated to be certified annually by the applicant along with a copy of the applicant's schedule of fees for all services to be provided under these regulations by the applicant; <u>Table of contents</u>	X			Removing wild crop in 2018.
§ 205.503(d)(1) The type of entity the applicant is (e.g., government agricultural office, for-profit business, not-for-profit membership association) and for: A governmental entity, a copy of the official's authority to conduct certification activities under the Act and the regulations in this part, <u>Table of contents</u>	X			



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 76 of 164

## § 205.503 Applicant Information

CHECKLIST	Complies <sup>13</sup>		s <sup>13</sup>	Remarks <sup>14</sup>
SECTION VIII	Yes	No	N/A	
§ 205.503(d)(2) The type of entity the applicant is (e.g., government agricultural office, for-profit business, not-for-profit membership association) and for: A private entity, documentation showing the entity's status and organizational purpose, such as articles of incorporation and bylaws or ownership or membership provisions, and its date of establishment; <u>Table of contents</u>	х			
§ 205.503(e) A list of each State or foreign country in which the applicant currently certifies production and handling operations and a list of each State or foreign country in which the applicant intends to certify production or handling operations. <u>Table of contents</u>	х			



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/2015 Page 77 of 164

§ 205.504 Evidence of Expe	§ 205.504 Evidence of Expertise and Ability					
This section of the checklist should be completed <u>only</u> annual update assessment, or renewal assessment. If d objective evidence that required information was not s requirement.	uring a	any on	site ass	essment there is		
CHECKLIST		omplie	s <sup>15</sup>	Remarks <sup>16</sup>		
SECTION IX	Yes	No	N/A			
References:						
NOP 2000 Accreditation Policies and Procedures						
NOP 2609 Unannounced Inspections						
NOP Appeals Procedure: Adverse Action Appeal Pro-	cess -	Certifi	ed Ope	ration or Applicant		
for Certification				95115-57		
Personnel						
§ 205.504(a)(1)				Personnel Used in the		
A copy of the applicant's policies and procedures for				Organic Program section of CDA's		
training, evaluating, and supervising personnel;	X procedure manua					
Table of Contents				outlines personnel		
				requirmements.		
	2	0	o. 10			

 <sup>&</sup>lt;sup>15</sup> For each requirement, use an "X" to identify whether the certifier complies, does not comply, or that a requirement is not applicable.
 <sup>16</sup> Provide explanations and/or comments to present evidence of compliance or noncompliance, as applicable. If a requirement is not applicable include why it does not apply.

NOP 2005 NOP Accreditation Assessment Checklist Rev08



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 78 of 164

## § 205.504 Evidence of Expertise and Ability

CHECKLIST	Complies <sup>15</sup>		s <sup>15</sup>	Remarks <sup>16</sup>	
SECTION IX	Yes	No	N/A		
§ 205.504(a)(2) The name and position description of all personnel to be used in the certification operation, including administrative staff, certification inspectors, members of any certification review and evaluation committees, contractors, and all parties responsibly connected to the certifier; <u>Table of Contents</u> <u>Table 8</u> <u>Table 8 Findings</u>	х			Administrative Staff (.3), Technical Staff (14), Management oversight (2)	
§ 205.504(a)(3)(i) A description of the qualifications, including experience, training, and education in agriculture, organic production, and organic handling, for each inspector to be used by the applicant: <u>Table of Contents</u> <u>Table 8 Table 8 Table 8 Findings</u>	X			Resumes for all inspectors were submitted	



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 79 of 164

## § 205.504 Evidence of Expertise and Ability

CHECKLIST	Complies <sup>15</sup>		s <sup>15</sup>	Remarks <sup>16</sup>
SECTION IX	Yes	No	N/A	
§ 205.504(a)(3)(ii) and for Each person to be designated by the applicant to review or evaluate applications for certification: <u>Table of Contents</u> <u>Table 8</u> <u>Table 8 Findings</u>	Х			Resumes were submitted for all staff
§ 205.504(a)(4) A description of any training that the applicant has provided or intends to provide to personnel to ensure that they comply with and implement the requirements of the Act and the regulations in this part. <u>Table of Contents</u>	Х			CDA provided a Annual training matrix with tabs for each year.
Administrative Policies and Procedures		20		
§ 205.504(b)(1) A copy of the procedures to be used to evaluate certification applicants, make certification decisions, and issue certification certificates; <u>Table of Contents</u>	х			



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 80 of 164

## § 205.504 Evidence of Expertise and Ability

CHECKLIST	Complies <sup>15</sup>		s <sup>15</sup>	Remarks <sup>16</sup>
SECTION IX	Yes	No	N/A	
§ 205.504(b)(2) A copy of the procedures to be used for reviewing and investigating certified operation compliance with the Act and the regulations in this part and the reporting of violations of the Act and the regulations in this part to the Administrator; <u>Table of Contents</u>	Х			
§ 205.504(b)(2) Do the procedures to be used for reviewing and investigating certified operation compliance with the Act and the regulations include conducting unannounced inspections at a rate in accordance with NOP 2609 Unannounced Inspections and inspector access to certified facilities? ( <i>This can be a separate policy/procedure.</i> ) <u>Table of Contents</u> § 205.403(a)(2)(i)-(iii)	Х			



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 81 of 164

## § 205.504 Evidence of Expertise and Ability

CHECKLIST	Complies <sup>15</sup>		s <sup>15</sup>	Remarks <sup>16</sup>
SECTION IX	Yes	No	N/A	
§ 205.504(b)(3) A copy of the procedures to be used for complying with the recordkeeping requirements set forth in § 205.501(a)(9); Table of Contents § 205.510(b)	X			
§ 205.504(b)(4) A copy of the procedures to be used for maintaining the confidentiality of any business-related information as set forth in § 205.501(a)(10); Table of Contents	х			
§ 205.504(b)(5) A copy of the procedures to be used, including any fees to be assessed, for making the information required under this clause available to any member of the public upon request; <u>Table of Contents</u> § 205.501(a)(10)	x			



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 82 of 164

# § 205.504 Evidence of Expertise and Ability

CHECKLIST		omplie	s <sup>15</sup>	Remarks <sup>16</sup>
SECTION IX	Yes	No	N/A	
§ 205.504(b)(6) A copy of the procedures to be used for sampling and residue testing pursuant to § 205.670. <u>Table of Contents</u>	х			



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/2015 Page 83 of 164

Conflicts of Interest				
§ 205.504(c)(1) A copy of procedures intended to be implemented to prevent the occurrence of conflicts of interest, as described in § 205.501(a)(11). Table of Contents	х			CDA provided signed COI and Confidentiality Agreement for all employess
§ 205.504(c)(2) A conflict of interest disclosure report, identifying any food- or agriculture-related business interests, including business interests of immediate family members, that cause a conflict of interest for all personnel required by this section and § 205.501(a)(11)(v). <u>Table of Contents</u>	х			CDA provided signed COI and Confidentiality Agreement for all employess
An applicant who currently certifies production or	hand	ing op	eratio	ns must submit:
§ 205.504(d)(1) A list of all production and handling operations currently certified by the applicant. <u>Table of Contents</u>	X			
§ 205.504(d)(2) Copies of at least three (3) different inspection reports and certification evaluation documents for production or handling operations certified by the applicant during the previous year for each area of operation for which accreditation is requested. <u>Table of Contents</u>			х	



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 84 of 164

§ 205.504(d)(3) The results of any accreditation process of the applicant's operation by an accrediting body during the previous year for the purpose of evaluating its certification activities. <u>Table of Contents</u>	Х		
§ 205.504(e) Any other information the applicant believes may assist in the Administrator's evaluation of the applicant's expertise and ability. <u>Table of Contents</u>	Х		



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/2015 Page 85 of 164

§ 205.510 Annual Report, Recordkeeping, and Renewal of Accreditation						
CHECKLIST	Complies <sup>17</sup>					
SECTION X	Yes	No	N/A	Remarks <sup>18</sup>		
An accredited certifier 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:						
§ 205.510(a)(1) A complete and accurate update of information submitted pursuant to §§ 205.503 and 205.504; <u>Table of Contents</u>	X					
§ 205.510(a)(2) Information supporting any changes being requested in the areas of accreditation described in § 205.500; <u>Table of Contents</u>	X					
§ 205.510(a)(3) A description of the measures implemented in the previous year and any measures to be implemented in the coming year to satisfy any terms and conditions determined by the Administrator to be necessary, as specified in the most recent notification of accreditation or notice of renewal of accreditation; <u>Table of Contents</u>	Х					

 <sup>&</sup>lt;sup>17</sup> For each requirement, use an "X" to identify whether the certifier complies, does not comply, or that a requirement is not applicable.
 <sup>18</sup> Provide explanations and/or comments to present evidence of compliance or noncompliance, as applicable. If a requirement is not applicable include why it does not apply.

NOP 2005 NOP Accreditation Assessment Checklist Rev08



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/2015 Page 86 of 164

§ 205.510 Annual Report, Recordkeeping, and Renewal of Accreditation					
CHECKLIST	Co	mplie	s <sup>17</sup>	1613	
SECTION X	Yes	No	N/A	Remarks <sup>18</sup>	
§ 205.510(a)(4) The results of the most recent performance evaluations and annual program review and a description of adjustments to the certifier's operation and procedures implemented or to be implemented in response to the performance evaluations and program review; and <u>Table of Contents</u>	X				
§ 205.510(a)(5) The fees required in § 205.640(a). <u>Table of Contents</u>	X				



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/2015 Page 87 of 164

Certifiers must maintain records according to the	followi	ng sch	edule	
§ 205.510(b)(1) Records <u>obtained from</u> applicants for certification and certified operations must be maintained for <u>not</u> <u>less than 5 years</u> beyond their receipt; <u>Table of Contents</u> § 205.501(a)(9)	х			
§ 205.510(b)(2) Records <u>created by</u> the certifier regarding applicants for certification and certified operations must be maintained for <u>not less than 10 years beyond</u> their creation; and <u>Table of Contents</u>	Х			
§ 205.510(b)(3) Records <u>created or received</u> by the certifier pursuant to the <u>accreditation requirements</u> of subpart F, <u>excluding</u> any records covered by § 205.510(b)(2), must be maintained for <u>not less than 5 years</u> beyond their creation or receipt. <u>Table of Contents</u>	х			
Amending Accreditation				



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 88 of 164

<b>§ 205.510(f)</b> Amendment to scope of an accreditation may be requested at any time. The application for amendment shall be sent to the Administrator and shall contain information applicable to the requested change in accreditation, a complete and accurate update of the information submitted pursuant to §§ 205.503 and 205.504, and the applicable fees required in § 205.640. Table of Contents	d X	
---	-----	--



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/2015 Page 89 of 164

§ 205.642 Fee Schedule							
Document on Certification File Review Checklist and Certification File Review Worksheets.							
CHECKLIST	Co	mplie	s <sup>19</sup>	Remarks <sup>20</sup>			
SECTION XI	Yes	No	N/A				
<b>§ 205.642</b> Are the fees charged reasonable?	X		×\$				
§205.642 Is the fee schedule that was submitted to applicants the same as the one provided to the Administrator? <u>Table of contents</u>	х			Yes – As documented on <u>Table 3</u> , the fee schedule provided to applicants was the same as the one provided to the Administrator.			
§§ 205.501(a)(16) and 205.642	X	,		Yes – As			

<sup>19</sup> For each requirement, use an "X" to identify whether the certifier complies, does not comply, or that a requirement is not applicable.
 <sup>20</sup> Provide explanations and/or comments to present evidence of compliance or noncompliance, as applicable. If a requirement is not applicable include why it does not apply.

NOP 2005 NOP Accreditation Assessment Checklist Rev08



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 90 of 164

§ 205.642 Fee Schedule					
Document on Certification File Review Checklist and CHECKLIST	Complies <sup>19</sup>				eview Worksheets. Remarks <sup>20</sup>
SECTION XI	Yes	No	N/A	Remarks	
Are the fees charged to operations for certification consistent with the fee schedule filed with the Administrator, to include any fees charged for unannounced inspections? <u>Table of contents</u> § 205.501(a)(16) NOP 2609 Unannounced Inspections				documented on <u>Table 3</u> , the fees charged to operations for certification were consistent with the fee schedule filed with the Administrator.	
§ 205.642 Are all applicants provided with an estimate of the total cost of certification and an estimate of the annual cost of updating the certification? <u>Table of contents</u>	х			Yes – As documented on <u>Table 3</u> , all operations were provided an estimate.	
§ 205.642 Are the nonrefundable portions of certification fees and the stages at which they become nonrefundable explained in the fee schedule submitted to the Administrator? <u>Table of contents</u>	Х				



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 91 of 164

§ 205.642 Fee Schedule					
Document on Certification File Review Checklist and Certification File Review Worksheets.					
CHECKLIST	Complies <sup>19</sup>			Remarks <sup>20</sup>	
SECTION XI	Yes	No	N/A		
§ 205.642 Does the certifier provide a copy of the fee schedule to anyone inquiring about the application process? <u>Table of contents</u>	Х				



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/2015 Page 92 of 164

\$ 205 661 Investigation of Contified Operations					
§ 205.661 Investigation of Certified Operations § 205.662 Noncompliance Procedure for Certified Operations					
Document on Certification File Review Worksheet, " Adverse Action Worksheet."	Fable 4	- Not	ice of I	Noncompliance/	
CHECKLIST Complies <sup>21</sup> Remarks <sup>22</sup>					
SECTION XII	Yes	No	N/A		
<b>References:</b> NOP 2607 Disclosure of Information Concerning Operations Certified Under the NOP NOP 4001 Complaint Handling Procedure NOP 4002 Enforcement of the USDA Organic Regulations by Accredited Certifying Agents NOP Appeals Procedure: Adverse Action Appeal Process – Certified Operation or Applicant for Certification					
§ 205.661(a) If the certifier conducts any investigations of complaints of noncompliance concerning production and handling operations certified as organic by the certifier, does the certifier notify the Program Manager of all compliance proceedings and actions taken? <u>Table of Contents</u>	х				

 <sup>&</sup>lt;sup>21</sup> For each requirement, use an "X" to identify whether the certifier complies, does not comply, or that a requirement is not applicable.
 <sup>22</sup> Provide explanations and/or comments to present evidence of compliance or noncompliance, as applicable. If a requirement is not applicable include why it does not apply.

NOP 2005 NOP Accreditation Assessment Checklist Rev08



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 93 of 164

#### § 205.661 Investigation of Certified Operations § 205.662 Noncompliance Procedure for Certified Operations

CHECKLIST	Complies <sup>21</sup>		es <sup>21</sup>	Remarks <sup>22</sup>
SECTION XII	Yes	No	N/A	
§ 205.662(a) In all cases when an inspection, review, or investigation of a certified operation by the certifier or a State organic program reveals any noncompliance with the Act or regulations, is a written notification of noncompliance sent to the certified operation? <u>Table of Contents</u> § 205.406(c)				Yes – As documented on <u>Table 4</u> , written notifications of NCs were sent to certified operations as appropriate. No – As documented on <u>Table 4</u> , written notifications of NCs were not sent to certified operations as appropriate.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 94 of 164

#### § 205.661 Investigation of Certified Operations § 205.662 Noncompliance Procedure for Certified Operations

CHECKLIST	Complies <sup>21</sup>		s <sup>21</sup>	Remarks <sup>22</sup>
SECTION XII	Yes	No	N/A	
§ 205.662(a)(1) – (3) Do all Notifications of Noncompliance include: a description of each noncompliance; the facts upon which the notification of noncompliance is based; and the date by which the certified operation must rebut or correct each noncompliance and submit supporting documentation? <u>Table of Contents</u>				Yes – As documented on <u>Table 4</u> (Continuing) or <u>Table 5</u> (Denial), written notifications of NCs included the required information. No – As documented on <u>Table 4</u> (Continuing) or <u>Table 5</u> (Denial), written notifications of NCs did not include all required information.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 95 of 164

#### § 205.661 Investigation of Certified Operations § 205.662 Noncompliance Procedure for Certified Operations

CHECKLIST		omplie	s <sup>21</sup>	Remarks <sup>22</sup>
SECTION XII	Yes	No	N/A	
§ 205.662(b) Does the certifier send the certified operation a written notification of noncompliance <b>resolution</b> after the certified operation demonstrates that each noncompliance is resolved? <u>Table of Contents</u>	х			Yes – As documented on <u>Table 4</u> , a written notification of NC resolution was sent to certified operations after they demonstrated that each NC was resolved.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 96 of 164

#### § 205.661 Investigation of Certified Operations § 205.662 Noncompliance Procedure for Certified Operations

CHECKLIST	Co	Complies <sup>21</sup>		Remarks <sup>22</sup>
SECTION XII	Yes	No	N/A	
§ 205.662(c) If rebuttal is unsuccessful or the correction of the noncompliance is not completed in the prescribed time period, does the certifier send the certified operation a written notice of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the noncompliance? <u>Table of Contents</u>				Yes – As documented on <u>Table 4</u> , a written notice of proposed suspension or revocation was sent to certified operations as appropriate. No – As documented on <u>Table 4</u> , a written notice of proposed suspension or revocation was not sent to all certified operations as appropriate.
§§ 205.662(c)(1) – (4) Do all Notifications of Proposed Suspension / Proposed Revocations include: the reasons for the			X	



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 97 of 164

#### § 205.661 Investigation of Certified Operations § 205.662 Noncompliance Procedure for Certified Operations

CHECKLIST	Complies <sup>21</sup>		Complies <sup>21</sup> Remarks <sup>2</sup>	Remarks <sup>22</sup>
SECTION XII	Yes	No	N/A	
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? <u>Table of Contents</u>				
§ 205.662(d) If the certifier or State organic program has reason to believe that a certified operation willfully violated the Act or regulations, the certifier or State organic program shall send the certified operation a notification of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the noncompliance. <u>Table of Contents</u>				Yes – As documented on <u>Table 4</u> , notification of proposed suspension or revocation was sent when the certifier had a reason to believe the certified operation willfully violated the Act or regulations.
				No – As documented on



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 98 of 164

## § 205.661 Investigation of Certified Operations § 205.662 Noncompliance Procedure for Certified Operations

CHECKLIST	Co	Complies <sup>21</sup>		Remarks <sup>22</sup>
SECTION XII	Yes	No	N/A	
				Table 4the certifierhad reason tobelieve a certifiedoperation willfullyviolated the Act orregulations but didnot send anotification ofproposedsuspension orrevocation asrequired.N/A – there wereno willfulviolations identifiedby the certifier.
§ 205.662(e)(1) Does the certifier or State program send the certified operation a written notification of suspension or revocation in all cases that a certified operation failed to correct the noncompliance, to resolve the	X			Yes – As documented on <u>Table 4</u> , a notification of suspension or
issue through rebuttal or mediation, or to file an				revocation was sent



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 99 of 164

#### § 205.661 Investigation of Certified Operations § 205.662 Noncompliance Procedure for Certified Operations

CHECKLIST	Complies <sup>21</sup>			Remarks <sup>22</sup>
SECTION XII	Yes	No	N/A	
appeal of the proposed suspension or revocation of certification? <u>Table of Contents</u>				to all certified operations which failed to: correct the NC; resolve the NC through rebuttal or mediation; or file an appeal.
§ 205.662(e)(2) Has the certifier or State program sent a notice of Suspension / Revocation during the time a final resolution of either mediation or appeal is pending for a certified operation which requested either one? <u>Table of Contents</u>		Х		No (certifier complies) – As documented on <u>Table 4</u> , a notification of suspension or revocation was not sent to any certified operation during the time mediation and/or an appeal was pending.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 100 of 164

## § 205.661 Investigation of Certified Operations § 205.662 Noncompliance Procedure for Certified Operations

CHECKLIST	Complies <sup>21</sup>			Remarks <sup>22</sup>
SECTION XII	Yes	No	N/A	
				N/A – there were no requests for mediation or appeals filed.
§ 205.662(g) Violations of Act Has the certifier fined operations as a result of any noncompliance issues? <u>Table of Contents</u>		Х		



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 101 of 164

#### § 205.661 Investigation of Certified Operations § 205.662 Noncompliance Procedure for Certified Operations

CHECKLIST		omplie	s <sup>21</sup>	Remarks <sup>22</sup>
SECTION XII	Yes	No	N/A	
§ 205.660(d) Are all notifications of noncompliance, rejections of mediation, noncompliance resolutions, proposed suspensions or revocations, and suspensions or revocations issued and each response to such notification sent to the recipient's place of business via a delivery service which provides dated return receipts? <u>Table of Contents</u>	X			Yes – As documented on <u>Table 4</u> , all notifications were sent to the recipient's place of business via a delivery service which provided dated return receipts.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 102 of 164

#### § 205.663 Mediation

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

CHECKLIST		omplie	s <sup>23</sup>	Remarks <sup>24</sup>
SECTION XIII	Yes	No	N/A	
§ 205.663 In all instances where mediation is requested, is the request from the applicant or certified operation in writing? <u>Table of Contents</u>	x			
§ 205.663 If the certifier rejects the request, is the notification to reject the request of mediation sent to the operation in writing? <u>Table of Contents</u>	x			
§ 205.663 Does the notification to reject the request of mediation advise the operation of their right to request an appeal pursuant to § 205.681? <u>Table of Contents</u>	X			

NOP 2005 NOP Accreditation Assessment Checklist Rev08

<sup>&</sup>lt;sup>23</sup> For each requirement, use an "X" to identify whether the certifier complies, does not comply, or that a requirement is not applicable.

<sup>&</sup>lt;sup>24</sup> Provide explanations and/or comments to present evidence of compliance or noncompliance, as applicable. If a requirement is not applicable include why it does not apply.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 103 of 164

#### § 205.663 Mediation

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

CHECKLIST	Co	Complies <sup>23</sup>		Remarks <sup>24</sup>	
SECTION XIII	Yes	No	N/A		
§ 205.663 Does the notification to reject the request of mediation advise the operation that an appeal must be requested within 30 days of the date of the written rejection of mediation? <u>Table of Contents</u>	Х				
§ 205.663 If the certifier accepted the mediation request, did the certifier send a settlement agreement to the operator for consideration with its mediation acceptance letter (informal mediation)? <u>Table of Contents</u> (When a certifier accepts mediation, the certifier can send a settlement agreement to the operator for consideration with its mediation acceptance letter.)		X		Not accepting mediation and don't have mediation procedures in place.	



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 104 of 164

## § 205.663 Mediation

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

CHECKLIST	Complies <sup>23</sup>		Complies <sup>23</sup> Remarks <sup>24</sup>	Remarks <sup>24</sup>
SECTION XIII	Yes	No	N/A	
§ 205.663 If the certifier accepted the mediation request and sent a settlement agreement to the operator for consideration with its mediation acceptance letter, was it clear that the operator was free to: accept or reject the settlement agreement; come back to the certifier for continued informal discussion; or request a more formal mediation process, to discuss terms that are agreeable to both parties (informal mediation)? <u>Table of Contents</u> ( <i>The proposed settlement may be included as an</i> <i>alternative to an adverse action, but <u>cannot</u> be <i>included in the adverse action notices.</i>)</i>			х	
§ 205.663 If the certifier accepted the mediation request, was the mediation conducted by a qualified mediator mutually agreed upon by the parties to the mediation? <u>Table of Contents</u>			х	



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 105 of 164

## § 205.663 Mediation

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

CHECKLIST		mplie	es <sup>23</sup>	Remarks <sup>24</sup>
SECTION XIII	Yes	No	N/A	
§ 205.663 Is an agreement reached no more than 30 days following the mediation session? <u>Table of Contents</u> 8 205.663			х	
§ 205.663 Any agreement reached during or as a result of the mediation process shall be in compliance with the Act and the regulations in this part: If a settlement agreement is reached, does it comply with the Act and the regulations in this part and include the NOP best practices for the agreement to include: the parties involved in the agreement (Name of certifier, operator, operation and responsibly connected party); corrective actions agreed to by the operator; the outcome; the timeframe by which the corrective actions will be completed; effective date the agreement will take effect; and signatures by the authorized representatives of the certifier <u>and</u> the certified operation ?			х	



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 106 of 164

#### § 205.663 Mediation

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

CHECKLIST	Complies <sup>23</sup>			Remarks <sup>24</sup>
SECTION XIII	Yes	No	N/A	
Table of Contents				5. 
§ 205.663 If mediation is unsuccessful, is the operation informed they have 30 days from termination of mediation to appeal the certifier's decision pursuant to § 205.681? <u>Table of Contents</u>			X	

## § 205.670 Inspection and Testing § 205.671 Exclusion from Organic Sale

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

CHECKLIST	Сотр	lies <sup>25</sup>	Remarks <sup>26</sup>
SECTION XIV	Yes N	o N/A	

<sup>25</sup> For each requirement, use an "X" to identify whether the certifier complies, does not comply, or that a requirement is not applicable.

<sup>&</sup>lt;sup>26</sup> Provide explanations and/or comments to present evidence of compliance or noncompliance, as applicable. If a requirement is not applicable include why it does not apply.

NOP 2005 NOP Accreditation Assessment Checklist Rev08



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 107 of 164

#### § 205.670 Inspection and Testing § 205.671 Exclusion from Organic Sale § 205.504(b)(6) requires that the certifier have procedures for sampling and residue testing. Procedures should address the requirements of § 205.670. Evaluate procedures under § 205.504(b)(6); Checklist Section IX. Complies<sup>25</sup> CHECKLIST Remarks<sup>26</sup> SECTION XIV No Yes N/A **References:** NOP 2610 Sampling Procedures for Residue Testing NOP 2611 Laboratory Selection Criteria For Pesticide Residue Testing NOP 2611-1 Prohibited Pesticides for NOP Residue Testing NOP 2613 Responding to Results from Pesticide Residue Testing § 205.403(e)(1) Does the inspector provide the operation with a receipt for the samples taken at the time of the X See observation inspection? Table 7b B Table of Contents § 205.403(e)(1) Is there any objective evidence that inspectors were Х charged for the samples taken? §§ 205.670(b) and (c) Yes - as Was the testing paid for by the requesting official documented on (Administrator or State) or the certifier? Table 7b, testing was paid for by the Table 7b H Х Table of contents requesting official and not the charged to the operations.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 108 of 164

	-		
<ul> <li>§ 205.670(d)</li> <li>Were at least 5% of certified operations sampled and tested on an annual basis (or at least one operation annually if certifier has fewer than thirty operations)?</li> <li>Table <u>7a</u></li> <li><u>Table of contents</u></li> </ul>		Х	Already noted in June CA Report
§ 205.670(e) Are samples collected by an inspector representing the certifier, State, or Administrator as applicable? Table 7b <u>A</u> <u>Table of contents</u>	х		Yes – as documented on <u>Table 7b</u> , samples were collected by an inspector representing the certifier, State, or Administrator as applicable.
§ 205.670(e) Is chain of custody maintained? Table 7b C <u>Table of contents</u>		Х	Lack of signed receipt from operation prevents verification that sample was taken from their field.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 109 of 164

§ 205.670(e) Is the sample submitted to an ISO 17025 accredited lab? Table 7b D Table of contents Or an alternate standard approved by the NOP?	Х		Yes – as documented on <u>Table 7b</u> , samples were submitted to an accredited or NOP-approved lab.
§ 205.670(e) Is the sample tested 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? Table 7b <u>E</u> <u>Table of contents</u>	х		Yes – as documented on <u>Table 7b</u> , samples were tested in accordance with an approved $AOAC$ or other validated methodology.
§§ 205.670(f) Are test results available for public access, unless the testing is part of an ongoing compliance investigation? <u>Table of contents</u>		Х	CDA was unaware that tests need to be made available for public access (205.670(f)). They thought that this would violate confidentiality. But nobody has ever requested them.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 110 of 164

§§ 205.402(b)(3) and 205.403(e)(2)Is a copy of the test results provided to the applicant or certified operation?Table 7b FTable of Contents (§ 205.402) or Table of Contents (§ 205.403)	Х			Add verbage "product can be sold as organic"
§ 205.670(g) If test results indicate a specific agricultural product contains pesticide residues or environmental contaminants that exceed the FDA's or EPA's regulatory tolerance, did the certifier promptly report such data to the applicable agency whose regulatory tolerance or action level was exceeded? ( <i>Test results that exceed federal regulatory tolerances must also be reported to the appropriate State health agency or foreign equivalent.</i> ) Table 7b I and J Table of contents			x	N/A – as documented on <u>Table 7b</u> , there were no test results that exceeded the FDA's or EPA's regulatory tolerance.
<b>§ 205.671</b> Is there a prohibited substance detected that is greater than 5% of the EPA tolerance for the residue or greater than the unavoidable residual environmental contamination (UREC) level and is the product allowed to be represented as organic? Table 7b <u>K</u> Table 7b <u>K</u>		Х		No (ACA Complies) – as documented on <u>Table 7b</u> , when test results verified there was a prohibited substance detected that was greater than 5% of the EPA tolerance or greater than the UREC level, the product



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 111 of 164

			was not allowed to be represented as organic.
§ 205.671 Are investigations conducted to determine the cause of the prohibited substance? Table 7b P	Х		



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/2015 Page 112 of 164

§ 205.672 Emergency Pest or Disease Treatment				
If there is no instance of a prohibited substance applied due to a Federal or State emergency pest or disease treatment program identify with an "X" in the N/A column, and include a statement in Remarks column. These requirements only apply in the United States and not in other countries.				
CHECKLIST	Co	mplie	s <sup>27</sup>	Remarks <sup>28</sup>
SECTION XV	Yes	No	N/A	
§ 205.672 Is there any instance where a prohibited substance was applied to a certified operation due to a Federal or State emergency pest or disease treatment program? <u>Table of Contents</u>		Х		
If 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 this part, the certification status of the operation shall not be affected as a result of the application of the prohibited substance: Provided, That:				
§ 205.672(a) Any harvested crop or plant part to be harvested that has contact with a prohibited substance cannot be sold, labeled, or represented as organically produced. Table of Contents			X	

 <sup>&</sup>lt;sup>27</sup> For each requirement, use an "X" to identify whether the certifier complies, does not comply, or that a requirement is not applicable.
 <sup>28</sup> Provide explanations and/or comments to present evidence of compliance or noncompliance, as applicable. If a requirement is not applicable include why it does not apply.

NOP 2005 NOP Accreditation Assessment Checklist Rev08



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 113 of 164

#### § 205.672 Emergency Pest or Disease Treatment

If there is no instance of a prohibited substance applied due to a Federal or State emergency pest or disease treatment program identify with an "X" in the N/A column, and include a statement in Remarks column. These requirements only apply in the United States and not in other countries.

CHECKLIST	С	Complies <sup>27</sup>		Remarks <sup>28</sup>
SECTION XV	Yes	No	N/A	
§ 205.672(b) Any livestock that are treated with a prohibited substance or product derived from treated livestock, cannot be sold, labeled, or represented as organically produced. <u>Table of Contents</u>		х		
Except that:	÷			
§ 205.672(b)(1) Milk or milk products may be sold, labeled, or represented as organically produced beginning 12 months following the last date that the dairy animal was treated with the prohibited substance; and <u>Table of Contents</u>			х	
§ 205.672(b)(2) The offspring of gestating mammalian breeder stock treated with a prohibited substance may be considered organic: <i>Provided that</i> , the breeder stock was not in the last third of gestation on the date that the breeder stock was treated with the prohibited substance. <u>Table of Contents</u>			х	



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/2015 Page 114 of 164

§ 205.500(c)(2) International Agreements					
For certifiers involved in any of the international agreements, please provide details of the review process in place and include a summary of the certifier's participation in the arrangements in the body of the audit report, under the heading "International Agreements."					
CHECKLIST	Co	mplie	s <sup>29</sup>	Remarks <sup>30</sup>	
SECTION XVI	Yes	No	N/A		
<b>References:</b> NOP 2403 Certifying Agents Approved to Issue TM-11 Export Certificates under an Export Arrangement between the USDA and a Foreign Government					
EU – U.S. Organic Equivalency Arrangement Please mark "N/A" if the certifier does not have any current clients shipping to the EU or receiving product from the EU.					
Are the certifier and applicable staff aware of the requirements for exporting to the EU? Program requirements can be accessed on the <u>NOP</u> <u>Web site</u> . <u>Table of Contents</u>	x			Have a copy of the requirements	
Does the certifier have a system in place to review and verify the terms of the arrangement? <u>Table of Contents</u>		X		Modules lack the necessary questions to verify compliance.	
Is the arrangement limited to organic products certified under the NOP which were produced or had final processing or packaging within the U.S.? <u>Table of Contents</u>		X			

 <sup>&</sup>lt;sup>29</sup> For each requirement, use an "X" to identify whether the certifier complies, does not comply, or that a requirement is not applicable.
 <sup>30</sup> Provide explanations and/or comments to present evidence of compliance or noncompliance, as applicable. If a requirement is not applicable include why it does not apply.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 115 of 164

#### § 205.500(c)(2) International Agreements

CHECKLIST	Complies <sup>29</sup>		Complies <sup>29</sup> Remarks <sup>30</sup>	Remarks <sup>30</sup>
SECTION XVI	Yes	No	N/A	
Does the certifier provide an EU Certificate of Inspection ( <u>EU Import Certificate</u> ) to certified operations wishing to export to the EU so that it is transferred with the product(s)? <u>Table of Contents</u>	Х			
If applicable did the certifier verify that organic apples, pears, and organic ingredients from organic apples and pears were produced without the use of antibiotics ( <i>streptomycin for fire blight control</i> ) for at least three (3) years prior to the harvest of the organic apples and pears? <u>Table of Contents</u>			х	
If applicable did the certifier verify that wine exported to the EU was: 1) produced using organic varieties of grapes and organic ingredients; 2) contained only nonorganic substances allowed under § 205.605; and 3) produced only using the wine- making practices and substances detailed in the <u>EU</u> <u>organic regulations</u> ? <u>Table of Contents</u>		х		



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 116 of 164

#### § 205.500(c)(2) International Agreements

CHECKLIST	Complies <sup>29</sup>		Complies <sup>29</sup> Remarks	Remarks <sup>30</sup>
SECTION XVI	Yes	No	N/A	
For retail products did the certifier verify general EU labeling requirements and that the labels contained the code assigned to them by the EU? <u>EU Certifier Codes</u> <u>EU Labeling Requirements</u> <u>Table of Contents</u>	X			
For bulk products did the certifier verify general EU labeling requirements and that there was a lot number present to allow for a complete audit trail and to verify the product's integrity? <u>EU Labeling Requirements</u> <u>Table of Contents</u>			х	
For certified operations that receive product(s) from the EU, did the certifier verify (either through file review and/or onsite inspection) that the <u>NOP</u> <u>Import Certificate</u> was received with the product(s) to provide verification that incoming product meets the terms of the arrangement and is, therefore, eligible for use as an ingredient or a product to repack or to be sold as is in the U.S.? <u>Table of Contents</u>		Х		



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/2015 Page 117 of 164

§ 205.500(c)(2) International Agreements						
For certifiers involved in any of the international agreements, please provide details of the review process in place and include a summary of the certifier's participation in the arrangements in the body of the audit report, under the heading "International Agreements."						
CHECKLIST	Co	mplie	s <sup>29</sup>	Remarks <sup>30</sup>		
SECTION XVI	Yes	No	N/A			
Switzerland – U.S. Organic Equiv	valency	v Arra	ngeme	ent		
Please mark "N/A" if the certifier does not have any current clients shipping to Switzerland or receiving product from the Switzerland.						
Are the certifier and applicable staff aware of the						
requirements for exporting to the Switzerland?						
Program requirements can be accessed on the NOP			X			
Web site.						
Table of Contents						
Does the certifier have a system in place to review						
and verify the terms of the arrangement?			X			
Table of Contents						
Is the arrangement limited to organic products						
certified under the NOP which were produced or had			37			
final processing or packaging within the U.S.?			Х			
Table of Contents						
Does the certifier provide a Swiss Certificate of			2	24		
Inspection (Swiss Import Certificate) to certified						
operations wishing to export to Switzerland so that it			X			
is transferred with the product(s)?						
Table of Contents						



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 118 of 164

#### § 205.500(c)(2) International Agreements

CHECKLIST	Complies <sup>29</sup>		Complies <sup>29</sup>		es <sup>29</sup> Remarks <sup>30</sup>	Remarks <sup>30</sup>
SECTION XVI	Yes	No	N/A			
If applicable did the certifier verify that wine exported to Switzerland was produced only using the wine-making practices and substances detailed in the <u>Swiss organic ordinances</u> ? <u>Table of Contents</u>			х			
For retail products did the certifier verify general Swiss labeling requirements and that the labels contained the code assigned to them by the Swiss authority? <u>Swiss Certifier Codes</u> <u>Swiss Labeling Requirements</u>			х			
For bulk products did the certifier verify general Swiss labeling requirements and that there was a lot number present to allow for a complete audit trail and to verify the product's integrity? <u>Swiss Labeling Requirements</u> <u>Table of Contents</u>			X			



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 119 of 164

#### § 205.500(c)(2) International Agreements

CHECKLIST	Complies <sup>29</sup>		s <sup>29</sup>	Remarks <sup>30</sup>	
SECTION XVI	Yes	No	N/A		
For certified operations that receive product(s) from Switzerland, did the certifier verify (either through file review and/or onsite inspection) that the <u>NOP</u> <u>Import Certificate</u> was received with the product(s) to provide verification that incoming product meets the terms of the arrangement and is, therefore, eligible for use as an ingredient or a product to repack or to be sold as is in the U.S.? <u>Table of Contents</u>			х		
U.S. – Canada Organic Equivalency Arrangement (USCOEA) Please mark "N/A" if the certifier does not have any current clients shipping to Canada or receiving product from Canada.					
Are the certifier and applicable staff aware of the requirements for exporting to Canada? Program requirements can be accessed on the <u>NOP website</u> . <u>Table of Contents</u>	X			CDA has a copy of the requirements.	
Does the certifier have a system in place to review and verify the terms of the arrangement? <u>Table of Contents</u>		Х		Modules lack the necessary questions to verify	



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 120 of 164

#### § 205.500(c)(2) International Agreements

CHECKLIST	Complies <sup>29</sup>		s <sup>29</sup>	Remarks <sup>30</sup>
SECTION XVI	Yes	No	N/A	
Did the certifier verify agricultural products exported to Canada were not produced with the use of sodium nitrate? <u>Table of Contents</u>	Х			
Did the certifier verify agricultural products exported to Canada were not produced by hydroponic or aeroponic production methods? <u>Table of Contents</u>	X			CDA doesn't certify hydroponic operations.
Did the certifier verify agricultural products derived from animals ( <u>with the exception of ruminants</u> ) were produced according to livestock stocking rates as set out in <u>CAN /CGSB32.310-2006</u> ? <u>Table of Contents</u>		X		



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 121 of 164

#### § 205.500(c)(2) International Agreements

CHECKLIST		mplie	s <sup>29</sup>	Remarks <sup>30</sup>
SECTION XVI	Yes	No	N/A	
Did the certifier verify agricultural products being sold or shipped to Canada and received from Canada under the arrangement are accompanied by an attestation statement ( <i>Certified in compliance with</i> <i>the terms of the U.SCanada Organic Equivalency</i> <i>Arrangement</i> ) per NOP PM 10-3? Include how the requirement is met. Did the certifier include "USCOEA compliant" or some variation on the certified operation's certificate, or did the certifier provide attestation statements to the operation rather than allowing the operation to do so themselves. <u>Table of Contents</u>		Х		
Did the certifier verify that labels meet the requirements of the destination country, to include that for retail products? Labels or stickers must state the name of the U.S. or Canadian certifier (may use the USDA organic seal or the Canada Organic Biologique logo), and all product labels must be in English and French? U.SCanada Agreement labeling requirements Table of Contents		X		



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 122 of 164

#### § 205.500(c)(2) International Agreements

CHECKLIST	Co	omplie	es <sup>29</sup>	Remarks <sup>30</sup>		
SECTION XVI	Yes	No	N/A			
Did the certifier verify that labels meet the requirements of the destination country, to include a lot number for wholesale products? <u>U.SCanada Agreement labeling requirements</u> <u>Table of Contents</u>		X				



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/2015 Page 123 of 164

U.S Korea Organic Equivale	ency Arrangement
Please mark "N/A" if the certifier does not have a	
Are the certifier and applicable staff aware of the	
requirements for exporting to Korea? Program	
requirements can be accessed on the NOP Web site.	X
Table of Contents	
Does the certifier have a system in place to review	
and verify the terms of the arrangement?	Х
Table of Contents	
Were all NAQS Import Certificates issued only for	
USDA organic products that were produced within	
the U.S. or had their final processing or packaging	X
occur within the U.S.?	
Table of Contents	
Were all NAQS Import Certificates issued only for	
processed products as defined by the Korean Food	X
Code?	~
Table of Contents	
Were all NAQS Import Certificates issued only for	
products that contain at least 95% organic	x
ingredients?	~
Table of Contents	
Did all NAQS Import Certificates issued include the	
statement, "Certified in compliance with the terms	X
of the US-Korea Organic Equivalency	A
Arrangement"?	
Did the certifier verify that processed products	
exported to Korea did not contain apples or pears	X
produced with the use of antibiotics?	
Table of Contents	



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 124 of 164

Did the certifier verify that labels on products exported to Korea meet MAFRA's organic labeling requirements? (product may display the USDA organic seal and/or Korean organic logo) <u>Table of Contents</u>			X	
For certified operations that receive product(s) from Korea imported under the equivalency arrangement, did the certifier verify (either through file review and/or onsite inspection) that the <u>NOP Import</u> <u>Certificate</u> issued by MAFRA-accredited certification body was received with the product(s) to provide verification that incoming product meets the terms of the arrangement and is, therefore, eligible for use as an ingredient or a product to repack or to be sold as is in the U.S.? <u>Table of Contents</u>			X	
U.S Japan Organic Equivale				
Please mark "N/A" if the certifier does not have any c Were all TM-11 Export Certificates issued for Japan	urrent	chents	shippi	ing to Japan.
only for USDA organic products that were produced within the U.S. or had their final processing or packaging occur within the U.S.? <u>Table of Contents</u> <i>All USDA-accredited certifiers may issue TM-11</i> <i>certificates to Japan.</i> <u>Table of Contents</u>	х			
Are the certifier and applicable staff aware of the requirements for exporting to Japan? Program requirements can be accessed on the <u>NOP Web site</u> . <u>Table of Contents</u>	Х			



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 125 of 164

Does the certifier have a system in place to review and verify the terms of the arrangement? <u>Table of Contents</u>		X	
Did the certifier assign a unique identification number to each export certificate? The unique identification number must begin with an acronym designating the certifier and the country code for the specific export arrangement. <u>Table of Contents</u>	х		
Does the certifier keep a paper-based or electronic control log that records and tracks the disposition of each export certificate? <u>Table of Contents</u>	X		
Did the certifier 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, as well as who 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? <u>Table of Contents</u>	х		
<ul> <li>Were export certificates issued for all organic plants, including fungi, and plant-based processed products that were exported to Japan?</li> <li>Export certificates aren't required for products not regulated by the JAS law, such as meat, dairy products, honey, or alcoholic beverages. However, alcoholic beverages labeled with the word</li> <li>"organic" in Japanese must be accompanied by an export certificate that includes:</li> <li>the name of the certified alcoholic beverage;</li> </ul>	Х		



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/2015 Page 126 of 164

<ul> <li>the name and address of the certified farm or brewery;</li> <li>the number and date of certification;</li> <li>the address and name of the operator;</li> <li>the country of origin; and</li> <li>the name and address of the certifying body.</li> </ul>				
Did all organic plants, including fungi, and plant- based processed products (such as grape juice or commeal) that were exported to Japan labeled with the JAS organic seal? <i>Products not regulated by the JAS law—such as</i> <i>meat, dairy products, or alcoholic beverages, <u>cannot</u> be labeled with the JAS organic seal under the terms of the arrangement.</i>	х			
Did the U.Sbased farm or business who applied the JAS organic seal to its products in the U.S. have a contract with a JAS certified importer, or in cases where the U.S. operation did not have a contract with a JAS certified importer, was the seal applied by the JAS certified importer once the product arrived in Japan? <u>List of JAS Certified Importers</u> <u>Table of Contents</u>	X	iwar		
<b>Export Arrangement w</b> Please mark "N/A" if the certifier does not have any c			shippi	ing to Taiwan.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 127 of 164

If the certifier has issued any TM-11 Export Certificates, are they on the NOP's <u>list of certifiers</u> approved to issue a certificate under an export arrangement? § 205.501(a)(21) <u>Table of Contents</u>	X	
Were all TM-11 Export Certificates issued only to U.S. certified operations selling and/or shipping to Taiwan? <u>Table of Contents</u>	X	
Are the certifier and applicable staff aware of the requirements for exporting to Taiwan? Program requirements can be accessed on the <u>NOP Web site</u> . <u>Table of Contents</u>	X	
Does the certifier have a system in place to review and verify the terms of the arrangement? <u>Table of Contents</u>	Х	
Did the certifier 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 (insert country name)?" <u>Table of Contents</u>	X	
Did the certifier assign a unique identification number to each export certificate? The unique identification number must begin with an acronym designating the certifier and the country code for the specific export arrangement. List of certifiers Table of Contents	X	



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/2015 Page 128 of 164

Does the certifier keep a paper-based or electronic control log that records and tracks the disposition of each export certificate including those issued, voided, or destroyed? <u>Table of Contents</u>	X	
Did the certifier 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, as well as who 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? <u>Table of Contents</u>	X	
Did all export certificates that were issued under the <u>Taiwan</u> arrangement for processed products and crops have the required statement, "Organic agricultural products and organic processed products, accompanied by this certificate, were produced or processed using zero prohibited substances"? <u>Table of Contents</u>	X	
Did all export certificates that were issued under the <u>Taiwan</u> arrangement for livestock and meat products have the required statement, "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?" <u>Table of Contents</u>	Х	



NOP 2005 Effective Date: 10/29/2015 Page 129 of 164

## 1. CLOSING MEETING

The purpose of the closing meeting is to present the assessment findings and conclusions in such a manner that the client can understand and acknowledge them.

- □ Sign out on the attendance list (<u>see beginning of checklist</u>).
- □ Present positive aspects of the certification program.
  - $\square$  Positive Aspect (1) –
  - $\square$  Positive Aspect (2) –
  - $\Box \qquad \text{Positive Aspect (3)} -$
- Present any items that require further guidance and consideration by the NOP.
  - $\square$  Pending Item (1) –
  - $\square$  Pending Item (2) –
- Present the assessment findings and conclusions in a manner so they are understood and acknowledged by the auditee. For each finding, cite the specific requirement of the assessment criteria and allow the auditee to ask questions on any findings.
- $\Box$  Discuss the next steps in the process:
  - 1) The report is written and sent to the NOP for review.
  - 2) The NOP reviews the report and determines the compliance / noncompliance of the program and makes all decisions concerning the accreditation. The NOP has the discretion to modify the assessment findings.
  - 3) The report is issued to the client by the NOP.
- $\Box$  Provide information about the NOP appeals process (§ 205.681(b)).
- Encourage feedback. Clients can submit feedback to <u>AIAInBox@ams.usda.gov</u>. *Provide the certifier with the NOP Auditor Evaluation form to complete*.
- 2. FINDINGS: Findings must be in NC report format prior to the auditor submitting the checklist to the NOP.

Table of Contents Table 1 Table 2 Table 3 Table 4 Table 5 Table 6a Table 6b Table 6c Table 7a Table 7b Table 8

a. <u>Noncompliances issued prior to this audit – Cleared (or remain Outstanding)</u>



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 130 of 164

**NP5159RKA.NC1** – **Accepted**. 7 CFR §205.501(a)(21), states that certifiers must "Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary." NOP 2613, Responding to Results from Pesticide Residue Testing, Section 5.3.1.a.2 instructs certifiers that when the pesticide test analysis results indicate detection below 5 percent of the EPA tolerance, but above .01 ppm, they are required to assess why the residue is present.

**2015** Comments: The certifier correctly issued a letter to an operation to investigate the source of contamination (Chlorpropham .592 mg/g) including a date by which the operation was to respond. The operation did not respond by the specified date and the certifier did not conduct a follow up. Therefore, the certifier was unable to assess why the residue was present and to determine if a noncompliance should be issued to the operation.

**2015 Corrective Action:** CDA updated their Organic Policy and Procedure Manual regarding procedures when residue tests show positive results below 5% of the EPA tolerance. CDA will issue a notice of noncompliance to operations that do not respond to their letter of investigation within the time period stated in the letter. A notice of noncompliance was sent to the operation regarding no response to the letter investigating the source of the contamination.

**Verification of Corrective Action:** A sample taken in 2016 tested positive for a prohibited substance below the 5% EPA tolerance level. The operation was contacted by CDA and issued a NoNC § 205.272: inadequate measures to prevent commingling or contamination of organic products. The notice should require corrective actions to prevent future contamination. The operation responded to the NoNC and was issued a NoNC Resolution letter by CDA. No other samples tested positive in 2016.

**NP5159RKA.NC2** – **Accepted**. 7 CFR §205.501(a)(21), states that certifiers must "Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary." NOP 4009, "Who Needs to be Certified?" provides clarification to certifiers regarding the certification requirements for operations that produce or handle agricultural products to be sold, labeled or represented as organic.

**2015** Comments: During the witness audit of a fruit producer, the auditor identified that one of the apple orchards listed in the operation's OSP should be considered a separate certified entity. Under the current arrangement between the orchard owner and the certified operation, the orchard owner is under contract to sell his harvested fruit to the certified operation, but the certified operation does not manage the orchard (i.e. conduct cultural practices, pay labor, etc.), does not purchase and apply inputs, and does not maintain all the records that demonstrate compliance to the regulations.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 131 of 164

**2015 Corrective Action:** CDA issued a notice of noncompliance to the fruit producer, identifying that contracted farming operations are not allowed to be certified under another entity's certificate. CDA provided training for inspectors on June 26, 2015, regarding NOP Instruction 4009 and a Training Attendance sign-in sheet was submitted.

#### **Verification of Corrective Action:**

**NP5159RKA.NC3** – **Accepted**. 7 CFR §205.403(c)(1) states that, "The on-site inspection of an operation must verify:.. The operation's compliance or capability to comply with the Act and the regulations in this part..."

**2015** Comments: During a witness audit, the inspector did not fully verify whether the contracted or rented fields in the operator's *OSP* were under the control (management) of the certified operation.

**2015 Corrective Action:** A new inspection report cover sheet was created to be used in conjunction with new OSP module system being developed. Included in the cover sheet is a question specifically requesting information regarding control/management of rented portions of the certified operation. CDA trained inspectors on April 7, 2016, regarding use of new inspection forms and the cover letter.

#### Verification of Corrective Action:

**NP5159RKA.NC4 – Accepted**. 7 CFR §205.403(d) states that during an exit interview, "the inspector must...address...any issues of concern."

**2015** Comments: During a witness audit of a split and parallel operation, the inspector did not identify as an issue of concern the lack of adequate controls to prevent contamination of products or fields. The storage of pesticides and fertilizers did not have a clear separation of approved and unapproved input materials. Input materials were located at spray rig filling stations in drums that were unlabeled. Brand names and sources are not listed on the OSP Input List; instead, some materials are listed with a generic identification: e.g. garlic oil, manganese, iron, sodium bicarbonate.

**2015 Corrective Action:** CDA updated the Crop OSP Module 10 Soil.Ferility Inputs and Module 12 Weed.Pest.Disease Inputs to require the operation to include product names and manufacturers, to ensure full information (rather than just generic names) are included in the OSP. CDA also provided training on June 26, 2015, to inspectors regarding identifying issues of concern during inspections.

Verification of Corrective Action: Pay attention to Hungenberg during tomorrow's inspection to verify this NC.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 132 of 164

**NP5159RKA.NC5** - 7 CFR §205.402(a)(2) states that "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..."

**2015** Comments: *The certifier approved a "Made with Organic \*\*\*" granola cereal label that displayed the word "organic" on the front panel with no "Made with Organic" phrase.* 

**2015 Corrective Action:** CDA issued a notice of noncompliance to the operation for the noncompliant cereal label. CDA updated the Organic System Plan Review Procedures Rev B 6.7 manual stating that the CDA logo, and USDA seal may not be used on the label of products certified to the "Made with Organic \*\*\*" labeling category. Training on label review is planned for June 17, 2016.

Verification of Corrective Action: Look at MWO labels when doing label reviews

**NP5159RKA.NC6** – **Accepted**. 7 CFR §205.403(e)(1) states that "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."

**2015** Comments: During a witness audit, a pesticide residue sample was obtained and proper sampling procedures were followed, with the exception that the operator was not provided a receipt.

**2015 Corrective Action:** CDA updated the Sampling Form to clearly indicate that the pink sheet stays with the operation when samples are taken to serve as a receipt. Training was conducted on June 26, 2015, for all organic inspectors. The proper use of sampling forms, including leaving a copy with the operation as a receipt, was presented during the training.

Verification of Corrective Action: CDA sampled three operations in 2016 and none of them were provided a receipt for the sample. There were no receipts on file for the 18 operations that were sample so far this year. Sampling Form was not issued yesterday.

**NP1595RKA.NC7** – **Accepted**. 7 CFR §205.662(c) states, "Proposed suspension or revocation. The notification of a proposed suspension...shall state: (3) The impact of a suspension..."

**2015** Comments: The auditor reviewed three letters of Notice of Proposed Suspension (NoPS) issued to clients. Two of the three letters issued do not explain the impact of the NoPS as stated in 205.100(a) "each 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 (specified ingredients or food group(s))" must be certified..." The auditor noted a discrepancy between the letters issued to clients and the CDA NoPS template, which actually does include language stating that "the operation will be unable to sell, or label its product as organic."



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 133 of 164

**2015 Corrective Action:** The notice of proposed suspension and combined notice of noncompliance and proposed suspension letter templates were updated to specifically state the impact of suspension. CDA created a document control system to ensure only the most current version of documents and letter templates are used in the future. Inspectors were trained on document control during the April 7, 2016 training.

## **Verification of Corrective Action:**

**NP1595RKA.NC8** – **Accepted**. 7 CFR §205.510(b)(2) states, "Records created by the certifying agent regarding applicants for certification and certified operations must be maintained for not less than 10 years beyond their creation."

**2015** Comments: In at least 3 files that were reviewed, the records of registered e-mails sent to the clients were not available during the audit. Currently, CDA sends registered e-mails from individual employee accounts and the delivery receipt required per 7 CFR §205.660(d) is not always retained (either electronically or as a hard copy).

**2015 Corrective Action:** CDA adjusted the Policy and Procedures Manual to clearly outline the current process for issuance of notices, and created a new requirement to save the documentation that the noncompliance was received by the operation. A copy of the documentation is saved electronically in the operation's Company Specific Information folder in the shared organic folder on the CDA server. Training was provided to the Program Manager and Certification Specialist on May 19, 2016.

## **Verification of Corrective Action:**

**AIA16120RK.NC2** –**Accepted**— 7 CFR § 205.501(a)(3) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670."

**2016 Comments:** *CDA did not conduct adequate surveillance of a crop operation including its website to ensure compliance with the USDA organic regulations. The following issues were identified:* 

- CDA did not issue a noncompliance to the operation for its use of the word "organic" in the company name and labels on uncertified products.
- CDA did not issue a noncompliance to the operation for use of the USDA seal on the website pages advertising uncertified products.

**2016 Corrective Actions:** CDA has updated the Organic System Plan to specifically request website URL's from certified operations. All review personnel have been trained to review an operation's website for compliance with the USDA organic regulations, including organic marketing claims, use of the USDA organic seal, and the use of trade names with the word "organic" in them. CDA provided verification of staff training on these topics.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 134 of 164

Verification of Corrective Action:

## Findings from Compliance Audit – Aurora Dairy:

**NP7162PZA.F1** - 7 C.F.R. §205.670(d) states, "A certifying agent must, on an annual basis, sample and test from a minimum of five percent of the operations it certifies, rounded to the nearest whole number. A certifying agent that certifies fewer than thirty operations on an annual basis must sample and test from at least one operation annually..."

Comments: CDA did not conduct residue sample testing of at least 5% of the total operations in 2016.

Auditor Notes: CDA did not conduct residue sampling during the Witness Audit as part of this Compliance Audit.

**NP7162PZA.F2** – 7 C.F.R. \$205.662 (e)(1) states, "If the operation fails to correct the noncompliance, to resolve the issue through rebuttal or mediation, or to file an appeal of the proposed suspension ..., the certifying agent ... shall send the certified operation a written notification of suspension ...."

**Comments:** CDA accepted corrective actions from one operation it had issued a Notice of Proposed Suspension to in 2016. CDA also allowed three operations to voluntarily surrender after being issued a Notice of Proposed Suspension.

**NP7162PZA.F3** – 7 C.F.R. §205.663 states, "Any dispute with respect to denial of certification or proposed suspension or revocation of certification under this part may be mediated at the request of the applicant for certification or certified operation and with acceptance by the certifying agent. Mediation shall be requested in writing to the applicable certifying agent."

**Comments:** CDA issued a settlement agreement to an operation they had sent a Notice of Proposed Suspension without receiving arequest for mediation in writing.

**NP7162PZA.F4** – 7 C.F.R. §205. 402(a)(2) states, "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;..." §205.206(e) states that an Organic System Plan must include, "Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations."

**Comments:** For the witness audit, the auditors reviewed the operation's records maintained by CDA. The file contained a list of inputs, however CDA did not record the review of the materials and if they were allowed.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 135 of 164

Verification: Have implemented a spreadsheet to track inputs reviewed.

**Auditor Observations:** While reviewing the C&C file, a new electrolyte was asked for at IR and inspector said it was submitted, and it was added to the material list. There was no indication it was evaluated by CDA. The pending material review was not communicated to the operation at final review. The electrolyte currently being used was not on the current 2016 materials list, but was found in the 2015 file. No issues were listed in the exit interview.

**NP7162PZA.F5** – 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 2027, "Personnel Performance Evaluation," Section 3.2b states, "Inspectors should be evaluated during an onsite inspection by a supervisor or peer (another inspector) at least annually."

**Comments:** CDA did not conduct field evaluations of all inspectors in 2016. Five of the twelve inspectors did not receive field evaluations.

**NP7162PZA.F6** – 7 C.F.R. \$205.403(d) states, "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 must also address the need for any additional information as well as any issues of concern."

**Comments:** During the witness audit the inspectors did not note items of concern and additional information requested of the operation in the exit interview. The inspectors verbally communicated concerns and additional information needed, but did not note the items in the exit interview.

**NP7162PZA.F7** – 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 states, "If an operation plans to add new products, fields, operations, or labels to its OSP, then the certifier must first approve these changes and issue an updated certificate. A request to add new fields, animal species, or facilities would require an additional onsite inspection."

**Comments:** A CDA inspector conducted the inspection of a new facility to be added to a certified operation's certification, however, an inspection report was not processed or reviewed by CDA and a decision was not issued to the certified operation.



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 136 of 164

**NP7162PZA.F8** – 7 C.F.R. \$205.403(b)(2) states, "All on-site inspections must be conducted ... when land, facilities, and activities that demonstrate the operation's compliance with or capability to comply with the applicable provisions of subpart C of this part can be observed, except that this requirement does not apply to unannounced on-site inspections.

**Comments:** CDA conducted the annual inspection of a dairy operation during the non-grazing season. No additional inspections were conducted during the grazing season.

**REMINDER**: This completed NOP 2005 checklist must be submitted to AIA within 30 days of the audit completion.

Back to Closing Meeting process



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 137 of 164

### b. <u>Findings identified during current audit</u>

□ F1 – 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:** The auditor could not determine the most recent labels approved as part of the organic system plans for operation files reviewed in the CDA filing system. There was no indication that product labels on file were either reviewed or approved by CDA. CDA indicated that Farmer's Market and Wholesale labels don't go through the formal label review process.

Notes: Auditor reviewed an operation files (Twisted Root, Morton's Orchard, Hungberg Produce) and did not find evidience that the labels on file were reviewed and approved.

- □ F2 –
- □ F3 -
- 🗆 F4 -
- □ F5 -
- □ F6 –

## 3. OBSERVATIONS



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 138 of 164

In this section, the auditor may insert comments and/or remarks on any part of the audit that will assist the reviewers in determining certifier compliance. The auditor may also use this section to ask for clarification on specific issues identified during the audit.

- When issuing letter to operations where the results from test of prohibited substances are negative/no detect, CDA's letter should include the statement, "that the product may be sold as organic"
- CDA was unaware that residue test results need to be made available for public access upon request (205.670(f)). They thought that this would violate confidentiality. Nobody has ever requested them so they have never denied anyone access to test results. CDA policy, however, should reflect this requirement.
- CDA doesn't require the operation to sign a receipt acknowledging that a sample was taken from their field. Chain of custody isn't maintained without a signed document by the operation verifying where the sample was taken.
- CDA is updating an operation's OSP. CDA, however, is not providing the operation a copy of the update OSP until it is sent with the annual update.

**REMINDER**: This completed NOP 2005 checklist must be submitted to AIA within 30 days of the audit completion.

Back to Closing Meeting process

#### Audit tasks for Graham:

- International Trade Section
- Certification Personnel, Table 8
- Materials Review, Table 10
- Labels, Table 6a, 6b, 6c Look at MWO labels to clear NP5159RKA.NC5
- Witness Audit and applicable checklist Colorado Egg
- CDA external and internal training
- Pesticide Residue, Table 7a & b.
- Assist with verification of corrective actions for prior NC



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 139 of 164

#### Audit tasks for Lead Auditor:

- File Reviews, Table 3.
- Tables 4 5: NoNC and adverse actions
- Witness Audit(s) and applicable checklist(s) Madhava Honey & Hungenberg Produce
- Unannounced Inspection review
- Complaint handling
- Verification of Corrective Action for Prior NC
- Fee schedule, cost estimates, and invoicing



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/15 Page 140 of 164

# National Organic Program File Review Worksheets

ē			Tabl	e 1º Gener	al Certificatio	n File Revi	ew Informati	on			
					Table 2 Table						
File No.	Name of applicant/certified operation sampled	A Date application or annual update received	B           Date of review           § 205.402(b)(1)           § 205.406(b)	C Review conducted by	D Inspection date <u>§</u> 205.403(b)(1) <u>§ 205.406(b)</u>	E Inspection conducted by	F Date of final review (for applicants § 205.404(a))	G Final review conducted by	H Date certification decision made	I Certification decision made by	J Date findings sent to operation § 205.402(b)(1)
1	Hungenberg Produce	3/28/2016	6/8/2016	A.Mack	6/30/2016	(b) (6),	7/20/2016	A.Stafford	7/22/2016	A.Stafford	7/22/2016
2	Colorado Egg	5/18/2016	6/21/2016	A.Mack	8/25/2016	(b) (6),	11/10/2016	A.Stafford	11/13/2016	A.Stafford	11/13/2016
3	Madhava	12/11/2015	4/19/2016	A.Mack	5/17/2016	(b) (6), (b)	6/15/2016	A.Stafford	6/16/2016	A.Stafford	6/16/2016
4	Boulder Altan	10/29/2013	11/20/2013	C.Palmer	1/21/2014	(b) (6), (b)	3/14/2014	A.Stafford	7/15/2014	A.Stafford	7/15/2014
5	Jones Farms	4/12/2016	8/11/2016	A.Mack	8/22/2016	(b) (6), (b)	12/8/2016	A.Stafford	12/11/2016	A.Stafford	12/11/2016
6	Morton's	4/12/2016	9/8/2016	A.Mack	9/21/2016	(b) (6), (b)	12/14/2016	A.Stafford	12/14/2016	A.Stafford	12/14/2016
7	Monroe Organic	4/4/2016	9/12/2016	A.Stafford	10/10/2016	(b) (6), (b)	12/19/2016	A.Mack	12/19/2016	A.Mack	12/19/2016
8	Eathstar Farms	5/5/2016	8/29/2016	A.Stafford	9/19/2016	(b) (6), (b)	12/14/2016	A.Mack	12/14/2016	A.Mack	12/14/2016
9	C & C Cattle	7/11/2016	9/21/2016	A.Mack	9/26/2016	(b) (6), (b)	12/12/2016	A.Stafford	12/12/2016	A.Stafford	12/12/2016
10	Twisted Root	3/14/2016	7/28/2016	A.Mack	8/12/2016	(b) (6), (b)	12/5/2016	A.Stafford	12/5/2016	A.Stafford	12/5/2016
11					5. 	and the second		о» С			
12								2 <sub>0</sub>			
13											
14					26 V						
15											
Instru	actions: Enter dates in the	he mm/dd/yy	format. Must sele	ct the most re	cent complete cer	tification cycl	e for continuing	operations.			



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/15 Page 141 of 164

	Table 1: General Certification File Review InformationTable of ContentsTable 2Table 2Table 6aTable 6bTable 6c										
File No.	Name of applicant/certified operation sampled	A Date application or annual update received	B Date of review § 205.402(b)(1) § 205.406(b)	C Review conducted by	D Inspection date <u>§</u> <u>205.403(b)(1)</u> <u>§ 205.406(b)</u>	E Inspection conducted by	F Date of final review (for applicants § 205.404(a))	G Final review conducted by	H Date certification decision made	I Certification decision made by	J Date findings sent to operation § 205.402(b)(1)
Rema	rks and Findings: <u>Clos</u>	sing Meeting l	Findings <u>§ 205.50</u>	1(a)(11)(vi)							

		Table 2: Summary of Certification File Review Information           Table of Contents         Table 1         Table 3         Table 6a         Table 6b         Table 6c         Table 7b	2		
File No.	A Scopes (C,WC,L,H)	B Brief Description of Operation (See instructions below)	C IA/AU	D Sample (Y/N)	E Labels (Y/N)
1	С, Н	Crops-Carrots, Split Production/Parallel Production: Handling. Single Ingredient – Carrots, washing, cutting, retail packaging.	IA	N	Y
2	L, H	Livestock – Eggs, chickens – nest run/bulk – no processing or packaging. Handling – process own feed	AU	N	N
3	Н	Handling – multi and single ingredient processed products, wholesale and sale to retail. Split and parallel production	AU	N	Y
4	С, Н	Crops – microgreens, seedlings/transplants. Handling – repackaging of small grains, Retail Sales	AU	N	Y
5	С	Crops – Alfalfa, hay, potatoes, cover crops. 100% Organic – no split or parallel.	AU	Y	N
6	С	Crops - Apricots, Apriums, Asian Pears, Cherries, English Walnuts, Nectarines, Peaches, Plums, Pluots. 100% organic – no split or parallel. Co-pack arrangement with Plum Daisy, LLC to process jams for Morton's.	AU	N	Y
7	С	Mixed vegetables/market farm/CSA. 100% Organic – no split or parallel.	AU	N	N



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/15 Page 142 of 164

		Table 2: Summary of Certification File Review Information           Table of Contents Table 1 Table 3 Table 6a Table 6b Table 6c Table 7	h		
File	A	B	C C	D	E
No.	Scopes	Brief Description of Operation	IA/AU	Sample	Labels
	(C,WC,L,H)	(See instructions below)		(Y/N)	(Y/N)
8	C, WC, H	Mixed Herbs – culinary and medicinal. Wild Crop – culinary and medicinal herbs and plants. 100% organic – no split or parallel production. Handling - Artemesia Smudge Stick, Floral Smudge Stick, Sweet Grass Braid, Lavender Bundle, Lavender Essential Oil, Lavender	AU	N	Y
9	C, L	Crops – pasture for livestock. 100% organic – no split or parallel. Livestock – dairy heifers, non-lactating	AU	N	N
10	C, L	Crops – Mixed vegetables/market farm/CSA. Livestock - Chickens, eggs. Both scopes 100% organic – no split/parallel.	AU	N	Y
11					5 5
12			24	24	2, 10
13					
14					
15					
sure th	he information p Scopes (L, C, V Description of production, etc description of t operations, inc.	h requirement (A-E), enter the appropriate information into <b>Table 2</b> . Insert information for the most provided in Table 2 is entered into the corresponding File No. in Table 1. WC, H) Operation: For crop operations, include a description about the type of crop and operation such as the for livestock operations, include a description about the type of livestock and operation. For hand the type of products and operation such as single ingredient product, multi ingredient products, trad- lude a description of the type of products and operation such as single products, organic and nonon to single harvester or multiple harvesters, collection areas, staging areas, production areas, and mat-	single crop, po lling operation ler, distributor, ganic of the sa	trallel produ s, include a etc. For wil me product i	ction, spli d crop in the
C.	Initial Applicat	ion (IA) or Annual Update (AU)		strangin of t	
D.		oulled during the inspection? (Y/N)			
	If samples were	e pulled, include information in <u>Table 7b</u> . Sampling Worksheet - Sample and Reporting Information			

*If samples were pulled, include information in <u>Table 7b</u>. Sampling Worksheet - Sample and Reporting Information. E. Are any labels used by the operation? (Y/N)* 

If there are labels, include information in <u>Table 6a</u>, <u>6b</u>, or <u>6c</u> Label Review Worksheet.



#### Table 3 – Full File Review

Table 3: Summary of Full File Reviews Table of Contents				
Instructions: This Checklist is used in conjunction with Table 1 a	nd <u>Tab</u>	<u>le 2</u> . T	his Checklist is	
used only to record the overall evaluation of files where a full file	review	was co	onducted.	
Use the certification file number as recorded in the Certification Fridentify the certification file(s). If a requirement is not applicable, in the "Remarks" for that section. This Checklist is not used to record the overall evaluation of full frideroups. Instead, the Certification File Review Checklist—Suppler	include ile revie	releva ews for	nt information Grower	
must be used.				
Fees and other charges for certification § 2	205.642			
	Yes	No	Certification File Number(s)	
Is the operation provided with an estimate? § 205.642				
Are the fees charged consistent with the Fee Schedule submitted				
to the Administrator? <u>§ 205.642</u> – same; <u>§ 205.642</u> – consistent;				
§ 205.501(a)(16)				
Certificate § 205.404(b)			•	
Does the certificate include:	Yes	No	Certification File Number(s)	
Name and address of the certified operation? § 205.404(b)(1)				
"Effective date of certification"? § 205.404(b)(2)				
(Date the operation was initially certified to the USDA organic				
regulations.)				
Scope - Categories of organic operation, including crops, wild				
crops, livestock, or processed products produced by the certified				
operation? <u>§ 205.404(b)(3)</u>				
Name, address, internet address, and telephone number of the certifier? $\S 205.404(b)(4)$				
Issue date of the certificate? NOP 2603				
Anniversary date? NOP 2603	0			
(Date when the certified operation is required to submit its next				
annual update.)				



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

Label classification for processed organic products? (100%		
Organic, Organic, or Made with Organic (specified ingredients or		
food groups)) NOP 2603		2
The statement "Certified Organic under the U.S. National	5	2
Organic Program 7 CFR Part 205"? NOP 2603		
The statement "Once certified, a production or handling		
operation's organic certification continues in effect until		
surrendered, suspended or revoked"? §205.404(c); NOP 2603		
Are certificates issued in English? NOP 2603		
Do certificates include more than one certified operation or an		
uncertified operation on them?		
Remarks and Findings: Closing Meeting Findings		

Application § 205.401           Table of Contents Table 1 Table 2					
Does the application include:	Yes	No	Certification File Number(s)		
The name of person completing the application;					
The applicant's business name; The applicant's address;					
The applicant's telephone number; and					
If a corporation, the name, address, and telephone number of					
the person authorized to act on the applicant's behalf?					
<u>§ 205.401</u> – Application Requirement					
$\underline{\$ 205.402(a)(1)}$ – Review for completeness					
$\underline{\$ 205.402(a)(2)}$ – Review for compliance					
Information on previous certifications? §205.401(c)					
$\underline{\$ 205.402(a)(3)}$ – ACA review for compliance					
Other information deemed necessary by the ACA to determine					
compliance with the ACT? § 205.401(d)					
Remarks and Findings: <u>Closing Meeting Findings</u>					



Organic System Plan (OSP) § 205.401(a) and	§ 205.	406(a)	
Does the OSP include (§§ 205.201(a)(1)-(6)):	Yes	No	Certification File Number(s)
A <b>description of practices and procedures</b> to be performed and maintained, including the frequency with which they will be performed? §§ 205.200; 205.202 - 205.207; 205.236 – 205.240; and 205.270 – 205.272			
A <b>list of each substance</b> to be used as a production input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable?			
A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented?			
A <b>description of the recordkeeping</b> system implemented to comply with the requirements established in § 205.103?			
Does the OSP include a description of the <b>management</b> <b>practices and physical barriers</b> established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and products with prohibited substances?			
Additional information deemed necessary by the certifier to evaluate compliance with the regulations?	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~		
Allowing an uncertified operation to produce or handle agricultural products, under contract or other arrangement, on the uncertified operation's land or premises (i.e., at units, facilities, or sites not explicitly subject to inspection or compliance action by the NOP or a certifier)? NOP 4009 Instruction Who Needs to be Certified			
NOP 5031 – Certification Requirements for Handling Unpack	aged (	Organi	c Products
Does the OSP contain information on how organic product is transported to and from the organic operation as applicable? Does the company bringing in or shipping the product handle unpackaged organic product?			
If the company handles unpackaged organic product and they take ownership of the product, are they certified?			
If the company handles unpackaged organic product and they <u>do not</u> take ownership are they: 1) a certified operation; or 2) part of the OSP of the certified seller or buyer?			



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

NOP 2005 Effective Date: 10/29/15 Page 146 of 164

<b>Continuing Certification: Did the certified operation submit</b> <b>an updated OSP that includes:</b> §§ 205.406(a)(1)-(4) Table of <u>Contents General Information Section</u>	Yes	No	Certification File Number(s)
A summary statement, supported by documentation detailing any deviations from, changes to, modifications to, or other amendments made to the previous year's organic system plan during the previous year?			
Any additions or deletions to the previous year's organic system plan, intended to be undertaken in the coming year, detailed pursuant to § 205.200?			
Any additions to or deletions from the information required pursuant to § 205.401(b)?			
An update on the correction of minor noncompliances previously identified by the certifier as requiring correction for continued certification?			
Other information as deemed necessary by the certifier to determine compliance with the Act and the regulations.			
Remarks and Findings: Closing Meeting Findings			)
General Assessments:	Yes	No	Certification File
			Number(s)
Are the materials and inputs used in compliance with the NL and annotations? §§ 205.403(c)(3), 205.402(a)(2), 205.406(c)			
What is the certifier's process for conducting material reviews and making determinations on allowable vs. prohibited substances for those substances that have not been reviewed and approved by another entity, i.e., certifier, EPA, ISO Guide			



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

65 accredited material evaluation program? §§ 205.402(a)(2), 205.406(c)	
Policy Memo 11-4	
Does the staff conducting the material reviews have the	
appropriate training, experience, and/or education to conduct	
the reviews along with appropriate resources? §§ 205.501(a)(1),	
<u>205.501(a)(4)</u> , <u>205.501(a)(5)</u>	
Is the application and OSP complete? §§ <u>205.402(a)(1)</u> ,	
<u>205.406(c)</u>	
Is there evidence that an exit interview was conducted?	
§ <u>205.403(d)</u>	
Was information or issues of concern identified by the inspector	
in the exit interview, as evidenced in the inspection report?	
§ <u>205.403(d)</u>	
Were there any notices of noncompliance or adverse actions by	
the certifier, and was the correct process followed? <u>Table 4</u> ,	
Table 5	
If this was a continuation of certification review and any	
information on the certificate changed, did the certifier provide	
the operation with an updated certificate? § 205.406 (d)	
Remarks and Findings: Closing Meeting Findings	

#### **Overall Determination Statement:**

**Include** a statement based on an overall determination on whether the operation meets the following as applicable: the crop production standards (§§ 205.200 through 205.206); wild crop production standards (§ 205.207); livestock production standards (§§ 205.236 through 205.240); handling production standards (§§ 205.270 through 205.272); and applicable guidance documents in the NOP Program Handbook.

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



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/15 Page 148 of 164

	Ta					ncompliance/Adver ts § 205.406(c) § 205					eet	
Name of Client and Scope	Notification of Minor Issues (Enter Yes, No, or N/A as applicable)	Not Non (Ent	ificati comp er Ye	on of liance s, No, plicab	e or	Type of Proposed Adverse Action (Enter PS, PR, or N/A as applicable)	Not	ificati posed	ion of	8	Adverse Action Taken	Request for Mediation or Appeal, and Remarks
	<ul> <li>Description of Minor Issue</li> <li>Facts of Each Minor Issue</li> <li>Date to Rebut or Correct</li> <li>Resolution</li> </ul>	Description of NC <u>§ 205.662(a)(1)</u>	Facts of Each NC § 205.662(a)(2)	Date to Rebut or Correct § 205.662(a)(3)	Resolution Notice Sent § 205.662(b)	<ul> <li>Proposed Suspension (PS)</li> <li>Proposed Revocation (PR)</li> <li>N/A – none sent</li> <li><u>\$ 205.662(c)</u></li> </ul>	Reasons for proposed action <u>§ 205.662(c)(1)</u>	Proposed Eff. Date <u>§ 205.662(c)(2)</u>	Impact of proposed action <u>§ 205.662(c)(3)</u>	Right of mediation or appeal <u>§ 205.662(c)(4)</u>	Suspension (Susp) Revocation (Rev) <u>§ 205.662(e)(1)</u> Enter Revocation or suspension if applicable	Did the certified operation request mediation or file an appeal? If so did the certifier or State send the notice of Suspension / Revocation while final resolution of either mediation or appeal was pending? § 205.662(e)(2) Enter remarks as appropriate. <u>Document</u> : 1) when Notices were submitted to the client and the method used (§ 205.660(d)); and 2) when and if the notices were sent to the Administrator (§205.501(a)(15(i)).
White Rock Specialties	N/A	Y	Y	Y	Y	N/A	<i>N</i> /	<i>N</i> /	<i>N</i> /	<i>N</i> /	<i>N/A</i>	N/A
		3		8	-	4 6			2	2 <u> </u>		



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/15 Page 149 of 164

	Tal					ncompliance/Adver <u>ats § 205.406(c) § 205</u>					neet	
Name of Client and Scope	Notification of Minor Issues (Enter Yes, No, or N/A as applicable)	Non (Ent	icomp ter Ye	on of olianco s, No, plicat	e or	Type of Proposed Adverse Action (Enter PS, PR, or N/A as applicable)		posed	ion of I Adv		Adverse Action Taken	Request for Mediation or Appeal, and Remarks
	<ul> <li>Description of Minor Issue</li> <li>Facts of Each Minor Issue</li> <li>Date to Rebut or Correct</li> <li>Resolution</li> </ul>	Description of NC <u>§ 205.662(a)(1)</u>	Facts of Each NC § 205.662(a)(2)	Date to Rebut or Correct § 205.662(a)(3)	Resolution Notice Sent § 205.662(b)	<ul> <li>Proposed Suspension (PS)</li> <li>Proposed Revocation (PR)</li> <li>N/A – none sent</li> <li><u>\$ 205.662(c)</u></li> </ul>	Reasons for proposed action <u>§ 205.662(c)(1)</u>	Proposed Eff. Date <u>§ 205.662(c)(2)</u>	Impact of proposed action <u>§ 205.662(c)(3)</u>	Right of mediation or appeal <u>§ 205.662(c)(4)</u>	Suspension (Susp) Revocation (Rev) <u>§ 205.662(e)(1)</u> Enter Revocation or suspension if applicable	Did the certified operation request mediation or file an appeal? If so did the certifier or State send the notice of Suspension / Revocation while final resolution of either mediation or appeal was pending? § 205.662(e)(2) Enter remarks as appropriate. <u>Document</u> : 1) when Notices were submitted to the client and the method used (§ 205.660(d)); and 2) when and if the notices were sent to the Administrator (§205.501(a)(15(i)).

#### Instructions:

- For livestock clients, identify the type of livestock (poultry, dairy, beef cattle, sheep, etc.).
- Start with Notifications of Noncompliance (NC) and then move on to Adverse Actions (proposed suspension or revocation, and actual suspension or revocation).
- Notifications of NC without Adverse Actions would have "N/A" in the "Type of Proposed Adverse Action" column; all other columns after could remain blank if N/A.
- For Notifications of NC the response *must* be "Yes" for the first 3 columns. If the certified operation demonstrates that each NC has been resolved, the response for the 4<sup>th</sup> column must also be "Yes."
- For Notifications of Proposed Adverse Actions the response must be "Yes" for all 4 columns.
- Also See §§ <u>205.662(d)</u> and <u>205.662(g)</u>.

Remarks and Findings: Closing Meeting Findings



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

			of Contents § 205	<b>/Denial of Certificat</b> .405 Table 3		
A.	<b>B</b> .	С.	<b>D</b> .	<b>E</b> .	<b>F</b> .	G.
Name of Client	Scope	Notification of Noncompliance Included § 205.405(a)	Applicant Response § 205.405(b)	Certifier Action Taken § 205.405(c)(1) § 205.405(c)(2)	Denial of Certification Included § 205.405(d)	Identify whether either of the two denial methods were used and whether they were appropriate.

C. Enter Yes if <u>all 3 requirements are met</u>: (1) a description of each NC; (2) facts upon which the notification of NC is based; and (3) date for rebuttal or CA for each NC with supporting documentation.

D. Enter the applicant's response: (1) corrected NC – submitted CA; (2) corrected NC – applied to another certifier; (3) rebutted NC; (4) no Response provided.

E. Enter action taken by the certifier: (1) reviewed CA/rebuttal and conducted inspection if necessary; (2) CA/rebuttal accepted, issued certificate; (3) CA/rebuttal not accepted, issued denial of certification; (4) no response by applicant – issued denial of certification.

F. Enter Yes if <u>all 4 requirements are met</u>. If any is missing, indicate which one and identify NC on the main checklist. The reason(s) for denial § 205.405(d); (1) right to reapply for certification § 205.405(d)(1); (2) right to request mediation § 205.405(d)(2); (3) right to file an appeal § 205.405(d)(3).

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

Remarks and Findings: Closing Meeting Findings



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/15 Page 151 of 164



Madhava Honey Madhava Honey Twisted Root	Product Cassava Fructose Free Sweetner	le of C 1 N	2 N/A	3	4	5	6	7		1			10	12	
Honey Madhava Honey Twisted Root	Fructose Free Sweetner	N	NI/A				Ŭ	/	8	9	10	11	12	13 Com	-
Honey Madhava Honey Twisted Root	Fructose Free Sweetner	N	NI/A											Yes	No
Honey Twisted Root	3.7			N/A	N	Y	N	Y	Y	N	N/A	Y	Y	Х	
	Vanilla Lavendar Flavored Honey	N	N/A	N/A	N	Y	Ν	Y	Y	N	N/A	Y	Y	Х	
Twisted Root	Produce label	N/A	N/A	N/A	Ν	N/A	Ν	Y	Y	Ν	N/A	Y	Y	X	
4 51 4 51	Egg label	N/A	N/A	N/A	N	N/A	N	Y	Y	N	N/A	Y	Y	X	
T	For products	1-1-1	1	1000/							101125-000				
which the star 3. Does the p without highl 4. Is this a mu 5. If the produ- statement? §	ercentage state tement is disp ercentage state ighting? § 205 ulti-ingredient uct is labeled 205.303(b)(1) ntify water or	layed? ement 5.303(a produ "Organ	§ 205 appea a)(2) act lab nic," d	5.303( ir in it eled a loes it	(a)(2 s en s 10 ider	2) tirety 00% O ntify e	in th rgan each	ne sa nic? org	ame § 20	type	e size, 03(a)(	style 3)	e, and	l color	
<ol> <li>Does the la handler of the similar phrase</li> <li>Is the certinian</li> </ol>	bel (on the in e finished proc e? § 205.303(l fier identifying	format luct, p o)(2) g state	tion parecede	anel) i ed by (no. 7	dent the s abo	tify th statem ove) or	e na ient, n the	me "Ce infe	ertif orm	ied o ation	organi n pane	c by el ano	* * * 1 belo	," or a	i
9. Does the la 10. Is the cert organic seal?	dentifying the abel display th tifier's seal or § 205.303(a)( splay the USI	e certi logo ii (5)	fier's ndivid	seal o lually	r log disp	go? § played	205. moi	303	(a)(	5)				DA	
and meets all	seal replicate requirements bels complian	of § 2	05.31	1(b)?											ısly,



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

# Remarks and Findings: Closing Meeting Findings

There is no indication that Twisted Root labels were reviewed and approved. CDA indicates that Farmer's Market and Wholesale labels don't go through the formal label review process.



	Table of C	John	-ms	1 a01			1 a U			00		20		
Client File	Product	1	2	3	4	5	6	7	8	9	10	11	Com	2 plies
													Yes	No
1. Madhava Honey	Peachy Green Tea Agave Five Drink Mix	N	N	N	N/A	N/A	N	N	Y	Y	N	Y		X
										i. Ĵ				
										ĵ.				
vegetables or proces 3. Does the "Made version of the same type size, so 4. Does the percentar on which the statem 5. Does the percentar without highlighting 6. Does the label ide 7. Does it identify w 8. Does the label ide 9. Is the certifier ide the handler or distril 10. Does the label d 11. Does it display to 12. Are the labels co	ps: beans, fish, fruits sed milk products? 4 with organic (specifie size of the largest typ style, and color with age of organic ingred ent is displayed? § 2 age of organic ingred attribute of organic ingred attribute of the gradient of the information pair of the information pair of the statement, "Cen- ntifying statement (no butor of the product? isplay the certifier's he USDA organic second populant? If 'No' an oblicants, or § 205,400	§ 2055 eed ing pe size out hi lients 005.3( lients ngred ic? § anel) i rttified no. 7 ? § 20 seal? § al a N		(a)(1) ents o the pa- thing ment (2) ment (2) ment anic b e) on 4(b)(2 go? § 304(c as not	(ii) r food ; anel of ; ? § 205 exceed appear ingredi )(1) name o by * * * the info 205.30 :) : issued	groups) which 5.304(a) one hat in its e ient state of the c ormatio 4(a)(3) , then s	)" star it app )(1)(i alf the entired temen ertific simila on par	temen bears a ii) e size ty in t nt? § 2 er that ar phr nel an	and d of the he sa: 205.3 t certi- case? d belo	ear ir oes it e larg me ty 04(b) ified § 205 w th	n letter appea est typ pe siz (1) the ha 5.304(1 e info	rs that ar in it be size re, styl ndler b)(2)	do not ts entire e on the le, and c of the fi	ty in panel color nishe
Remarks and F	indings: <u>Closing</u> d a NoNC to Madha	Me	eting	g Fin	dings									
and the second s			- A Direction	TILC		4		4 .4		the second second	. 1	( I have been a second second	11	.1



Table 6b: La	abel Review Wo	rkshe	et: '	'Ma	de wi	th Or	gani	<b>c" (</b> s	peci	fied	ingre	edien	ts or fo	ood
			gro	up(s)	)) § 20	05.303	3							
	<u>Table of</u>	Conte	ents [	Tabl	<u>e 1 Ta</u>	ble 2	Tabl	<u>e 4</u> [	<b>Fable</b>	<u>e 5</u>			e	
Client File	Product	1	2	3	4	5	6	7	8	9	10	11	1	2
													Com	plies
													Yes	No
		38				100					1.0			



Client File	Product	Requirements	Remarks	Com	plies
	Label Type	-		Yes	No
	4			-	-
					2
				_	
	с. 			2	
	13				2
	2				-
	10				
	2				2
	03 04				
nstructions: For l	abels reviewed the	at are not "100% Or	ganic", "Organic", or "Ma	ade with	2
		low. Insert more row			
0		rement (§205.305, et			
			or specific information i	flabalia	
ioncompliant.		regarding the review	of specific information i	I label is	
and the second			1		
			ot issued, then <u>§205.402(</u>	$\underline{a}(2)$ or	
		(c) for certified oper	ations.		
<b>Remarks and Find</b>	lings: Closing Me	eeting Findings			



Table 7a: Sample Testing Worksheet: General Information         Table of Contents Table 1 Table 2 Table 3 Table 4 Table 5									
Provide information on sampling conducted by the certifier since the previous assessment,	Samples taken since their Mid-term audit (8/18/15): 2015- Mesa Crest (9/2/15), Excelsior Orchards (9/3/15), Kokopeli (9/10/15)								
i.e., number of certified operations; number of	2016 White Rock Specialties $(2/22/16)$ , White Mountain Farm $(2/22/16)$ , Jones								
operations with samples pulled; number of	Farms Organic (2/22/15)								
samples pulled overall; types of samples (soil,	2017-18 samples taken. Results not back from the lab								
tissue, product, water, etc.). Were 5% of the									
certified operations sampled and tested on an	Jan 2, 2016 $204_{5\%} = 10_{}$								
annual basis (or at least one operation	Jan 2, 2017 $203_5\% = 10_{}$								
annually if the certifier has fewer than thirty									
operations)?	All of the samples taken were plant samples and tested for prohibited substances.								
<u>§ 205.670(d)</u>	PAL Lab ISO 17025:2005 #64422 114-268								
Remarks and Findings: <u>Closing Meeting Findings</u>									
	1 5%. This was a finding from the June 2017 Compliance audit (NP7162PZA.F1).								
	A representatives and chain of custody was maintained. Receipts given to the								
operation for the sample taken were not on file.	Sample results were not back from the lab to verify compliance.								



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

File	Name of	A	B	<u>C</u>	n	E	F	G	H	Ta Ta	J	K	L	M	N	0	Р	Com	nlies
No.	applicant / certified operation sampled	<b>a</b>	~	<u> </u>	D	-	-	9	-	-	2	-	Type of sample pulled	What was the sample tested for?	Why was the sample pulled?	Provide info on the test results	Provide info on the certifier decision and outcome	Yes	No
1	White Rock Specialties (x2)	Y		Y	Y	Y	Y	Y	N	N	N / A	N	Potato tubers	Chlorproph am	Complaint Investigation	NoNC issued	NoNC resolution letter sent to operation		
2	White Mountain Farm	Y	2	Y	Y	Y	Y	Y	N	N	N / A	Ν	Potato tubers	Chlorproph am	Complaint Investigation	No detect			
3	Jones Farms Organics	Y		Y	Y	Y	Y	Y	N	N	N / A	Ν	Potato tubers	Chlorproph am	Complaint Investigation	No detect			
4																			
5			2																
6		2	5		5. 8.					2, j.	2?				·			2	
7																			
8							Î			235 - 23 - 24 - 24					14 				
9																			
10									(										
"Y" for respon the ap A. Wa B. Die	or "Yes" or "N	' for " nplies" nse. ollecte provid	No," " colu ed by le the	as ap umn. an in	oprop If any spect	riate. requ or reg with	Mak uirem prese a rec	e an a ent is nting ceipt?	asses s not	smen met, certifi	t on vident	wheth ify or dmir	her or not the a Checklist So	requirements v ection XIV (§§	orting requirement vere met by enter 205.670 and 20 (e)	ering an "X	" under the ap	propria	te

E. Was an approved AOAC or Validated Method used? § 205.670(e)



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 159 of 164

*	Table 7b – Sample Testing and Reporting Information         Table of Contents Table 2																		
File No.	Name of applicant / certified operation sampled	A	B	<u>C</u>	D	E	F	<u>G</u>	H	I	<u>J</u>	<u>K</u>	L Type of sample pulled	M What was the sample tested for?	N Why was the sample pulled?	O Provide info on the test results	Provide info on the certifier decision and outcome	Com Yes	plies No
G. We Availa H. Wa I. Did J. Wa K. We L. Wh	<ul> <li>F. Were results sent to the operation? §§ 205.402(b)(3) and 205.403(e)(2)</li> <li>G. Were test results available for review during the assessment? <i>If results are not available, assess why and if appropriate, identify a NC to § 205.501(a)(9). Availability of test results for review during assessments is also identified in NOP 2613.</i></li> <li>H. Was the operation charged for testing? § 205.670(b)(c)</li> <li>I. Did the results exceed FDA or EPA tolerances? § 205.670(g)</li> <li>J. Was the applicable agency notified if "T" above is "Yes"? § 205.670(g); see NOP 2613 for further guidance</li> <li>K. Were any prohibited substances greater than 5% of the EPA tolerance or higher than UREC? § 205.671</li> <li>L. What type of sample was pulled, i.e., soil, tissue, product, water, etc.?</li> </ul>																		
N. Wł O. Pro P. Pro	<ul> <li>M. What was the sample tested for? (Specific pesticide name or classification.)</li> <li>N. Why was the sample pulled? (Directed by the certifier or NOP? Inspector decision?)</li> <li>O. Provide information on test results. (Positive, negative, etc.) NOP 2613</li> <li>P. Provide information on the certifier decision and outcome. (Was there an investigation?) § 205.671; see NOP 2613 for further guidance</li> <li>Remarks and Findings: Closing Meeting Findings</li> </ul>																		



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 160 of 164

			Tab	le 8 - Pers	onnel Inform	ation Work	sheet					
Name	Status – Employee / Contractor / Responsibly connected individuals	Title / Position	Dura tion in the curre nt positi on	Duration employed with Certifier	Certification Scopes Approved to inspect or evaluate	Education	Training	Experience	Job Description (or indicate section in Quality Manual)	Confl ict of Inter est Reco rd Date	Confid entiali ty Recor d Date	Date of last Perf Evaluat ion?
Duane Sinning	Employee	Assistant Division Director	3 yrs	3 yrs	None	See Resume	See Resume	See Resume	See Resume	4/3/2 017	4/3/20 17	4/21/20 16
Amy Stafford	Employee	Program Manager (Organic) Until 5/15/2017	4 yrs	4 yrs	Crop, Livestock, Handling	See Resume	See Resume	See Resume	See Resume	4/3/2 017	4/3/20 17	4/12/20 16
Mitch Yergert	Employee	Division Director	12 yrs	30 yrs	Crops, Livestock, Handling	See Resume	See Resume	See Resume	See Resume	4/3/2 017	4/3/20 17	4/25/20 17
Alyssa Mack	Employee	Agriculture Program Assistant (Organic)	2 yrs 4 mos	2 yrs 4 mos	Crop, Handling	See Resume	See Resume	See Resume	See Resume	4/3/2 017	4/3/20 17	4/30/20 16
Barb Terry	Employee	Administrative Assistant II	1 yr 6 mos	1 yr 6 mos	None	See Resume	See Resume	See Resume	See Resume	4/3/2 017	4/3/20 17	4/28/20 16
Barb Rosenbach	Employee	Program Assistant	21 yrs	12 yrs	None	See Resume	See Resume	See Resume	See Resume	4/3/2 017	4/3/20 17	4/20/20 16
Don Brooks	Employee	Field Staff Supervisor	17 yrs	17 yrs	None	See Resume	See Resume	See Resume	See Resume	4/3/2 017	4/3/20 17	4/21/20 16
(b) (6), (b) (7) (C)	Employee	Lead Inspector	5 yrs	29 yrs	Crop, Livestock, Handling	See Resume	See Resume	See Resume	See Resume	4/5/2 017	4/5/20 17	4/26/20 16
(b) (6), (b) (7) (C)	Employee	Lead Inspector	5 yrs	12 yrs, 6 mos	Crop, Livestock,	See Resume	See Resume	See Resume	See Resume	4/5/2 017	4/5/20 17	4/29/20 16



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250

					Handling							
(b) (6), (b) (7) (C)	Employee	Plant Industry Inspector III	9 yrs 9 mos	9 yrs 9 mos	Crop, Livestock, Handling	See Resume	See Resume	See Resume	See Resume	4/5/2 017	4/5/20 17	4/20/20 16
b) (6), (b) (7) C)	Employee	Plant Industry Inspector III	17 yrs 4 mos	17 yrs 4 mos	Crop, Handling	See Resume	See Resume	See Resume	See Resume	4/5/2 017	4/5/20 17	4/29/20 16
(b) (6), (b) (7) (C)	Employee	Plant Industry Inspector III	12 yrs 10 mos	12 yrs 10 mos	Crop, Livestock, Handling	See Resume	See Resume	See Resume	See Resume	4/5/2 017	4/5/20 17	4/21/20 16
(b) (6), (b) (7) (C)	Employee	Plant Industry Inspector III	9 yrs	9 yrs	Crop, Handling	See Resume	See Resume	See Resume	See Resume	4/5/2 017	4/5/20 17	4/20/20 16
(b) (6), (b) (7) (C)	Employee	Plant Industry Inspector III	19 Yrs	19 yrs	Crop, Handling	See Resume	See Resume	See Resume	See Resume	4/5/2 017	4/5/20 17	4/20/20 16
(b) (6), (b) (7) (C)	Employee	Plant Industry Inspector III	4 yrs 5 mos	6 mos	Сгор	See Resume	See Resume	See Resume	See Resume	4/5/2 017	4/5/20 17	Not yet eval for OG program
b) (6), (b) (7) C)	Employee	Plant Industry Inspector III	15 yrs 5 mos	5 yrs 1 month	Crop, Handling	See Resume	See Resume	See Resume	See Resume	4/5/2 017	4/5/20 17	4/26/20 16
b) (b), (b) (7) (C)	Employee	Plant Industry Inspector III	4 yrs 10 mos	4 yrs 10 mos	Crop, Handling	See Resume	See Resume	See Resume	See Resume	4/5/2 017	4/5/20 17	4/27/20 16
(b) (6), (b) (7) (C)	Employee	Plant Industry Inspector III	27 yrs	27 yrs	Crop, Handling	See Resume	See Resume	See Resume	See Resume	4/5/2 017	4/5/20 17	4/22/20 16
(b) (6), (b) (7) (C)	Employee	Plant Industry Inspector III	5 yrs	5 yrs	Crop, Livestock, Handling	See Resume	See Resume	See Resume	See Resume	4/5/2 017	4/5/20 17	4/26/20 16

the resume or CV; please have those records available for the auditors review at your office.

Administrative Staff (.3), Technical Staff (14), Management oversight (2)

**Remarks and Findings:** 



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 162 of 164

All COI and Conf agreements were signed and submitted for review.

	Table 9 – Certifier Offices and Locations												
Α	B	C	D	E	F	G	H	Ι	J	K	L	М	
Certifier office or location: Organization's name; postal and physical addresses; point of contact; telephone number and email.												Activities Not Covered in Columns C to L (provide a brief description)	
Colorado Department of Agriculture Organic Program 305 Interlocken Parkway Broomfield, CO 80021 Contact: Mitch Yergert 303-869-9052 <u>Cda.organic@state.co.us</u>	15	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	As this is the sole office, all organic certification and accreditation activities happen here.	
								2					



		80.03		Ĵ							
Instructions – Table 9											
accreditation and certification activities of contractors conduct reviews). Also include office or location is the principal or auxilia Column B: Number of Staff Indicate the r Column C - L: Indicate either "Y" (= Yes) of Column C: Policy Formulation Does this of Column D: Process and/or Procedural Decertification staff and contractors when co Column E: Contract Review Does this off Column F: Application Review Does this off Column G: Inspection Reports Review Doe Column H: Inspections Does this office of Column I: Decisions on Certification Doe office issue or make decisions on whether Column J: Decisions on Non-compliance a actions, or adverse actions? Does this offic Column K: Review of Materials, Ingredien approval or compliance of inputs or labels Column L: Retain Records Does this offic Column M: Activities Not Covered in Colum	ccur (do e any pa ry office or "N" ( office or or ductin ice or lo office or office or of office or office or office or of office or office or of office or office or of office or office or of office or office or of office or office office off	o not li artner e. of sta = No) location ng NO ocation r location r location	ist cer rship o in eac ion for Does th DP accr in issue tion cc e or lo nduct or loca tinuing Action ake de its, Re	ified r sep ndivid h col mula is of edita e or s nduc cation inspe- tion i cert n Do ecisio view	operat arate e luals co umn. te poli ice or l tion an gn con t a revi ctions, ssue or ficatio es this ns on v and Ap	ion lo ntitie onduc cy reg ocati d cer tract ew o uct ir assig mak n for office vheth oprov	gardin on cr tifica s for f cert s for e dec existi or lo ner to al of	ng the eate ificat tion a accre ificat tion r pecto isions ng ce ocatio issue Prode	here contr accre e cert work activit ditati ion a repor ors, p s of c ertifie n issue con uct La	inspe racted ditati tifier's instru- ties? ion or pplica t revi- rovide ertific ed ope ue or tinuir abels tatior	s NOP accreditation and certification policies? uctions, standard operating procedures, and/or other guidance for r certification services? ations for completeness or for compliance? ew? es inspectors, collects inspection reports, etc? cation for new applicants (e.g. Denials or approvals)? Does this erations? make decisions of noncompliance, resolutions, proposed adverse ng certification for existing certified operations? Does this office or location issue or make decisions of regarding the
inspector field evaluations, etc											
	Remarks										



1400 Independence Avenue SW. Room 2648 South Building Washington, DC 20250 NOP 2005 Effective Date: 10/29/2015 Page 164 of 164



United States Department of Agriculture 1400 Independence Avenue S.W. Agricultural Marketing Service National Organic Program

Room 2648 South Building Washington, DC 20250

NOP 2005-4 Effective Date: August 25, 2014 Page 1 of 6

# **National Organic Program** Witness Audit Checklist

Witness Audit - General Information           This checklist is used in conjunction with Tables 1, 2, 3, 6a, 6b, 6c, and 7b of NOP 2005           Accreditation Assessment Checklist. This checklist is used to record evaluation information for each witness audit with the exception of grower groups. NOP 2005-5 Witness Audit Checklist for Grower Groups shall be used for witness audits of grower groups.								
Name of auditor(s):	Graham Davis							
Inspection date; initial or annual?	8/9/2017 Annual Inspection							
Name of operation:	Colorado Egg							
Location of operation:	Ft. Lupton, CO							
Scope(s) of certification requested:	Processing and Production							
Inspector's name:	(b) (6), (b) (7)(C)							
Inspector conflict of interest or confidentiality concerns:	Signed and on file							
Operation representative (knowledgeable):	Violet Garcia, Shari Yaetts, Diane Waalks, Mike Kent, Luis Hernandez							
Other inspection attendees:								
Time inspection started: 9am	Time inspection completed: 3:30pm							
General information: <b>Crops</b> grown, acreage, fields and field location(s) (1 site or 2 or more); <b>Wild Crops:</b> products collected, harvest site locations, collector training; <b>Livestock</b> operation type, number of animals, identification methods, products; <b>Handling</b> operation, products								

type, number of animals, identification methods, products; Handling operation, products processed, facilities, etc...



United States Department of Agriculture 1400 Independence Avenue S.W. Agricultural Marketing Service National Organic Program

Colorado Egg is a feed processor and egg laying facility in Ft. Lupton, Colorado. Their feed mill is dedicated to producing organic feed although the operation is a split facility. They buy their laving hens from <sup>(D)</sup> <sup>(4)</sup> (certified by GOA) at 18 weeks. The facility houses 120,000 organic chickens in 6 houses.

The houses that were inspected had doors that were open to provide outdoor access. The operation indicated that the doors were open for 12 hours a day.

General information on materials and inputs used and are they in compliance with the National List (NL) and annotations.

The operation added three cleaning products, 1. Sanidate Sanitizer for flock change out, 2. Pro-Oxine/Biocide used to clean the water lines in the houses, 3. Chlorine bleach for foot baths. The inspector recognized that the salt listed in their OSP wasn't the same as the salt on hand and required the operation to provide a label for the salt they are using.

complies with the USDA organic regulations for: (§ 202	5.403(c))
General	
Maintain or improve natural resources (§ 205.200)	Yes
Crops	Section N/A N/A
Land requirements (§ 205.202)	
Soil fertility and crop nutrient management practice	
standard (§ 205.203)	
Seeds and planting stock practice standard (§ 205.204)	
Crop rotation practice standard (§ 205.205)	
Crop pest, weed, and disease management practice	
standard (§ 205.206)	
Approved temporary variance practices? (§ 205.290)	
Wild Crops	Section N/A
Wild-crop harvesting practice standard (§ 205.207)	
Livestock	Section N/A
Origin of livestock (§ 205.236)	Yes
Livestock feed (§ 205.237)	Yes
Livestock health care practice standard (§ 205.238)	Yes

Did the inspector and the on-site inspection verify that the organic system plan (OSP)



United States Department of Agriculture 1400 Independence Avenue S.W. Agricultural Marketing Service National Organic Program

Room 2648 South Building Washington, DC 20250

Livestock living conditions (§ 205.239)	Yes
Pasture practice standard (§ 205.240)	Yes
Approved temporary variance practices? (§ 205.290)	N/A
Handler	Section N/A
Organic handling requirements (§ 205.270)	Yes
Facility pest management practice standard (§ 205.271)	Yes (tin cats with glue boards inside
1751 MARK LANG 2016 PH	the houses and bait stations outside
	the houses).
Commingling and contact with prohibited substance	Yes (color coded system in place, all
prevention practice standard (§ 205.272)	feed is organic)
Did the inspector verify product composition for all	Yes
products? (§ 205.301)	
Approved temporary variance practices? (§ 205.290)	N/A

Labels (§ 205.403(c))	Section N/A N/A
Were labels verified during the on-site inspection?	
(§ 205.403(c)(2))	
Were the labels being used the same as those approved	
by the certifier?	
How was the inspector made aware of which labels were	
approved by the certifier?	
Sampling	Section N/A N/A
Did the operation provide access to all products?	
Was a sample collected during the inspection?	
(§ 205.670) (pre- or post-harvest?) (periodic residue	
testing?)	
Why was sample pulled? (Directed by the certifier or	
NOP, or inspector decision?)	
For what was sample to be tested?	
Verify sampling procedures, chain of control, etc.	
(§ 205.670(e))	
Did the inspector provide the applicant with a receipt for	
any samples taken? (§ 205.403(e)(1))	
Did the sampling process follow the certifier's sampling	
procedure?	
Was the inspector charged for the samples?	
(§ 205.403(e))	
Did the certifier pay for the testing? (§ 205.670(b), (c))	

# Exit Interview (§ 205.403(d))

Document information addressed or requested by the inspector during the exit interview: Salt label.



United States Department of Agriculture1400 Independence Avenue S.W.Agricultural Marketing ServiceRoom 2648 South BuildingNational Organic ProgramWashington, DC 20250

Was the exit interview conducted with a knowledgeable	Yes (Shari and Violet)
representative?	60 Date:
Did the exit interview address the accuracy and	Yes
completeness of the inspection observations?	
Did the exit interview address the need for additional	Yes (salt label)
information?	
Did the exit interview address issues of concern	Yes
identified during the inspection?	

<b>Questions for the inspector:</b> As the inspection progresses insert additional questions to ask the inspector on areas of the inspection/operation that need clarification.								
What did the inspector receive from the certifier in order	CDA final review, OSP modules,							
to conduct the inspection?	Inspection appointment form, audit							
	forms.							
Does the inspector have a copy of the USDA organic	Yes							
regulations?								
If applicable, was the inspector knowledgeable of recent	Yes							
updates to the regulations or policy clarifications?								
How is the inspector informed of the certifier's policies	Inspector is a CDA employee							
and procedures and changes to them?								
What is the inspector's background (experience, training,	5 years as a lead inspector, 12 years							
and education) in relation to the operation being	with CDA.							
inspected?								

<b>Questions for the Applicant/Certified Operation:</b> As the inspection progresses insert additional questions to ask the operation's representative on areas of the operation that need clarification.					
Did the certified operation receive a copy of the previous Yes, received inspection report and notification of renewal					
Did the operation receive a certificate from the certifier? Yes					
Does the client have a current copy of the USDA organic regulations?	Yes				
If applicable, how did the operation receive information on temporary variances?	N/A				

Overall did the inspection verify:	
That the operation was in compliance or was able to comply with the Organic Foods Production Act and the regulations? (§ 205.403(c)(1))	Yes, the inspector reviewed all OSP modules.
That the OSP accurately reflected the practices used by the operation? (§ 205.403(c)(2))	Yes. CDA doesn't use an inspection report template, they verify the OSP directly.



That prohibited substances had not been and were not being applied to the operation? (§ 205.403(c)(3))	Yes
Does the inspector provide consulting services of any kind? (§ 205.501(a)(11)(iv))	No, the inspector answered all questions appropriately
If so, how is this information provided to the certifier?	N/A
Was there enough time allocated for the inspection?	Yes
Did the inspector verify the corrective actions on previous noncompliances?	N/A
Was the inspection scheduled when land, facilities, and production practices demonstrate compliance with NOP requirements?	Yes
Did the inspector collect new or revised OSP information?	Yes
Days or months between submission of application (annual update) and date of inspection? If length of time is unreasonable, why?	The initial review occurred on 8/2

International Agreements	
Does the operation participate in any international	No
agreements, such as:	
EU equivalency	
Canada equivalency	
<ul> <li>Japan or Taiwan export arrangement</li> </ul>	
If yes for equivalency arrangements and the operation	N/A
is shipping out, did the inspector verify specific program	
requirements, including:	
Critical variances	
<ul> <li>Labeling requirements of the destination country</li> </ul>	
<ul> <li>Documentation requirements, including</li> </ul>	
compliance of incoming ingredients, as applicable	
If yes for equivalency arrangements and the operation	N/A
has received EU or Canada product in, did the	
inspector verify incoming product was accompanied by:	
NOP Import Certificate (EU)	
• Attestation statement (Canada)?	
If yes for Japan export arrangement, did the inspector	N/A
verify program requirements, including material use?	
Was the inspector aware of international agreement	N/A
requirements?	
How is the inspector informed of the international	CDA employee.
agreements? What information or training is provided by	



United States Department of Agriculture1400 Independence Avenue S.W.Agricultural Marketing ServiceRoom 2648 South BuildingNational Organic ProgramWashington, DC 20250

the certifier?	
Does the OSP indicate participation in international	OSP only asks a record keeping
agreements (i.e., would the inspector know of	question regarding international
international agreement participation before arriving	documents. OSP doesn't verify the
onsite)?	terms of agreement are met.

Witness Audit	- Auditor findings and citations
Finding 1 OSI	P modules don't include enough questions to verify compliance with international
agreements.	
F' 1' 0	
Finding 2	
Finding 3	
Finding 4	
Finding 4	
Witness Audit	- Auditor follow up requests or activities
Observation:	
•	CDA is updating an operation's OSP during their inspection. CDA, however, isn't providing the operation a copy of the update OSP until it is sent with the annual update.
	annuai upaaie.

NOP 2005-4 Witness Audit Checklist Rev05



#### NATIONAL ORGANIC PROGRAM: NONCOMPLIANCE REPORT

### AUDIT AND REVIEW PROCESS

An onsite renewal assessment of Colorado Department of Agriculture (CDA) organic program was conducted on August 7, 2017. The National Organic Program (NOP) reviewed the auditor's report to assess CDA's compliance to the USDA organic regulations. This report provides the results of NOP's assessment.

#### **GENERAL INFORMATION**

Colorado Department of Agriculture (CDA)		
305 Interlocken Parkwy, Broomfield, CO 80021		
305 Interlocken Parkwy, Broomfield, CO 80021		
e Mitch Yergert, Director, Division of Plant Industry		
Mitchell.yergert@state.co.us		
303.869.9074		
Rebecca Claypool, NOP Reviewer; Penny Zuck and Graham Davis,		
On-site Auditor(s).		
USDA National Organic Program (NOP)		
NOP assessment review: August 18, 2017		
Onsite audit: August 7-11, 2017		
NP7219PZA		
Yes		
Renewal Assessment		
To evaluate the conformance to the audit criteria; and to verify the		
implementation and effectiveness of CDA's certification		
7 CFR Part 205, National Organic Program as amended		
CDA's certification services in carrying out the audit criteria during		
the period: June 2015 through August 2017		

The Colorado Department of Agriculture (CDA) organic program is a state government certification program based in Broomfield, CO. It was initially accredited as a certifying agent by the USDA National Organic Program (NOP) on October 15, 2002. Current accreditation certification is good until October 16, 2017. At the time of this Accreditation Renewal Assessment, CDA provided organic certification for 206 operations in Colorado: crops (136), wild crops (1), livestock (11) and handling (93). The CDA is not currently accepting new clients for certification due to a moratorium imposed by the Colorado legislature. The moratorium was imposed because the legislature determined that the organic program resources (staffing) was at maximum capacity given its current client numbers and budget. There are no satellite offices, although staff inspectors (12) are distributed throughout the state and perform inspections for multiple CDA programs. The CDA organic program is administered by the Organic Program

Manager with the assistance of an Organic Certification Specialist. The program is overseen by the Division Director of the CDA.

The Accreditation Renewal Assessment included three witness audits. One Crops and Handling operation in Greeley, CO; one Crops, Livestock, and Handling operation in Fort Lupton, CO; and one Processing/Handling operation in Longmont, CO.

# NOP DETERMINATION

The NOP reviewed the onsite audit results to determine whether CDA 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 CDA.

## 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.

**NP5159RKA.NC1** – **Cleared** - 7 C.F.R. §205.501(a)(21), states that certifiers must "Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary." NOP 2613, Responding to Results from Pesticide Residue Testing, Section 5.3.1.a.2 instructs certifiers that when the pesticide test analysis results indicate detection below 5 percent of the EPA tolerance, but above .01 ppm, they are required to assess why the residue is present.

**2015** Comments: The certifier correctly issued a letter to an operation to investigate the source of contamination (Chlorpropham .592 mg/g) including a date by which the operation was to respond. The operation did not respond by the specified date and the certifier did not conduct a follow up. Therefore, the certifier was unable to assess why the residue was present and to determine if a noncompliance should be issued to the operation.

**2015 Corrective Action:** CDA updated their Organic Policy and Procedure Manual regarding procedures when residue tests show positive results below 5% of the EPA tolerance. CDA will issue a notice of noncompliance to operations that do not respond to their letter of investigation within the time period stated in the letter. A notice of noncompliance was sent to the operation regarding no response to the letter investigating the source of the contamination.

**2017 Verification of Corrective Action:** A review of CDA's Policy and Procedures Manual includes the revised procedure. A sample taken in 2016 tested positive for a prohibited substance below the 5% EPA tolerance level. The operation was contacted by CDA and issued a NoNC. The operation responded to the NoNC and was issued a NoNC Resolution letter by CDA. No other samples tested positive in 2016.

**NP5159RKA.NC2** – **Cleared** - 7 C.F.R. §205.501(a)(21), states that certifiers must "Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary." NOP 4009, "Who Needs to be Certified?" provides clarification to certifiers regarding the certification requirements for operations that produce or handle agricultural products to be sold, labeled or represented as organic.

**2015** Comments: During the witness audit of a fruit producer, the auditor identified that one of the apple orchards listed in the operation's OSP should be considered a separate certified entity. Under the current arrangement between the orchard owner and the certified operation, the orchard owner is under contract to sell his harvested fruit to the certified operation, but the certified operation does not manage the orchard (i.e. conduct cultural practices, pay labor, etc.), does not purchase and apply inputs, and does not maintain all the records that demonstrate compliance to the regulations.

**2015 Corrective Action:** CDA issued a notice of noncompliance to the fruit producer, identifying that contracted farming operations are not allowed to be certified under another entity's certificate. CDA provided training for inspectors on June 26, 2015, regarding NOP Instruction 4009 and a Training Attendance sign-in sheet was submitted.

**2017 Verification of Corrective Action:** The contracted producer applied for certification and was denied by CDA. The denial was reviewed by the auditor and was issued in compliance with the USDA organic regulations. There are no other occurrences of contracted operations being certified under another entity's certification.

**NP5159RKA.NC3** – **Cleared** - 7 C.F.R. §205.403(c)(1) states that, "The on-site inspection of an operation must verify:... The operation's compliance or capability to comply with the Act and the regulations in this part..."

**2015** Comments: During a witness audit, the inspector did not fully verify whether the contracted or rented fields in the operator's OSP were under the control (management) of the certified operation.

**2015 Corrective Action:** A new inspection report cover sheet was created to be used in conjunction with new OSP module system being developed. Included in the cover sheet is a question specifically requesting information regarding control/management of rented portions of the certified operation. CDA trained inspectors on April 7, 2016, regarding use of new inspection forms and the cover letter.

**2017 Verification of Corrective Action**: Through file reviews and witness audits the auditor verified that the revised inspection cover sheet is being used.

**NP5159RKA.NC4** – **Cleared** - 7 C.F.R. §205.403(d) states that during an exit interview, "the inspector must...address...any issues of concern."

**2015** Comments: During a witness audit of a split and parallel operation, the inspector did not identify as an issue of concern the lack of adequate controls to prevent contamination of products or fields. The storage of pesticides and fertilizers did not have a clear separation of approved and unapproved input materials. Input materials were located at spray rig filling stations in drums that were unlabeled. Brand names and sources are not listed on the OSP Input List; instead, some materials are listed with a generic identification: e.g. garlic oil, manganese, iron, sodium bicarbonate.

**2015 Corrective Action:** CDA updated the Crop OSP Module 10 Soil.Ferility Inputs and Module 12 Weed.Pest.Disease Inputs to require the operation to include product names and manufacturers, to ensure full information (rather than just generic names) are included in the OSP. CDA also provided training on June 26, 2015, to inspectors regarding identifying issues of concern during inspections.

**2017 Verification of Corrective Action:** The witness audit of an inspection of a parallel operation verified the proper use of the revised OSP modules.

**NP5159RKA.NC5** – **Cleared** - 7 C.F.R. §205.402(a)(2) states that "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..."

**2015 Comments**: *The certifier approved a "Made with Organic \*\*\*" granola cereal label that displayed the word "organic" on the front panel with no "Made with Organic" phrase.* 

**2015 Corrective Action:** CDA issued a notice of noncompliance to the operation for the noncompliant cereal label. CDA updated the Organic System Plan Review Procedures Rev B 6.7 manual stating that the CDA logo, and USDA seal may not be used on the label of products certified to the "Made with Organic \*\*\*" labeling category. Training on label review is planned for June 17, 2016.

**2017 Verification of Corrective Action: "**Made with Organic\*\*\*" labels reviewed by the auditor were in compliance with the regulations. Auditor verified the training records for label review training that took place in June 2016.

**NP5159RKA.NC6** – **Cleared** - 7 CFR §205.403(e)(1) states that "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."

**2015** Comments: During a witness audit, a pesticide residue sample was obtained and proper sampling procedures were followed, with the exception that the operator was not provided a receipt.

**2015 Corrective Action:** CDA updated the Sampling Form to clearly indicate that the pink sheet stays with the operation when samples are taken to serve as a receipt. Training was conducted on June 26, 2015, for all organic inspectors. The proper use of sampling forms, including leaving a copy with the operation as a receipt, was presented during the training.

**2017 Verification of Corrective Action:** During a witness audit, the auditor verified two samples were obtained and receipts were given to the operator. The chain of custody form is now being used as the receipt. The inspector prints a copy of the form and provides the copy to the operation as the receipt.

**NP1595RKA.NC7** – **Cleared** - 7 CFR §205.662(c) states, "Proposed suspension or revocation. The notification of a proposed suspension...shall state: (3) The impact of a suspension..."

**2015 Comments**: The auditor reviewed three letters of Notice of Proposed Suspension (NoPS) issued to clients. Two of the three letters issued do not explain the impact of the NoPS as stated in 205.100(a) "each 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 (specified

NP7219PZA NC CDA 082117 Page 4 of 7

ingredients or food group(s))" must be certified..." The auditor noted a discrepancy between the letters issued to clients and the CDA NoPS template, which actually does include language stating that "the operation will be unable to sell, or label its product as organic."

**2015 Corrective Action:** The notice of proposed suspension and combined notice of noncompliance and proposed suspension letter templates were updated to specifically state the impact of suspension. CDA created a document control system to ensure only the most current version of documents and letter templates are used in the future. Inspectors were trained on document control during the April 7, 2016 training.

**2017 Verification of Corrective Action:** The auditor verified the document control system being used is located on the shared server. Older versions of the documents are archived. The current Notice of Proposed Suspension template includes the impact of suspension.

**NP1595RKA.NC8** – **Cleared** - 7 CFR §205.510(b)(2) states, "Records created by the certifying agent regarding applicants for certification and certified operations must be maintained for not less than 10 years beyond their creation."

**2015 Comments**: In at least 3 files that were reviewed, the records of registered e-mails sent to the clients were not available during the audit. Currently, CDA sends registered e-mails from individual employee accounts and the delivery receipt required per 7 CFR §205.660(d) is not always retained (either electronically or as a hard copy).

**2015 Corrective Action:** CDA adjusted the Policy and Procedures Manual to clearly outline the current process for issuance of notices, and created a new requirement to save the documentation that the noncompliance was received by the operation. A copy of the documentation is saved electronically in the operation's Company Specific Information folder in the shared organic folder on the CDA server. Training was provided to the Program Manager and Certification Specialist on May 19, 2016.

**2017 Verification of Corrective Action:** The auditor verified electronic copies of receipts are saved in the operation's files on the server.

**AIA16120RK.NC2** – **Cleared** - 7 CFR § 205.501(a)(3) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670."

**2016 Comments:** CDA did not conduct adequate surveillance of a crop operation including its website to ensure compliance with the USDA organic regulations. The following issues were identified:

- CDA did not issue a noncompliance to the operation for its use of the word "organic" in the company name and labels on uncertified products.
- CDA did not issue a noncompliance to the operation for use of the USDA seal on the website pages advertising uncertified products.

**2016 Corrective Actions:** CDA has updated the Organic System Plan to specifically request website URL's from certified operations. All review personnel have been trained to review an operation's website for compliance with the USDA organic regulations, including organic marketing claims, use of the USDA organic seal, and the use of trade names with the word "organic" in them. CDA provided verification of staff training on these topics.

**2017 Verification of Corrective Action:** The auditor verified the revised organic system plan is currently being used. Certification staff review operator website addresses as part of the initial review of the organic system plan.

# **Noncompliances Identified during the Current Assessment**

**NP7219PZA.NC1** – 7 C.F.R. §205.501(a)(21) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Demonstrate the ability to fully comply with the requirements for accreditation set forth in this subpart; Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary." The NOP website provides instructions and the terms of international trade arrangements.

**Comments**: CDA's Organic System Plans do not include questions about exporting, importing, or participation in trade arrangements. The Organic System Plan module 1 includes the following question, "Through what avenues does the operation sell or otherwise market their products? Mark all that apply...Exporting (where?)".

**NP7219PZA.NC2** - 7 C.F.R. §205.403 (c)(1) and (2) states, "The on-site inspection of an operation must verify: The operation's compliance or capability to comply with the Act and the regulations of this part;... That the information, including the organic production or handling system plan, provided in accordance with §§205.401, 205.406, and 205.200, accurately reflects the practices used or to be used by the applicant for certification or by the certified operation."

**Comments:** During witness inspections and interviews with staff, the following verification issues were identified:

- Inspector did not verify labels on-site were the same as the labels in the approved organic system plan.
- Operator indicated cleaning logs are kept for truck and equipment clean-outs, however inspector did not verify the record keeping by reviewing the logs.
- Pest management company service logs and/or invoices were not reviewed by the inspector to verify no prohibited materials were used in the facility.
- Inspectors do not verify compliance of imported and exported products or ingredients purchased and handled by certified operations. Inspection report documents do not require inspectors to record compliance verification of internationally traded products.

**NP7219PZA.NC3** - 7 C.F.R. §205.663 states, "Any dispute with respect to denial of certification or proposed suspension or revocation of certification under this part may be mediated at the request of the applicant for certification or certified operation and with acceptance by the certifying agent. Mediation shall be requested in writing to the applicable certifying agent...."

**Comments:** CDA does not have procedures for accepting a request for mediation and reaching settlement agreements with operations. CDA denied the request for mediation from an operator when the noncompliances were correctable and could be resolved.

**NP7219PZA.NC4** – 7 C.F.R. \$205.662(a)(3) states, "When an inspection, review, or 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. Such notification shall provide: (1) A description of each noncompliance; (2) The facts upon which the notification of noncompliance is based; and (3) The date by which the certified operation must rebut or correct each noncompliance and submit supporting documentation of each such correction when correction is possible.

**Comments:** Not all of CDA's templates for a Notice of Noncompliance include language that allows the operation to rebut the noncompliance.

**NP7219PZA.NC5** – 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:** The auditor could not determine the most recent labels approved as part of the organic system plans for operation files reviewed in the CDA filing system. There was no indication that product labels on file were either reviewed or approved by CDA. CDA indicated that Farmer's Market and Wholesale labels don't go through the formal label review process.



## Agricultural Marketing Service Livestock, Poultry and Seed Program Quality Assessment Division

Company Information:			
Company Name:	Colorado Department of Agriculture (CDA)		
Est. No.:	st. No.: FMMI# 3123219		
Street Address:	Street Address: 305 Interlocken Parkway		
City, State, Zip:	ip: Broomfield, CO 80021		
Contact:	Mitch Yergert		
Phone: 303.869.9052			
Email:	cda.organic@state.co.us		
Program:	National Organic Program		
Comments:	NP7219PZA - Renewal Assessment		

#### Audit Objectives:

To verify compliance with the USDA organic regulations, 7 CFR 205, as amended, and NOP Policy requirements (NOP Handbook). To conduct a renewal assessment.

#### Audit Scope:

The company's quality manual including personnel, processes, procedures, facilities, and related records since June 2015.

#### Audit Criteria & Reference Documents:

7 CFR Part 205 National Organic Program, Final Rule, dated December 21, 2000; As amended. NOP Policy requirements (NOP Handbook) NOP 2000, General Accreditation Policies and Procedures



# **Agricultural Marketing Service** Livestock, Poultry and Seed Program **Quality Assessment Division**

Company Name: Colorado Department of Agriculture (CDA)				
Audit Team and Responsibilities				
Auditor:	Title:	Responsibility:		
Penny Zuck	Auditor	Responsible for all areas of audit to include Scheduling; Conducting Opening and Closing Meetings; Review of certification process an procedures; and completing final report.		
Graham Davis	Auditor	Assist with audit, as needed.		

Audit Schedule						
Date:	Time:	Activity: Location:		Auditor		
		See Attached Audit Schedule				



### **Agricultural Marketing Service** Livestock, Poultry and Seed Program **Quality Assessment Division**

Company Name: Colorado Department of Agriculture (CDA)							
Cost Estimate							
Audit Time:	Auditor 1:	Auditor 2:		Rate:		Amount:	
Onsite Audit							
Travel	12.00	12.00	\$	108.00	\$	2,592.00	
Pre-Audit	8.00	8.00	\$	108.00	\$	1,728.00	
Audit	28.00	28.00	\$	108.00	\$	6,048.00	
Post-Audit	8.00	8.00	\$	108.00	\$	1,728.00	
Desk Audit Only			\$	108.00	\$	-	
Per Diem:	Auditor 1:	Auditor 2:		Rate:		Amount:	
Per Diem Days				n/a			
Lodging	712.00	712.00	\$	-	\$	1,424.00	
M&IE	345.00	345.00	\$	-	\$	690.00	
Associated Costs:	Auditor 1:	Auditor 2:		Cost:		Amount:	
Airfare	700.00	700.00	\$	1,400.00	\$	1,400.00	
Local Transportation			\$	-	\$	-	
Room Tax	59.45	59.45	\$	118.90	\$	118.90	
Rental Car	525.00		\$	525.00	\$	525.00	
Parking	50.00	50.00	\$	100.00	\$	100.00	
POV Miles	60.00	26.75	\$	0.560	\$	48.58	
Administrative	1.00	1.00	\$	108.000	\$	216.00	
Miscellaneous	100.00	100.00	\$ 200.00		\$	200.00	
Credit	n/a	n/a	\$	-	\$	-	
		(	GRAN	<b>ID TOTAL</b>	\$	16,818.48	

• •

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

Client (Auditee) Name:

Client (Auditee) Signature:

Date:

Date:

: Zula 64

Lead Auditor Signature:

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

7/7/2017

# OFFICIAL FUNCTION COMMITMENT REQUEST (FISCAL RULES CHAPTER 4 SECTION 1)

NO. REQUEST CONSECUTIVELY EACH FISCAL YEAR

AGENCY REQUEST NO.

DEPARTMENT, DIVISION OR AGENCY COLORADO DEPARTMENT OF AGRICULTURE, DIV. OF PLANT INDUSTRY		SUBORDINATE AGENCY	
TYPE OF FUNCTION (GROUP LUNCHEON, RECEPTION, ETC.) 2017 ORGANIC PROGRAM REACCEDIDATION A	AUDIT		DATE OF FUNCTION 8/7-10/2017
PURPOSE OF FUNCTION		FUND NUMBER	DIRECT COSTS
USDA REACCREDIDATION AUDIT, OF THE COL DEPARTMENT OF AGRICULTURE ORGANIC PR		23\$0	FUNCTIONS
		G/L ACCT. (5XXX6)	RELATED COSTS
			TRAVEL
		OBJECT CODE () 4180 390	PER DIEM/SUBSISTENCE
		ORG. UNIT ACCOUNT	REGISTRATION FEE
		6130	s
		APPROP CODE	OTHER
		BCCAACL001	\$50.00
		TOTAL COST	\$50.00
LOCATION OF FUNCTION 305 INTERLOCKEN PARKWAY, BROOMFIELD, (	CO 80021		NO. OF PERSONS ATTENDING 8
SIGNATURE OF PERSON CERTIFY NG AVAILABILITY OF FUNDS	TITLE		DATE
	DIRECTOR, DIVISION OF PLAN		
APPROVAL OF DEPARTMENT HEAD OR AUTHORIZED DELEGATE	TITLE		DATE
	DEPUTY COMMISS		
	COLORADO DEPT.	OF AGRICULTURE	

STATE EMPLOYEES ATTENDING THE OFFICIAL FUNCTION		
NAME ( NCLUDE "AND SPOUSE" F ATTEND NG)	POSITION TITLE	
MITCH YERGERT DUANE SINNING ALYSSA MACK BARB TERRY BARB ROSENBACH (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) DON BROOKS	DIRECTOR, DIVISION OF PLANT INDUSTRY DEPUTY DIRECTOR, DIVISION OF PLANT INDUSTRY ORGANIC CERTIFICATION SPECIALIST ADMINISTRATIVE ASSISTANT PROGRAM ASSISTANT PLANT INDUSTRY INSPECTOR PLANT INDUSTRY INSPECTOR PLANT INDUSTRY INSPECTOR INSPECTOR SUPERVISOR, PLANT INDUSTRY	
VISITING GUESTS OR D	IGNITARIES ATTENDING	
NAME ( NCLUDE "AND SPOUSE" F ATTEND NG)	AFF LIATION	
PENNY ZUCK GRAHAM DAVIS	USDA AUDITOR USDA AUDITOR	

# **National Organic Program**

# **File Review Worksheets**

# Note: Please submit this completed form in MSWord format

	SECTION I – Certifier Information <u>Table of Contents</u> <u>Closing Meeting Findings</u>		
	Description	Completed by the Certifier (Include page or section number of quality/program manual as applicable)	Auditor Comments
		General	
1	Name and Type of Business Entity (Incorporated, LLC, Partnership, etc)	Colorado Department of Agriculture, Organic Program Governmental Entity	
2	List the locations (City, State, and Country) where key activities occur and are performed. Also complete Table 9	Broomfield, Colorado, USA	
3	List any names and types (organic and nonorganic) of accreditations obtained.	USDA National Organic Program accreditation, Crop, Livestock, Handling scopes, Wild Crop – we are going to discontinue wild crop certification at the end of 2017.	
4	List the types (organic and nonorganic) of certifications and business services offered.	Organic Certification, Organic Export Documentation under Organic Trade Arrangements	

	SECTION I – Certifier Information <u>Table of Contents</u> Closing Meeting Findings	
5	List the states (US only) and countries where NOP certification currently occurs Note the number of operations certified to the NOP at the time of the assessment. Operations may hold more than one certification scope. Therefore the total number of certified operations might not be the sum of certification scopes issued.	Colorado         Total:214 NOP certified operations         Crop:141         Wild-crop: _1         Livestock: _10         Handlers: _86         Grower Groups:0         Approximate Handler Types:         Processors:79         Distributors:7         Traders/Brokers:0         Retailers: _0         The 214 was at the time of our previous assessment in 2015.
7	Indicate the number of certified operations on January 2 for all years since the prior assessment. Also include the year of the prior assessment.	Jan 2, 20151 Jan 2, 2016 204 Jan 2, 2017203

	SECTION I – Certifier Information <u>Table of Contents</u> <u>Closing Meeting Findings</u>		
		Certification Process	
8	What does the certifier provide to applicants on the initial application? $\underline{\$}$ 205.501(a)(8)	Please See Attachment A, Organic Certification Application Packet Documents	
9	How are the information, documentation, and/or forms provided to those inquiring about certification? (i.e, hard copy, electronic, etc.)?	Sent upon request electronically, via email (not done at this time due to moratorium on new applicants for program). Will send via USPS if email not available.	
10	Who (job title/position description) conducts the initial review for completeness and ability to comply? <u>Table 8</u>	Program Manager (M.Yergert), Program Assistant (A. Mack), <mark>Janis Kieft – is the new program manager as of</mark> August 7 <sup>th</sup> .	
11	What is the certifier's process for identifying the legal status of clients?	Request legal status as part of OSP and review against Colorado Dept. of State Website (see Attachment B Organic System Plan Review)	
12	Who (job title/position description) reviews labels? Is a checklist used by the reviewer/approver? What records are maintained for approved labels?	Program Manager (M. Yergert), Program Assistant (A. Mack) review labels. No Checklist is maintained; instructions are included in Organic System Plan Review (Attachment B), status of review maintained in Module 50, copies of all labels are maintained in the operation's electronic OSP folder.	
13	How are inspectors selected or assigned for inspections? Who assigns inspectors?	Inspectors are selected from staff multiple field inspectors based on training completed, assigned geographical area, and number of consecutive inspections at the same operation. All assigned by Program Manager.	
14	Are inspectors employees or independent contractors?	Employees	

6	SECTION I – Certifier Information		
	Table of Contents Closing Meeting Findings		
15	Did all certified operations for each calendar year since the prior onsite audit receive inspections?	Yes	
16	Who (job title/position description) reviews the inspection results/report for an initial inspection?	Program Manager, Program Assistant	
17	Who (job title/position description) makes the certification decision for an initial inspection?	Program Manager, Program Assistant	
18	Provide a brief description of the annual update process. <u>§ 205.406 Table</u> <u>3</u>	Please see Attachment C Organic System Plan Update Procedures	
19	Who (job title/position description) reviews the inspection report, results of analysis conducted (as applicable), and information requested from and provided by continuing operation?	Program Manager, Program Assistant	
20	Explain the process and documents for providing an initial and an annual cost estimate for certification.	The fee schedule is sent out with the OSP for update or application, when application or update is received, a letter with estimated inspection fees is sent.	
	Minor Issue, Noncompliance, and Adverse Action Process		
21	Who (job title/position description) makes the determination on whether to issue a minor issue, noncompliance, proposed adverse action, and adverse	Program Manager, Program Assistant	

	<u>[</u> ,	SECTION I – Certifier Information Table of Contents Closing Meeting Findings
22	When operations submit corrective actions or a rebuttal, who (job title/position description) reviews the materials and determines whether they are adequate? <u>Table 8</u>	Program Manager, Program Assistant
23	How many minor issues have been issued since the last onsite audit?	~300
24	How many noncompliances have been issued since the last onsite audit?	107
25	How many proposed suspensions have been issued since the last onsite audit?	22
26	How many proposed revocations have been issued since the last onsite audit?	0
27	How many certification denials have been issued since the last onsite audit?	1

	SECTION I – Certifier Information		
	Table of Contents Closing Meeting Findings		
28	How many suspensions have been issued since the last onsite audit?	13	
29	How many revocations have been issued since the last onsite audit?	0	
30	How many certified operations are currently appealing issued proposed adverse actions?	1	
31	How many settlement agreements were established with operations since the prior onsite audit?	2015: 0 2016: 2 2017: 2	
32	Are settlement agreements in accordance with the guidance provided by the NOP training module? http://www.ams.usda.gov/NOPTraining	Yes	
		Material Input Review	
33	Does your organization offer material input program services (i.e. issue certificates for organic material inputs)?	No	

	SECTION I – Certifier Information <u>Table of Contents</u> <u>Closing Meeting Findings</u>		
34	What is the certifier's process for conducting material reviews and making determinations on allowable vs. prohibited substances for those substances that have not been reviewed and approved by another entity? (See	Please see Attachment D – Input Materials Review Policy	
35	Where in your Quality or Program Manual is your material input procedures described?	In the Input Materials Review Policy (Attached)	
36	Does your organization approve liquid nitrogen fertilizers (LNF) with a nitrogen content greater than 3%?	Only in conjunction with a particular operation's OSP, and not without verification of inspection by an MRO, per NOP Guidance 5012	
		Pesticide Residue Sampling	
37	Number of pesticide residue tests conducted during the calendar years since the last assessment.	2015: 11 2016: 5 2017: 18 + 1 pending	
38	Was all pesticide sampling conducted by the certifier? If not, explain.	Yes	
39	Describe your organization's annual sampling program.	A crop is selected for sampling in discussion with the CDA lab. Operations growing the selected crop are chosen, and inspectors assigned	
40	Names of labs conducting pesticide residue analysis for your organization? Are all the labs ISO 17025 accredited?	Pacific Agricultural Laboratory (PAL), who is ISO 17025 accredited, and Colorado Department of Agriculture Laboratory, also ISO 17025 accredited	

		SECTION I – Certifier Information Table of Contents Closing Meeting Findings	
41	Are all inspectors equipped and trained to collect samples? What equipment and documents are provided to them?	Yes, PAL Chain of Custody or CDA Residue Testing Form, for equipment, please see Attachment L, Sampling Equipment List, taken from CDA Residue Sampling Procedures and Guidelines (Field Services document)	
	Other	Accreditation and Certification Information	
42	Describe your organization's record keeping system. For example, all electronic database, all paper documents, hybrid system, etc	Electronic document control system housed on shared drive, administered by the program manager	
43	Does your organization contract or partner with any organizations to conduct certification or accreditation services on your behalf (e.g. inspections, inspector evaluations)? If so, briefly summarize here and	No	
44	How many unannounced inspections were conducted since the prior onsite audit? § 205.403(a)(2)(i-iii)	2015: 10 2016: 11 2017: 2 (at least 9 more will be conducted prior to Dec. 31 <sup>st</sup> 2017)	
45	Describe how your unannounced inspections are selected.	Selected based on complaint, risk assessment, and random selection	
46	Number of surrenders since the last onsite audit?	2015: 10 2016: 10 2017: 4	

¥	SECTION I – Certifier Information Table of Contents Closing Meeting Findings		
			1
47	Do you certify Private Label operations that do not physically handle organic products but contract with co-packers?	No operations that are exclusively private label. A few operations certified for processing may have a few items toll produced by another certified organic facility.	
48	Describe your organization's external and internal training program for NOP certification staff and contractors (if applicable)?	2 annual in-house trainings with full organic staff, spring generally April, utilizes information from annual NOP training held at ACA meeting.	
49	Describe your annual certification personnel performance evaluation program? Are annual performance evaluations conducted on all certification personnel? Are annual field evaluations conducted on all	Annual performance evaluation based on state HR criteria. All personnel annually evaluated, all inspectors receive annual field evaluations.	
50	Do any certified operations import or export organic products under established organic trade agreements	Yes	
51	Does your organization have the following:		
	Quality Manual	Yes (not names as such, CDA Policies and Procedures Manual)	
che	Organizational Chart	Yes	
58	Program Manual	Yes (not names as such, CDA Policies and Procedures	
	Standard Operating Procedures	Yes	
	Control List of documents and	Yes	

	SECTION I – Certifier Information <u>Table of Contents</u> <u>Closing Meeting Findings</u>	
52	When was the date of the most recent annual review? Who conducted the review?	October 13, 2016, conducted by Don Brooks, Field Services Supervisor, CDA

Table 9 – Certifier Offices and Locations												
Α	B	C	D	E	F	G	H	Ι	J	K	L	М
Certifier office or location: Organization's name; postal and physical addresses; point of contact; telephone number and email.												Activities Not Covered in Columns C to L (provide a brief description)
Colorado Department of Agriculture Organic Program 305 Interlocken Parkway Broomfield, CO 80021 Contact: Mitch Yergert 303-869-9052 Cda.organic@state.co.us	15	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	As this is the sole office, all organic certification and accreditation activities happen here.
										5		
										8 93 		
						Ins	struc	tion	s – T	able	9	

Column A: ACA office or location: Organization's name and postal address; point of contact; telephone number and email. List all offices or locations where NOP accreditation and certification activities occur (do not list certified operation locations where inspections are conducted or home offices were certifier staff or contractors conduct reviews). Also include any partnership or separate entities that are contracted by your organization to conduct activities. Indicate whether the office or location is the principal or auxiliary office.

Column B: Number of Staff Indicate the number of staff or individuals conducting NOP accreditation and certification activities.

Column C - L: Indicate either "Y" (= Yes) or "N" (= No) in each column.

Column C: Policy Formulation Does this office or location formulate policy regarding the certifier's NOP accreditation and certification policies?

Column D: Process and/or Procedural Development Does this office or location create work instructions, standard operating procedures, and/or other guidance for certification staff and contractors when conducting NOP accreditation and certification activities?

Column E: Contract Review Does this office or location issue or sign contracts for accreditation or certification services?

Column F: Application Review Does this office or location conduct a review of certification applications for completeness or for compliance?

Column G: Inspection Reports Review Does this office or location conduct inspection report review?

Column H: Inspections Does this office or location conduct inspections, assign inspectors, provides inspectors, collects inspection reports, etc..?

**Column I: Decisions on Certification** Does this office or location issue or make decisions of certification for new applicants (e.g. Denials or approvals)? Does this office issue or make decisions on whether to issue continuing certification for existing certified operations?

**Column J: Decisions on Non-compliance and Adverse Action** Does this office or location issue or make decisions of noncompliance, resolutions, proposed adverse actions, or adverse actions? Does this office issue or make decisions on whether to issue continuing certification for existing certified operations?

Column K: Review of Materials, Ingredients, and Inputs, Review and Approval of Product Labels Does this office or location issue or make decisions of regarding the approval or compliance of inputs or labels?

Column L: Retain Records Does this office or location create, retain, or maintain any accreditation or certification records?

Column M: Activities Not Covered in Columns C to M (provide a brief description) Here are some examples: client outreach, provide certification materials, conduct inspector field evaluations, etc...

Remarks



#### ORGANIC CERTIFICATION PROGRAM APPLICATION FEE SCHEDULE

This form can be filled out electronically and will automatically calculate your fee. Please complete this form to determine your application fees for the current year. Application fees are annual fees and must be submitted for both initial applications and renewals. All applicants pay a \$400.00 base fee. Additional fees are broken down into 5 scopes (Crop, Process Handler, Livestock, Wild Crop, and Poultry & Livestock Processing). For operations that include multiple scopes, each additional scope is \$200.00.

Certification Renewals: Renewal Forms and Fees must be postmarked by the specified date in your renewal cover letter. The base fee increases \$100 per month if not postmarked by the date specified (1 - 30 days past due = \$100; 31 - 60 days past due = \$200; up to a maximum of \$300).

**Initial Applicants: New applicants requesting crop certification must submit the application and Organic System Plan by June** 1<sup>st</sup> to receive certification for the year. There are no late fees for initial certifications.

GENERAL INFORMATION						
Applicant/Company Name:		DBA, if applicable:				
Primary Contact's Name:	Phone Number:		Email Address:			
Mailing Address:	City:	State:	Zip Code:	County:		
Physical Address:	City:	State:	Zip Code:	County:		

BASE FEES			
What is your Primary scope?			
(CHECK ONE ONLY - The pa	rt of your operation that produces the most	income)	
Crops	Poultry and Livestock Processing		
Livestock	Process Handler		
Wild Crop			
	Primary Scope = \$400.00	If entering by hand enter \$400 here:	0.00
Which additional scopes are y	ou wishing to certify?		
(Ruminant Livestock Producer	s must select crops as an additional scope)		
(Check all that apply, additional	l scopes = \$200 each)	If entering by hand enter \$200 for each checked box, below	
Crops (must be selected i	if ruminant livestock is part of operation)		0.00
Livestock			0.00
Wild Crop			0.00
Process Handler			0.00
Poultry and Livestock Pr	rocessing		0.00
Ba	ase Fee Total (Primary Scope + additional scopes)		0.00

\*Continue to Page two for Scope Fees



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### ORGANIC CERTIFICATION PROGRAM - APPLICATION FEE SCHEDULE CONT'D

SCODE 1. CDODS	Primary Scope)			
SCOPE 1: CROPS	to the type and nu	mber of acres you are requesting	for certificati	on. If more than one type of production
occurs, enter the one which pro	duces the most inc	ome	for certification	sh. If more than one type of production
Irrigated Acres		Dryland Acres		×
$\Box$ 1 – 20 acres	\$400.00	□ 1 – 1500 acres	\$400.00	
21 – 200 acres	\$850.00	1501 - 4000 acres	\$850.00	
201 or greater acres	\$2100.00	4001 or greater acres	\$2100.00	
Perennial Fruit	42100.00	Greenhouse/Specialty Crop	\$2100.00	
1 - 5 acres	\$400.00	□ 1 – 12000 sq. ft.	\$400.00	
6 - 40 acres	\$850.00	12001 – 15000 sq. ft.	\$850.00	
41 or greater acres	\$2100.00	15001 or greater sq. ft.	\$2100.00	0.0
SCOPE 2: LIVESTOCK	to the trme and m	mhor of livertools you are reques	ting for cortifi	action
-	s to the type and hu	mber of livestock you are request	ing for certifi	
<b>Poultry</b> 1 – 1000 head	A 100 CC	Dairy	A 400 00	
	\$400.00	1 – 100 head	\$400.00	
1001 – 6000 head	\$850.00	101 – 300 head	\$850.00	
6001 or greater head	\$2100.00	□ 301 or greater head	\$2100.00	
Other (Beef cattle, sheep, pigs	s)			
1 - 250 head	\$400.00			
251 – 500 head	\$850.00			
500 or greater head	Contact CDA			
	1			
SCOPE 3: PROCESS HAND	LING	ducts are being requested, enter t	the highest fee	of the two.
SCOPE 3: PROCESS HAND	LING Iulti-Ingredient pro	ducts are being requested, enter t Multi-Ingredient Finished Pr		of the two.
SCOPE 3: PROCESS HAND If both Single-Ingredient and M	LING Iulti-Ingredient pro			of the two.
SCOPE 3: PROCESS HAND If both Single-Ingredient and M Single Ingredient Finished Pr	LING fulti-Ingredient pro roducts	Multi-Ingredient Finished Pr	roducts	of the two.
SCOPE 3: PROCESS HAND If both Single-Ingredient and M Single Ingredient Finished Pr 1 – 20 products	LING fulti-Ingredient pro roducts \$400.00	Multi-Ingredient Finished Pr	s400.00	of the two.
SCOPE 3: PROCESS HAND If both Single-Ingredient and M Single Ingredient Finished Pr 1 - 20 products 21 - 40 products	LING fulti-Ingredient pro roducts \$400.00 \$850.00	Multi-Ingredient Finished Pr $\Box$ 1 – 5 products $\Box$ 6 – 15 products	subscription           \$400.00           \$850.00	
SCOPE 3: PROCESS HAND If both Single-Ingredient and M Single Ingredient Finished Pr 1 - 20 products 21 - 40 products 41 or greater products	LING fulti-Ingredient pro oducts \$400.00 \$850.00 \$2100.00	Multi-Ingredient Finished Pr	subscription           \$400.00           \$850.00	
SCOPE 3: PROCESS HAND If both Single-Ingredient and M Single Ingredient Finished Pr 1 – 20 products 21 – 40 products 41 or greater products SCOPE 4: POULTRY AND I	LING fulti-Ingredient pro oducts \$400.00 \$850.00 \$2100.00	Multi-Ingredient Finished Pr	subscription           \$400.00           \$850.00	
SCOPE 3: PROCESS HAND If both Single-Ingredient and M Single Ingredient Finished Pr 1 – 20 products 21 – 40 products 41 or greater products SCOPE 4: POULTRY AND I	LING fulti-Ingredient pro oducts \$400.00 \$850.00 \$2100.00	Multi-Ingredient Finished Pr	subscription           \$400.00           \$850.00	
SCOPE 3: PROCESS HAND If both Single-Ingredient and M Single Ingredient Finished Pr 1 – 20 products 21 – 40 products 41 or greater products SCOPE 4: POULTRY AND I Livestock Processing	LING fulti-Ingredient pro coducts \$400.00 \$850.00 \$2100.00 LIVESTOCK PRO	Multi-Ingredient Finished Pr         1 - 5 products         6 - 15 products         16 or greater products         OCESSING         Poultry Processing	store         store <th< td=""><td></td></th<>	
SCOPE 3: PROCESS HAND If both Single-Ingredient and M Single Ingredient Finished Pr 1 – 20 products 21 – 40 products 41 or greater products SCOPE 4: POULTRY AND I Livestock Processing 1 – 300 head	LING fulti-Ingredient pro oducts \$400.00 \$850.00 \$2100.00 LIVESTOCK PRO \$400.00	Multi-Ingredient Finished Pr         1 - 5 products         6 - 15 products         16 or greater products         Poultry Processing         1 - 3000 head	subscription           \$400.00           \$850.00           \$2100.00           \$400.00	of the two. 0.00
SCOPE 3: PROCESS HAND If both Single-Ingredient and M Single Ingredient Finished Pr 1 – 20 products 21 – 40 products 41 or greater products SCOPE 4: POULTRY AND I Livestock Processing 1 – 300 head 301 – 500 head	LING fulti-Ingredient pro oducts \$400.00 \$850.00 \$2100.00 LIVESTOCK PRO \$400.00 \$850.00	Multi-Ingredient Finished Products         1 – 5 products         6 – 15 products         16 or greater products         OCESSING         Poultry Processing         1 – 3000 head         3001 – 9000 head	subscription           \$400.00           \$850.00           \$2100.00           \$2100.00           \$400.00           \$400.00           \$850.00	0.00
SCOPE 3: PROCESS HAND If both Single-Ingredient and M Single Ingredient Finished Pr 1 – 20 products 21 – 40 products 41 or greater products SCOPE 4: POULTRY AND I Livestock Processing 1 – 300 head 301 – 500 head 501 or greater head	LING fulti-Ingredient pro oducts \$400.00 \$850.00 \$2100.00 LIVESTOCK PRO \$400.00 \$850.00	Multi-Ingredient Finished Products         1 – 5 products         6 – 15 products         16 or greater products         OCESSING         Poultry Processing         1 – 3000 head         3001 – 9000 head	subscription           \$400.00           \$850.00           \$2100.00           \$2100.00           \$400.00           \$400.00           \$850.00	0.0
SCOPE 3: PROCESS HAND If both Single-Ingredient and M Single Ingredient Finished Pr 1 – 20 products 21 – 40 products 41 or greater products SCOPE 4: POULTRY AND I Livestock Processing 1 – 300 head 301 – 500 head	LING fulti-Ingredient pro oducts \$400.00 \$850.00 \$2100.00 LIVESTOCK PRO \$400.00 \$850.00	Multi-Ingredient Finished Products         1 – 5 products         6 – 15 products         16 or greater products         OCESSING         Poultry Processing         1 – 3000 head         3001 – 9000 head	subscription           \$400.00           \$850.00           \$2100.00           \$2100.00           \$400.00           \$400.00           \$850.00	0.00
SCOPE 3: PROCESS HAND If both Single-Ingredient and M Single Ingredient Finished Pr 1 – 20 products 21 – 40 products 41 or greater products SCOPE 4: POULTRY AND I Livestock Processing 1 – 300 head 301 – 500 head 501 or greater head SCOPE 5: WILD CROP	LING fulti-Ingredient pro oducts \$400.00 \$850.00 \$2100.00 LIVESTOCK PRO \$400.00 \$850.00	Multi-Ingredient Finished Products         1 – 5 products         6 – 15 products         16 or greater products         OCESSING         Poultry Processing         1 – 3000 head         3001 – 9000 head	subscription           \$400.00           \$850.00           \$2100.00           \$2100.00           \$400.00           \$400.00           \$850.00	0.0
SCOPE 3: PROCESS HAND If both Single-Ingredient and M Single Ingredient Finished Pr 1 – 20 products 21 – 40 products 41 or greater products SCOPE 4: POULTRY AND I Livestock Processing 1 – 300 head 301 – 500 head 501 or greater head SCOPE 5: WILD CROP Wild Crop Harvesting	LING fulti-Ingredient pro oducts \$400.00 \$850.00 \$2100.00 LIVESTOCK PRO \$400.00 \$850.00 \$2100.00	Multi-Ingredient Finished Products         1 – 5 products         6 – 15 products         16 or greater products         OCESSING         Poultry Processing         1 – 3000 head         3001 – 9000 head	s400.00           \$850.00           \$2100.00           \$400.00           \$850.00	0.00
SCOPE 3: PROCESS HAND If both Single-Ingredient and M Single Ingredient Finished Pr 1 – 20 products 21 – 40 products 41 or greater products SCOPE 4: POULTRY AND I Livestock Processing 1 – 300 head 301 – 500 head 501 or greater head SCOPE 5: WILD CROP Wild Crop Harvesting 1 – 2 sites	LING fulti-Ingredient pro oducts \$400.00 \$850.00 \$2100.00 LIVESTOCK PRO \$400.00 \$400.00 \$2100.00 \$400.00 \$400.00	Multi-Ingredient Finished Products         1 – 5 products         6 – 15 products         16 or greater products         OCESSING         Poultry Processing         1 – 3000 head         3001 – 9000 head	s400.00           \$850.00           \$2100.00           \$400.00           \$850.00	0.0
SCOPE 3: PROCESS HAND If both Single-Ingredient and M Single Ingredient Finished Pr 1 – 20 products 21 – 40 products 41 or greater products SCOPE 4: POULTRY AND I Livestock Processing 1 – 300 head 301 – 500 head 501 or greater head SCOPE 5: WILD CROP Wild Crop Harvesting 1 – 2 sites 3 – 5 sites	LING fulti-Ingredient pro oducts \$400.00 \$850.00 \$2100.00 LIVESTOCK PRO \$400.00 \$2100.00 \$2100.00 \$400.00 \$400.00 \$400.00 \$400.00 \$400.00 \$400.00	Multi-Ingredient Finished Products         1 – 5 products         6 – 15 products         16 or greater products         OCESSING         Poultry Processing         1 – 3000 head         3001 – 9000 head	s400.00           \$850.00           \$2100.00           \$400.00           \$850.00	

Print this form and mail it along with a check made payable to: Colorado Department of Agriculture

**Colorado Department of Agriculture** 

**Division of Plant Industry** 

305 Interlocken Parkway

Broomfield, CO 80021



#### ORGANIC CERTIFICATION PROGRAM APPLICATION FEE SCHEDULE CONT'D

**Application Fee Refund Policy:** The entire application fee can be refunded if an applicant decides to withdraw from the certification process, prior to the on-site inspection. Once the on-site inspection is conducted, the entire application fee becomes non-refundable. In order to obtain a refund, the applicant must inform the Colorado Department of Agriculture in writing that they no longer wish to proceed with the organic certification process and request a refund of their application fee.

**Inspection Fees**: Inspection fees are calculated separately and are determined by hourly rates. In the event of an Unannounced Inspection, an operation will only be charged if the unannounced inspection replaces the required annual inspection.

#### Inspection Fee Schedule

Hourly Rates		Mileage	Per Diem
Inspection Time	\$34/hour		
Driving Time	\$34/hour	Mileage Rate: \$0.25/mile	Varies by Location
Report Write-Up Time	\$34/hour		

### THIS PAGE CAN BE KEPT BY THE APPLICANT



**Colorado Department of Agriculture** 

Division of Plant Industry

305 Interlocken Parkway, Broomfield, CO 80021 Tel: (303)869-9070

# **Organic Certification Program**

# Affidavit for Compliance for Products Exported into Canada

Operator Information (Exporting to Canada)							
Contact Name	Operation Name	Date					

Supplier Information (Grower/Supplier)						
Contact Name	Operation Name	Phone				
Fax	Email					

Products Requested for Canadian Export Verification:

#### Please verify that the products listed above meet the following requirement and sign and date this statement:

I attest that these agricultural products to be exported to Canada were not produced with the use of sodium nitrate, without hydroponic or aeroponic production methods, and according to the livestock stocking rates asnoted in the Canada Organic Regulation.

Signature	Date

Certification Agency		
Contact Name	Certification Agency	
Amy Stafford	Colorado Department of Agricultur	re
<b>Phone</b> 303-869-9075	Email amy.stafford@state.co.us	Fax 303-466-2860
<b>**Certified in compliance with the terms of the US-C</b> <i>I attest that the information provided by our client, regar</i> <i>Agreement, to be accurate to the best of my knowledge.</i>		

Signature

Date

Affidavit for Canadian Export

Revision A Page 1 of 1



## COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry

305 Interlocken Parkway, Broomfield, Colorado, 80021 Tel: (303) 869-9050 Fax: (303) 466-2860 www.colorado.gov/ag/dpi INSPECTOR USE ONLY

Appointment Date:

Appointment Time:

DPI-ORG-OIAF (02/15)

# **Organic Certification Program**

# **Organic Inspection Appointment Form**

(Return form with completed Plan Questionnaire)

Farm/Business Name			me:
	State:	Zip Code:	County:
Fax:	Email:		
ch day(s) of the week are	most convienient for	an Organic	Inspector to visit your operation:
tten directions to your farn	n or business.		
		Fax: Email:	Fax: Email: ch day(s) of the week are most convienient for an Organic



**Colorado Department of Agriculture** 

Division of Plant Industry

305 Interlocken Parkway, Broomfield, CO 80021 Tel: (303)869-9070

# **Organic Certification Program**

# Affidavit for Compliance for Products Exported into Canada

Operator Information (Exporting to Canada)							
Contact Name	Operation Name	Date					

Supplier Information (Grower/Supplier)						
Contact Name	Operation Name	Phone				
Fax	Email					

Products Requested for Canadian Export Verification:

#### Please verify that the products listed above meet the following requirement and sign and date this statement:

I attest that these agricultural products to be exported to Canada were not produced with the use of sodium nitrate, without hydroponic or aeroponic production methods, and according to the livestock stocking rates asnoted in the Canada Organic Regulation.

Signature	Date

Certification Agency		
Contact Name	Certification Agency	
Amy Stafford	Colorado Department of Agricultur	re
<b>Phone</b> 303-869-9075	Email amy.stafford@state.co.us	Fax 303-466-2860
<b>**Certified in compliance with the terms of the US-C</b> <i>I attest that the information provided by our client, regar</i> <i>Agreement, to be accurate to the best of my knowledge.</i>		

Signature

Date

Affidavit for Canadian Export

Revision A Page 1 of 1



### Organic Certification – Organic System Plan Clean Equipment/Transport Affidavit

Per NOP Rule 205.272 measures must be implemented to prevent prohibited substances from coming into contact with organic land, soil and products as well as to prevent potential commingling of organic and nonorganic products. An operation that uses equipment, including transportation, for both organic and nonorganic production must keep records documenting the cleaning of equipment in between organic and nonorganic uses. Additionally, organic operations that use custom operators must provide documentation that the operator's equipment has been cleaned prior to working organic fields and crops.

Grower/Business Name:

Date truck/equipment loaded/used:

Type of transport/equipment:

Is the form of transportation/equipment used only for organic or approved products?

If no, list product transported prior to current load:

Transport/ Equipment unit was inspected and found to be free of:

□Foreign odors

□Residues

Conventional/synthetic product

Other substances which may compromise the organic integrity

			CHECH	<b>KALL TH</b> A	AT APPLY	ł	
Transport company/machinery id	Product carried/work carried out	Equipment inspected prior to using/loadi ng?	Swept	Vacuum	Air Blown	Washed	Other, describe

I hereby certify that the above equipment/transport units were inspected and cleaned thoroughly using the method indicated to protect the integrity of the organic products being transported.

Operator Signature

Producer Signature

Date

Date

 $\Box$  Yes

□ No



# Livestock Production – Organic System Plan Module 71: Slaughter and Transportation

SLAUGHTER AND TRANSPORTATION								
□ No animals at this operation are requested for certification as slaughter stock. Skip to Module 72								
*Please note, If animals are slaughtered on this operation, a Process Handler OSP must be submitted.								
1. Have all animals requested for organic slaughter stock been under organic management since the last third of gestation?								
2. Where are animals slaughtered?								
3 List the name, address and contact information of the facility that slaughters your livestock. $\Box$ N/A								
<ul> <li>4. Is the facility listed above certified organic? □ Yes □ No</li> <li>List the certifier of the facility:</li> </ul>								
5. Who is responsible for transporting or arranging for transportation of animals?								
The seller/this operation								
6. How are animals transported to the slaughter facility? In what type of vehicle?								
7. How are organic animals identified during transport?								
Deperator Review, Initial and Date: Inspector Review, Initial and Date:								



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### Module 71: Slaughter and Transportation Cont'd

#### SLAUGHTER AND TRANSPORT Cont'd

8. Describe bedding used in transport.

9. How long does transportation to the slaughter facility typically take? If longer than 12 hours, how is water and feed provided?

11. Describe how animal stress and injury are minimized during transport.

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



#### Livestock Production - Organic System Plan MODULE 60: Operation Profile

#### **Operation Profile**

In the table below, please enter the requested information. Depending on the operation, numbers of animals should reflect the maximum number during a season or the average number to give the best understanding of the operation. A production group or class is a group of animals managed separately based on age, sex, diet, reproductive stage, etc. Production groups listed here should be the same throughout this OSP.

Type and Breed of Livestock	Total # of animals	# of Females	# of Males	# of Nonorganic Breeding Stock	# of Organic Animals Eligible for Slaughter (managed organically from last third of gestation)	Classes or Production Groups (if applicable)	Products for Organic Certification (Dairy, Meat, Fiber, Live Animals, etc.)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:

Company Name: F-E-350 2/29/2016

Livestock OSP Module 60 Operation Profile



# MODULE 60: Operation Profile Cont'd

1. Describe the flow of animals through the operation during a given year. This can be done in a narrative form below or in a
flow chart(s) or diagram(s). Include and explain major aspects of the operation.
2. A map or diagram of the operation must be submitted. This should include all relevant aspects of the operation including pasture areas, housing/shelter structures, yards, feed pads, manure storage, etc.
3. Does any custom grazing or boarding of animals owned by the operation ever take place at locations not owned or managed
by this operation? Please explain. $\Box$ N/A
4. Does the operation maintain any other types of certifications? If yes, please list
5. NOP Rule 205.236(c) requires that a producer of an organic livestock operation maintain records sufficient to preserve the
individual identity of all organically managed animals. Please describe the animal identification system used at this operation.
6. If an animal needs to be treated with prohibited materials, how are they identified and/or kept segregated?
Please Note: A list of individual animals must be maintained by the operation. This list must include the following for each animal:
Animal ID, breed (if multiple breeds), date of birth or date of purchase, date placed under organic management, notations regarding any medical treatments including antibiotics or prohibited materials, any event and reason of animal leaving the operation. This list will be
verified at inspection.
Operator Review, Initial and Date: Inspector Review, Initial and Date:
Company Name:



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### Livestock Production – Organic System Plan MODULE 61: Origin of Livestock

NOP Rule 205.236 requires that 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 <i>except</i> that milk or milk products from a herd must be from animals that have been under continuous organic management for at least one year prior to production										
of organic products. Once an entire distinct herd (dairy) has been converted to organic production, all dairy animals shall										
be under organic management from the last third of gestation.  1. Are dairy animals raised at this operation? Yes No										
a) If yes, is a dai	iry herd curren	tly being trans	itioned to organic manager	nent? Yes	No					
i) If yes, list the	i) If yes, list the date conversion began									
2. How does this ope	ration obtain re	eplacement or :	additional animals?							
Organic animals (or	ganically manag	ged from the las	t third of gestation) are purcl	nased.						
			to organic (only allowed for ntinuous organic managemen							
□ Nonorganic breeder dairy operations).	stock are obtair	ned to raise offsp	pring organically from the la	st third of gestation (does	not apply to					
□ Replacement animal sooner.	ls are bred and b	oorn on this oper	ration and managed organica	lly from the last third of g	sestation or					
□ Other, explain:										
Please complete the ta	ble below for a	ny animals pu	rchased since the last OSP	update						
Type/Class of Livestock PurchasedNumber of head purchasedDate of 										

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



# Livestock Production – Organic System Plan MODULE 62: Nonorganic Livestock Production

#### Nonorganic Livestock Production

	No Nonorganic Livestock Production occurs on this operation. All livestock on this operation are Organic. Skip to Module 63: Feed and Pasture						
	Which types of Livestock are being raised nonorganically on this operation:						
2.	Does the operation raise the same types of Livestock organically and nonorganically?						
	a) If yes, please list the types of livestock raised both organically and nonorganically:						
	b) If yes, how are nonorganic and organic livestock kept separate and distinguishable?						
3.	How are organic feeds and healthcare products kept separate and distinguishable from nonorganic?						
4.	How are organic and nonorganic products kept separate and distinguishable during harvest/collection, processing, and packaging?						

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

# Livestock Production – Organic System Plan MODULE 63: Feed and Water

FEED		Section 1
NOP Rule 205.237 requires the producer of an organic livestock operation to provide a total feed products, including pasture and forage, that are organically produced and handled by operation synthetic substances listed in 205.603 and nonsynthetic substances not prohibited in 205.604 may supplements. All agricultural ingredients for such additives and supplements must have been pr Using animal drugs, including hormones and antibiotics, to promote growth is prohibited, as is p additives in amounts above those needed for adequate nutrition and health maintenance. Feedin formulas containing urea or manure, and feeding of mammalian or poultry by-products are pro-	s certified to t be used as fe oduced and h roviding feed g of plastic pe	he NOP <i>except</i> that ed additives and andled organically. supplements or
1. Does this operation grow crops for livestock feed (other than pasture)?	No No	
If yes, what types of feed crops does this operation grow (other than pasture)?		
2. Are fodder sprouts (sprouted grain) grown as livestock feed?		
If yes, please describe the system for growing fodder sprouts.		
3. Are young stock (under 6 months) raised at this operation? If yes, please indicate by what means young stock are fed, by checking all applicable	boxes below.	
Raised on/with mother or nurse animal       Image: Organic milk from organic on-farm animals         Milk replacer       Image: Organic forage         Other, list:       Image: Organic forage		rchased organic milk ganic grains
4. Is feed purchased? If yes, please enter all feed purchases in Module 44: Feed and Feed Supplement List		
5. Is any organic feed processed (mixed, ground, roasted, extruded, etc) at this operation?	Yes	No No
(If yes, a Process Handler OSP must be submitted.)		
If yes, is equipment used to process organic feed also used for nonorganic feed?	Yes	No
If yes, how does the operation ensure there is no contamination from nonorganic pro	oducts?	
6. What is the operation's plan for emergency feed supplies?		
<ul> <li>7. Is the feed ration provided at this operation sufficient to meet nutritional requirements of growth, including vitamins, minerals, protein and/or amino acids, fatty acids, energy soun</li> <li>□ Yes</li> <li>□ No</li> </ul>		0
Operator Review, Initial and Date: Inspector Review, Initial and	1 Date:	



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

### Livestock Production – Organic System Plan MODULE 63: Feed and Water

FEED Cont'd				Section 1 Cont'd
8. Please indicate where and	how feed is stored in the table be	low.		
Storage Name or ID	Type of Feed Stored	Type of Storage	Capacity	Dedicated Organic?
	ions other than this operation afte a Storage Facility Affidavit.	er purchase? Yes	No	
	0			
	thods used in feed storage areas? Iodule 17: Cleaning, Sanitizing an	☐Yes ☐No d Post-Harvest Inputs.		

Operator Review, Initial and Date:

Company Name:

F-E-353

10/10/2015



#### Livestock Organic System Plan Module 63: Feed and Water Cont'd

WATER			Section 2
1. What are the sources of water for l			
On-site well	□ Municipal	□ Natural river/creek/pond	
☐ Man-made farm pond	□ Spring	□ Other, specify:	
2. If livestock have access to a river, o	ereek or pond, how is	water quality maintained and erosion controlled?	□ N/A
3. Are any additives used in livestock If yes, please list them in Modu		□Yes □ No d Feed Supplements.	
4. Describe how the exercise encure	a there is year round	access to alson water sources for livesteals	
4. Describe now the operation ensure	s there is year round	access to clean water sources for livestock.	
5. Are any water contamination prob If yes, how are contamination is		🗖 Yes 🛛 No	
6. Is water regularly tested?	Yes 🔲 No ested?		
If yes, when were water tests m Please note, copies of water test			

Operator Review, Initial and Date:



#### **Healthcare Materials**

NOP Rule 205.238(b) states that when preventative practices and veterinary biologics are inadequate to prevent sickness, a producer may administer synthetic medications: *Provided*, that, such medications are allowed under 205.603. Please note: parasiticides allowed under 205.603 may be used on dairy stock only with a minimum of 90 days prior to production of milk/milk products that are to be sold, labeled or represented as organic. And only allowed in breeder stock prior to the last third of gestation, but not during lactation for progeny that are to be sold, labeled or represented as organically produced. In the table below, please list all healthcare materials administered or planned to be administered to livestock in the event of sickness. Product labels and/or certificates need to be submitted for all materials.

Product Name	Source/Supplier or Manufacturer	Reason for Use	Frequency/ Duration	Milk or Meat Withholding Period (205.603)	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



Product Name	Source/Supplier or Manufacturer	Reason for Use	Frequency/ Duration	Milk or Meat Withholding Period (205.603)	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



Product Name	Source/Supplier or Manufacturer	Reason for Use	Frequency/ Duration	Milk or Meat Withholding Period (205.603)	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



Product Name	Source/Supplier or Manufacturer	Reason for Use	Frequency/ Duration	Milk or Meat Withholding Period (205.603)	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



Product Name	Source/Supplier or Manufacturer	Reason for Use	Frequency/ Duration	Milk or Meat Withholding Period (205.603)	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



Product Name	Source/Supplier or Manufacturer	Reason for Use	Frequency/ Duration	Milk or Meat Withholding Period (205.603)	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



Product Name	Source/Supplier or Manufacturer	Reason for Use	Frequency/ Duration	Milk or Meat Withholding Period (205.603)	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



Product Name	Source/Supplier or Manufacturer	Reason for Use	Frequency/ Duration	Milk or Meat Withholding Period (205.603)	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



Product Name	Source/Supplier or Manufacturer	Reason for Use	Frequency/ Duration	Milk or Meat Withholding Period (205.603)	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



Product Name	Source/Supplier or Manufacturer	Reason for Use	Frequency/ Duration	Milk or Meat Withholding Period (205.603)	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



Product Name	Source/Supplier or Manufacturer	Reason for Use	Frequency/ Duration	Milk or Meat Withholding Period (205.603)	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



Product Name	Source/Supplier or Manufacturer	Reason for Use	Frequency/ Duration	Milk or Meat Withholding Period (205.603)	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



#### **Healthcare Materials**

NOP Rule 205.238(b) states that when preventative practices and veterinary biologics are inadequate to prevent sickness, a producer may administer synthetic medications: *Provided*, that, such medications are allowed under 205.603. Please note: parasiticides allowed under 205.603 may be used on dairy stock only with a minimum of 90 days prior to production of milk/milk products that are to be sold, labeled or represented as organic. And only allowed in breeder stock prior to the last third of gestation, but not during lactation for progeny that are to be sold, labeled or represented as organically produced. In the table below, please list all healthcare materials administered or planned to be administered to livestock in the event of sickness. Product labels and/or certificates need to be submitted for all materials.

Product Name	Source/Supplier or Manufacturer	Reason for Use	Frequency/ Duration	Milk or Meat Withholding Period (205.603)	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



Product Name	Source/Supplier or Manufacturer	Reason for Use	Frequency/ Duration	Milk or Meat Withholding Period (205.603)	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



## Livestock Production – Organic System Plan MODULE 69: Living Conditions

#### Housing and Shelter

#### Section 1

Per NOP Rule 205.239, 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. This includes, 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, stage of life, climate and environment. Yards, feeding pads and feedlots may be used to provide ruminants with outdoor access during the non-grazing season and supplemental feeding during the grazing season provided that yards, feeding pads, and feed lots are large enough to allow all livestock occupying the space to feed simultaneously without crowding and without competition for food. Continuous total confinement indoors, or in yards, feeding pads or feed lots is prohibited. Maps of the operation should include the location of animal housing and shelter as well as yards, feeding pads, feedlots, etc.

1. In the table below please describe the types of housing and shelter available for livestock.

Shelter Type	Size (sq. ft.)	Production Group, Class or Age	Bedding or Flooring Type	# of Animals per Unit
		-	•	

2.	Are agricultural products (hay, straw, hulls, stalks, etc.) used as bedding?	Yes	No
If	agricultural products are used for bedding they must be from certified organic sou	rces.	

#### 3. For any <u>agricultural products used as bedding</u>, list the supplier and the supplier's certifier below.

Material	Source	Certifier

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



## **MODULE 69: Living Conditions Cont'd**

HOUSING AND SHELTER Cont'd	Section 1 Cont'd
4. How often is housing cleaned out?	
5. How is housing cleaned?	
6. Are any sanitation or cleaning products used in the cleaning of housing?	
6. Are any sanitation or cleaning products used in the cleaning of housing? UYes No If yes, please list in Module 17: Cleaning, Sanitizing and Post-Harvest Inputs	
7. Are any fumigants or other pest control methods used in and around housing structures?	es 🔲 No
If yes, please list in Module 17: Cleaning, Sanitizing and Post-Harvest Inputs	
8. What sources of light are used in animal housing?	
9. Is day length regulated using artificial light?  Yes No If yes, please describe practices.	
10. Describe the locations of any treated wood that animals could come into contact with.	
OUTDOOR ACCESS	Section 2
1. What outdoor areas, other than pasture, do animals have access to? $\Box$ N/A	
2. Are the areas listed above large enough such that all animals can feed simultaneously without crowdi	nσ?
□Yes □ No ■ N/A	
3. Within the outdoor areas listed above, do animals have access to shade?	□ N/A
4. Within the outdoor areas listed above, do animals have access to clean water for drinking? $\Box$ Y	es 🗆 No 🔳 N/A
Operator Review, Initial and Date: Inspector Review, Initial and Date:	
Company Name:	



## MODULE 69: Living Conditions Cont'd

OUTDOOR ACCESS Cont'd			:	Section 2 Cont'd			
5. Are outdoor areas well-drained and managed to prev	ent runoff of wastes?	□ Yes	🗆 No	□ N/A			
6. How often is waste removed from outdoor areas?	□ N/A						
7. At what age do animals have access to the outdoors?							
8. For how many hours per day do animals have access to the outdoors (combine time on pasture with other outdoor areas)? If this is different depending on class or production group, please specify time outdoors by group.							
9. Are animals subject to temporary confinement?							
Reason for Confinement	Duration of Confineme	ent					
10. How are periods of confinement documented?							
Operator Review, Initial and Date:	Inspector Revi	ew, Initial and	Date:				



## Module 69 - Living Conditions Cont'd

MANURE MANAGEMENT	Section 3
NOP rule 205.239 requires manure be managed in a way to prevent runoff of wastes and contamination of crops, so water by nutrients, heavy metals or pathogenic organisms. Manure management should optimize the recycling of n	
1. What is the estimated quantity of manure generated per year at this operation?	intrenes.
2. Describe how manure is collected, stored and used at this operation.	
3. Describe, specifically, how manure management practices prevent runoff of wastes and contamination of crops, water.	soil and
4. Are any additives applied to manure (lime, inoculants, preservatives, microbial digesters)?	□ No
5. If manure is composted, please describe the methods by which it is composted.	
6. If manure is spread on fields at this operation, describe the practice, including the months applied and rate of ap N/A	oplication.
7. If manure is spread on fields at this operation, how many acres are available for manure application?	N/A

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



## Livestock Production – Organic System Plan MODULE 70: Milk Handling

MILK HANDLIN	G		Section 1		
□ Milking of dairy	animals does not occur a	t this operation. Skip to Mo	dule 71.		
1. Flow diagrams or maps of the milk handling portion of the operation must be submitted and should reflect animals' movement from pasture or housing through any holding pens to the area where they are milked and their exit back to pasture or housing. The location of any relevant equipment and machinery used in the milking process as well as storage areas should be indicated.					
2. Describe the mill	x handling system(s) used	at this operation (tie stall, p	arlor, etc.).		
3. How is the opera		□ Other			
4. How many times	a day are animals milked	l and at what approximate ti	mes of the day?		
5. Is milk tested for	somatic cell counts?	🗆 Yes 🛛 No			
6. In the table belo	w, report production rate	es and somatic cell counts for	the last six days of milking.		
Date	Total number of animals milked	Somatic Cell Count	Total pounds of milk produced		
7. Describe methods for cleaning milking equipment and storage tanks, including frequency.					
8. Are cleaners, detergents, and sanitizers used to clean milking equipment and storage tanks? Please list these in Module 17: Cleaning, Sanitizing and Post-Harvest Inputs.					
9. Are products used to clean animals prior to milking? □ Yes □ No Please list these in Module 68: Healthcare Materials.					
*If raw milk is processed (including pasteurization) into other products, a Process Handler OSP must be submitted.					
<i>Torganic dairy cows</i> Operator Review, Initia		staugnter stock, you must also co	Inspector Review, Initial and Date:		
Company Name:					



## Livestock Production – Organic System Plan Module 71: Slaughter and Transportation

SLAUGHTER AND TRANSPORTATION						
□ No animals at this operation are requested for certification as slaughter stock. Skip to Module 72						
*Please note, If animals are slaughtered on this operation, a Process Handler OSP must be submitted.						
1. Have all animals requested for organic slaughter stock been under organic management since the last third of gestation?						
2. Where are animals slaughtered?         □Not slaughtered         □Slaughtered         □Slaughtered						
3 List the name, address and contact information of the facility that slaughters your livestock. $\Box$ N/A						
4. Is the facility listed above certified organic? □ Yes □ No List the certifier of the facility:						
5. Who is responsible for transporting or arranging for transportation of animals?						
The seller/this operation						
6. How are animals transported to the slaughter facility? In what type of vehicle?						
7. Are organic animals transported with nonorganic animals If yes, how are organic and nonorganic animals kept distinguishable?						
If yes, how is it ensured that no prohibited materials or nonorganic feed are used for organic animals?						
8. How long does transportation to the slaughter facility typically take?						
perator Review, Initial and Date: Inspector Review, Initial and Date:						



#### COLORADO DEPARTMENT OF AGRICULTURE **Division of Plant Industry** 305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

## Module 71: Slaughter and Transportation Cont'd

SLAUGHTER AND TRANSPORT Cont'd		
9. Are animals provided with food during transport?	Series Yes	□ No
10. Are animals provided with water during transport?	□ Yes	
11. Describe how animal stress and injury are minimized	during transn	ort
The Descript now animal stress and injury are maintained	ouring transp	

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



# **NON-ORGANIC INGREDIENT STATEMENT**

Product:

Manufacturer:

This form can be completed by the manufacturer of the product/ingredient and is used in place of a statement declaration. Indicate whether the three statements for "All Products" are True or False. Then find the type of product that applies (citric acid, color, flavor, etc.), and indicate whether the statements are True or False for that product type.

The product indicated above conforms to the following criteria:	True	False
□ All Products		1
<ol> <li>No genetically engineered micro-organisms were used in production.</li> <li>This product has not been irradiated.</li> <li>Sewage sludge was not used in production of the product or ingredients.</li> </ol>		
<ul> <li>Citric Acid</li> <li>Produced by microbial fermentation of carbohydrate substance.</li> </ul>		
<ul> <li>Colors</li> <li>Derived from non-synthetic* source(s) only.</li> </ul>		
<ul> <li>Enzymes</li> <li>Derived from edible, nontoxic plants, nonpathogenic fungi, or nonpathogenic bacteria.</li> </ul>		
<ul><li>Pectin</li><li>Non-amidated forms only</li></ul>		
<ul> <li>Yeasts</li> <li>This yeast is non-synthetic*.</li> <li>No growth on petrochemical substrate and/or sulfite waste liquor.</li> </ul>		

The above statements regarding the above-named product produced by my company are true to the best of my knowledge, and are based on information provided by our supplier or vendor.

Name (please print)

Title/Department

Signature

Date

\*<u>Nonsynthetic (natural)</u>. A substance that is derived from mineral, plant, or animal matter and does not undergo a synthetic process as defined in section 6502(21) of the Act (7 U.S.C. 6502(21)). For the purposes of this part, nonsynthetic is used as a synonym for natural as the term is used in the Act.

\*<u>Synthetic.</u> A substance that is formulated or manufactured by a chemical process or by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral sources, except that such term shall not apply to substances created by naturally occurring biological processes.

F-E-015 5/27/2015 Nonorganic Ingredient Statement



## Process Handling - Organic System Plan Ingredient Commercial Availability Record

Name of Operation/Company:

Ingredient Name:

Please use this form as a tool to document the search for organic forms of ingredients before you request use of a nonorganic form. Submit a copy of the completed form when requesting certification of a new product with nonorganic agricultural ingredients.

Products labeled organic must contain at least 95% organic ingredients. In order for an ingredient to be used in the remaining 5% of the product, it must be a non-organic agricultural ingredient listed in Section 205.606 of the National List (NOP Rule) AND it must be demonstrated that they are commercially unavailable in organic form. The National Organic Program defines commercially available as the "ability to obtain a production input [ingredient] in an appropriate form, quality, or quantity to fulfill an essential function in a system of organic production or handling, as determined by the certifying agent in the course of reviewing the organic plan." Cost cannot be used as a reason to not use an organic ingredient.

Certified operations are responsible for documenting efforts to source organic forms of ingredients from reasonable sources. This information must be updated regularly and a system must be in place that regularly searches for organic forms of ingredients, that may be currently unavailable, in order to receive continued approval of the nonorganic form.

Ingredient	1 <sup>st</sup> Source – Name, phone, date contacted	2 <sup>nd</sup> Source – Name, phone, date contacted	3 <sup>rd</sup> Source – Name, phone, date contacted	Reason Organic Ingredient not used (at least one reason must be checked)			
				<b>Quality</b>	🗆 Quantity	🗆 Form	□ Other
				Explain:			
				<b>Quality</b>	<b>Quantity</b>	<b>Form</b>	Other
				Explain:			
				Quality	<b>Quantity</b>	🗆 Form	□ Other
				Explain:			
				Quality	<b>Quantity</b>	🗌 Form	□ Other
				Explain:			



#### Process Handling – Organic System Plan Module 52: MULTI INGREDIENT PRODUCT PROFILE FORM

A separate PPF must be completed for each organic multi ingredient, processed product. A sample product label must also be submitted for each product. Both the Product Profile and label must be approved by CDA before being released in the marketplace.

<b>Product Name on label</b> (include Brand name and the names of all products using this formula)				
Label Claim – 100% Organic, Organic, Made with Organic				
Package Size(s) – list all				
Are any of the products/labels listed above Sec	ond Party or Private Labels?	Yes	No	

If yes please submit the organic certificate of the owner of the private label.

Is this product processed at the address listed in the OSP?

Yes	No
facility processi	ing the product

If no, please list the following information and submit the organic certificate of the facility processing the product:						
Facility/Company Name         Address & Phone Number         Certified Organic by Whom?						

In the table below, list the ingredients (not including processing aids) used for this product (per batch) in descending order by weight. The ingredients listed must correspond to the ingredients statement on the product label. A copy of the organic certificate, which includes the specific ingredient(s), must be submitted for each supplier. Additional documentation may be required for nonorganic or non-agricultural ingredients. Water and salt should be listed here, but not included in the percentage calculation. List any processing aids on page 2.

Ingredient	Quantity (specify amount and unit of measure)	Certified Organic?	Supplier of Ingredient	Certifier of Supplier if applicable	CDA to Enter (%organic * qty = Adjusted amount)
		Yes No			
		Yes No			
		Yes No			
		Yes No			
		Yes No			
		Yes No			
		Yes No			
		Yes No			
		Yes No			
		Yes No			
		Yes No			
		Yes No			
		Yes No			
		Yes No			

#### Continued on page 2



#### Module 52: MULTI INGREDIENT PRODUCT PROFILE FORM Cont'd

Ingredient	Quantity (specify amount and unit of measure)	Certified Organic?	Supplier of Ingredient	Certifier of Supplier if applicable	CDA to Enter (%organic * qty = Adjusted amount)
		Yes No			
		Yes No			
		Yes No			
		Yes No		с	
		Yes No			
		Yes No			
		Yes No			
		Yes No			

Total weight or volume excluding salt & water

Adjusted Total

%Organic = Adjusted Total / Total weight or volume = \_\_\_\_\_

Processing aids for product listed on previous page

\*Processing aids for products labeled as "100 % Organic" must be organic. \*Organic certificates for all organic processing aids must be submitted. Specification sheets for nonorganic processing aids must be submitted.

Processing Aid	Quantity (specify amount and unit of measure)	Certified Organic?	Supplier of Ingredient	Certifier of Supplier if applicable
		Yes No		

#### Lot Coding:

Describe the production code or lot numbering system that will appear on each final package sold. This code must serve to trace the product and all of its components back to the original ingredients used.

Code Sample: \_\_\_\_\_

Translation of Code:

Documentation verifying non-availability or organic equivalent forms of agricultural ingredients and National List compliance for nonorganic ingredients (non-GMO, non-irradiated, and no sewage sludge use) must be provided for applicable ingredients.



# COLORADO DEPARTMENT OF AGRICULTURE

**Division of Plant Industry** 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### CDA Use Only:

Formulation approved by:	Date:
Label approved by:	Date:
<ul> <li>100% Organic</li> <li>Organic</li> <li>Made With Organic</li> </ul>	

🗆 Retail

🗆 Bulk



#### Process Handling - Organic System Plan MODULE 53: Operation Profile & Production Methods

#### **OPERATION PROFILE**

Section 1

1. Attach a facility layout/diagram for each site where organic production, handling, storage, etc. occurs. If more than one facility is used in producing or storing organic products, list the different addresses and describe and/or indicate the flow of product between facilities. Diagrams should include major processing areas and equipment, raw ingredient storage, finished product storage, cold storage, incoming ingredient location, outgoing finished product location, sinks, tables, etc. In the case where organic and nonorganic production occurs in the same facility, indicate any separate organic/nonorganic areas. Pest control locations (indoors and out) and types should be included whether on this map or a separate diagram.							
2. Attach a process flow diagram for all products handled and processed by this operation. If more than one facility or process has been identified in item 1, provide the applicable flow charts from each of the facilities. Include descriptions of all treatments performed on the goods you handle, naming each piece of equipment involved. Describe or show (on the schematic) where and how the product is received, stored, processed, packaged, and warehoused. Identify ALL equipment, machinery, grading stations, and storage areas. Indicate where ingredients are added and processing aids are used.							
3. Which of the following categori							
Processor of Single Ingre			i Ingredient Products				
□ Packer of raw agricultura	-		riously packaged products				
□ Warehouse/Storage Facil		Wholesale Distributor					
□ Hauler/Transporter of pr	oducts	her, Specify:					
<ul> <li>4. Does the operation process goods on a fee for service basis such that ownership of the products stays with an outside operation (for example: an outside operation brings grain to this operation to be milled and once milled, the grain goes right back to the outside operation).</li> <li>□ Yes □ No</li> </ul>							
If yes, please describe:							
1791 - 167							
<ul> <li>5. Does the operation contract with any other facility to produce or process products in any way, including storing and labeling? (If the operation stores product in a facility owned and managed by a different operation, please submit the "Storage Facility Affidavit")</li> <li> I Yes </li> </ul>							
If yes, please complete the table be	low:						
If yes, please complete the table below:         Contracted Facility & Address       Activity performed (storage, labeling, etc.)       Certified Organic?       Certifier							
		1					

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



## COLORADO DEPARTMENT OF AGRICULTURE

**Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

## MODULE 53: Operation Profile Cont'd

OPERATION PROFILE Cont'd	Section 1
	Yes 🛛 No
a) If yes, are the other operations certified organic?	
b) If no to 6a, how does this operation prevent commingling with nonorganic products or ingredients u operations?	ised by other
	Yes 🛛 No
If yes, please include these in Module 50 - Products Requested for Certification	
8. Is the operation responsible for arranging the harvest of organic crops (raw agricultural ingredients/produ	cts)?
□ Yes □ No	
If yes, please describe:	
9. Does this operation own and provide containers to farms (not owned by the operation) to harvest organic c	vons/nuoduots?
9. Does this operation own and provide containers to farms (not owned by the operation) to harvest organic c	rops/products:
If yes, please describe:	
10. Please describe from what materials all product contact surfaces (equipment or otherwise) are constructed	
(e.g. – stainless steel, food grade plastic, wood, painted steel, concrete, etc. Please include all aspects of handlin processing other than final packaging.	ig and

Operator Review, Initial, Date:

Operation Name:



## COLORADO DEPARTMENT OF AGRICULTURE

**Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

## MODULE 53: Operation Profile Cont'd

Production Methods		Section 2
1. Is flame used as heat source?  Yes No		
a) If yes, is the flame in direct contact with air that directly passes over organic products?	□ Yes	🗆 No
i) If yes, what is the fuel source?		
ii) Are fuel lines filtered to remove any incidental carryover of oils or other impurit	ies in the lines?	,
iii) How often are firing systems cleaned or overhauled?		
2. Is irradiation of any kind used in this operation?		
a) If yes, indicate, for each of the following where, how and for what purpose it is us	ed:	
i) gamma ray:		
ii) x-ray:		
iii) ultraviolet light:		
3. For each type of product processed by the operation, indicate the processing yield, as a percent to finished goods	age or ratio of r	eceived ingredients
to finished goods.		
a) What are the main reasons for loss?		
Operator Review, Initial, Date: Inspector Initi	al & Date:	

Operation Name:



#### Process Handling – Organic System Plan MODULE 54: Nonorganic Process Handling

NONORGANIC PRODUCTION
□ No Nonorganic Processing/Production occurs at this operation. All processing/production is organic. Skip to Module 55
1. Does the operation handle, process or store nonorganic products?
If yes, what percentage of the operation's business is organic?%
2. Are the same products (organic guacamole and nonorganic guacamole; milling organic wheat and nonorganic wheat) handled/produced organically and nonorganically?
3. Are the same ingredients used in organic and nonorganic forms?
<ul> <li>4. Are any processing areas, lines, or equipment dedicated organic (no nonorganic production ever occurs)?</li> <li></li></ul>
<ul> <li>5. Does the processing of organic products occur simultaneously with the processing of nonorganic products?</li> <li>Yes</li> <li>No</li> <li>If yes, how does the operation ensure that no commingling of organic and nonorganic ingredients and products occurs? If no, describe scheduling of organic vs. nonorganic processing "runs."</li> </ul>
6. How are equipment and processing areas cleaned to ensure that no nonorganic product commingles with organic product?
7. Is equipment purged between runs of nonorganic and organic product? If yes, what is the quantity used in the purge, how is the purge quantity determined to be sufficient, and what is done with the purge product?
8. How are organic and nonorganic ingredients and products distinguished?
9. How are employees made aware of organic v. nonorganic ingredients and products?           Operator Review, Initial and Date:         Inspector Review, Initial and Date:

Company Name: F-E-404 10/10/2015



## Process Handling Organic System Plan MODULE 55: Receiving, Storage, Packaging and Shipping

Receiving			Section 1					
commingling with nonorgan	g organic products are prot ic products during shipping	ected from contamination from prohibited :						
2. In what types of containers do o	rganic products/ingredients	arrive at this operation? Check all that app	ory.					
☐ Bins ☐ Drums ☐ Cardboard boxes	<ul> <li>□ Totes</li> <li>□ Bulk trailer</li> <li>□ Retail packages</li> </ul>	<ul> <li>Bulk bags</li> <li>Plastic boxes</li> <li>Other, specify:</li> </ul>						
3. Describe any policies in place fo damaged in shipping:	r handling organic ingredie	nts/products received in containers that hav	e been opened or					
4. What receiving/shipping docum	ents accompany incoming o	rganic products? Check all that apply.						
<ul> <li>Organic Certificates</li> <li>Transaction Certificates</li> <li>Invoices</li> <li>Field Tickets</li> </ul>	<ul> <li>Contracts</li> <li>Certificates of analysis</li> <li>Bills of lading</li> <li>Other, specify:</li> </ul>	☐ Purchase Orders ☐ Clean Truck/Equipment affida ☐ Scale tickets	vits					
5. Is an internal lot code assigned a If yes, please describe the lot		nic products? 🗆 Yes	□ No					
Operator Review, Initial and Date:		Inspector Review, Initial and Date:						

Company Name:

Page 1 of 3



## MODULE 55: Receiving, Storage, Packaging and Shipping Cont'd

Storage			Sec	ction 2			
be properly documented Off-site storage must be operation, please submit	The NOP Rule requires that no commingling or contamination of organic products occurs during storage. All storage sites must be properly documented and organic products clearly identified. Storage areas should be indicated on the facility map/diagram. Off-site storage must be inspected. If the operation stores organic products at a facility owned and managed by a different operation, please submit the "Storage Facility Affidavit"						
	re organic products at this fac	cility? 🗆 Yes 🗆 No					
If no, skip to Section 3	to the table below. In the "Us	e" column include Packaging Material Storage, I	Tinished Produc	ot			
	orage – Cold/wet v. not cold/di		misned i roud	<u>u</u>			
			Dedicated				
Use	Location or Name	Type and Capacity	Organic?				
			□ Yes	□ No			
			□ Yes	🗆 No			
			□ Yes	□ No			
			□ Yes	🗆 No			
			□ Yes	🗆 No			
			□ Yes	🗆 No			
<ul> <li>2. Describe how the operation ensures that organic product in storage is protected against contamination by prohibited materials and/or commingling with nonorganic product. Include signage, color coding, cleaning procedures, etc.</li> <li>3. Are any pest control methods used in storage areas?</li> </ul>							
3. Are any pest control methods used in storage areas?							
<ul> <li>4. Have any storage areas ever been treated with prohibited materials (fogging, fumigation, etc.) for pest control, etc.?</li> <li>□ Yes</li> <li>□ No</li> <li>If yes, please list the materials used, if known, and describe how the operation ensures that there are no remaining residues prior to storage of organic product:</li> </ul>							
5. Please list any off-site storage areas in Module 51 – Operation Profile. If storage areas are not owned or managed by this operation, please complete the "Storage Facility Affidavit"							
Operator Review, Initial a	and Date:	Inspector Review, Initial and Date:					
Company Name:							

Page 2 of 3



## MODULE 55: Receiving, Storage, Packaging and Shipping Cont'd

Packaging					Section 3
Packaging materials, bins and sto or containers that have been in co unless the bag or container has b packaging/labels used for all pro- place as certified organic.	ontact with any su een thoroughly cl	ibstance in such a man eaned. Procedures to (	ner to compron document and v	nise the organic integrity are perify this must be in place. Sa	prohibited ample images of
1. What type(s) of packaging m					apply.
	Cardboard	U Woo		□ Plastic	
□ Poly plastic	Glass	□ Met		□ Foil	
Waxed paper	□ Natural fibe	r 🗆 Syn	thetic fiber	□ Other, specify:	
2. Are all packaging materials, If no, please describe:	storage and ship	pping containers food	grade? 🛛 Yes	s 🗆 No	
3. Are all packaging materials, If no, how does the operation				□ No a exposed to prohibited mate	erials?
4. Are any packaging materials If yes, how are they cleaned?		eturnable/re-usable?	□ Yes	□ No	
<ul> <li>5. Are any finished organic pro If yes, describe measures tak</li> <li>6. How do organic products lea</li> </ul>	en to ensure org	anic product is other	☐ Yes wise identified a	□ No and segregated from nonorg	anic products:
o. How do organic products ica	ve the facility. e	neek an that appiy.			
Retail packages	□ Wholesale b			Bulk trailer	
Drums	□ Totes	🗆 Bull	k bags	□ Other:	
Shipping					Section 4
1. What shipping or sales documents must cle	arly identify prod	ucts as organic.			
2. Who is responsible for trans ☐ This operation, the s	-	nging transportation ☐ The buyer	of finished pro	oducts?	escribe:
3. If this operation is responsib nonorganic products or are exp	osed to prohibite	ed materials? Check	all that apply.	1000	ngle with
Clean Truck/Transp		<ul> <li>Impermeable packa</li> <li>Organic product pla</li> </ul>		Use of separate pallets	anda
<ul> <li>Segregated area of t</li> <li>Other, specify:</li> </ul>	ransport unit	Organic product pla	istic wrapped	Transport clean out reco	orus
Operator Review, Initial and Date:		Ir	spector Review,	Initial and Date:	
Company Name:					
F-E-405	Process Handler O	SP Module 55: Receiving	. Storage, Packag	ing, Shipping	Revision A



## Process Handling - Organic System Plan Module 56: Pest Control

## Pest Control

limited to: removal of pest habitat, factors such as temperature, light, h controls such as traps, light, or sour If these practices are not effective in	food sources and breeding ar numidity, atmosphere and ain nd or lures and repellents usin n controlling and preventing tifying agent agree on the sul	cility must use management practices to prevent pests, including but not reas; prevention of access to facilities; management of environmental circulation. Pests may also be controlled by mechanical or physical ng nonsynthetic or synthetic substances consistent with the National List. pests, a synthetic substance not on the National List may be used; bstance and methods of use as well as measures taken to prevent contact dicated on facility maps.				
1. What type of pest management		ty?				
☐ In house. Name of responsible						
Contracted pest control service		hone number:				
□ None used, no pest problems a	at this operation.					
		peration must still know, include in the OSP and keep records on-site of t control company should be notified of the operation's organic status.				
2. What pest problems are experi	ienced by this operation?					
□ Flying Insects	Crawling Insects	□ Rodents				
□ Birds	$\Box$ Other(s), specify:					
3. Check all pest management pr	actices used at this facility:					
Good sanitation		Ultrasound or light devices				
□ Removal of exterior 1	habitat/food sources	Electrocuting devices				
□ Clean up of spilled p	roduct	□ Visual scare methods				
☐ Air curtains		□ Mechanical traps				
□ Air showers		□ Sticky traps				
□ Screened windows/ve	ents	Baits				
□ Sealed doors and/or v	windows	□ Lures				
□ Repair of holes/crack	S	□ Repellents				
□ Incoming ingredient	inspection	Diatomaceous earth				
□ Vacuum treatments		Pyrethrum				
Positive air pressure		Rotenone				
□ Heat treatments		□ Boric acid				
□ Freeze treatments		🗆 Ryania				
□ Monitoring		Disodium Disodium				
□ Regular inspection of	f facility exterior	□ Octal tetrahydrate				
$\Box$ Other(s), specify:						
4. Have any parts of the facility be	een treated or planned to be	e treated by fumigation, fogging, or crack and crevice sprays?				
These methods require pre-approval by CDA prior to use. Testing may be necessary to verify no residue remains that could						
contaminate organic products.		0.12 30 50 50×05*				
**All Pest Control Materials must	be listed in the table in Mod	<u>ule 58</u>				
Operator Review, Initial and Date:		Inspector Review, Initial and Date:				



# COLORADO DEPARTMENT OF AGRICULTURE

**Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

## **MODULE 32: Origin of Livestock**

NOP Rule 205.236 states that poultry or edible poultry products must be from animals that have been under continuous organic management beginning no later									
than the second day of life. If birds begin their organic management on an operation other than the one represented in this application, they must be certified organic (pullets, spent hens).									
organic (punets, spent nens).									
1. Are chicks/replacements bred on farm?									
2. Are replacer	nent or additional a	nimals purchas	ed?	Yes No	3				
Please complete t	he table below. Inclu	de planned purc	hases or hatchir	igs from on-farm	breeding, for the	current vear. I	Documentation regardin	g purchases.	breeding, and
	be verified during in						5	01	6,
				Destants	<u>IF</u> PURCHASED				
				Projected or Actual	PURCHASED				
T1 1 TD ///				Slaughter date		Age/stage of			
Flock ID (if multiple flocks			Date Organic	or beginning Egg		birds received			If Certified
or multiple types			Management	Production	Date Birds	(chick,		Certified	Organic, by
of poultry)	Type of Poultry	Hatch Date	Began	date	Received	pullet, etc.)	Source	Organic?	whom?
3.	0							2	
2								· · · · · · · · · · · · · · · · · · ·	
5	5							5	
			. ,	1 1				1	1 1

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



#### **MODULE 33: Housing and Living Conditions**

## **SECTION 1 - HOUSING**

NOP Rule 205.239 requires organic livestock operators to establish and maintain year-round living conditions which accommodate the health and natural behavior of animals, including access to the outdoors, access to pasture, clean and dry bedding and shelter, fresh air, sunlight and exercise areas. Continuous total confinement of any animal indoors is prohibited. *The structures listed below should correspond with the map/diagram requested in Module 30 – Operation Profile.* 

In the table below indicate the type(s) of housing and/or shelter used for organic animals:

Structure/ Housing Type	Poultry Type	Stage of growth/age	Size – Ft. LxW=Total	Number of birds housed	Describe animal entry/exits and sizes	Describe outdoor access related to structure, including size	Location if different from main address

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



## SECTION 1 - HOUSING Cont'd

## Module 33 Cont'd

	g and bedding used in housing sti dding, they must be organically p			
2. What conditions are addresse	ed by the housing/shelter provide	d? Check all that ap	ply	
Natural Maintenance	Comfort Behaviors	□ Opportunity for e	xercise	
□ Ventilation	□ Air circulation	□ Reduction of pote	ential for injury	
□ Appropriate temperatures				
□ Other, describe:				
and sanitizers in Module 17. 4. How is manure/soiled beddin	sing structures. How often? Are g managed on the operation? (pe es not contribute to contamination	r NOP Rule 205.239(	e), livestock operation operators	
5. Is day length regulated using If yes, please describe:	artificial light?	: 🗆 Yes	i 🗆 No	
Operator Review, Initial and Date:		Inspector Re-	view, Initial & Date:	
Company Name:				

F-E-303 10/10/2015



#### COLORADO DEPARTMENT OF AGRICULTURE

**Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

# SECTION 2 – LIVING CONDITIONS Module 33 Cont'd 1. Which of the following accommodations are provided for the organic poultry on this operation? Image: Control operation Image: Control operation

□ Other, describe:

#### 2. In the table below, describe how outdoor access is managed for each type of poultry and stage of growth/age.

Type of Poultry	Stage of Growth/Age	Season	Average number of hours outdoor access is available
		Spring	
		Summer	
		Fall	
		Winter	
		Spring	
		Summer	
		Fall	
		Winter	
		Spring	
		Summer	
		Fall	
		Winter	

3. Describe instances where animals may be subject to confinement. Include specific reason and duration. Records of confinement periods and outdoor access must be maintained. This documentation must be available at inspection.

Operator Review, Initial and Date:

Inspector Review, Initial & Date:



#### SECTION 3 - OUTDOOR AREAS HISTORY

#### Module 33 Cont'd

Outdoor access areas, for poultry being requested for certification, must have had no prohibited substances applied within the past 36 months. In the table below, provide the requested information for each pasture area or poultry run used or planned to be used by the operation. Include any parcels that are planned for future use and designate any areas that are being transitioned ("T") to organic (a prohibited substance has been applied and the operation is managing as organic ("O") until the 36 month time frame has been achieved). For fields not previously included in the OSP, one of the following must be provided: 1) A Prior Land Use Affidavit from the previous land manager, 2) three years of previous field history, 3) the last date a prohibited substance was applied. Please indicate/label the outdoor areas listed below on field/facility maps.

ID:		ACRES OR SQUA	RE FT:	
Year	O or T	Last date prohibited substance applied (if "T" or new to OSP)	# of Birds	Inputs (any seeding, re-seeding, or other materials applied)
ID:		ACRES OR SQUA	RE FT:	
Year	O or T	Last date prohibited substance applied (if "T" or new to OSP)	# of Birds	Inputs (any seeding, re-seeding, or other materials applied)
2				
	193	- 26	29.	
ID:		ACRES OR SQUA	RE FT:	
Year	O or T	Last date prohibited substance applied (if "T" or new to OSP)	# of Birds	Inputs (any seeding, re-seeding, or other materials applied)

Operator Review, Initial and Date:

Inspector Review, Initial & Date:



#### **MODULE 34: FEED AND FEED SUPPLEMENTS**

#### SECTION 1 – FEED AND FEED SUPPLEMENTS

NOP Rule 205.237 states feed must be composed of agricultural ingredients that are organically produced and handled by operations certified to the NOP except that, feed supplements (vitamins, minerals, enzymes, amino acids, etc.) may be non-agricultural and non-synthetic substances or synthetic substances if listed in 205.603.								
1. Is any poultry : If yes, please	fyes, a Crop OSP must be	submitted)	Yes		No	)		
<ul> <li>2. Is any feed processed on farm (mixed, ground, roasted, etc.)? Yes No If yes, please describe:</li> <li>3. In the table below, please indicate types and sources of feed and supplements. Include pre-mixed feeds, individual ingredients and whether planned/potential</li> </ul>								
or current. Includ	or current. Include any feed grown on farm. Verification for Supplements (CDA to enter)							
Type of Feed or	Brand Name & Source	If Feed, Certified Organic by what agency?	Current or planned use?					
Supplement				Approved Generic	OMRI	WSDA	Status	Review Date

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



#### COLORADO DEPARTMENT OF AGRICULTURE

**Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### **SECTION 2 – FEED RATIONS**

#### Module 34 Cont'd

In the table below, provide a general description of feed rations provided to each class of poultry. List feed additives as well as supplements. Per 205.237, feed supplements or additives must not be provided in amounts above those needed for adequate nutrition and health maintenance for the species at its specific stage of life.

Type and Class/Age of Poultry	Time of year or specific stage of growth	Daily Rations: types and amount per bird			

SECTION 3 - FEED STORAGE							
In the table below, indicate where and how feed is stored.							
Type of Feed Stored	Type of Storag	ge		Capacity	Dedicated Organic?		
How are pests controlled in feed storage areas? Please list all pest control inputs in Module 17.							
SECTION 4 - WATER							
Water used for livestock must be potable and readily accessible. Documented proof of appropriate levels of coliform bacteria, nitrates, and/or known contaminates may be required.							
1. What are the sources of water fo		e required.					
On-Site Well	☐ Municipal		□ River/creek/pon	d	□ Other, specify:		
<ul> <li>Are any additives used in drinking water? Yes No If yes, please describe:</li> </ul>							
Operator Review, Initial & Date: Inspector Review, Initial and Date:							



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

## **MODULE 35: HEALTHCARE**

## SECTION 1 – HEALTHCARE

NOP Rule 205.238 requires	producers to es	stablish and maintain j	preventative livestock h	ealthcare practi	ces. When preventative			
practices and veterinary biologics are inadequate to prevent sickness, a producer may administer synthetic medications provided								
that such medications are allowed under 205.503. Withholding medical treatment from a sick animal is prohibited by the								
National Organic Standard		ann an im al h-a lth an						
1. Identify the general co □Good sanitation	omponents of y				abaltar ar banaina			
	in housing	Maintaining dry be     DEvelucion/management	ement of pests/parasites	Appropriate shelter or housing				
Good ventilation	in nousing			Access to outdoors				
Pasture rotation	2	□Good quality feed						
□Nutritional supple		Selective breeding		□ Raising own replacement stock				
Select breeds with	h suitable traits	☐Isolation for purch	ased/diseased animals	Culling				
□Other, specify:								
2. An effective healthcare	program shoul	d anticipate potential	l health or disease issu	es and have a p	lan for the prevention			
and treatment of these iss								
might have. Describe prev	entative measu	ires in place and treat	tments used if the prev	ventative measu	ires are insufficient.			
Condition	Preventative Measures Possible Treatments				Occurring or has occurred?			
					Specify Diseases:			
Diseases								
Distasts								
				4				
Eye Problems								
External Parasites								
				2				
Foot Problems								
				÷.				
Internal Parasites								
Pecking &/or								
Cannibalism								
Predators	Predators							
Reproductive	Reproductive							
Disorders/Including egg								
laying problems								
<b>Respiratory Disorders</b>								
Skin or Feather	Skin or Feather							
Conditions								
Viruses					Specify Viruses:			
Other, Specify								

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



# COLORADO DEPARTMENT OF AGRICULTURE

**Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

SECTION 1 - HEALT	THCARE Cont'd				Module 35, Cont'd
	nistered at this operation? be (and list in table below):		🗆 Yes	🗆 No	
4. If an animal must be treated with prohibited materials, describe how they are segregated from the rest of the flock or how it is otherwise insured that products from the specific animal are not sold as organic ( <i>Records regarding treatment and segregation must be kept and may be viewed at inspection</i> )?					
5. What is the average	e percentage of culled poultry, a	annually?			
6. What is the averag	e percentage of death or loss, ar	nnually?			
7. How is livestock he	alth monitored?				
8. How often is livesto	ock health monitored?				
9. In the table below plo	ease list all Healthcare Material	ls used (not	feed additives/	supplements) on this o	
Material	Manufacturer	OMRI/ WSDA?	Status (CDA to	o Enter)	Review Date (CDA to Enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

# SECTION 2- PHYSICAL ALTERATIONS

# Per NOP Rule 205.238 the performance of physical alterations are allowed as needed to promote the animals' welfare when done in a manner that minimizes pain and stress Are Animals subject to physical alterations? Uses No If yes, please complete the table below Purpose How is pain/stress minimized Alteration Age or Stage of Growth Purpose How is pain/stress minimized If yes, please complete the table below If yes If yes If yes Alteration Age or Stage of Growth Purpose How is pain/stress minimized If yes If yes If yes If yes If yes Alteration Age or Stage of Growth Purpose How is pain/stress minimized If yes If yes If yes If yes If yes If yes, please complete the table below Purpose How is pain/stress minimized If yes If yes

Operator Review, Initial and Date:

Inspector Review, Initial and Date:

Company Name:

Module 35, Cont'd



# COLORADO DEPARTMENT OF AGRICULTURE

**Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

# **MODULE 36: PRODUCT HANDLING & PACKAGING**

SECTION 1 – MEAT PRODUCTION		
NOP Rule 205.236 requires that poultry raised for meat products be later than the second day of life. All meat products sold as organic handling facility.		
1. Does the operation sell meat products from organic poultry? If no skip to Section 2	Yes	No
a) If yes, how are they sold?	Live	Other, specify:
List the slaughter facility you use or plan to use to process your orga Business Name:	anic livestock:	
Address:		
Phone:		
Certified Organic By:		
SECTION 2 – EGG PRODUCTION		
□ No egg packing or handling occurs at this operation. Poultry is	not raised for egg [	production. Skip to Module 37
NOP Rule 205.272(b)(1)(2) requires that containers, bins and packa preservatives, or fumigants. All reusable containers must be thorou organic crops prior to use.		
1. Are containers used to harvest/collect eggs? If yes, list the types of containers and whether they are new or u	Yes	No
If yes, list the types of containers and whether they are new of a	istu.	
2. Are containers used for both organic and conventional products If yes, describe how the operation ensures that there is no risk o Container:	The second	☐ No om residues left in the
3. Are containers cleaned prior to harvest? If yes, describe methods and list any materials used in Module	Yes	No
<ul> <li>4. Indicate what methods are used to prepare post-harvest areas/factorized and the prepare post-harvest areas/factorized areas/fac</li></ul>		ning
Operator Review, Initial and Date: In	nspector Review, Initi	al and Date:



# COLORADO DEPARTMENT OF AGRICULTURE

**Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

SECTION 2 – EGG PRODUCTION Cont'd		Module 36, Cont'd
<b>5.</b> Are quaternary ammonia products used for cleaning or sanitation? Yes (Please note, Quaternary Ammonia products are known to leave residues on food contact surfaces. Steps m remain on any food contact surfaces. On a product label, quaternary ammonia may be noted as alkyl dimensional and the second statement of the second statement.		
<ul> <li>6. Are eggs cleaned, washed or sanitized in any way?</li> <li>Yes</li> <li>If yes, please describe the process. Include any materials used as well as the rate used. Please also list the material in Module 17.</li> </ul>	No	
7. What is the source of water used in direct contact with eggs?         □ Municipal       □ Well       □ N/A       □ Other (Spread)	ecify):	
8. Does the operation have a CDA Egg License?	griculture lie address whe	censing and inspection. re the eggs originated and
SECTION 3 - PACKAGING		
1. Are organic products packaged in any way?		
<ul> <li>a. If yes, what types of packaging or containers are used? Mark all that apply.</li> <li>Cardboard</li> <li>Paper</li> <li>Wood</li> <li>Gla</li> <li>Plastic bags</li> <li>Solid plastic</li> <li>Metal</li> <li>Foil</li> <li>Other (Specify):</li> </ul>		
b. Are packaging materials or containers food grade? If no, please explain:	Yes	No
c. Are packaging materials or containers re-used? If yes, explain how organic products are protected from potential contaminati	Yes on:	No
d. Are retail labels applied to packaging?	Yes	No
e. Are non-retail labels applied to packaging?	Yes	No
f. Is the USDA seal applied to packaging or marketing information?	Yes	No
g. Is the Colorado Organic seal applied to packaging or marketing information?	Yes	ΠNο
**Please submit color copies of all labels used by the operation (photographs and printing	proofs are	acceptable)
Operator Review, Initial and Date: Inspector Review, Initial and	nd Date:	



# Organic Certification – Organic System Plan Storage Facility Affidavit

Per NOP Rule 205.101(b)(1) certified organic operations may store their products at non-certified facilities as long as the products are packaged or otherwise enclosed in a container prior to being received or acquired by the operation and may not be repacked or relabeled while in control of the storage operation. CDA can waive the requirement for an annual inspection of storage facilities if the storage facility complies with the requirements to safeguard the product from contacting prohibited substances.

CDA Certified Operation Name:			
Name of Storage Facility:	Manager/Owner:		
Physical Address:	Email:	Phone:	

- The manager of the storage facility must answer the questions below.
- Copies of the Storage Facility Affidavit must be kept by both the CDA certified operation and the storage facility.
- The Storage Facility Affidavit must be submitted to CDA annually by the certified operation

Freezer

Which types of storage occur at this facility?

	Dry
--	-----

Cold

**Other**, Specify:

Please complete the table below to describe the storage facilities YES NO NA 1. Does the storage facility implement necessary measures to protect the organic product from contacting prohibited substances such as pesticides? 2. Does the CDA certified operation retain ownership of the product during storage? 3. Is the organic product packaged or enclosed in a container prior to being received and does it remain in that enclosed container during storage? 4. Do the appropriate records indicate that the product is "organic"? 5. Are the records detailed enough to disclose description and amounts of organic products transferred, and to link any lot numbers assigned by the CDA-certified operation with П tracking numbers or lot numbers assigned at the storage facility? 6. If pesticide fogging is performed or pesticide sprays are applied to areas where packaged or otherwise enclosed organic products are stored, are the organic products removed prior to application or covered with impermeable coverings, or otherwise protected from contacting pesticides and is this documented with written records? 7. Does the storage facility further process the organic product, including sorting, culling, cleaning, icing, hydro cooling or hydro vacuuming? 8. Does the storage facility label or re-label the organic product? 9. Does the storage facility apply any substance to the organic product or its packaging or container, including water, ethylene or controlled atmosphere treatment?

Name: \_\_\_\_

Signature: \_\_\_\_\_

Date:

CDA reserves the right to inspect any facility storing organic product owned by a CDA certified operation as specified in NOP 205.400. If it is determined that the storage operation has misrepresented policies or procedures as stated on this waiver, or acts in a manner that might jeopardize organic integrity or tracking of the organic product, the CDA client using the facility will be notified. The CDA client will be held responsible for correcting any noncompliance issues according to the timeline set by CDA.



# **MODULE 64: Feed and Feed Supplements**

# Feed and Feed Supplements

Please list all purchased feed and feed supplements in the table below. Include anything added to water, minerals, and silage inoculants. Labels for products and/or verification of organic certification must be submitted. Products administered for healthcare/medical reasons should be listed in Module 68: Healthcare Materials list.

Type of Feed or Supplement Product Name	Source/Supplier or Manufacturer	Certifier of Supplier (if applicable)	Status (CDA to enter)	Review Date (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



# MODULE 64: Feed and Feed Supplements Cont'd

FEED AND FEED SUPPLEMENTS Cont'd					
Type of Feed or Product Name	Source/Supplier or Manufacturer	Certifier of Supplier (if applicable)	Status (CDA to enter)	Review Date (CDA to enter)	

Operator Review, Initial and Date:

Inspector Review, Initial and Date:

Company Name:

F-E-354 10/10/2015



# MODULE 64: Feed and Feed Supplements Cont'd

FEED AND FEED SUPPLEMENTS Cont'd				
Type of Feed or Product Name	Source/Supplier or Manufacturer	Certifier of Supplier (if applicable)	Status (CDA to enter)	Review Date (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



# MODULE 64: Feed and Feed Supplements Cont'd

FEED AND FEED SUPPLEMENTS Cont'd				
Type of Feed or Product Name	Source/Supplier or Manufacturer	Certifier of Supplier (if applicable)	Status (CDA to enter)	Review Date (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



# Livestock Production – Organic System Plan Module 72: Marketing and Recordkeeping

MARKETING					Section 1
1. How are livestock produc	ts sold? Check all that a	pply			
In retail packaging	□ Bulk/wholesale	to processor		ve animals	
CSA/Subscription	On farm retail		□ Othe	r, Specify:	
2. Is the USDA organic seal u	used on livestock produc	t packaging?	Yes	No No	
3. Is the Colorado Department	nt of Agriculture identif	ied as the orga	nic certifier of	the product on p	product packaging?
4. Is the Colorado Organic lo	go/seal used on product	packaging?	Yes	<b>No</b>	
*Please submit examples/coj	pies of any labels applie	d to product pe	ackaging		
RECORDKEEPING					Section 2
The NOP Rule requires that	t records disclose all ac	tivities and tr	ansactions of	the operation, h	e maintained for at least 5
					l back to the location where
they were produced. All re					
1. What types of records an	re kept for organic live	stock producti	ion? Check al	l that apply.	
Documentation of purchas	sed animals				
Animal ID lists					
Cull and/or death records					
□ Breeding records					
Pasture Access					
Periods of animal confine					
Purchased feed, including	organic certificates				
□ Feed supplements					
□ Feed rations					
□ Feed labels					
□ Feed storage					
□ Animal health					
☐ Medical treatments					
Somatic cell/plate counts					
□ Milk production					
□ Slaughter records					
□ Sales					
□ Shipping and transportation					
Product quality test result:	5				
2. Are records maintained t	for at losst 5 years?	□ Yes	D No		
If no, please explain.	or at least 5 years:	163			
in act, presse capitality					
Operator Review, Initial and Da	to:		Tree	maator Daview. T	nitial and Data:
Operator Review, initial and Da	ie.		Ins	spector Review, In	initial and Date:



#### Process Handling Organic Certification – Important Information for Processors Please Keep These Pages for Reference

(This reference includes some major points of the NOP Rule regarding product composition; however, it is not exhaustive. Processors are responsible for understanding specific rules that pertain to their operation)

#### Information for Processors – NOP Rule 205.105, 205.270, 205.301, 205.303 - .309

The USDA-NOP defines "Processing" as methods including, but not limited to: slaughtering, cutting, grinding, cooking, baking, heating, drying, mixing, freezing, chilling, dehydrating, preserving, canning, jarring and repacking, among others. The NOP published guidance (document #5031) in 2014 requiring operations that combine or mix loads of unpackaged organic products (such as hay, grain or livestock) to also be certified. Per NOP Rule 205.105 organic, processed products (including individual ingredients) must be produced without the use of excluded methods (genetically modified organisms), ionizing radiation, or sewage sludge. Synthetic substances and ingredients are prohibited except as provided in 205.605.

#### **Documentation of Ingredients**

- If non-organic, agricultural ingredients are used in any products requested for certification, documentation must be submitted verifying the ingredient was not produced using genetically modified organisms, sewage sludge or ionizing radiation. The ingredient must be listed on 205.606 and a "Commercial Availability Record", documenting the operation's efforts to find the ingredient in organic form must also be submitted.
- If salt is used as an ingredient in any products requested for certification, documentation must be submitted to verify the salt is free
  of prohibited materials including flowing agents.
- If non-organic natural flavors are used as an ingredient in any products requested for certification a "Natural Flavor Affidavit" must be completed by the manufacturer of the flavor and submitted to the CDA.

#### Processing Aids

The NOP defines a processing aid as: a) a substance that is added to a food during processing, but removed from the food before it is packaged in its finished form; b) a substance that is added to food during processing, is converted to constituents normally present in food and does not significantly increase the amount of the constituents naturally found in the food and; c) a substance that is added to a food for its technical or functional effect in the processing, but is present in the finished food at insignificant levels and does not have any technical or functional effect in the product. Examples include: anti-caking agents, filtering agents, enzymes, anti-sticking agents and others. *If an otherwise single ingredient product is produced with processing aids it must be listed in Module 52 – Multi Ingredient Product Profile Form. Documentation that processing aids used are suitable for organic production may be required.* 

#### **Calculating percent Organic**

Per NOP Rule 205.302, the percentage of all organically produced ingredients in an agricultural product sold, labeled or represented as 100 % Organic, Organic, or Made With Organic must be calculated by dividing the total net weight or volume of (excluding water and salt) combined organic ingredients in the finished product by the total weight of all ingredients (excluding water and salt) in the finished product. *If an organic ingredient is not listed on the supplier's organic certificate as being 100% organic, it is calculated at 95% organic in the above calculation, unless other documentation can verify 100% organic status. The exception is raw agricultural products (unprocessed vegetables, fruits, etc.) which can be considered 100% organic whether listed in a certificate this way or not.* 

#### The NOP Rule allows four categories of products using the word "organic." Please review the following categories:

#### Products labeled "100% Organic"

- Must contain 100% organic ingredients including processing aids, excluding water and salt.
- No ingredients may be produced using excluded methods (genetic engineering), sewage sludge, or ionizing radiation.
- Must not contain sulfites, nitrates, or nitrites.
- Product labels may display, on the principal display panel, information panel and any other panel of the packaging, labeling or marketing information, the terms "100% organic" or "organic."
- Product labels may display the USDA Seal (please see the NOP Rule <u>https://www.ams.usda.gov/rules-regulations/organic</u> for allowable examples of the USDA Seal image) and/or the seal of the certifying agent.
- Product labels must display the statement "Certified Organic by the Colorado Department of Agriculture" located directly below the
  information identifying the producer or distributor of the product. Some abbreviations of this statement are permissible. Please
  obtain CDA approval before finalizing and printing product labels.



#### Information for Processors Cont'd

#### Products labeled "Organic"

- Must contain not less than 95% organically produced raw or processed agriculture products, excluding water and salt. Any
  remaining product ingredients must be only nonagricultural substances listed in 205.605 or agricultural products listed in 205.606
  and not available commercially. No ingredients may be produced using excluded methods (genetic engineering), sewage sludge, or
  ionizing radiation.
- Must not contain sulfites, nitrates, or nitrites.
- Must not include organic and nonorganic forms of the same ingredient.
- Product labels may display the term "organic" and may display the percentage of organic ingredients in the product.
- Product labels may display the USDA Seal (please see the NOP Rule https://www.ams.usda.gov/rules-regulations/organic for allowable examples of the USDA Seal image) and/or the seal of the certifying agent.
- Product labels must 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.
- Product labels must display the statement "Certified Organic by the Colorado Department of Agriculture" located directly below the
  information identifying the producer or distributor of the product. Some abbreviations of this statement are permissible. Please
  obtain CDA approval before finalizing and printing product labels.

#### Products labeled "Made with Organic"

- Must contain at least 70% organic ingredients.
- Organic and nonorganic ingredients must be produced without excluded methods (genetic engineering), sewage sludge, or ionizing radiation.
- Can contain sulfites, nitrates, nitrites and nonorganic ingredients even when organic ingredients are available, and can include
  organic and nonorganic forms of the same ingredient.
- Cannot display the USDA Seal.
- May display the seal of the certifying agent.
- May display the statement "Made with Organic..." in terms of specified ingredients, provided that the statement does not list more than three organically produced ingredients, or more than three food groups, provided that all ingredients of each listed food group are organically produced.
- May display the percentage of organic ingredients in the product.
- Product labels must 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.
- Product labels must display the statement "Certified Organic by the Colorado Department of Agriculture" located directly below the information identifying the producer or distributor of the product. Some abbreviations of this statement are permissible. Please obtain CDA approval before finalizing and printing product labels.

#### Multi ingredient packaged products with less than 70% organically produced ingredients

- May only identify organic content by identifying each organically produced ingredient in the ingredient statement with the word "organic" or with an asterisk or other reference mark which is defined below the ingredient statement.
- If the organically produced ingredients are identified in the ingredient statement, the product's percentage of organic ingredients
  may be displayed on the information panel.
- Must not display the USDA seal or the seal, logo or other identifying mark of a certifying agent which represents organic certification.

# Labeling of *nonretail containers* used for only shipping or storage of raw or processed agricultural products labeled as "100% Organic", "Organic" or "Made with organic"

- May display the name and contact information of the certifying agent and the USDA Seal
  - May identify the product as organic
  - May display the seal or logo of the certifying agent that certified the product
  - Must display the production lot number



# Process Handling - Organic System Plan Module 57: Water, Chlorine and Sanitation

Water Use   Section 1
<ol> <li>Is water used in your operation? □ Yes □ No</li> <li>a) If yes, describe all uses.</li> </ol>
b) What is the source of your water supply?
2. Please describe what analyses have been performed including dates and frequency of testing.
3. Are there any potential contaminates for the water used? Include structural issues, type of plumbing, etc.
<ul> <li>4. Are any treatments done to your water on site (such as chlorination, filtration, reverse osmosis, etc.)</li> <li>□ Yes</li> <li>□ No</li> </ul>
a) If yes, please describe your maintenance protocols for your treatment system and submit any technical bulletins or specification sheets for this system.

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



# Module 57 Cont'd: Water, Chlorine and Sanitation

Water Use Cont'd	Section 1 Cont'd
5. Is steam used in your processing (including head space injection)?	
a) If yes, is there direct contact of steam with food products or their packaging materials?  ☐ Yes ( i) If yes, please list any boiler additives in use in Module 59 and submit MSDS information for a	□ No ll additives.
(ii) Describe how the operation prevents contact of volatile boiler chemicals when processing orga (i.e. is the water changed, is there a lock-off system, etc). You may attach a sample log to evidence	
Chlorine	Section 2
The NOP Rule requires that inputs used for sanitation present no contamination risk to organic products by contact substances. All substances and materials used for cleaning and sanitizing must be listed in Module 58. Unless a ma the National List, an intervening step must be included between application of a material and direct contact with or Intervening steps may include residue testing, potable water rinse, drying/evaporation, etc.	terial is listed on
1. Is calcium hypochlorite, chlorine dioxide or sodium hypochlorite used at this operation? If no, continue to Section 3 – Sanitation.	No
If yes, what is chlorine used for?      Equipment cleaning/sanitizing      Direct contact with organic product	
a) If used for equipment cleaning/sanitizing, what is the maximum rate listed on the product label?	
b) Does the label require a potable water rinse?	
2. If used in direct contact with organic product, at what rate is it used?	
a) How is use rate verified?	
b) Is organic product rinsed with potable water after chlorine use?	
c) How is rinse water tested to verify the residual level of chlorine is under the maximum level in the Water Act?	Safe Drinking

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



# Module 57 Cont'd: Water, Chlorine and Sanitation

Sanitation					Section 3
1. Check all cleaning methods			-		
Manual Washing	□ Soap and Wa		Sanitizing	Scrap	
□ Sweeping	□ Vacuuming		Compressed Air	□ Stean	n Cleaning
Purging of Equipment	t 🗌 Clean in Plac	e (CIP)	Other (specify):		
2. List all equipment used in or materials that come into contac intervening steps taken to ensur are not limited to; use of non-re material used that is included o step. Examples include citric ar	t with the equipment. Sub re no residues from cleanse sidual materials, potable v n the National List may be	mit MSDS ers or saniti vater rinses used in dir	of all cleaning material zers remain on equipm , evaporation, residue t ect contact with organi	s used. In ent. The testing, et ic product	nclude descriptions of se steps may include, but c. Please note, any
Equipment/surface	Cleansers/Sanitizers used	Purge Run Prior to Organic?	How is it ensured no re remain?	esidues	Name of document cleaning is recorded on

3. If equipment is purged with organic material please identify the amount of organic product used in the purge run, how the operation determined the amount of organic material used in the purge is adequate to remove residues of nonorganic product, and what is done with the purged material after the purge run is complete.

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

# **MODULE 37: Recordkeeping**

### RECORDKEEPING

Per NOP Rule 205.103, organic producers must maintain records concerning the production, harvesting, and handling of organic livestock and livestock products. These records must fully disclose all activities and transactions of the operation in sufficient detail to be readily understandable and auditable and must be available for inspection and copying. Per NOP Rule 205.236(c), The producer of an organic livestock operation must maintain records to preserve the identity of all organically managed animals and edible and non-edible products produced on the operation.

1. What method of animal identification is used on this operation?			
□Leg Band			
$\Box$ Flock(s), describe:			
□Other, specify:			
2. Which of the following records are maintained?	_	_	_
Pasture/outside access (days/hours	Yes	No	NA
Periods & reasons for confinement	Yes	No	NA
Medications administered	Yes	No	NA
Records that treated animals have been diverted from organic market	Yes	No	NA
Culled/mortality rates	Yes	No	NA
Vitamins, minerals or other approved materials	Yes	No	NA
Receipts for purchased feed products	Yes	No	NA
Organic certificates for feed and/or livestock	Yes	No	NA
Feed storage records	Yes	No	NA
Receipts for purchased livestock	Yes	No	NA
Pest control/sanitation records for cleaning of houses	Yes	No	NA
Egg handling records	Yes	No	NA
Sales records	Yes	No	NA
Other, specify:			

Other, specify:

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



# Organic Certification Program Uncertified Handler Declaration

The purpose of this form is to verify eligibility for the exclusion from certification under 205.101(b)(1). This form must be completed by any uncertified operation that sells and/or handles agricultural products labeled as "100 percent organic," "organic," or "made with organic" (specified ingredients or food group(s))"

Name and Address of Handling Operation:		
Name and Title of Responsible Party (must	t match signature):	
Phone:	Email:	Website:

- Do you handle any organic products that are not enclosed in a package or container when you receive them?
   □Yes □No If yes, please explain:
- 2. Do you open packages or containers of organic products? 
  Yes 
  No If yes, please explain:
- 3. Do you re-label any organic products? □Yes □No If yes, please explain:
- 4. Do you process any organic products? □Yes □No If yes, please explain:
- 5. Do all organic products remain in the same package or container for the entire time they are in your possession? □Yes □No If no, please explain:
- 6. What do you do when incoming packages or containers of organic product have been damaged?
- 7. Describe the measures implemented to prevent commingling of organic and nonorganic products:
- 8. Describe the measures you have implemented to prevent contamination of organic products from substances such as cleaners, sanitizers, and pest control products:
- 9. Explain how you maintain audit trail records sufficient to track organic product back to its certified organic source:
- 10. Do you agree to provide copies of audit trail records to Colorado Department of Agriculture upon request?
   Yes No If no, please explain:

Any information about your suppliers and sources will be kept confidential in accordance with:

**§205.501(a)** A private or governmental entity accredited as a certifying agent under this subpart must:

(10)Maintain strict confidentiality with respect to its clients under the applicable organic certification program and not disclose to third parties (with the exception of the Secretary or the applicable State organic program's governing State 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 § 205.504(b)(5);

# § 205.100 (c) Any operation that:

(1) 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 the amount specified in \$3.91(b)(1) of this title per violation.

(2) Makes a false statement under the Act to the Secretary, a governing State official, or an accredited certifying agent shall be subject to the provisions of section 1001 of title 18, United States Code.

*I declare under penalty of perjury (under the laws of the United States of America) that the foregoing is true and correct.* 

Executed on: \_\_\_\_\_\_ (date)

Signature:

Printed Name:



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

# MODULE 17: CLEANING, SANITIZING & POST HARVEST INPUTS

### **Cleaning, Sanitizing & Post-Harvest Inputs**

List all products used after products have been harvested including tool and equipment cleaners and sanitizers, pest control products used in handling and storage areas, and materials applied to products. If you have discontinued use of a product and are unlikely to use it again, please strike through or cross out the entry. Labels for each product need to be on file with CDA. If you have received approval for a product and have submitted a product label, you do not need to resubmit the label each year.

Product	Manufacturer	Use & How Applied	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)
*NOP Rule Reference	es (CDA to enter) -	1	1	1	1

Operator Review, Initial and Date:

Inspector Review, Initial and Date:

Company Name:

F-E-217 10/10/2015



# **MODULE 64: Feed and Feed Supplements**

# Feed and Feed Supplements

Please list all purchased feed and feed supplements in the table below. Include anything added to water, minerals, and silage inoculants. Labels for products and/or verification of organic certification must be submitted. Products administered for healthcare/medical reasons should be listed in Module 68: Healthcare Materials list.

Type of Feed or Supplement Product Name	Source/Supplier or Manufacturer	Certifier of Supplier (if applicable)	Status (CDA to enter)	Review Date (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



# MODULE 64: Feed and Feed Supplements Cont'd

FEED AND FEED SUPPLEMEN	NTS Cont'd			
Type of Feed or Product Name	Source/Supplier or Manufacturer	Certifier of Supplier (if applicable)	Status (CDA to enter)	Review Date (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



# Process Handling - Organic System Plan Ingredient Commercial Availability Record

Name of Operation/Company:

**Ingredient Name:** 

Please use this form as a tool to document the search for organic forms of ingredients before you request use of a nonorganic form. Submit a copy of the completed form when requesting certification of a new product with nonorganic agricultural ingredients.

Products labeled organic must contain at least 95% organic ingredients. In order for an ingredient to be used in the remaining 5% of the product, it must be a non-organic agricultural ingredient listed in Section 205.606 of the National List (NOP Rule) AND it must be demonstrated that they are commercially unavailable in organic form. The National Organic Program defines commercially available as the "ability to obtain a production input [ingredient] in an appropriate form, quality, or quantity to fulfill an essential function in a system of organic production or handling, as determined by the certifying agent in the course of reviewing the organic plan." Cost cannot be used as a reason to not use an organic ingredient.

Certified operations are responsible for documenting efforts to source organic forms of ingredients from reasonable sources. This information must be updated regularly and a system must be in place that regularly searches for organic forms of ingredients, that may be currently unavailable, in order to receive continued approval of the nonorganic form.

Ingredient	1 <sup>st</sup> Source – Name, phone, date contacted	2 <sup>nd</sup> Source – Name, phone, date contacted	3 <sup>rd</sup> Source – Name, phone, date contacted	Reason Organic Ingredient not used (at least one reason must be checked)			
				Quality	<b>Quantity</b>	<b>Form</b>	□ Other
				Explain:			
				Quality	<b>Quantity</b>	<b>Form</b>	Other
				Explain:			
				Quality	<b>Quantity</b>	Given Form	□ Other
				Explain:			
				Quality	<b>Quantity</b>	Given Form	Other
				Explain:			



# Process Handling - Organic System Plan Module 50: Products Requested for Certification

#### **Products Requested for Certification**

The USDA-NOP defines "Processing" as slaughtering, cutting, grinding, cooking, baking, heating, drying, mixing, freezing, chilling, dehydrating, preserving, canning, jarring and repacking, among others. The NOP also published guidance (document #5031) in 2014 requiring operations that combine or mix loads of unpackaged organic products (such as hay, grain or livestock) to also be certified.

The products being requested for certification must be reviewed and updated each year. This is what will be on the operation's certificate. List or review all products, strike through any products that have been discontinued, add any new products to the bottom of the list. Each item listed below must have either a Single or Multiple Ingredient Product Profile Form (Modules 51 and 52), source & certification documentation for each ingredient, and organic non-availability and natural flavor verification if applicable. If a product is marketed under different names (either trade names or product names) using the same formulation, list all names used. Indicate whether a product is <u>being marketed as</u> "100% Organic," or "Made With Organic" (MWO). Please see Module 53 and the document, "Important Information for Process Handlers" for more information. <u>A product list can be submitted by the operation in their own format as long as all of the requested information is included.</u>

Product Name	Product Size(s)	Marketing Claim (100%, Organic, MWO)	If <u>private label/2<sup>nd</sup> party</u> list company & certifier.	Formula Approved or cite issues (CDA to Enter)	Label Approved or cite issues (CDA to enter)	Date Reviewed (CDA to enter)

#### Operator Review, Initial and Date:

Inspector Review, Initial and Date:



# Module 50: Products Requested for Certification Cont'd

Product Name	Product Size(s)	Marketing Claim (100%, Organic, MWO)	If <u>private label</u> , list company & certifier.	Formula Approved or cite issues (CDA to Enter)	Label Approved or cite issues (CDA to enter)	Date Reviewed (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



# MODULE 50: PRODUCTS REQUESTED FOR CERTIFICATION, Cont'd

Product Name	Product Size(s)	Marketing Claim (100%, Organic, MWO)	If <u>private label</u> , list company & certifier.	Formula Approved or cite issues (CDA to Enter)	Label Approved or cite issues (CDA to enter)	Date Reviewed (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



# MODULE 50: PRODUCTS REQUESTED FOR CERTIFICATION, Cont'd

Product Name	Product Size(s)	Marketing Claim (100%, Organic, MWO)	If <u>private label</u> , list company & certifier.	Formula Approved or cite issues (CDA to Enter)	Label Approved or cite issues (CDA to enter)	Date Reviewed (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



# MODULE 50: PRODUCTS REQUESTED FOR CERTIFICATION, Cont'd

Product Name	Product Size(s)	Marketing Claim (100%, Organic, MWO)	If <u>private label</u> , list company & certifier.	Formula Approved or cite issues (CDA to Enter)	Label Approved or cite issues (CDA to enter)	Date Reviewed (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



# Process Handler - Organic System Plan MODULE 58: Materials and Inputs

List all materials used for processing, cleaning, sanitizing, and pest control including but not limited to boiler additives, floatation agents, anti-microbial agents, anti-foaming agents, waxes, etc. If any material is routinely used for equipment maintenance and protection, such as mineral oil, please also list that. If you have discontinued use of a product and are unlikely to use it again, please cross out the entry. Product labels, specification sheets, OMRI/WSDA certificates and/or MSDS sheets for each product need to be on file with CDA. If you have received approval for a product and have submitted a product label, you do not need to resubmit the label each year.

Product	Manufacturer	Use (cleanser, sanitizer, pest control, boiler additive, etc.)	Equipment or surface(s) used on	Steps taken to ensure no contact with organic product or packaging (purge, rinse, testing)	OMRI/ WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:

Company Name:

F-E-408 2/29/2016



# MODULE 58: Processor Handler Inputs, Cont'd

Product	Manufacturer	Use (cleanser, sanitizer, pest control, boiler additive, etc.)	Equipment or surface(s) used on	Steps taken to ensure no contact with organic product or packaging (purge, rinse, testing)	OMRI/ WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)
*NOP Rule Referen	ces (CDA to enter) -	1	1	1	<u> </u>	1	1

Operator Review, Initial and Date:

Inspector Review, Initial and Date:

Company Name:

F-E-408 2/29/2016



# ORGANIC CERTIFICATION PROGRAM - ORGANIC SYSTEM PLAN MODULE 1: GENERAL INFORMATION

SECTION 1 – GENERAL INFORMATION								
Company/Applicant Name (This will be printed on your certificate): DBA (If applicable):								
Owner's Name:	Manager's Name:		Primary Contact	Primary Contact's Name:				
Physical Address:	City:	State:	Zip Code:	County:				
Mailing Address:	City:	State:	Zip Code:	County:				
Phone, Business:	Phone, Cell:	Email Address:						
Website URL:	Year first certified:		Do you need a co standards?	py of the organic				
For which scope(s) is organic certification				(Please note:				
ruminant livestock operations must include	eenhouse/Specialty	Wild Cro		vestock, Poultry				
Livestock, Ruminants	restock, Other		andler (including o					
Which category best describes this operat	tion? ] Organic and Convent	ional/Nonorganic						
Through what avenues does the operation								
	etail establishment	□ CSA/subscription □ Bulk commodities		Contract to buyer				
☐ Other (specify):		Exporting (where?						
For producers, are organic products pure If yes, a Process Handler OSP must l	and the second	cers to sell or otherw	ise distribute? 🛛	Yes 🗆 No				
Please provide a brief description of this o	operation:							

Operator Review, Initial and Date:



# MODULE 1: GENERAL INFORMATION Cont'd

SECTION 1 – GENERAL INFORMATION, CONT'D								
The business is operating as a: Sole Pro	prietorship 🛛 Partnership	Corporation Date Incorporat	Limited Liability Co. ed:					
List the person(s) authorized to receive and a the state of Colorado.	accept service of summons and	l legal notices of all l	kinds for the applicant in					
Name(s):	Title:							
Complete Address (if different from operatio	on's address):							

SECTION 2 - PREVIOUS CERTIFICATION
This section must be filled out each year.
For re-certification, were conditions placed on the previous year's certification? If yes, what were the conditions?
Were all the conditions addressed?
Has certification ever been denied for this operation (by any USDA-accredited organic certification agent)?
☐ Yes ☐ No If yes, describe the circumstances:
Are there any outstanding non-compliances for the operation (from any USD-accredited organic certification agent)?
Yes No
If yes, what is the non-compliance?



#### MODULE 1: GENERAL INFORMATION Cont'd

#### SECTION 3 – ATTACHEMENTS

#### This section must be filled out each year.

Detailed field and facility maps are required to be on file with the CDA. Attachments for the following may be required as supporting documentation. If you have already submitted a particular piece of information, it does not need to be included again unless a change or update has occurred. Please select all documents that have been attached to the OSP for the current year.

#### **Crop/Plant Production**

- Field maps (with Field ID, buffers/dimensions, adjoining land use, notable structures)
- □ Soil/plant tissue tests
- □ Seed documentation
- □ Non GMO, Nonorganic verification
- Compost documentation
- □ Input (Fertilizers, pesticides, etc.) product labels
- □ Input product OMRI or WSDA certificates
- □ Labels for product sold by the operation as organic
- □ Prior land use affidavits
- □ Fees
- Inspection Appointment Form
- □ Other, Please list:

#### **Livestock Production**

Field maps (with pasture/outdoor areas, housing and handling structures, adjoining land use, etc.)

- □ Water tests
- □ Organic certificates for purchased animals
- □ Organic certificates for purchased feed
- Labels/ingredient statements for supplements and additives
- □ Labels for all vaccines and medications/health care products
- □ Input product OMRI or WSDA certificates
- □ Labels for product sold by the operation as organic
- Prior land use affidavits
- □ Fees
- Inspection Appointment Form
- Other, Please list:

#### **Process Handling**

- Process flow chart/narrative
- □ Facility map/diagram
- Organic ingredients supplier certificates
- Nonorganic ingredients verification
- Natural Flavor Affidavits
- □ Processing aid labels/MSDS/spec. sheets
- □ Water test results
- □ Boiler additive labels/MSDS
- Cleanser/sanitizer labels/MSDS
- □ Pest control product labels/MSDS
- □ Inspection Appointment Form
- Inspection Appointment Form
- Other, Please list:



#### MODULE 1: GENERAL INFORMATION Cont'd

### SECTION 4 - AFFIRMATION & SIGNATURE

The following must be signed by the Applicant. By signing this document, the Applicant acknowledges and agrees to:

1. Fully comply with all applicable organic product and handling regulations in accordance with Title 7 CFR Part 205 National Organic Program Rule issued by the United States Department of Agriculture (USDA), Agricultural Marketing Service.

2. Establish, implement, and update annually, an organic production and handling system plan (OSP) that will be submitted to the Colorado Department of Agriculture (CDA) Organic Program.

3. Supply the CDA Organic Program with all information required to verify compliance with the National Organic Program Rule.

4. Permit on-site inspections with complete and unrestricted access to the production and handling operation, including noncertified production and handling areas, structures, and offices by the CDA Organic Program. This inspection may occur with or without an authorized representative of the operation present. These inspections may be announced or unannounced at the discretion of the CDA Organic Program or as required by the Administrator of the National Organic Program.

5. Understand that the CDA Organic Program may use subcontractors for inspecting, testing, and other technical services, as necessary.

6. Maintain all records applicable to the organic operation for not less than five (5) years beyond their creation.

7. Allow authorized representatives of the CDA Organic Program, of the Secretary of Agriculture (USDA) access to these records under normal business hours for review and copying to determine compliance with the National Organic Program Rule.

8. Submit to the CDA Organic Program the applicable fees as described on the most current fee schedule.

9. Immediately notify the CDA Organic Program about any application, including drift, of a prohibited substance to any field, production unit, site, facility, livestock or part of an operation.

10. Understand that the use of the CDA name and seal must be in accordance with the Colorado Department of Agriculture's guidelines

11. Immediately notify the CDA Organic Program of any change in the certified operation or portion of it that may affect its compliance with the National Organic Program Rule.

I, the owner or legally authorized representative, acknowledge the above General Requirements for CDA Organic Certification and understand that failure to meet the above requirements may be cause for denial of an application and sanctioning of certification.

I affirm that all statements made in this application are true and correct. No prohibited products have been applied to any of my organically managed fields during the three-year period prior to projected harvest. I understand that the operation may be subject to unannounced inspection and/or sampling for residues at any time as deemed appropriate to ensure compliance with the NOP Rules. I understand that acceptance of this form in no way implies granting of certification by the Colorado Department of Agriculture. I agree to follow all the applicable organic standards set forth in the National Organic Program regulations, 7 CFR Part 205.

Signature	of O	perator:

Date:



# Livestock Production – Organic System Plan MODULE 66 Addendum: Pasture and Grazing

(Use this form if additional space is needed for Module 66, Section 3)

#### PASTURE AND GRAZING

Section 3

Per NOP Rule 205.240 Pasture and rangeland must be managed as a crop in compliance with NOP organic crop standards. A pasture plan (this module or the producer's own documents, provided they address all of the requirements of 205.240(c)1 - 8) must be updated annually.

1. From the Crop OSP, please list and describe the management of the fields that are used as pasture to graze animals, in the table below.

Pasture or Rangeland ID/Name	Acres	Pasture make-up/composition (perennial species, annual species, native pasture, rangeland, crop residue, etc.)	Irrigated? If yes, list type	Grazing Methods (Rotational, Continuous, Intensive, etc.)
Total Acres Available for Grazing	0.0			

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



# PASTURE AND GRAZING

Per NOP Rule 205.240 Pasture and rangeland must be managed as a crop in compliance with NOP organic crop standards. A pasture plan (this module or the producer's own documents, provided they address all of the requirements of 205.240(c)1 - 8) must be updated annually.

1. From the Crop OSP, please list and describe the management of the fields that are used as pasture to graze animals, in the table below.

Pasture or Rangeland ID/Name	Acres	Pasture make-up/composition (perennial species, annual species, native pasture, rangeland, crop residue, etc.)	Irrigated? If yes, list type	Grazing Methods (Rotational, Continuous, Intensive, etc.)
		C MINE DE DOS NOS		
	2			
Total Acres This Page	0.0			
Total Acres Previous Page	0.0			
Total Acres Available for Grazing	0.0			

Operator Review, Initial and Date:

Inspector Review, Initial and Date:

Company Name:

Section 3



# Process Handling - Organic System Plan Module 50: Products Requested for Certification

#### **Products Requested for Certification**

The USDA-NOP defines "Processing" as slaughtering, cutting, grinding, cooking, baking, heating, drying, mixing, freezing, chilling, dehydrating, preserving, canning, jarring and repacking, among others. The NOP also published guidance (document #5031) in 2014 requiring operations that combine or mix loads of unpackaged organic products (such as hay, grain or livestock) to also be certified.

The products being requested for certification must be reviewed and updated each year. This is what will be on the operation's certificate. List or review all products, strike through any products that have been discontinued, add any new products to the bottom of the list. Each item listed below must have either a Single or Multiple Ingredient Product Profile Form (Modules 51 and 52), source & certification documentation for each ingredient, and organic non-availability and natural flavor verification if applicable. If a product is marketed under different names (either trade names or product names) using the same formulation, list all names used. Indicate whether a product is <u>being marketed as</u> "100% Organic," or "Made With Organic" (MWO). Please see Module 53 and the document, "Important Information for Process Handlers" for more information. <u>A product list can be submitted by the operation in their own format as long as all of the requested information is included.</u>

Product Name	Product Size(s)	Marketing Claim (100%, Organic, MWO)	If <u>private label/2<sup>nd</sup> party</u> list company & certifier.	Formula Approved or cite issues (CDA to Enter)	Label Approved or cite issues (CDA to enter)	Date Reviewed (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



### Module 50: Products Requested for Certification Cont'd

Product Name	Product Size(s)	Marketing Claim (100%, Organic, MWO)	If <u>private label</u> , list company & certifier.	Formula Approved or cite issues (CDA to Enter)	Label Approved or cite issues (CDA to enter)	Date Reviewed (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



Product Name	Product Size(s)	Marketing Claim (100%, Organic, MWO)	If <u>private label</u> , list company & certifier.	Formula Approved or cite issues (CDA to Enter)	Label Approved or cite issues (CDA to enter)	Date Reviewed (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



Product Name	Product Size(s)	Marketing Claim (100%, Organic, MWO)	If <u>private label</u> , list company & certifier.	Formula Approved or cite issues (CDA to Enter)	Label Approved or cite issues (CDA to enter)	Date Reviewed (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



Product Name	Product Size(s)	Marketing Claim (100%, Organic, MWO)	If <u>private label</u> , list company & certifier.	Formula Approved or cite issues (CDA to Enter)	Label Approved or cite issues (CDA to enter)	Date Reviewed (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



Product Name	Product Size(s)	Marketing Claim (100%, Organic, MWO)	If <u>private label</u> , list company & certifier.	Formula Approved or cite issues (CDA to Enter)	Label Approved or cite issues (CDA to enter)	Date Reviewed (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



Product Name	Product Size(s)	Marketing Claim (100%, Organic, MWO)	If <u>private label</u> , list company & certifier.	Formula Approved or cite issues (CDA to Enter)	Label Approved or cite issues (CDA to enter)	Date Reviewed (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



Product Name	Product Size(s)	Marketing Claim (100%, Organic, MWO)	If <u>private label</u> , list company & certifier.	Formula Approved or cite issues (CDA to Enter)	Label Approved or cite issues (CDA to enter)	Date Reviewed (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



Product Name	Product Size(s)	Marketing Claim (100%, Organic, MWO)	If <u>private label</u> , list company & certifier.	Formula Approved or cite issues (CDA to Enter)	Label Approved or cite issues (CDA to enter)	Date Reviewed (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



Product Name	Product Size(s)	Marketing Claim (100%, Organic, MWO)	If <u>private label</u> , list company & certifier.	Formula Approved or cite issues (CDA to Enter)	Label Approved or cite issues (CDA to enter)	Date Reviewed (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



Product Name	Product Size(s)	Marketing Claim (100%, Organic, MWO)	If <u>private label</u> , list company & certifier.	Formula Approved or cite issues (CDA to Enter)	Label Approved or cite issues (CDA to enter)	Date Reviewed (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

## MODULE 50: PRODUCTS REQUESTED FOR CERTIFICATION, Cont'd

Product Name	Product Size(s)	Marketing Claim (100%, Organic, MWO)	If <u>private label</u> , list company & certifier.	Formula Approved or cite issues (CDA to Enter)	Label Approved or cite issues (CDA to enter)	Date Reviewed (CDA to enter)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



## Process Handling - Organic System Plan Module 59: Quality Control & Recordkeeping

Quality Control	Section 1
1. Does the operation have standard operating procedures for organic processing?	Yes 🗆 No
2. Does the operation have a quality assurance program in place? ☐ Yes ☐ No If yes, what type of program?	
□ ISO □ HACCP □ Total Quality Management (TQM) □ Oth	her, specify:
3. Does the operation conduct product testing?	
a)Are samples retained:	
<ul> <li>4. Does the operation have a product recall system in place? □ Yes □ No</li> <li>If yes, please describe.</li> </ul>	
5. Is the operation inspected or audited by any other agencies?	
6. List or describe any licenses held by this operation:	
Operator Review, Initial and Date: Inspector Review, Initial and	nd Date:



## Module 59: Quality Control & Recordkeeping Cont'd

Recordkeeping			Section 2
products that are to be sold, la	abeled or represented as org icient detail as to be readily	understood, be sufficient to demon	on, harvesting and handling of lose all activities and transactions of strate compliance with the Act and
Indicate the records currently inspections.	kept or plan to be kept by tl	e operation. These records must b	e accessible to inspectors during
Incoming Ingredients (Check	k all that apply)		
<ul> <li>Purchase orders</li> <li>Quality testing results</li> <li>Certificates of Analysis</li> <li>Receiving summary logs</li> <li>Other, specify:</li> </ul>	<ul> <li>Contracts</li> <li>Invoices</li> <li>Receipts</li> <li>Non GMO verification</li> </ul>	<ul> <li>Bills of lading</li> <li>Customs forms</li> <li>Scale tickets</li> <li>No sewage sludge verification</li> </ul>	<ul> <li>Organic certificates</li> <li>Transaction certificates</li> <li>Receiving records</li> <li>No ionizing radiation verification</li> </ul>
In Process Records			
<ul> <li>Batch logs</li> <li>Equipment clean out logs</li> <li>Production summary reports</li> </ul>	<ul> <li>Production reports</li> <li>Cleaning/sanitation logs</li> </ul>	<ul> <li>Blending reports</li> <li>Packaging reports</li> <li>Other, specify:</li> </ul>	<ul> <li>Ingredient inspection forms</li> <li>Quality assurance reports</li> </ul>
Storage			
☐ Ingredient inventory reports	☐ Finished pro	oduct reports 🛛 Other, spec	cify:
<b>Outgoing Finished Product</b>			
<ul> <li>Shipping logs</li> <li>Scale tickets</li> <li>Sales orders</li> <li>Sales summary log</li> </ul>	<ul> <li>Transport inspection form</li> <li>Export declaration forms</li> <li>Transaction certificates</li> <li>Internal audit documentation</li> </ul>	<ul><li>Sales invoices</li><li>Organic certificate</li></ul>	<ul> <li>Purchase orders</li> <li>Phytosanitary certificates</li> <li>Shipping summary log</li> <li>Other, specify:</li> </ul>
Other			
<ul> <li>MSDS sheets</li> <li>Complaint logs</li> <li>Internal audit documentation</li> </ul>		<ul> <li>Equipment maintenance records</li> <li>locumentation (for nonorganic ingred)</li> <li>Other, specify:</li> </ul>	
sources of individual ingredie Describe how the audit trail a period of time:	ents: system allows you to baland		to outgoing product amounts over a
Operator Review, Initial and Da	te:	Inspector Review, Initia	I and Date:



## Process Handling - Organic System Plan Non-Organic Ingredient Affidavit

This form is to be <u>completed by the manufacturer of an ingredient used in your product, that is not certified organic</u>, in place of a statement declaration. The manufacturer must indicate whether the three statements for "All Products" are True or False. Then find the type of product(s) that specifically applies (citric acid, color, flavor, etc.) and indicate whether the statements are True or False for that product type.

<b>Product:</b>	
	· · · · · · · · · · · · · · · · · · ·

Manufacturer:

### The Product indicated above conforms to the following criteria:

<ul> <li>For All Products, indicate whether the following statements are True or False</li> <li>No genetically engineered micro-organisms were used in production.</li> </ul>		FALSE
<ul><li>This product has not been irradiated.</li><li>Sewage sludge was not used in production of the product or ingredients.</li></ul>		
For products/ingredients containing <u>Citric Acid</u>		
• Citric acid is produced only by fermentation of carbohydrate substance.		
<ul> <li>For <u>Colors</u></li> <li>This color and any constituents are derived from non-synthetic sources only.</li> </ul>		
<ul> <li>For <u>Flavors</u></li> <li>This flavor and any constituents are derived from non-synthetic sources only.</li> <li>No synthetic solvent or carrier systems were used in production of the flavor.</li> <li>This flavor does not contain any artificial preservatives.</li> </ul>		
<ul> <li>For <u>Enzymes</u></li> <li>Any enzymes are derived from edible, nontoxic plants, nonpathogenic fungi or nonpathogenic bacteria.</li> </ul>		
<ul> <li>For <u>Pectin</u></li> <li>This is a non-amidated form of pectin.</li> </ul>		
For <u>Yeast</u>	_	_
<ul> <li>This yeast is non-synthetic</li> <li>No growth of yeast has occurred on a petrochemical substrate, on sulfite waste liquor</li> </ul>		
or a substrate produced using genetically modified organisms.		



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### Livestock Production – Organic System Plan MODULE 66: Ruminant Livestock Feed and Pasture

#### Dry Matter Demand and Dry Matter Intake

No <u>ruminant</u> animals/animal products are being requested for certification at this operation. Instead, fill out Module 65: Non-ruminant Livestock Feed.

1. Please complete the table below regarding Dry Matter Demand. An operation may submit their own documents as long as they contain all of the requested information.

Production Group/Class	Approximate average animal weight (lbs.)	Dry Matter Demand (lbs.per animal/day)

2. How are the Dry Matter Demand values, listed above, determined?

3. How is Dry Matter Intake determined at this operation?

Operator Review, Initial and Date:

Inspector Review, Initial and Date:

Company Name:

Section 1



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

### MODULE 66: Ruminant Livestock Feed and Pasture cont'd

### FEED RATIONS

Section 2

During the grazing season, producers must provide an average of no less than 30% of a ruminant animal's dry matter intake from grazing. The grazing season is defined as the period of time when pasture is available for grazing given climate factors, natural precipitation or irrigation. The grazing season must be at least 120 days per year; however, these days do not need to be continuous.

1. Describe feed rations <u>during the grazing season</u> by each animal class or production group in the table below. Include DMI from grazing, all other feed and feed supplements. This information can be submitted on your own forms as long as all requested information is included.

N/A. All animals' total ration is 100% pasture during the grazing season and the grazing season is at least 120 days. Skip to "Non Grazing Season Feed Rations" on page 3 of this module.

GRAZING SEASON FEED RATIONS				
<b>Class or Production Group</b>	Feed Type or Ration Component	Amount (per animal per day)		

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



### MODULE 66: Ruminant Livestock Feed and Pasture Cont'd

#### FEED RATIONS Cont'd

Section 2 Cont'd

2. Describe feed rations during the <u>Non-Grazing Season</u> by each animal class or production group in the table below. Include feed supplements. The non-grazing season must not be longer than 245 days. This information can be submitted on your own forms as long as all requested information is included.

N/A. Ruminant Livestock are not part of this operation during the non-grazing season. Skip to Section 3 of this module.

#### NON GRAZING SEASON FEED RATIONS

Class or Production Group	Feed Type or Ration Component	Amount (per animal per day)

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



#### MODULE 66: Ruminant Livestock Feed and Pasture Cont'd

#### PASTURE AND GRAZING

Section 3

Per NOP Rule 205.240 Pasture and rangeland must be managed as a crop in compliance with NOP organic crop standards. A pasture plan (this module or the producer's own documents, provided they address all of the requirements of 205.240(c)1 - 8) must be updated annually.

1. From the Crop OSP, please list and describe the management of the fields that are used as pasture to graze animals, in the table below.

Pasture or Rangeland ID/Name	Acres	Pasture make-up/composition (perennial species, annual species, native pasture, rangeland, crop residue, etc.)	Irrigated? If yes, list type	Grazing Methods (Rotational, Continuous, Intensive, etc.)
	ŝ			
Total Acres Available for Grazing	0			

2. Describe the grazing season of this operation including the approximate start and end dates and conditions that determine the grazing period.

3. During the grazing season, how many hours per day are animals on pasture? If this is different between classes or production groups, please list the number of hours for each group.

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



#### COLORADO DEPARTMENT OF AGRICULTURE

Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

## MODULE 66: Ruminant Livestock Feed and Pasture Cont'd

PASTURE AND GRAZING Cont'd	Section 3 Cont'd				
4. How does the operation ensure all animals are grazing a minimum of 120 days per year?					
5. How is it determined that animals are receiving no less than an average of 30% of their dry matter during the grazing season?	demand from pasture				
6. Is pasture access ever denied to animals during the grazing season? If yes, for what specific reasons is pasture denied and for how long is pasture denied?					
7. How is the denial of pasture access documented?					
8. How is it ensured that enough pasture of sufficient quality is available to supply 30% of animals' durequirements during the grazing season? Check all that apply.	ry matter intake				
<ul> <li>Rotational grazing</li> <li>Resting periods</li> <li>Forage testing</li> <li>Other, describe:</li> </ul>	☐ Weed control priate forage heights				
9. How do pasture management practices of this operation minimize the outbreak and spread of disease and parasites?					
10. Are ruminants finished for slaughter at this location?					
a) If yes, are these livestock grazed during the finish period?					
b) If no, how long is the finishing period?					
Operator Review, Initial and Date: Inspector Review, Initial and Date:					



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### Process Handling – Organic System Plan Module 51: SINGLE INGREDIENT PRODUCT PROFILE FORM

Please complete the following information for single ingredient products the operation plans to market. Attach product labels used for each product. <u>Product labels and source verification for the product must be approved by CDA prior to being released in the market place</u>. Copies of organic certificates from suppliers which list the certified products/ingredients must be submitted. In order for a product to be labeled as 100% Organic, it must be listed as such on the supplier's certificate. \*\*Single Ingredient products that use processing aids or salt and water must be listed on the Multi Ingredient PPF form.

Finished Product Name (from Module 50)	Ingredient	Supplier of Ingredient	Certifier of Supplier

Are any of the products/labels listed above Second Party or Private Labels? Yes No This is only required if the final Handler/Distributor of the product identified on the label is NOT the operation for whom this OSP is completed. If yes please submit the organic certificate of the owner of the private label.

#### Are the products processed at the address listed in the OSP? Yes No If no, please list the following information and submit the organic certificate of the facility processing the product:

Facility/Company Name         Address & Phone Number		Certified Organic by Whom?	

#### Lot Coding:

Describe the production code or lot numbering system that will appear on each final package sold. This code must serve to trace the product and all of its components back to the original ingredients used.

Code Sample:

Translation of Code:



## COLORADO DEPARTMENT OF AGRICULTURE **Division of Plant Industry** 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

CDA Use Only:		
Formulation approved by:		Date:
Label approved by:		Date:
□ 100% Organic	□ Retail	
Organic	🗆 Bulk	
□ Made With Organic		



## COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

### **MODULE 30: Operation Profile**

### **OPERATION PROFILE**

1. In the table below, list the animals for which you are requesting organic certification. Indicate the types of poultry being raised (chickens, ducks, geese, etc.), the products for which they are being raised and the number of males and females. Indicate any planned additional birds for the year as well as current numbers.							
Type and Breed of Poultry	Products (check all that apply)		Number of Females	Number of Males	Number of Capons (castrated males)	Planned or Current?	
	Eggs	🗌 Meat	Stock To Sell				
	Eggs	Meat	Stock To Sell				
	Eggs	🗌 Meat	Stock To Sell				
	Eggs	🗌 Meat	Stock To Sell				
	Eggs	🗌 Meat	Stock To Sell				
	Eggs	🗌 Meat	Stock To Sell				
	Eggs	🗌 Meat	Stock To Sell				
	Eggs	🗌 Meat	Stock To Sell				

2. If poultry are being raised for egg production, what are the arrangements or planned arrangements for animals that are no longer productive?

3. Please provide a brief description regarding the flow (or planned flow) of animals through the system from hatching or receiving of the animal through harvest of products to the end of life. Include types of housing, feed, age at first harvest of product(s), etc. This must be for each flock or type of animal that has a different flow. <u>Please also include/attach a map or diagram of the location of all poultry housing units/structures and outdoor access areas of the operation, including dimensions; as well as location of any poultry product processing areas (egg washing, storage, packaging, etc.).</u>

Operator Review, Initial and Date:



## Livestock Production – Organic System Plan MODULE 67: Healthcare

## HEALTHCARE, GENERAL

Section 1

practices and veterinary biologi that such medications are allow	cs are inadequa ed under 205.60 estock treated v	ate to prevent sickness, a producer 1 03. Medical treatment must not be	ock healthcare practices. When preventative nay administer synthetic medications, provided withheld from a sick animal in an effort to clearly identified and shall not be sold, labeled,			
		peration's livestock healthcare pla	n? Check all that apply			
□Selection of well adapted s		Selective breeding	□Raising own replacement stock			
□Good quality feed	species	□Nutritional supplements	☐Multi species grazing			
Access to the outdoors		Dry bedding	Good ventilation in housing			
Low stress handling		Good sanitation	Biological control of pests, parasites			
Quarantine/isolation of sic	k animals	Administration of vaccines/o				
Allowed health materials/		□Other(s):	the biologics			
Anowed health materials/	bioducts	Domer(s).				
	et up of the op	g densities allow for exercise and f eration allows for freedom of mov	ement, exercise and reduction of stress? Section 2			
	physical alterati d stress.		e the animal's welfare providing it is in a			
1. In the table below, describe any physical alterations performed on animals. Include ear tagging, ear notching, branding, castration, dehorning, etc.						
1. In the table below, describe castration, dehorning, etc.						
castration, dehorning, etc.		o physical alterations are perform	ed at this operation.			
castration, dehorning, etc.		o physical alterations are perform	ed at this operation.			
castration, dehorning, etc.		o physical alterations are perform	ed at this operation.			
castration, dehorning, etc.		o physical alterations are perform	ed at this operation.			
castration, dehorning, etc.		o physical alterations are perform	ed at this operation.			
castration, dehorning, etc.		o physical alterations are perform	ed at this operation.			
castration, dehorning, etc.		o physical alterations are perform	ed at this operation.			
castration, dehorning, etc.		o physical alterations are perform	ed at this operation.			
castration, dehorning, etc. Physical Alteration	Age	o physical alterations are perform Reason for Alteration	tions is minimized? Check all that apply. re used			
<pre>castration, dehorning, etc. Physical Alteration  2. How do practices ensure tha  Handling time is minimized  Separation time from the gro  Other, describe:</pre>	Age	o physical alterations are perform Reason for Alteration	tions is minimized? Check all that apply. re used			
<pre>castration, dehorning, etc. Physical Alteration 2. How do practices ensure that  Handling time is minimized  Separation time from the grow </pre>	Age	o physical alterations are perform Reason for Alteration	tions is minimized? Check all that apply. re used			



## MODULE 67: Healthcare Cont'd

#### PREVENTION AND TREATMENT

Section 3

1. An effective Healthcare Program should anticipate potential health or disease issues and have a plan for the prevention and treatment of these issues. In the table below describe health problems and diseases livestock have had, are having or might have. A few issues have been indicated, but you must include the other specific problems or potential problems at your operation.

Health Problem/Disease	Preventative Practices	Treatment or Control (general – please list specific materials & products in Module 68)
External Parasites		
Flies		
Internal Parasites		
Predators, specify:		

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



## MODULE 67: Healthcare Cont'd

Prevention and Treatment Cont'd		Section	on 3 Cont'd
2. Are synthetic parasiticides used on this operation, including any emerg	gency use?	🗆 Yes	□ No
2a. If yes, please indicate the time interval between treatment and obtaining p	product from the an	imal.	
3. If an animal is treated with a prohibited material, what happens to the products from the animal are prevented from entering the organic mark		atment? How	v is it ensured that
	□Production analy □Other, list:	vsis	
5. What is average percentage of death or loss on this operation?			
5a. Please describe measures in place for euthanizing sick or injured	livestock that can	not be treate	d.
<ul> <li>6. What is the name and contact information for the operation's veterina</li> <li>7. Does the operation utilize other off-farm specialists (e.g. nutritionists)?</li> </ul>		i.	
All healthcare materials/products intended for use on the operation must be list vaccinations and synthetic medications. When determining the acceptability of 205.603 – "Synthetic substances allowed for use in organic livestock production periods. All Healthcare materials and products must be approved by CDA prior	°a synthetic health n." Special attentio	care product,	please refer to NOP Rule

Operator Review, Initial and Date:

Inspector Review, Initial and Date:

#### NATURAL FLAVOR PRODUCT QUESTIONNAIRE - NATIONAL ORGANIC PROGRAM USE

The USDA National Organic Program (NOP) allows the use of certain natural (non-synthetic) substances, including flavors, in products labeled as "Organic" or "Made with Organic...(specified ingredients or food groups)" providing they comply with provisions established in the USDA NOP (7 CFR Part 205).

The NOP defines Non-synthetic (natural) in 7 CFR 205.2: a substance that is derived from mineral, plant or animal matter and does not undergo a synthetic process as defined in section 6502 (21) of the Act (7 U.S.C. 6502(21)). Under the terms of the Act, "synthetic" means a substance that is formulated or manufactured by a chemical process or by a process that chemically changes a substance extracted from naturally occurring plant, animal or mineral sources, except that such term shall not apply to substances created by naturally occurring biological processes.

Non-synthetic Flavors authorized under the NOP, Section 205.605 (a)(9) must be from non-synthetic sources only and must not be produced using synthetic solvents, carrier systems or any artificial preservative. In addition, Sections 205.105 (e)(f) respectively prohibit so-called "excluded" methods (GMOs) and ionizing radiation from being used to produce or during the handling of any ingredients or products under the NOP.

FDA Definition of Natural Flavors FDA 21 CFR Part 101.22(a)(3): "... natural flavor or natural flavoring means the essential oil, oleoresin, essence or extractive, protein hydrolysate, distillate, or any product of roasting, heating or enzymolysis, which contains the flavoring constituents derived from a spice, fruit or fruit juice, vegetable or vegetable juice, edible yeast, herb, bark, bud, root, leaf or similar plant material, meat, seafood, poultry, eggs, dairy products, or fermentation products thereof, whose significant function in food is flavoring rather than nutritional. Natural flavors include [but not exclusively] the natural essences or extractives obtained from plants listed in §§182.10, 182.20, 182.40, and 182.50 and part 184 of this chapter, and the substances listed in §172.510 of this chapter."

In order to approve the use of a natural flavor used in an "organic" or "made with" product, CDA requests the information below in order to determine compliance under the terms of the NOP. CDA may request additional information as needed.

#### Identification of Natural Flavor Product (Name/code):

Include FEMA GRAS number if applicable

#### **Supplier Name and Address:**

#### Type of flavor (select one or more as necessary):

Protein Hydrolysate	Extracts	Essential oil
Compounded flavor	Oleoresin	Isolate
Distillate	Compounded WONF	Other

#### **Natural Flavor Product**

#### A. Flavor constituents

1. Do all of the flavor constituents in the natural flavor product named above meet the FDA definition of a natural flavor (see above)? Yes

No

2. Natural flavors authorized for use in NOP "organic" or "made with organic" products, in addition, must not be produced using synthetic extraction solvents. Extraction may only use natural, non-petroleum based solvents. Is/are the natural flavor constituent(s) made using NOP-suitable extraction solvents?\*

Yes N/A, no extraction solvents used.

- Please list any solvent(s) used in the production of this Natural Flavor Product:  $\triangleright$
- \* Allowed natural extraction solvents include water, natural ethanol, super-critical carbon dioxide, authentic essential oil, and natural vegetable oils. No hydrocarbon solvents, or chlorinated, or halogenated solvents may be used. Propane, hexane, and freon are examples of solvents that are prohibited.

#### B. Non-flavor constituents and other ingredients

Natural flavors authorized for use in NOP "organic" or "made with organic" products must not contain any synthetic carrier systems or any artificial preservatives, including but not limited to, propylene glycol, polyglycerol esters of fatty acids, mono- and di-glycerides, benzoic acid, polysorbate 80.

≻	Please list any carrier system(s) used in this Natural Flavor Product or attach an Ingredient Statement:
_	N/A, no carrier system(s) used.

≻	Please list any preservative(s) used in this Natural Flavor Product or attach an Ingredient Statement:
_	N/A, no preservative(s) used.

**C. Genetically Modified Organism (GMO)** products may not be used at any stage in the process of making natural flavor products for NOP goods. **Excluded methods** (= GMO use) include a variety of methods used to genetically modify organisms or influence their growth and development by means that are not possible under natural conditions or processes and are not considered compatible with organic production. Such methods include, but are not limited to, recombinant DNA technology (including gene deletion, gene doubling, introduction of a foreign gene, and changing the positions of genes when achieved by recombinant DNA technology); therefore, GMO-plant extracts may not be used nor may natural flavors be the product of GMO-yeast fermentation.

This natural flavor product, including any solvents, carriers, preservatives or other processing aids used or contained therein, was produced and handled without the use of excluded (GMO) methods?
 Yes

**D. Ionizing Radiation** is prohibited for all uses involving food preservation, pest control and pathogen control in NOP products. Other radiation uses, including food inspection, are permitted providing such use meets applicable FDA regulations, which establish limitations applicable to all (organic and non-organic) food products.

Ionizing radiation as described in 21 CFR 179.26 was not used in the processing of this natural flavor product?
 Yes
 No

Please sign this questionnaire below

Pursuant to 7CFR 205.605(a)(9) and 205.105(e)(f), I, on behalf of the supplier, hereby attest that the information provided in this form is accurate and truthful to the best of my knowledge.

Company Name:\_\_\_\_\_

Printed Name:\_\_\_\_\_\_Title:\_\_\_\_\_

Signature:\_\_\_\_\_Date\_\_\_\_



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### Process Handling – Organic System Plan Module 52: MULTI INGREDIENT PRODUCT PROFILE FORM

A separate PPF must be completed for each organic multi ingredient, processed product. A sample product label must also be submitted for each product. <u>Both the Product Profile and label must be approved by CDA before being released in the marketplace.</u>

<b>Product Name on label</b> (include Brand name and the names of all products using this formula)	
Label Claim – 100% Organic, Organic, Made with Organic	
Package Size(s) – list all	

Are any of the products/labels listed above Second Party or Private	Labels?
If yes please submit the organic certificate of the owner of the private labe	l.

No No

Yes

Is this product processed at th	e address listed in the OSP?	Yes	No No
If no, please list the following	e of the facility processing	the product:	
Facility/Company Name	Address & Phone Number	Certified Organic by Whe	om?

In the table below, list the ingredients (not including processing aids) used for this product (per batch) in descending order by weight. The ingredients listed must correspond to the ingredients statement on the product label. A copy of the organic certificate, which includes the specific ingredient(s), must be submitted for each supplier. Additional documentation may be required for nonorganic or non-agricultural ingredients. Water and salt should be listed here, but not included in the percentage calculation. List any processing aids on page 2.

Ingredient	Quantity (specify amount and unit of measure)	Certified Organic?	Supplier of Ingredient	Certifier of Supplier if applicable	CDA to Enter (%organic * qty = Adjusted amount)
		Yes No			
		Yes No			
		Yes No			
		Yes No			
		Yes No			
		Yes No			
		Yes No			
		Yes No			
		Yes No			
		Yes No			
		Yes No			
		Yes No			
		Yes No			

Total weight or volume

excluding salt & water

Adjusted Total

%Organic = Adjusted Total /Total weight or volume = Cont'd on page 2



#### Module 52: MULTI INGREDIENT PRODUCT PROFILE FORM Cont'd

#### Processing aids for product listed on previous page

\*Processing aids for products labeled as "100 % Organic" must be organic.

\*Organic certificates for all organic processing aids must be submitted. Specification sheets for nonorganic processing aids must be submitted.

Processing Aid	Quantity (specify amount and unit of measure)	Certified Organic?	Supplier of Ingredient	Certifier of Supplier if applicable
		Yes No		

#### Lot Coding:

Describe the production code or lot numbering system that will appear on each final package sold. This code must serve to trace the product and all of its components back to the original ingredients used.

Code Sample:	
Translation of Code:	

Documentation verifying non-availability or organic equivalent forms of agricultural ingredients and National List compliance for nonorganic ingredients (non-GMO, non-irradiated, and no sewage sludge use) must be provided for applicable ingredients.

#### CDA Use Only:

Formulation approved by: \_\_\_\_\_ Date: \_\_\_\_\_

Label approved by: \_\_\_\_\_ Date: \_\_\_\_\_

□ 100% Organic
Organic
□ Made With Organic
Retail
Bulk



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

## **MODULE 31: Nonorganic Livestock Production**

## Nonorganic Poultry Production

No Nonorganic Livestock Production occurs on this operation. All poultry on this operation are Organic. Skip to Module 32: Origin of Livestock				
2	Skip to Module 52. Origin of Livestock			
1.	Which types of Livestock are being raised nonorganically on this operation:			
2.	Does the operation raise the same types of Livestock organically and nonorganically?			
	a) If yes, please list the types of livestock raised both organically and nonorganically:			
	a) If yes, please list the types of investock raised both of gaincany and nonorgaincany.			
	b) If yes, how are nonorganic and organic livestock kept separate and distinguishable?			
	b) If yes, now are nonorganic and organic investock kept separate and distinguishable.			
3.	How are organic feeds and healthcare products kept separate and distinguishable from nonorganic?			
3				
4.	How are organic and nonorganic products kept separate and distinguishable during harvest/collection, processing, and packaging?			

Operator Review, Initial and Date:



## Colorado Department of Agriculture Annual Conflict of Interest Disclosure Form

Employee Name:	
Position:	
I am involved in the following activities related to certification of organic produce Reviewing applications for certification Performing on-site inspections Reviewing certification documents Evaluating qualifications for certification	ers and handlers:
<ul> <li>Making recommendations concerning certification</li> <li>Making certification decisions</li> <li>Other responsibilities related to certification (describe)</li> </ul>	

Select one of the following statements as applicable:

\_\_\_\_\_I, the undersigned employee of the Colorado Department of Agriculture ("Department"), hereby attest and confirm that I have read and understand the conflict of interest requirements set forth in section 24-18-108, C.R.S. and in 7 C.F.R. part 205.501(a)(11) that apply to the performance of my duties at the Department in connection with the certification of organic producers and handlers under the authority of the U.S. Department of Agriculture National Organic Program. I further attest and confirm that, to the best of my knowledge, I presently have no conflict of interest of the type prohibited by the above-mentioned federal and state laws, and that I have had no such conflict exists or may develop I have an affirmative duty to immediately report such conflict or possible conflict to the Program Manager for the Colorado Organic Certification Program, and to refrain from engaging in any activity related to organic certification that would be prohibited by such conflict until and unless the Program Coordinator determines that either no such conflict exists, or has been resolved in compliance with the NOP Final Rule.

\_\_\_\_\_I, the undersigned employee of the Colorado Department of Agriculture (Department"), hereby attest and confirm that I have read and understand the conflict of interest requirements set forth in section 24-18-108, C.R.S. and in 7 C.F.R. part 205.501(a)(11), attached hereto and incorporated by reference, that apply to the performance of my duties at the Department in connection with the certification of organic producers and handlers under the authority of the U.S. Department of Agriculture National Organic Program. I hereby disclose that during the last twelve (12) months since I last completed an Annual Conflict of Interest Disclosure Form the following conflict(s) of interest arose with respect to my duties under the Colorado Organic Certification (describe the conflict(s)).

The above conflict(s) was reported to Program Manager for the Colorado Department of Agriculture's Organic Program and resolved as follows:

Signature of Employee

Date

## Colorado Organic Certification Program Policy Regarding Communications with and about Applicants for Certification and Certified Operations

In accordance with 7, C.F.R. part 205.501(a)(11)(iv), all employees of the Colorado Department of Agriculture, whether directly involved in the Organic Certification Program or not, are prohibited from giving advice or providing any kind of consulting to applicants for certification or certified operations with respect to overcoming identified barriers to certification. Communications with applicants and certified operations concerning certification problems should be limited to identification and description of the deficiency or non-compliance, along with a reference to the specific section of the NOP rule or supplemental guidance from USDA that establishes the requirement that must be satisfied.

In addition, all employees must maintain strict confidentiality with respect to clients under the organic certification program and not disclose to third parties (with the exception of the Secretary or the applicable State organic program's governing State 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 §205.504(b)(5).

I have read, understand and agree to adhere to the above policy.

Signature	Date
Position	

# ADDENDUM OF PRODUCTS

## CERTIFIED TO THE USDA ORGANIC REGULATIONS 7 CFR PART 205

## HOBBS FAMILY FARM

46000 Olson Road Avondale, Colorado 81022 United States P.O. Box 411 Avondale, Colorado 81022 United States

Products:

Crops:

Basil, Beans, Beets, Calendula, Carrots, Cilantro, Corn, Cucumber, Eggplant, Garlic, Fennel, Gallairda, Leeks, Lettuce, Marigold, Melons, Okra, Onion, Radish, Peppers, Shallot, Squash, Sunflower, Tomatoes, Zinnia, Grass Hay

Processiing/Handling:

100% Organic:

Fresh Pack Produce

Cleaning and Packing Seed

Seeds: Arugula-Sputnik; Basil-Genovese; Bean-Blue Speckled, Bolita, Provider, Hopi, Hopi Black, Jade, Purple Guatemalan; Calendula-Resina, Strawberry; Carrot-Dragon, Scarlet Keeper, Scarlet Nantes; Cilantro-Sunmaster; Corn-Concho, Glass Gem; Cucumber-Homemade Pickles, Lemon, Marketmore; Eggplant-Rosa Bianca, Diamond; Fava Bean-Aquadulce; Fennel-Perfection, Fino, Finale; Gallairda-Flower; Garlic-Chamisal; Leek-King Richard; Lettuce-Bronze Arrowhead, Deer's Tongue, Emerald Fan, Jericho, New Red Fire, Nevada, Paris Island, Plato II, Waltmans; Marigold-African Flower; Melon-Delicious, Golden Honey Moon, Huerfano Bliss; Okra-Red Velvet; Onion-Colorado #6, Rossa di Milano, Valencia; Parsley-Italian Flat Leaf; Field Pea-Speckled; Pepper-Ancho Poblano, Corno di Toro, Early Jalapeno, King of the North, Pueblo Chile, Sunrise Orange; Poppy-Shirley; Pumpkin-Kakai Hulless; Squash-Hidatsa, Costata, Waltham; Sunflower-Hungarian Black, Tarahumara; Tomato-Amish Paste, Black Plum, Burrell's Special, Cosmonaut Volkov, Amana Orange, Peacevine Cherry; Watermelon-Crimson Sweet, Wheat-Trego, Zinnia-Mixed

# ADDENDUM OF PRODUCTS

## CERTIFIED TO THE USDA ORGANIC REGULATIONS 7 CFR PART 205

## NATURAL GROCERS VCNFM, INC.

4403 Table Mountain Drive Golden, Colorado 80403 United States 12612 W. Alameda Parkway Golden, Colorado 80403 United States



# CERTIFIED ORGANIC



CERTIFIED TO THE USDA ORGANIC REGULATIONS 7CFR PART 205

## FACILITY NAME.

Physical Address

City, Colorado Zip United States

## ANNIVERSARY DATE

Cert Category

mm/dd/yyyy

 $\leq$ 

Products/Category Certified

Mailing Address City, Colorado Zip United States

 $\geq$ 

CERTIFICATION NUMBER

Initial Effective Date mm/dd/yyyy

Amy Stafford Organic Certification Program Manager Date Issued

Once certified, a production or handling operation's organic certification continues in effect until surrendered or suspended or revoked.



**Colorado Department of Agriculture** 

## **Organic Crop Production Inspection Report**

Operation's Name:	Person Interviewed:				
Physical Address:	Others Present for Inspection:				
Type of Inspection:         New Applicant       Continuation	Has a Current Copy of NOP Standards?				
Inspector:	Date:	Time In: Time Out:			
Has any of the demographic or contact information changed?       Yes       No         If yes, list the changes:					
All Organic       Split       Total Acres Farmed: Owned: Rented:         Acres added this year (should be included in Total farmed):         Acres Organic (including fallow) 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:		
1 <del>7</del>		

Section 3: Seeds	NOP Rule §205.204
Verify operation consistent with Section 3 of OSP	
Describe changes/discrepancies:	
	<u></u>
Are current organic certificates available for all organic seeds purchased? 🗌 Yes 🗌 N	0
Inspect seed labels N/A	
• If non-organic seeds were used - verify reason and required documentation	
Comments:	-

Section 4: Source of Seedlings and Perennial Stock	NOP Rule §205.204	
Part A. Verify source of organic seedlings and review current organic certificate(s)	<b>N</b> /A	
Comments:		
·		
	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?		
	<u>`</u>	
<ul> <li>Part D. Verify perennial stock N/A</li> <li>If non-organic planting stock was used, then verify reason and required documentatio</li> </ul>	n	
Comments:		
<ul> <li>If newly planted verify source; if non-organic verify management compliant with §205.204(a)(4)</li> </ul>		
Comments:	Set Alexandria a sub-ender solar e solar e so	
Section 5: Soil and Crop; Fertility Management NOP Rule §205.203, 205.20	05, 205.601, 205.602	
Part A. Uverify operation consistent with this section of OSP		
Describe changes/discrepancies:		
	<u></u>	
	<u>`</u>	
<b>Review all fertility inputs</b> <b>Are all products being used listed in the OSP?</b> Yes No		
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	s No	
<ul> <li>Describe changes/discrepancies:</li> </ul>		

Part B. If compost was used, verify compliant with NOP §205.203 (c)(2)(i)(ii) and (iii)		
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).		
$\Box$ Yes $\Box$ No $\Box$ 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:		
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.		

es:

Part A. Crop Rotation Is there a crop rot	on tation program compliant with 205.205?	,	
Yes N Comments:	Io 🗌 N/A		
F-I-002	Crop Inspection Report	Revision A	

Part B. Weed Management – NOP Rule 205.206		
Is there evidence of restricted or prohibited strategies/inputs used for weed management?		
$\Box$ Yes $\Box$ No $\Box$ N/A		
Comments:		
Part C. Pest Management – NOP Rule 205.206		
Is there evidence of restricted or prohibited strategies/inputs used for pest management?		
$\Box$ Yes $\Box$ No $\Box$ 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?		
Are all products used listed on the "Materials Review Sheet"?		
Are all products allowed for use (National List restrictions being followed?)  Yes No		
<ul> <li>Describe changes/discrepancies:</li> </ul>		

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 the operation to have listed in the OSP):	to maintain organic integrity (n/a is not acceptable for	
Is roadside spraying an issue?		
Comments:		
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:		
Any issues of concern regarding commingling or cross-contamination (e.g. parallel/split production or transitional production?		
Comments:		

Part C. 🗌 Equipment		
Describe changes/discrepancies:		
<b>Does custom harvesting occur at operation?</b> 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?		
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:		

Part F. Storage	
Describe changes/discrepancies:	
Any prohibited materials stored in or near organic crop storage? Use 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?	
$\Box$ Yes $\Box$ No $\Box$ 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?	
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?		
Comments:		
Other Comments:		

Crop Inspection Report

#### 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 notes what was collected, or what clarification was provide.

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

Issue	Response

Recommended Sampling	NOP §205.402, 205.403
<ul> <li>None Samples Obtained</li> <li>Number of samples taken</li></ul>	Soil Other
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?
Do the labels appear to meet §205.300? Yes No
Describe changes/discrepancies:

Crop Inspection Report

Revision A Page 9 of 12 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.

<u>Please remember</u> 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: I. Page: Change: 2. Page: Change: 3. Page: Change: 4. Page: Change: 5. Page: Change: 6. Page: Change: 7. Page: Change: Comments:

#### 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.\_\_\_\_\_

Comments:

5.

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	

Other	
	2
	-
×	-
	-
	3

F-I-002 4/8/2015 Crop Inspection Report

Revision A Page **11** of **12** 

## \*\*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.

Representati	ve of Operation Signatu	re Date
I	nspector Signature	Date
Attachments:	Farm Questionna Field Maps Complete Field D Other (specify)	
Pre- Inspection Time	hour(s)	Driving Time hour(s)
Inspection Time	hours(s)	
Inspection Narrative Write-up Time	hour(s)	Mileage

# OPERATION ORGANIC CROP INSPECTION

Inspector Colorado Department of Agriculture Inspection Date:

## CROP:

#### **GENERAL AND FARM PLAN INFORMATION**

#### HISTORY AND ELIGIBILITY

#### **SEEDS**

#### SEEDLINGS AND PERENNIAL STOCK

## SOIL AND CROP; FERTILITY MANAGEMENT

## **CROP MANAGEMENT**

#### MAINTENANCE OF ORGANIC INTEGRITY

# **RECORD KEEPING SYSTEM**

# **ON-FARM HANDLER ADDENDUM (IF NEEDED):**

# **COMPANY OVERVIEW**

# **CLEANING/SANITATION**

# PACKING, PROCESSING

# POST HARVEST MATERIALS

# WATER

#### SHIPPING/STORAGE CONTAINERS

#### **STORAGE**

## **PEST MANAGEMENT**

# QUALITY ASSURANCE

F-I-016 5/23/2015 Crop Narrative Template

Revision A Page 1 of 2

# **BOTH CROP (AND HANDLER ADDENDUM):**

## AUDIT TRAIL

# **RECOMMENDED SAMPLING**

#### **OTHER CONSIDERATIONS**

#### SUMMARY

(Each issue/area of concern listed here should be accompanied by the NOP Rule that corresponds to it.

For example: 1. Documentation for manure requirements 205.203(c)(2)(i)(ii)(iii)

Attachment #	Document *
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	

#### LIST OF ATTACHMENTS

\* Each document should be numbered and attached to the narrative in the order they are listed here.

**Company:** 

# **Reviewer:**

Date of Initial Review: Date Review Finalized:			Finalized:	
PAGE	ISSUE OF CONCERN/ INCOMPLETE	REVIEWER or INSPECTOR	COMMUNICATION	REQUESTED INFORMATION AND RESOLUTION
(OSP)	(Clarification? Incomplete?)	(Issue handled before or at inspection?)	(email, during inspection, date due for items prior to inspection)	(specific notification to operation, and response received, specific request to inspector)
Previous Year – conditions to cert. or outstanding NONC?				

Organic Inspection Attachment Log

Attachment File Name

Description



#### Colorado Department of Agriculture

# **Organic Inspection Report Cover Sheet**

Operation's Name:	Person Interviewed:	
Physical Address:	Others Present for Inspection:	
Type of Inspection: □ New Applicant □ Continuation	Has a Current Copy of NOP Standards?	
Inspector:	Date: Time	e In: e Out:

#### **General Questions**

Does the operation have a complete copy of their current Organic System Plan?

□Yes □ No (if No, please explain)

Did you observe any obvious health and/or safety violations? □Yes □No (if Yes, Please Explain in Exit Interview Section)

Are any sections of the operation not fully under the care and control of the operation requesting organic certification? (Are any fields farmed by someone other than the operation? Are crops/products/ingredients held or stored at a rented facility? Etc.)

 □Yes
 □No (If Yes, Please Explain in the Exit Interview Section)

Were any portions of the operation *not* visited during the inspection? **UYes D** No (If Yes, please explain) 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 notes what was collected, or what clarification was provide.

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

Issue	Response

NOP RULE § 205.103

Please use the 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?			
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? $\Box$ Yes $\Box$ No $\Box$ N/A			
Comments:			
Other Comments:			
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?			

#### **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.

<u>Please remember</u> 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.

Inspection Cover Sheet

#### 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:	

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	
Comments	
e	n.t

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.

Representative of Operation Signature

Date

Inspector Signatu	re			Date	
Attachments:		Farm Questionnaire Field Maps Complete Field Hist Other (specify)	ories		 
Pre- Inspection Time	hour(s)	Driving Time		hour(s)	
Inspection Time	_hours(s)				
Inspection Narrative Write-up Time		hour(s)	Mileage		

Organic Inspection Photo Log

Photo File Name

Description



# **Organic Field Inspector Evaluation**

In order to evaluate an inspector's job performance, please complete this form and return it to the Organic Program Manager.

Inspector	Evaluator	
Date	 Firm	
	 Inspected	

A. General Inspection Process	Needs Improvement	Good	Excellent
On time for the inspection Courteous Ability to establish rapport Prior review of OSP Knowledge of type of operation Ability to answer questions Arrived Prepared (NOP rules, notebook, camera, e Communication skills Exit Interview	tc.)		

Specific comments on any "Needs Improvement" scores.

<b>B. Understanding of Organic Standards</b> Crop/Livestock/Processing standards (circle) Certification Process	Needs Improvement	Good	Excellent	
Approved materials Audit trail				

Specific comments on any "Needs Improvement" scores.

# C. Does the inspector demonstrate general knowledge organic regulations regarding:

		Yes	No	N/A
	Seeds, Seedlings			
	Crop Rotation			
	Soil Building, Fertilization			
	Weed Management			
	Pest Management			
	Post Harvest Handling			
	Contamination Prevention			
	Livestock Feed			
	Livestock Housing			
	Livestock Health			
	Manure Management			
	Record Keeping			
	Product Tracking			
	Product Labeling			
	Sanitation		<u> </u>	<u> </u>
	Ingredients/ Processing Aids		<u> </u>	<u> </u>
			<u> </u>	<u> </u>
Split/Parallel Production				
		Needs		
D.	Inspection Report Writing	Improvement	Good	Excellent
	Completeness			
	Organization			
	Clarity			
	Accuracy			
	Proper attachments			
	Identification of non-compliance			
	Completed on time			

Specific comments on any "Needs Improvement" scores.

# E. General evaluation of inspector with suggested improvements.



Colorado Department of Agriculture

# **Organic Process/Handling Production Inspection Report**

Operation's Name:		1 Interviewed:
Physical Address:	Others Pres	sent for Inspection:
Type of Inspection:        □ New Applicant	Applicant	has a current copy of NOP Standards?
Inspector:	Date:	Time In: Time Out:
Section 1: General Information         Has any of the demographic or contact information changed?       Yes         If yes, list the changes:		
Section 2: Company Overview           Verify information listed in this section.         Orga           • Describe changes/discrepancies (if applicable):		
<ul> <li>Is all ingredient supplier information correct?</li> <li>Describe changes/discrepancies:</li> </ul>		

□ Is the operation inspected/regulated by another government agency? □ Yes □ No If yes, name of agency/agencies:			
Section 4: Labeling and Product Composition Review reports and document items relevant to orga	NOP Rule §205.105, 205.270, 205.300-203.305, 205.307-205.311 mic certification:		

Section 3: Private labeling

□ Does the company plan to custom label organic products for another company? □Yes □No

Describe changes/discrepancies (if applicable):

□ Does the company plan to contract with any other facilities to <u>produce</u>, <u>handle</u>, <u>store or label organic</u> <u>product</u>?

Describe changes/discrepancies (if applicable):

□ Verify all products listed in the section. □ All Organic □ Split Operation
Describe changes/discrepancies regarding products claiming 100% organic:      N/A     Comments:
Describe changes/discrepancies regarding products claiming organic:      N/A Comments:
Describe changes/discrepancies regarding products claiming "made with organic":      N/A Comments:
<ul> <li>Describe changes/discrepancies regarding products claiming &lt;70% organic product:</li></ul>
□ Are product labels used? □ Yes □ No Review all labels
Are all labels being used included in the label file? $\Box$ Yes $\Box$ No
Do the labels appear to meet §205.300? $\Box$ Yes $\Box$ No
Describe label changes/discrepancies (if applicable):
List labels that were added during the inspection:

Section 5: Product Ingredient Verification	IOP Rule Subpart D
<ul> <li>A. □ Verify all information in this section.</li> <li>Describe changes/discrepancies:</li></ul>	
	2
<b>Did the company have current organic certificates for all ingredients?</b>	No 🗆 N/A
Is documentation of non-organic ingredients complete? 🛛 Yes 🖾 No 🖾 N/A	
Comments:	
Section 6: Harvest and Transportation NOP Rule §205.1	03, 205.270, 205.272

□ Verify all information in this section.

Describe changes/discrepancies:

Section 7: Receiving – Incoming Organic Products

# NOP RULE §205.103, 205.270, 205.272

#### A. U Verify all information in this section.

• Describe changes/discrepancies:

Section 8: Cleaning and Sanitation	NOP §205.103, 205.270, 205.272
Use Materials Review Packet to verify cleaning labels	
□ Are all cleaning /sanitizing labels included in the packet? □ Yes □ M	No
For products not found on 205.605 or 205.606, is a clean water rinse document	ted? 🗆 Yes 🗆 No
Do records of cleaning/sanitation activities document all procedures? $\Box$	Yes No N/A
Comments:	
Is Chlorine (bleach), sodium hypochlorite, or calcium hypochlorite being used	at the facility?
$\Box$ Yes $\Box$ No (if no, move to section 9)	
What is the chlorine used for?  food handling facility and equipment	direct food contact
Food Handling Facility/ Equipment	
Verify the maximum rate listed on the label for purpose used?	
Does the label require a rinse? $\Box$ Yes $\Box$ No	
Direct Food Contact	
What rate is the operation using?	
Does the company rinse with potable water after use? $\Box$ Yes $\Box$ No Is it do	cumented?  Yes No
Does the operation monitor the chlorine level of the final rinse water (the point	t at which the water last
contacts the organic product)?	? 🗆 Yes 🗆 No
Describe changes/discrepancies within this section:	
	H = Coop 400, 005 070, 005 070
	JLE §205.103, 205.270, 205.272
A. U Verify all information in this section.	
Describe changes/discrepancies:	

Section 10: Post Harvest Materials	NOP Rule §, 205.272, 205.601
□ Verify all information in this section.	
Describe changes/discrepancies within this section:	
Are all post-harvest products listed and labels provided?  Yes  N	lo □ N/A
Comments:	
Are these materials on the "Materials Review Sheet"?  Yes No	
Comments:	F
Section 11: Processing Aids NOF	P Rule §, 205.272, 205.605-205.606
□Verify all information in this section.	
Describe changes/discrepancies within this section:	
Are all processing aids listed and labels provided? $\Box$ Yes $\Box$ No $\Box$ N	N/A
Comments:	

Are the processing aids certified organic? 
Yes (if yes, attach organic cert)
No N/A
Are these materials on §205.605?
Yes No N/A
Comments:

Section 12: Water	NOP Rule §, 205.103, 205.272, 205.601, 205.605
□ Verify all information in this section.	
Describe changes/discrepancies within this section:	
Are all boiler water additives listed and labels pro	wided? 🗆 Yes 🗌 No 🗌 N/A
Comments:	
c	
Are these materials on the National List (205.605	or 205.606)?  Yes No N/A
Comments:	

## Section 13: Storage

□ Verify all information in this section.

• Describe changes/discrepancies:

Section 14: Packing, Storage Containers, and Shipping Containers

NOP RULE §205.270, 205.272

NOP RULE §205.270, 205.272

<ul> <li>Verify all information in this section.</li> <li>Describe changes/discrepancies:</li> </ul>				
Were all labels for all products produced provided?	🗆 Yes	□ No	□ N/A	

Section 15: Shipping – Outgoing Organic Products	NOP RULE $\$205.103, 205.270, 205.272$
□ Verify all information in this section.	
Describe changes/discrepancies:	
Comments:	

Section	16: Pe	st Mai	nade	ment

	-				2.5	
Verify	all	infor	mation	in	this	section.

Describe changes/discrepancies:

Are exclusion/sanitation practices used	$\square$ Yes	🗆 No
---	---------------	------

Are mechanical methods being used? Yes No

Allowed materials: Are all pest control products used listed and labels included? 
Yes No

□ N/A

Comments:

NOP RULE § 205.271

Are materials not on the national list being used?  Yes  No Does the company have approval from CDA to use items not on the nat	ional list?
$\Box$ Yes $\Box$ No $\Box$ N/A	ional list.
Comments:	
Were any pest infestations noted?  Yes No N/A If yes, what type of pest(s) were observed?	
What pest evidence did you observe? $\Box$ Actual pest $\Box$ Feces $\Box$ Other	
Comments:	
tion 17: Product Flow	NOP RULE § 205.270, 205.2

□ Verify all information in this section.

• Describe changes/discrepancies:

Is the schematic flow chart complete and accurate? DYes DNO N/A

Comments:

Is the facility map complete and accurate? DYes DNo DN/A

Comments:

Section 18: Quality Assurance

NOP RULE §205.103, 205.270, 205.272

#### □ Verify all information in this section.

• Describe changes/discrepancies:

Comments:

٦

Section 19: 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 notes what was collected, or what clarification was provide.

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

Issue	Response
	·

#### Product Audit Results

#### NOP RULE § 205.103

Please use the Traceability Audit Form and the Mass In and Out Balance Form to conduct your audits. Conduct both audits using an ingredient/finished product of your choice. It is preferred that you use 2 different products/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

purchased correlates with the amount of product sold?  $\Box$  Yes  $\Box$  No  $\Box$  N/A

Comments:

Other Comments:

#### Samples

#### NOP §205.402, 205.403

□ None	□ Samples Obtained
--------	--------------------

- Number of samples taken \_\_\_\_\_\_
- Sample Type: □ Final Product □ Ingredient □ Other\_\_\_\_\_
- Reason for sample(s) obtained:

What type of receipt was provided?

Changes made to the OSP during the inspection				
List changes made	e 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:				

# Exit Interview Instructions §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.

<u>Please remember</u> 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.

#### Additional Documents Need

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

Issues of Concern (Cite the Standard)	NOP §205.403(d)
List Possible Areas/Issues of Concern:	
1	<u></u>
	<u></u>
2	
3	
4	
5	

those.

5			
Comments			

Othe	
2	

\*\*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.

**Representative of Operation Signature** 

Date

Ins	spector Signature	Date
Attachments:	Facility Flow Ch Facility Map Product Profiles Other (specify)	and/or Product Labels
Pre- Inspection Time	hour(s)	Driving Time hour(s)
Inspection Time	hours(s)	
Inspection Narrative Write-up Time	hour(s)	Mileage



**Process/Handler Traceability Form** 

Company	Date	

Perform a traceability test by choosing a specific lot of finished product. The purpose of a traceability audit is to verify that the operation is keeping sufficient documentation to comply with the NOP Rules for the lot of product being produced.

If this is an initial certification, trace a product back as completely as possible using documents available from the licensee. Or you may trace a conventional product. Note any discrepancies or lack of lrms verifying organic procedures and transactions.

Listed in the Link column is what connects the documents together. (Is it the date? Lot #? Batch #?) This may/can change within this traceability audit.

Question	Document Name	Link(s)	Additional Information
1. Does the producer have a		· · · ·	
label on the finished product that			
states certified by the CDA?			
2. Are there shipping/sales			
records?			
3. Does the producer have			
facility management			
documentation?			
4. Is there storage and			
packaging information			
available?			
5. Does the producer have			
processing information?			
6. Is there receiving – incoming			
product information available?			
7. Does the producer have			
product ingredient verification			
information?			

Product and lot #\_\_\_\_\_

1. Is the system functional, current and accessible?

2. Is there a lot numbering/date coding system in place? Is it found on all the documents? (If no, list as an area of concern) Give an example of a lot number and explain the lot code.

PH Traceability Form



## Colorado Department of Agriculture

## **Organic Poultry Inspection Report**

Operation's Name:	Person Interviewed:
Physical Address:	Others Present for Inspection:
Type of Inspection:       New Applicant         Continuation       Follow-up	Has Current Copy of NOP Standards?
Inspector:	Date: Time In: Time Out:

Section 1: General Information
Has any of the demographic or contact information changed? Yes No
If yes, list the changes:
Has a Crops OSP been provided to verify pasture is managed as a crop per 205.602 – 205.606?
Yes No Comments:
Conditions from last inspection N/A
List condition(s) and how operation has addressed them:

Section 2: Organic Poultry Flow Chart	Section	2: C	organic	Poultry	Flow	Chart
---------------------------------------	---------	------	---------	---------	------	-------

Verify that flow chart describes each stage of production and final destination of animals

Describe changes/discrepancies:

Section 3: Organic Poultry Operation Profile

Verify operation consistent with this section.

Describe changes/discrepancies:

#### Section 4: Source of Animals

#### Verify poultry purchasing information.

Describe changes/discrepancies:

Verify operation has adequately addressed management of day old chicks.

Describe changes/discrepancies:

Section 5: Poultry Feed Rations
Verify operation is consistent with feed ration table.
Describe changes/discrepancies:
×
Are organic certificates included for all feed that is purchased? Yes No N/A
Verify operation consistent with on-farm feed processing in this section. N/A
Describe changes/discrepancies:
Verify operation consistent with feed storage table.
Describe changes/discrepancies:
Section 6: Livestock Materials Inventory
Verify operation consistent with this section. N/A

Verify operation consistent with this section. N/A
Review all materials
Are all products being used listed in the OSP?  Yes  No
Are all products used listed on the "Materials Review Sheet"?
• Are all products allowed for use (National List restrictions being followed?)
Describe changes/discrepancies:
7

Section 7: Livestock Living Conditions & Pasture	NOP Rule 205.239
Verify operation consistent with this section	
Describe changes/discrepancies:	
	5.05
☐ Is shelter consistent with what is described in this section? ☐ Yes ☐ No	
Describe changes/discrepancies:	
·	
☐ Verify sanitizers/cleaning products used in the housing area ☐ N/A	
Review Labels	
Are all products being used listed in the OSP?  Yes No	
Are all products used listed on the "Materials Review Sheet"?	
Are all products allowed for use (National List restrictions being followed)?	No
Describe changes/discrepancies:	
Verify bedding	
If edible, is it organic? Yes No N/A	
Review organic certificate(s) for edible bedding	
Describe changes/discrepancies:	
Section 8: Health Management	
<b>Review all conditions and products used (vaccinations, antibiotics, parasiticides)</b>	N/A
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?)	No
Comments:	
Verify operation consistent with remaining section. (Does operation have adequate culled or loss of animals?)	records on

Comments:

Section 9: Slaughter
Verify operation consistent with this section.
Describe changes/discrepancies:

Section 10: Egg Handling & Packing
Verify operation is consistent with this section.
Describe changes/discrepancies:
· · · · · · · · · · · · · · · · · · ·
Review sanitizer/wash label(s)for egg washing N/A
Comments:
Does operation need a Process Handling Certificate? Yes No
Comments:

#### Section 11: Recordkeeping

Verify operation is consistent with this section.

Is the animal identification system adequate to ensure separation of animals, if needed?

Yes No N/A

Comments:

Describe changes/discrepancies:

#### 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 notes what was collected, or what clarification was provide.

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

Issue	Response
	·

Recommended Feed Sampling	NOP §205.402, 205.403
<ul> <li>None Samples Obtained</li> <li>Number of feed samples taken</li> <li>Sample Type: grain forage pasture Other</li> <li>Reason for sample(s) obtained:</li> <li>What type of receipt was provided?</li> </ul>	
Animal Audit	NOB \$205 102
Animal Audit	NOP §205.103
Select several animals of each type and stage of growth for auditing.	NOP §205.103
	NOP §205.103
Select several animals of each type and stage of growth for auditing.	NOP §205.103

Are records sufficient to document the animal received a 100% organic diet?  Yes No
Is animal identification appropriate for the type of animal and sufficient to track animals?
Yes No Comments
Are animal treatment records sufficient to document all vaccines and other medications applied to the animals?  Yes No N/A Comments
Were records sufficient to document when and how animals left the facility? Yes No N/A
Comments
If no, explain missing components.
Are records sufficient to document the amount of animal product (milk/eggs) produced equals the amount sold?
Comments:
Results of Audit:
(Attach copies of all audit control documents gathered during sample audit.)

#### **Exit Interview Instructions**

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.

<u>Please remember</u> 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 m	hade by the applicant: None			
1. Page: 2. Page: 3. Page:	Change:Change:Change:			
4. Page: 5. Page:	Change:			
Comments:	_ Change	-		
2		-11		

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
Comments:
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
2	
3	
3	
1	
4	
5	
5	
6	iö
Comments	

Other	

#### \*\*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.

Representative of Operation Signature Inspector Signature		re Date
		Date
Attachments:	Pasture Plan         Organic Certifica         Labels (vaccine, 1)         Other (specify)	ites medicines, supplement)
Pre- Inspection Time	hour(s)	
Inspection Time	hour(s)	Drive Time hour(s)
Inspection Narrative Write-up Time	hour(s)	Mileage

## COLORADO DEPARTMENT OF AGRICULTURE

**Division of Plant Industry** 

CDA

305 Interlocken Parkway, Broomfield, Colorado, 80021

Tel: (303) 869-9050 Fax: (303) 466-2860 www.colorado.gov/ag/dpi ORGANIC RESIDUE ANALYSIS AND CHAIN OF CUSTODY

Sample ID Number:		Collection Date	:		Certifying Agent/State/Lab:	CDA / CO / ICS
Commodity Information			Collection Site Info	ormation		
Commodity:		a di	Operation Name:			
Claim: 100% Organic	Organic		Location:	4		
Made with Organic	Other	1	Facility Type: Pro	ducer	Distribution Center	Field
Origin: Domestic Import	ed Unknown		War	ehouse	Packing Shed	Other
If imported, country of origin:			Grower Name:			
			Packing Company	:		
Shipping Information			Distributor/Other:	2		2
Collector's Name:			Lot number or any	other identific	ation number on packaging	j:
Signature:						50 g <del></del>
Ship Date:						
Sample Receipt in Laboratory						
Sample Collected by:						
(Select or Print Name)		28			- 58	20
Signature:		t <u></u>			<u></u>	
Received by (initials):	Date received:	Ba	sed on condition (	upon arrival, wi	ill sample be analyzed? Ye	s No 🗌
Additional Comments:				apon ann a, m	in campio se analyzea. Te	
COMPOUND	RESULTS	ABORATORY A ME	NALYSIS SECTIO THOD	<u>N</u> MDL	CONFI	RMATION
			1.3 -			
		50	19		52 (f)	
Remarks:					<b>L</b>	
Analysis Conducted by: Print N	lame		Signature:		Dat	e:
Analysis Review/Approval by: Print N	lame		Signature:		Dat	e:
			F CUSTODY	<u>2010/00/00</u>		
RELINQUISHED	RECEIVED B	Y	DATE	TIME	REASON FOR SAM	PLE TRANSFER
	2					
		Organic Program	Laboratory	Operation		

Residue Analysis and Chain of Custody

## COLORADO DEPARTMENT OF AGRICULTURE

**Division of Plant Industry** 

CDA

305 Interlocken Parkway, Broomfield, Colorado, 80021

Tel: (303) 869-9050 Fax: (303) 466-2860 www.colorado.gov/ag/dpi ORGANIC RESIDUE ANALYSIS AND CHAIN OF CUSTODY

Sample ID Number:	Collection Date:	C	ertifying Agent/State/Lab: CDA / CO / ICS
Commodity Information	Coll	ection Site Information	
Commodity:	Ope	ration Name:	
Claim: 100% Organic Organ		ation:	
Made with Organic Other	Faci	ility Type: Producer D	istribution Center Field
Origin: Domestic Imported I	Jnknown	Warehouse	Packing Shed Other
If imported, country of origin:	Gro	wer Name:	
	Pac	king Company:	
Shipping Information	Dist	ributor/Other:	
Collector's Name:	Lot	number or any other identification	tion number on packaging:
Signature:		, <b>,</b>	
Ship Date:			
Sample Receipt in Laboratory			
Sample Collected by:			
(Select or Print Name)			
Signature:			
Received by (initials): Date rec	eived: Based	on condition upon arrival, will	sample be analyzed? Yes No
Additional Comments:			
COMPOUND R	LABORATORY ANAI ESULTS METHO		CONFIRMATION
Remarks:	L	I	
Analysis Conducted by: Print Name		Signature:	Date:
Analysis			
Review/Approval by: Print Name		Signature:	Date:
RELINQUISHED	CHAIN OF CL		REASON FOR SAMPLE TRANSFER
	RECEIVED BY	DATE TIME	



## **Crop Traceability Form**

Company	 Date	

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.

## Сгор:

Question	Document Name	Link	Additional Information
1. Does the producer have			
organic seed /seedlings or non-			
organic seed documentation and			
organic certificates?			
2. Does the producer have input			
(fertility, pest control, etc)			
records?			
3. Are there planting and			
cultivating records available?			
4. Does the producer have			
harvest records?			
5. Do storage records show			
field numbers, date of harvest,			
and amount harvested?			
6. Does the producer have			
shipping records?			
7. Does the producer have sales			
records?			

Do you have copies of all records?

1. Is the system functional, current and accessible?

### Types of records that could be used:

#### 1. Sales Records:

- A. Includes:
- Invoices or receipts  $\rightarrow$
- Sales logs of summaries  $\rightarrow$
- Transaction Certificates  $\rightarrow$
- Bills of Lading
- Farmer's Market Worksheets
- Weigh/scale tickets

#### 2. Shipping Records

- A. Includes:
- Settlement Sheet
- Clean Truck Affidavits

#### 3. Storage Records

- A. Includes: (What a storage record SHOULD show; specifically bin storage)
- Storage unit #
- Capacity of storage unit
- Type of crop or products stored
- Date of stored crop
- Field # where harvested
- Date and quantity in (often an estimate)
- Date and quantity out

(Clean out logs, map/ input of pest control)

#### 4. Harvest Records

- A. Must show:
- Type of crop/product
- Field #
- Date harvested
- Yield amounts

Optional:

- equipment clean-out documentation
- Harvest records sometimes combined with storage
- Activity logs, crop storage
- Pocket notebooks

#### 5. Input Records (Activity Log)

A. Must show:

- crops and/or variety planted and dates
- Inputs used, dates and rates of application
- Compost and manure management and paperwork
- Purchase records (receipts and labels of products)

#### 6. Planting/ Seed Records

A. Includes:

- Seed Certificates showing Certified Organic seed
- Seed packets

F-I-025 5/23/2015

- Map of land/ acreage, planting area
- Activity log of planting dates
- B. What they-sheedling information, invoices
- date of sale Documentation of commercial non-availability
- product sold
- name of buyer
- lot #

#### How the inspector uses Sale Records:

- Determine if the products can be tracked
- back to the field(s) of production.
- Determine that <u>quantities</u> sold as organic are consistent with the previous year's organic crop yields.
- Verify that lot numbers are used appropriately
- Verify that products are properly designated "certified organic"

#### How the inspector uses Storage Records:

- Determine if the products can be tracked back to the field(s) of production.

- Verify pest management

- Verify that storage units are physically numbered and that the numbers correspond to the storage records

- Verify proper clean out and that no commingling occurs for split operations.

#### How the inspector uses Harvest Records:

- Determine if the organic products can be tracked back to the field(s) of operation

- Determine if yields are realistic for the operationVerify that crops harvested are consistent with
- crop plan. Verify no commingling has occurred
- Verify no commingling has occurred.

- These records often show equipment cleaning procedures and dates cleaned or the use of custom harvesting.

#### How the inspector uses Input Records:

- Confirm inputs and production practices. (Look for receipts)

- Report any use of prohibited or questionable substances

- Assess if input records and other audit trail documents are well organized and accessible.

Crop Traceability Form

# How the inspector uses Planting/Seed Records: - Verify that seed, seedling information is organic

or commercially unavailable in organic form

- Verify when crops were planted (planting dates)



#### **Colorado Department of Agriculture**

## **Organic Livestock Inspection Report**

Operation's Name:		Person Interviewed:	
Physical Address:	Oth	ers Present for Inspec	tion:
Type of Inspection:       New Applicant         Continuation       Follow-up		Has Current Copy	of NOP Standards
Inspector:	Date	e:	Time In: Time Out:
General and Farm Plan Information Has any of the demographic or contact information If yes, list the changes:	e is n	anaged as a crop per	No

# 

Verify operation consistent with Part A (slaughter stock) of this section.
Describe changes/discrepancies:
☐ Verify operation consistent with Part B (dairy stock) of this section.
Describe changes/discrepancies:
Verify operation consistent with Part C (breeder stock) of this section.
Describe changes/discrepancies:
• Describe changes/discrepancies.
Ruminants (Cattle, sheep, goats, etc) go to Ruminant Addendum now and then skip to Section 3.
Section 2: Feed NOP Rule 205.237
Verify operation consistent with Part A (feed) of this section.
Describe changes/discrepancies:
Are organic certificates included for all feed that is purchased?
Verify operation consistent with Part B (feed supplements and additives) of this section.
Review all feed supplements and additives
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:

Section 1: Livestock Origin Information

NOP Rule 205.236

Verify operation consistent with Part C (feed storage) of this section.
Describe changes/discrepancies:
Verify operation consistent with Part D (water) of this section.
Describe changes/discrepancies:
Water test provided? Yes No

Section 3: Livestock Health Care Practice Standard	NOP Rule 205.238
<b>Verify operation consistent with Part A of this section.</b>	
Review all vaccines or medications used	
Are all products being used listed in the OSP?  Yes No	
Are all products used listed on the "Materials Review Sheet"?	
Are all products allowed for use (National List restrictions being followed?)	s 🗌 No
Describe changes/discrepancies:	
	2
Is vaccination information complete? Yes No N/A	
Comments:	
	<u>0</u> 4
Are labels for all vaccines and other medications provided? Yes No N/A Comments:	
Verify operation consistent with Part B (fly control) of this section.	n <sup>6</sup> .
Comments:	
□ Verify operation consistent with Part C (parasite control) of this section.	
Comments:	
□ Verify operation consistent with Part D (predator control) of this section.	
Comments:	
Review all products used	

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

Livestock Living Conditions	NOP Rule 205.239
<b>Verify operation consistent with this section of OSP.</b>	
Describe changes/discrepancies:	
Are manure management records sufficient? Yes No N/A Comments:	
Are milk production management records sufficient? Yes No N/A Comments:	

#### Transportation

Verify operation consistent with this section.

Describe changes/discrepancies:

#### Record Keeping System

Verify operation consistent with this section.

If not describe changes/discrepancies:

NOP §205.103

If not describe changes/discrepancies:
· · · · · · · · · · · · · · · · · · ·
Animal Audit NOP §205.103
Select several animals of each type and stage of growth for auditing.
Which animals were audited:
Were organic certificates available to document purchased animals were organic?         Yes       No         N/A       Comments
Are records sufficient to document the animal received a 100% organic diet? Yes No
Is animal identification appropriate for the type of animal and sufficient to track animals?
Are animal treatment records sufficient to document all vaccines and other medications applied to the animals? Yes No N/A Comments
Were records sufficient to document when and how animals left the facility?
Comments
Do records sufficient to document all production (young stock, meat, milk, fiber)?
Were all documents complete and accessible? Yes No N/A If no, explain missing components.

Marketing

Verify operation consistent with this section.

esults of Audit						
5						
5 <u></u>						
1 <u>7</u>						
8 <u>0</u>						
Attach copies of a	all audit contro	ol documents	gathered du	ring sample au	dit.)	

Recommended Sampling	NOP §205.402, 205.403
None Samples Obtained	
Number of feed samples taken	
Sample Type: grain forage pasture Other	
Reason for sample(s) obtained:	
2	
What type of receipt was provided?	

Changes made to the Livestock 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:				

#### Additional Issues

Describe any additional issues/changes/discrepancies not covered by the inspection, or of importance, that may affect the operation's ability to comply with the standards, or any potential non-compliances (cite the section(s) of the NOP standards that are relevant):

#### \*\*If new applicant complete a full narrative in addition to the inspection form\*\* \*\*Complete all exit interview information in the Crop 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.

Representat	ive of Operation Signatu	re	Date		
	nspector Signature		Date		
Attachments:	Pasture Plan Organic Certific Labels (vaccine, Other (specify)		plement)		
Inspection Time	hour(s)	Drive Time	h	our(s)	
Inspection Narrative Write-up Time	hour(s)	Mileage			

## **Reviewing an Organic Plan**

Here are some helpful questions to keep in mind when preparing for an organic inspection. A Pre- inspection Review is conducted in order for an inspector to understand what the applicant is saying about his/her operation. Completeness of answers and identification of issues (Organic Control Points) will need to be identified before the inspection and explored further during the inspection if needed.

If you need assistance with this OSP or feel you are not qualified to conduct this inspection, please contact us at the office. We are more than happy to provide more training, accompany you on the inspection or/ and assist you in any way we can!

1. Has the operation been previously certified organic or is this a first time application for organic certification?

2. Are there any conditions or reminders that need to be addressed? If yes, what still needs to be completed? (These can be found on the "last letter of correspondence" in the last section of the OSP file.)

3. What does the applicant want certified? Are the finished product labels for the products, if applicable, found in the plan? If not, which are missing?

4. What missing documents need to be gathered at time of inspection?

5. What potential issues of contamination have you, the inspector, flagged?

F-I-011

Reviewing an Organic Plan

Revision A

4/20/2015

6. What potential issues of commingling have you, the inspector, identified?

7. What possible violations to the standard have you identified? Site citation.

PLEASE NOTE: Keep visits brief, businesslike, and as professional as possible. Addressing issues beyond the scope of an organic inspection (e.g. discussing ways to improve the operation, or asking about chemigation permits) adds to the time of the inspection and is not part of the inspector's duties. We have received feedback from our operations regarding these issues in the past.

Reviewing an Organic Plan

Revision A



# Colorado Department of Agriculture **EXIT INTERVIEW FORM**

Inspector Name:

Entity Name:

Summarize inspection findings indicating a change to the organic system plan and potential noncompliances/continuous improvement points:

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.

Inspected Party Signature

By signing below, I, the Inspector, attest that the above Exit Interview items are a result of by observations during on-site inspection and/or application review of the above Inspected Party.

Inspector Signature

Date

Date

Exit Interview Form



Colorado Department of Agriculture

## **Organic Livestock Ruminant Addendum Report**

NOP Rule 205.237
For Ruminant producers:
<ul> <li>Does the OSP describe the total feed ration for each type and class of animal? ☐ Yes ☐ No Does this include:</li> <li>(i) All feed produced on-farm? ☐ Yes ☐ No (verify this is the same as in crop OSP)</li> <li>(ii) All feed purchased from off-farm sources? ☐ Yes ☐ No</li> <li>(iii) The percentage of each feed type, including pasture, in the total ration? ☐ Yes ☐ No</li> <li>(iv) A list of all feed supplements and additives? ☐ Yes ☐ No</li> </ul>
Does the amount of feed produced and purchased meet the ration requirements? 🗌 Yes 🗌 No
Comments:
and class of animal?       Yes       No       Comments:
Has the producer provided the method for calculating dry matter demand and dry matter intake? Yes No What method(s) do they use?
Comments:
Does the producer define a grazing season of at least 120 days? Yes No How many days is the grazing season? Is it continuous or split? Comments:
During the grazing season is each class of animal provided not more than an average of 70 percent of a ruminant's dry matter demand from dry matter fed?
List the actual percentage of dry matter intake for each class of animals (list both the producers calculated amount and your verified amount):
ä

Co	m	m	en	ts	•
~					٠

Are records kept to document when ruminant animals are denied pasture in accordance with §205.239(b)(1) through (8), and §205.239(c)(1) through (3)? Yes No Comments:

Are records kept to document when ruminant animals are denied pasture in accordance with §205.239(b)(1) through (8), and §205.239(c)(1) through (3) 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? Yes No Comments:

Livestock Living Conditions Ruminants	NOP Rule 205.239
Does the operation adequately describe their access to pasture?	Yes No
Records used:	
Comments:	
Were the animals subject to temporary confinement?	

Pasture Plan	NOP Rule 205.240
Does the pasture plan include: (These could also be addressed in the	Crop Plan)
Types of pasture used to ensure that the feed requirements of 205.237 are b	being met?
Yes No	
Comments:	
Detailed maps that includes location/source of shade, location/source of wa          Yes       No         Comments:	ter?
<b>Description of the grazing season relative to the operation's regional location</b> Yes No	on?
Comments:	

Yes $\square$ No	pastures, including maps giving each pasture its own identification?
nments:	
aion control and	materian of material methods and vincorian array martines?
	protection of natural wetlands and riparian areas practices?
Yes No	

SIGN IN SHEET FOR ATTENDANCE AT ORGANIC INSPECTOR TRAINING October 6, 2016 Treated Lumber-Draft Guidance NOP 5036; Material Review-Interim Instruction NOP 3012; OSP Module System Review Held at: COLORADO DEPARTMENT OF AGRICULTURE, DIVISION OF PLANT INDUSTRY 305 INTERLOCKEN PARKWAY, BROOMFIELD, CO 80021 (303) 869-9050		
NAME (Print)	SIGNATURE	

NAME (Print)	SIGNATURE



## **Organic System Plan Review Report**

Operation's Name:	
Physical Address:    City:   Zip (	Code:
Type of operation:          Crop Producer          Processing/Handling	<ul> <li>Livestock Producer</li> <li>Wild Crop Harvesting</li> </ul>
<b>Type of Certification requested:</b> Initial	ontinuation Other:
Reviewer:	Date:
· · · · · · · · · · · · · · · · · · ·	
Prior Conditions	
Conditions from last certification N/A List condition(s) and how operation has addresse	d them:
Was condition(s) addressed satisfactorily?  Yes	🗌 No
Issued Identified	
Certification issues identified during the OSP review	v or inspection:

Sample Results
Sample results reviewed N/A
Sample types(s):
Results:

Action Taken
Certification granted Date of Decision:
Certification granted with conditions Date of Decision:
Date of required correction:
Notice of noncompliance Date of Decision: Reason for noncompliance:
Date of required response:
Notice of denial of certification Date of Decision:
Reason for denial:
Date mediation request must be received:
Date appeal must be filed by:
Notice of proposed suspension Date of Decision:
Reason for proposed suspension:
Date of proposed suspension:
Date mediation request must be received:
Date appeal must be filed by:

Notice of proposed revocation Date of Decision: Reason for proposed revocation:
Date of proposed revocation:
Date mediation request must be received:
Date appeal must be filed by:

## Additional Comments

Comments:

Signature of Reviewer



**Mass In and Out Balance Form** 

Company	 Date	

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 \_\_\_\_\_

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

- 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.

## HINTS and EXAMPLE

#### 1. Define period:

- a. Example: At time of inspection, the operation may have 50 lbs of flour on hand from the original 100 that was purchased; audit the 50 that has been used.
- b. Example: You can choose to audit the flour from the date of purchase to current date.
- c. Example: Choose to audit all flour from a specified time period before the inspection. Inspection date June 1<sup>st</sup>, you audit all flour in April and May that was used.

\* The idea is to find a place to start from, preferably from "0". Maybe ask for the most recent incoming product invoice for the flour that way there is a specified amount.

#### 2. Define unit of measure:

d. Cups, ounces, gallons, etc...

#### 2. Obtain beginning and ending inventories:

- a. Example: look at most recent invoice to see what was ordered for the beginning inventory and then view current inventory for ending.
- b. Example: Find where the ending or beginning inventory is at "0". This will give a frame of reference.
- c. Example: If looking at months or time period view inventory records for those months.

#### 3. Add in purchases of product:

a. Make sure no more product were ordered than was specified. This is just a cautionary step.

#### 4. How much of the ingredient has been sold?

**a.** Obtain sales records to show how much of the finished products have been sold with the ingredient in them, for the amount listed in #1.

#### 5. What is the expected yield?

**a.** When looking at Batch or Recipe Sheets, calculate the amount of flour that should be used for that time period or amount listed in #1. If the 50lbs of flour can yield 40 loaves of bread according to the batch/recipe sheet, that is the expected yield.

**Summary Statement :** This is a word explanation of what is going on.

For example: "In the month of September, the sales of finished products with flour compared to production was 250 lbs more than was sold. Thus information is lacking in regards to inventory records for the month.

"In the month of September, the sales of finished products containing flour compared to production were equal at 250lbs. The audit information is complete and is representative of the operation."

SIGN IN SHEET FOR ATTENDANCE AT ORGANIC INSPECTOR TRAINING DATE OF TRAINING TRAINING TOPIC Held at: COLORADO DEPARTMENT OF AGRICULTURE, DIVISION OF PLANT INDUSTRY 305 INTERLOCKEN PARKWAY, BROOMFIELD, CO 80021 (303) 869-9050		
NAME (Print)	SIGNATURE	

NAME (Print)	SIGNATURE



Colorado Department of Agriculture

## **Organic Greenhouse/Specialty**

## **Inspection Report**

Operation's Name:	Person Interviewed:
Physical Address:	Others Present for Inspection:
Type of Inspection:	Has a Current Copy of NOP Standards?
Inspector:	Date: Time In: Time Out:

Section 1: General and Section 2: Farm Plan Information		
Has any of the demographic or contact information changed? Yes No		
If yes, list the changes:		
<ul> <li>Verify crops and acreages or sq. ft listed in OSP</li> <li>Describe changes/discrepancies (if applicable):</li> </ul>		
·		
All Organic       Split       Total Acres/ Sq. Ft Farmed:Owned:Rented:         Acres/ Sq Ft. Organic (including fallow)      Acres/Sq Ft. Conventional		

Section 3: History and Eligibility	NOP Rule §205.202	
Are any plants grown in the ground? Yes No If no, a three- year history is no	ot applicable.	
Is all ground requested for certification eligible?  Yes No N/A (Verify compliant with NOP §205.202 Land Requirements)		
Comments:		
<ul> <li>Maps (Floor Plan) accurate and complete?</li> <li>Describe changes/discrepancies:</li> </ul>		

Section 4: Seeds	NOP Rule §205.204
Verify operation consistent with Section 3 of OSP	
Describe changes/discrepancies:	
Are current organic certificates available for all seeds purchased?	
Inspect seed labels N/A	
• If non-organic seeds were used - verify reason and required documentation	
Comments:	

Section 5: Source of Seedlings and Perennial Stock		NOP Rule §205.204
Part A. Verify source of organic seedlings	N/A	
Comments		<u>.</u>

<b>Part B. Verify operation consistent with Greenhouse part of OSP</b>		
Describe changes/discrepancies:		
Verify compliant with §205.206(f) No treated lumber		
Verify soil mix ingredient labels		
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?)		
Describe changes/discrepancies:		
<ul> <li>Part C. Verify perennial stock  N/A</li> <li>If non-organic planting stock was used, then verify reason and required documentation Comments:</li> <li>If newly planted verify source; if non-organic verify management compliant with §205.204(a)(4) Comments:</li> </ul>		
Uverify operation consistent with Part D and E (parallel or split operations) of the OSP.		
Describe changes/discrepancies:		
Any issues of concern regarding commingling or cross-contamination of parallel/split production?		
Comments:		

Section 6: Soil and Crop; Fertility Management	NOP Rule §205.203, 205.205, 205.601, 205.602
<b>Verify operation consistent with Section 5 of OSP</b>	
Describe changes/discrepancies:	
Review all fertility inputs	
Are all products being used listed in the OSP?	No
Are all products used listed on the "Materials Review S	heet"?
Are all products allowed for use (National List restricti	ons being followed?)
Describe changes/discrepancies:	
<ul> <li>If compost was used, verify compliant with NOP §2</li> </ul>	05.203 (c)(2)(i)(ii) and (iii)
Yes No N/A	
Letter from compost manufacturer provided? Yes	
If produced on site, is documentation available?	es 🗌 No 🛄 N/A
Comments:	
• If raw manure was used, verify compliant with NO	P §205.203 (c)(1)(i), (ii) and (iii).
Yes  No  N/A	
Is the 90 day preharvest interval met? Yes No Is the 120 day preharvest interval met? Yes No	
Comments:	
Is soil erosion a problem? Yes No N/A	
Comments:	
Is water quality a problem? Yes No	х х
Comments:	
Section 7: Specialty Crop Management	NOP Rule §205.205, 205.206, 205.601, 205.602
☐ Verify operation consistent with Section 6 of OSP.	
<ul> <li>Describe changes/discrepancies:</li> </ul>	

Crop Rotation
Is there a crop rotation program which is compliant with 205.205?
Yes No N/A, no crops planted in the ground
Comments:
Weed Management – NOP Rule 205.206
Is there evidence of restricted or prohibited strategies/inputs?
$\Box$ Yes $\Box$ No $\Box$ N/A
Comments:
Pest Management – NOP Rule 205.206
Is there evidence of restricted or prohibited strategies/inputs?
$\Box$ Yes $\Box$ No $\Box$ N/A
Comments:
Discours Management NOD Della 205 200
Disease Management – NOP Rule 205.206 \ Is there evidence of restricted or prohibited strategies/inputs?
$\square$ Yes $\square$ No $\square$ N/A
Comments:
<b>Review all crop protection input labels</b>
Are all products being used listed in the OSP?  Yes No
Are all products used listed on the "Materials Review Sheet"?
Are all products allowed for use (National List restrictions being followed?) [Yes No
Describe changes/discrepancies:

Section 8: Maintenance of Organic Integrity	NOP RULE §205.201(a)(5) and 205.202(c)
Verify operation consistent with Part A (equipment)	of this section of the OSP.
Describe changes/discrepancies:	
Verify cleaning procedures and any relevant docume	ntation if equipment is used for both organic and
non-organic. Comments	
Verify operation consistent with Part B (harvest) of the	
Harvest by applicant Custom harvest	No Harvest, Container Crops
<ul> <li>Describe changes/discrepancies:</li> </ul>	
· · · · · · · · · · · · · · · · · · ·	
□ Verify operation consistent with Part C (post harvest	handling) of this section of the OSP.
□ N/A	
Describe changes/discrepancies:	
□ Verify operation consistent with Part D (storage) of the storage of the storag	nis section of the OSP.
□ N/A	
Describe changes/discrepancies:	
Section 9 : Labeling and Product Composition NOP Ru	le 205.105, 205.270, 205.300 - 205.305, 205.307 – 205.311
☐ Verify all products listed in the Section. ☐ All O	
Describe changes/discrepancies regarding products c	laiming 100% organic: N/A
Comments:	

omments:	 	
Other comments for this section:		

Section 10: Cleaning, Sanitation	NOP §205.103, 205.270, 205.272
<b>Verify all information in this section.</b>	
Describe changes/discrepancies:	
Are all cleaning products listed and labels provided? Yes No	
Comments:	
For products not found on §205.605 or §205.606, is a clean water i	rinse documented?
Do records of cleaning/sanitation activities document all procedures	? 🗌 Yes 🗌 No 🗌 N/A

Section 11: Packing, Storage Containers and Shipping Containers	NOP §205.103, 205.270, 205.272
<ul> <li>Verify all information in this section.</li> <li>Describe changes/discrepancies:</li> </ul>	
Section 12: Shipping/Transportation – Outgoing Organic Products	NOP Rule §205.103, 205.270, 205.272
□ Verify operation consistent with Section 12 of OSP.	
Has operation identified all potential contamination or commingli or shipment of crops?	
If the operation is responsible for outgoing transportation, is the o documented?	cleaning of transport units verified and

Comments:	
-----------	--

Section 13: Record Keeping System		NOP §205.103
Verify operation consistent wit	th Section 13 of OSP	
Review Checklist of records	in Section 13:	
Does the operation have all of	the documents available for viewing that are marked?	Yes No
If no, list what is missing bel	low:	
	ach all supporting documents.	1
List issues with record keeping	g not identified on the crop audit form:	
F-I-003	Greenhouse/Specialty Crop Inspection Rep	ort Revision A

Are records kept for five years? Yes No
Conduct yield verification on at least one crop or an In and Out Balance on one product.
Note: If operation is a parallel operation, conduct the yield verification on one of these crops.
Crop/Product :
Estimated Yield/ Amount Sold: Actual Yield/Amount Sold:
Does actual reflect estimated amount? Yes No
If no, describe reason(s):

#### 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 notes what was collected, or what clarification was provide.

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

Issue	Response

ecommended Sampling NOP §205.402, 205.40	
<ul> <li>None Samples Obtained</li> <li>Number of samples taken</li> </ul>	
Sample Type: Crop Vegetation So     Reason for sample(s) obtained:	oil Other
What type of receipt was provided?	

#### **Exit Interview Instructions**

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.

<u>Please remember</u> 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	e 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:		

NOP §205.403(d)

#### Additional Documents Need

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		20
5.		
6.		2
Comments		

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)
List Possible Areas/Issues of Concern:	
1	
2.	
3	
4	
5	
	<u>-</u>
6	
Comments	

Othe	Other	
2	2	

## \*\*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.

Representat	ive of Operation Signati	ıre	Date	
]	nspector Signature		Date	
Attachments:	Input labels Field/ Area Map Complete Field Other (specify)			
Inspection Time	hour(s)	Driving Time		hour(s)
Inspection Narrative Write-up Time	hour(s)	Mileage		



# Colorado Department of Agriculture Organic Process/Handling Production Inspection Report

Tomore and Mark Mark Species		AND AN AND AN ANALY	Rend Medical Constant
Operation's Name:		Person Interviewed: Mary Gomane	
Renee's Garden, LLC			
Diseries 1 Addresses	04	David for Income	4
Physical Address:		ers Present for Inspec	
5717 Arapahoe Avenue, Ste. C	Mari	elle Harris, Operations	Manager
Boulder, CO 80303			
	<u></u>		
Type of Inspection:	Ар	plicant has a current o	copy of NOP Standards?
□ New Applicant	$\boxtimes$ Yes $\square$ No		□ No
			Time In: 9:15 AM
Inspector: A. Stafford	Date: 9/7/2016		Time Out: 11:30 AM
Section 1: General Information			
Has any of the demographic or contact information	i chan	nged? 🗌 Yes 🛛 🕅	No
If yes, list the changes:			
Conditions from last inspection (Listed on last y		contification latton)	N/A
List condition(s) and how operation has address			
List condition(s) and now operation has address	eu ine	·m.	
Section 2: Company Overview			
Verify information listed in this section.	anic	Split	

• Describe changes/discrepancies (if applicable):

If yes, list the changes: Marielle is the local contact; Mary is the responsible party and primary contact but lives out of state. In the case there is an emergent situation or an unannounced inspection, Marielle is the person to contact.

	Is all ingredient supplier information correct?	Yes	No
--	---	-----	----

• Describe changes/discrepancies:

Provide documentation verifying imported seed accompanied by EU Import cert, received for Cornsorzio; at this time Renee's not purchasing from other EU suppliers until she can verify documentation can be issued for export to the US.

☐ Is the operation inspected/regulated by another government agency? ☐ Yes ☐ No		
If yes, name of agency/agencies:		
If it is not a health dept. report, has the company ever been inspected by the health dept.? Yes No Review reports and document items relevant to organic certification:		

Section 3: Private labeling		
<b>Does the company plan to custom label organic products <u>for another company</u>? <b>Yes</b> No</b>		
Describe changes/discrepancies (if applicable):		
а <del></del>		
<b>Does the company plan to contract with any other facilities to <u>produce</u>, <u>handle</u>, <u>store or label organic</u> <u>product</u>?</b>		
Describe changes/discrepancies (if applicable):		

Sec	tion 4: Labeling and Product Composition NOP Rule §205.105, 205.270, 205.300-203.305, 205.307-205.311
	Verify all products listed in the section. All Organic Split Operation
•	Describe changes/discrepancies regarding products claiming 100% organic: N/A Comments:
•	Describe changes/discrepancies regarding products <b>claiming organic</b> : N/A Comments:
•	Describe changes/discrepancies regarding products claiming "made with organic": N/A Comments:
•	Describe changes/discrepancies regarding products <b>claiming &lt;70% organic product</b> : N/A Comments:
	Are product labels used? Yes No
	Review all labels
	Are all labels being used included in the label file?
	Do the labels appear to meet §205.300? Yes No
•	Describe label changes/discrepancies (if applicable):
•	List labels that were added during the inspection:

Section 5: Product Ingredient Verification	NOP Rule Subpart D
A. Verify all information in this section.	
Describe changes/discrepancies:	
Did the company have current organic certificates for	all ingredients? Yes No N/A
Comments:	
a	
T. J	
Is documentation of non-organic ingredients complete	
Comments:	
n	
2	
Section 6: Harvest and Transportation	NOP Rule §205.103, 205.270, 205.272

Verify all information in this section.

• Describe changes/discrepancies:

## Section 7: Receiving – Incoming Organic Products

### NOP RULE §205.103, 205.270, 205.272

## A. Verify all information in this section.

Describe changes/discrepancies:

Section 8: Cleaning and Sanitation	NOP §205.103, 205.270, 205.272
Use Materials Review Packet to verify cleaning labels	
Are all cleaning /sanitizing labels included in the packet?	No
For products not found on 205.605 or 205.606, is a clean water rinse docum	ented? Yes No
Do records of cleaning/sanitation activities document all procedures?	Yes No N/A
Comments:	
Is Chlorine (bleach), sodium hypochlorite, or calcium hypochlorite being use	ed at the facility?
$\Box$ Yes $\Box$ No (if no, move to section 9)	
What is the chlorine used for?	direct food contact
Food Handling Facility/ Equipment	
Verify the maximum rate listed on the label for purpose used?	-
Does the label require a rinse? Yes No	
Direct Food Contact	
What rate is the operation using?	
Does the company rinse with potable water after use?  Yes  Yes  No  Is it d	locumented? Yes No
Does the operation monitor the chlorine level of the final rinse water (the po	int at which the water last
contacts the organic product)?  Yes No If yes, is it at or below 4pp	
Describe changes/discrepancies within this section:	
Section 9: Packing and Processing NOP	RULE §205.103, 205.270, 205.272
A. Verify all information in this section.	
Describe changes/discrepancies:	
	*

Section 10: Post Harvest Materials NOP Ru	ıle §, 205.272, 205.601
Verify all information in this section.     Describe changes/discrepancies within this section:	
Are all post-harvest products listed and labels provided?  Yes No N Comments:	/A
Are these materials on the "Materials Review Sheet"?  Yes No N/A Comments:	
Section 11: Processing Aids NOP Rule §, 205.	272, 205.605-205.606
Verify all information in this section.	
Describe changes/discrepancies within this section:	
Are all processing aids listed and labels provided? <b>Yes No N/A</b> Comments:	
Are the processing aids certified organic? Yes (if yes, attach organic cert) N Are these materials on §205.605? Yes No N/A Comments:	0 🗌 N/A

Section 12: Water	NOP Rule §, 205.103, 205.272, 205.601, 205.605
<b>Verify all information in this section.</b>	
Describe changes/discrepancies within this section:	
Are all boiler water additives listed and labels provided	
Comments:	
Are these materials on the National List (205.605 or 205	.606)? Yes No N/A
Comments:	
Section 13: Storage	NOP RULE §205.270, 205.272

Verify all information in this section.

• Describe changes/discrepancies:

Section 14: Packing, Storage Containers, and Shipping Containers		NOP RULE §205.270, 205.272
<ul> <li>Verify all information in this section.</li> <li>Describe changes/discrepancies:</li> </ul>		
Were all labels for all products produced provided?	Yes No	□ N/A

Section 15: Shipping – Outgoing Organic Products

## NOP RULE §205.103, 205.270, 205.272

Verify all information in this section.

• Describe changes/discrepancies:

Comments:

tion 16: Pest Management	NOP RULE § 205.271
Verify all information in this section.	
Describe changes/discrepancies:	
Are exclusion/sanitation practices used? Yes No	
Are mechanical methods being used? Yes No	
Allowed materials: Are all pest control products used listed and labels included	d? 🗌 Yes 🗌 No
Are all products used listed on the "Materials Review Sheet"?	
Are all products allowed for use (National List restrictions being followed?)	Yes No
Comments:	
Are materials not on the national list being used?  Yes No	
Does the company have approval from CDA to use items not on the national list	st?
Yes No N/A	
Comments:	
Were any pest infestations noted? Yes No N/A	
If yes, what type of pest(s) were observed?	
What pest evidence did you observe? Actual pest Feces Other	
Comments:	

Section 17: Product Flow	NOP RULE § 205.270, 205.272
Verify all information in this section.	
Describe changes/discrepancies:	
r	
Is the schematic flow chart complete and accurate?  Yes No	N/A
Comments:	
Is the facility map complete and accurate?  Yes No N/A	
Comments:	

#### Section 18: Quality Assurance

## Verify all information in this section.

Describe changes/discrepancies:

#### Comments:

#### Section 19: 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 notes what was collected, or what clarification was provide.

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

Issue	Response

NOP RULE §205.103, 205.270, 205.272

roduct Audit Results	NOP RULE § 205.103
lease use the Traceability Audit Form and the Mass In and Out Balance Form to conduct conduct both audits using an ingredient/finished product of your choice. It is preferred that ifferent products/ingredients.	
Traceability Audit: Were all documents complete and accessible?	
Mass In and Out Balance: Was their sufficient documentation to show that the ar purchased correlates with the amount of product sold? Yes No N/A Comments:	
Other Comments:	

Samples	NOP §205.402, 205.403
None Samples Obtained	
Number of samples taken	
Sample Type: Final Product Ingredient Other	
Reason for sample(s) obtained:	
What type of receipt was provided?	

#### **Exit Interview Instructions**

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.

<u>Please remember</u> 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	e by the applicant: None	
1. Page:	Change:	
10 10 10 10 10 10 10 10 10 10 10 10 10 1	Change:	
104.2.1 AS 104.	Change:	
10000000 000 000 000	Change:	
	Change:	
	Change:	
7. Page:	Change:	
Comments:		
<u>14</u>		

#### Additional Documents Need

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:

2	
3.	
4	
5.	
6	
Comments	

those.

1

Issues of Concern (Cite the Standard)	NOP §205.403(d)
List Possible Areas/Issues of Concern:	
1	
2	
3	
4	
5	
6.	
	<u>A</u> rt
Comments	
· · · · · · · · · · · · · · · · · · ·	

Other			
e.			
÷			
-			

### \*\*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.

Representati	ve of Operation Sign	ature Date
Iı	spector Signature	Date
Attachments:		
Pre- Inspection Time	hour(s)	Driving Time hour(s)
Inspection Time	hours(s)	
Inspection Narrative Write-up Time	hour(s)	Mileage

**Company:** 

## **Reviewer:**

Date of Initial l	Review:	Date Review Finalized:				
PAGE ISSUE OF CONCERN/ INCOMPLETE		REVIEWER or INSPECTOR	COMMUNICATION	REQUESTED INFORMATION AND RESOLUTION		
(OSP)	(Clarification? Incomplete?)	(Issue handled before or at inspection?)	(email, during inspection, date due for items prior to inspection)	(specific notification to operation, and response received, specific request to inspector)		

## OPERATION ORGANIC PROCESS HANDLING INSPECTION 2015

Inspector Colorado Department of Agriculture Inspection Date:

## **BACKGROUND/GENERAL INFORMATION**

## **COMPANY OVERVIEW**

LABELING AND PRODUCT COMPOSITION

PRODUCT INGREDIENT INFORMATION

HARVEST AND TRANSPORTATION

**RECEIVING- INCOMING PRODUCT** 

**CLEANING/SANITATION** 

PACKING AND PROCESSING

**POST HARVEST MATERIALS** 

**PROCESSING AIDS** 

## WATER

## STORAGE

## PACKING, STORAGE/SHIPPING CONTAINERS

## SHIPPING-OUTGOING PRODUCT

## **PEST MANAGEMENT**

## **PRODUCT FLOW**

## **QUALITY ASSURANCE**

**SAMPLING** P/H Narrative Template

Revision A Page 1 of 2

## **OTHER CONSIDERATIONS**

### **SUMMARY**

(Each issue/area of concern listed here should be accompanied by the NOP Rule that corresponds to it.

For example: 1. Documentation for manure requirements 205.203(c)(2)(i)(ii)(iii)

## LIST OF ATTACHMENTS

Attachment #	Document *
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	

\* Each document should be numbered and attached to the narrative in the order they are listed here.

#### NATURAL FLAVOR PRODUCT QUESTIONNAIRE - NATIONAL ORGANIC PROGRAM USE

The USDA National Organic Program (NOP) allows the use of certain natural (non-synthetic) substances, including flavors, in products labeled as "Organic" or "Made with Organic...(specified ingredients or food groups)" providing they comply with provisions established in the USDA NOP (7 CFR Part 205).

The NOP defines Non-synthetic (natural) in 7 CFR 205.2: a substance that is derived from mineral, plant or animal matter and does not undergo a synthetic process as defined in section 6502 (21) of the Act (7 U.S.C. 6502(21)). Under the terms of the Act, "synthetic" means a substance that is formulated or manufactured by a chemical process or by a process that chemically changes a substance extracted from naturally occurring plant, animal or mineral sources, except that such term shall not apply to substances created by naturally occurring biological processes.

Non-synthetic Flavors authorized under the NOP, Section 205.605 (a)(9) must be from non-synthetic sources only and must not be produced using synthetic solvents, carrier systems or any artificial preservative. In addition, Sections 205.105 (e)(f) respectively prohibit so-called "excluded" methods (GMOs) and ionizing radiation from being used to produce or during the handling of any ingredients or products under the NOP.

FDA Definition of Natural Flavors FDA 21 CFR Part 101.22(a)(3): "... natural flavor or natural flavoring means the essential oil, oleoresin, essence or extractive, protein hydrolysate, distillate, or any product of roasting, heating or enzymolysis, which contains the flavoring constituents derived from a spice, fruit or fruit juice, vegetable or vegetable juice, edible yeast, herb, bark, bud, root, leaf or similar plant material, meat, seafood, poultry, eggs, dairy products, or fermentation products thereof, whose significant function in food is flavoring rather than nutritional. Natural flavors include [but not exclusively] the natural essences or extractives obtained from plants listed in §§182.10, 182.20, 182.40, and 182.50 and part 184 of this chapter, and the substances listed in §172.510 of this chapter."

In order to approve the use of a natural flavor used in an "organic" or "made with" product, CDA requests the information below in order to determine compliance under the terms of the NOP. CDA may request additional information as needed.

#### Identification of Natural Flavor Product (Name/code):

Include FEMA GRAS number if applicable

#### **Supplier Name and Address:**

#### Type of flavor (select one or more as necessary):

Protein Hydrolysate	Extracts	Essential oil
Compounded flavor	Oleoresin	Isolate
Distillate	Compounded WONF	Other

#### **Natural Flavor Product**

#### A. Flavor constituents

1. Do all of the flavor constituents in the natural flavor product named above meet the FDA definition of a natural flavor (see above)? Yes

No

2. Natural flavors authorized for use in NOP "organic" or "made with organic" products, in addition, must not be produced using synthetic extraction solvents. Extraction may only use natural, non-petroleum based solvents. Is/are the natural flavor constituent(s) made using NOP-suitable extraction solvents?\*

Yes N/A, no extraction solvents used.

- Please list any solvent(s) used in the production of this Natural Flavor Product:  $\triangleright$
- \* Allowed natural extraction solvents include water, natural ethanol, super-critical carbon dioxide, authentic essential oil, and natural vegetable oils. No hydrocarbon solvents, or chlorinated, or halogenated solvents may be used. Propane, hexane, and freon are examples of solvents that are prohibited.

#### B. Non-flavor constituents and other ingredients

Natural flavors authorized for use in NOP "organic" or "made with organic" products must not contain any synthetic carrier systems or any artificial preservatives, including but not limited to, propylene glycol, polyglycerol esters of fatty acids, mono- and di-glycerides, benzoic acid, polysorbate 80.

≻	Please list any carrier system(s) used in this Natural Flavor Product or attach an Ingredient Statement:
	N/A, no carrier system(s) used.

≻	Please list any preservative(s) used in this Natural Flavor Product or attach an Ingredient Statement:
_	N/A, no preservative(s) used.

**C. Genetically Modified Organism (GMO)** products may not be used at any stage in the process of making natural flavor products for NOP goods. **Excluded methods** (= GMO use) include a variety of methods used to genetically modify organisms or influence their growth and development by means that are not possible under natural conditions or processes and are not considered compatible with organic production. Such methods include, but are not limited to, recombinant DNA technology (including gene deletion, gene doubling, introduction of a foreign gene, and changing the positions of genes when achieved by recombinant DNA technology); therefore, GMO-plant extracts may not be used nor may natural flavors be the product of GMO-yeast fermentation.

This natural flavor product, including any solvents, carriers, preservatives or other processing aids used or contained therein, was produced and handled without the use of excluded (GMO) methods?
 Yes

**D. Ionizing Radiation** is prohibited for all uses involving food preservation, pest control and pathogen control in NOP products. Other radiation uses, including food inspection, are permitted providing such use meets applicable FDA regulations, which establish limitations applicable to all (organic and non-organic) food products.

Ionizing radiation as described in 21 CFR 179.26 was not used in the processing of this natural flavor product?
 Yes
 No

Please sign this questionnaire below

Pursuant to 7CFR 205.605(a)(9) and 205.105(e)(f), I, on behalf of the supplier, hereby attest that the information provided in this form is accurate and truthful to the best of my knowledge.

Company Name:\_\_\_\_\_

Printed Name:\_\_\_\_\_\_Title:\_\_\_\_\_

Signature:\_\_\_\_\_Date\_\_\_\_



# **NON-ORGANIC INGREDIENT STATEMENT**

Product:

Manufacturer:

This form can be completed by the manufacturer of the product/ingredient and is used in place of a statement declaration. Indicate whether the three statements for "All Products" are True or False. Then find the type of product that applies (citric acid, color, flavor, etc.), and indicate whether the statements are True or False for that product type.

The product indicated above conforms to the following criteria:	True	False
□ All Products		1
<ol> <li>No genetically engineered micro-organisms were used in production.</li> <li>This product has not been irradiated.</li> <li>Sewage sludge was not used in production of the product or ingredients.</li> </ol>		
<ul> <li>Citric Acid</li> <li>Produced by microbial fermentation of carbohydrate substance.</li> </ul>		
<ul> <li>Colors</li> <li>Derived from non-synthetic* source(s) only.</li> </ul>		
<ul> <li>Enzymes</li> <li>Derived from edible, nontoxic plants, nonpathogenic fungi, or nonpathogenic bacteria.</li> </ul>		
<ul><li>Pectin</li><li>Non-amidated forms only</li></ul>		
<ul> <li>Yeasts</li> <li>This yeast is non-synthetic*.</li> <li>No growth on petrochemical substrate and/or sulfite waste liquor.</li> </ul>		

The above statements regarding the above-named product produced by my company are true to the best of my knowledge, and are based on information provided by our supplier or vendor.

Name (please print)

Title/Department

Signature

Date

\*<u>Nonsynthetic (natural)</u>. A substance that is derived from mineral, plant, or animal matter and does not undergo a synthetic process as defined in section 6502(21) of the Act (7 U.S.C. 6502(21)). For the purposes of this part, nonsynthetic is used as a synonym for natural as the term is used in the Act.

\*<u>Synthetic.</u> A substance that is formulated or manufactured by a chemical process or by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral sources, except that such term shall not apply to substances created by naturally occurring biological processes.

F-E-015 5/27/2015 Nonorganic Ingredient Statement



**Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, Colorado, 80021 Tel: (303) 869-9050 Fax: (303) 466-2860 www.colorado.gov/ag/dpi Reviewed by

Date

# **Organic Certification Program**

# **Organic Processor/Handler Certification - Renewal**

YEAR :	
Company Name:	
Name of Primary Con	tact Person:
Permission to list y publications:	our name/address/contact information/organic products in CDA website and other
🗆 Yes	No
Permission to distr promotional objecti	ibute name/address/contact information/organic products upon request for research and ives:
🗆 Yes	No
List all products red	quested for certification:

These forms are for renewal of your organic certification only. Please complete the Organic Process/Handling Plan Certification Questionnaire if an initial applicant for organic certification.

Please complete and submit the Application Fee Schedule and appropriate fees with this form.

**Application Deadline:** The items included in this renewal application package must be completed and postmarked to CDA with appropriate fees no later than **October 15, 2015.** 

Submissions after this date may result in additional fee assessment.

# **HOW TO COMPLETE THIS FORM**

- Please complete the sections below for the Organic Processor/Handler Update. Sections 1 and 2 MUST be fully completed, other sections that follow may be identified as having no changes. If there are changes to a section, please complete that section of the blank Organic System Plan (attached), and identify the page number of the OSP, and the question(s) that were updated and submitted. The most recent full OSP submitted has been attached for your convenience.
- Also attached is a listing of all items are currently listed on your CDA Organic certificate; please review this list to ensure all items you wish certified are listed. If something is not listed, please complete the attached Single Ingredient or Multi-Ingredient Product Profile Sheet for those items. Please also review the Product Profile for each product requested for certification; if there are ANY changes to this, the Product Profile must be updated and submitted. This includes changes in formula, changes in suppliers, changes in product names/sizes, etc. If updating any products, or submitting new products, do NOT update the old product profile sheet. The most recent version must be used, be completed fully, and if any suppliers have changed, must have supplier certificates attached.
- A list of all inputs that have been reviewed for your operation is included. Please also carefully review this list and provide updated information (including labels/ingredient lists) as necessary.
- Please ensure all steps of the process are included in the process flow chart. If there are multiple steps in the process, either all steps must be included in the flow chart, or separate flow charts for each step must be submitted.

Section 1: General Int	Section 1: General Information						
Applicant/Company Name (This is what will be printed on your certificate)			DBA (if applicable)				
Owner's Name		Manage	r's Name			Primary Co	ntact's Name
Physical Address		(	City		State	Zip Code	County
Mailing Address			City		State	Zip Code	County
Phone	Fax		Email				Best way to contact you to complete the plan
		tification		List surrout surrout		n hu othor	Do you understand the organic
Year first certified	List previous organic cer agencies	tincation	by other	List current organi agencies	c certification	n by other	standards?
							Yes No
Year when last complete	Process Handling Quest	ionnaire v	vas last su	ıbmitted:			
For re-certification, were conditions placed on your last year's certification? Yes No							
Were all conditions addre	Were all conditions addressed? Yes No If yes, how?						
Have you ever been denied certification? If yes, describe the circumstances							
Yes No							
Do you have any outstand noncompliances?	ding If yes, what is(a	re) the no	ncomplia	nce(s)?			
Yes No	Yes No						
Organic Processor/Handler Certification - Renewal							

Section 2: Company Overview
Processor of multi-ingredient products Wholesale Grocery Distributor
Processor of single-ingredient products Warehouse/Storage Facility
Packer of raw agriculture products Repacker of previously packaged products
Other (please specify):
2. What specific type of handling or processing occurs at this facility? (i.e. fruit/vegetable packing, coffee roasting, grain cleansing, etc.)
3. List the products you are requesting to be certified. These products will appear on your certificate. Attach additional sheets if necessary.
4. Does your company handle or process, or plan to handle or process, the same product in both an organic and in a conventional form? Yes No If "Yes", please provide a list of the products that you handle or process in both an organic and conventional form
5. What percentage of your operation is organic? Conventional?
Section 3: Private Labeling
A. HAVE ANY AGREEMENTS FOR CUSTOM PROCESSING OR LABELING OF PRODUCT BEEN DEVELOPED SINCE THE LAST ORGANIC SYSTEM PLAN SUBMISSION? If Yes, Please update the table in the Organic System Plan and submit that page.
NO CHANGES
B. HAS YOUR COMPANY SUBCONTRACTED WITH ANY FACILITY TO PRODUCE, PROCESS, STORE OR LABEL ORGANIC PRODUCT SINCE THE LAST ORGANIC SYSTEM PLAN SUBMISSION? If Yes, Please update the table in the Organic System Plan and submit that page.
NO CHANGES
Section 4: Labeling and Product Composition         NOP Rule 205.105, 205.270, 205.300 - 205.305, 205.307-205.311           The NOP Rule allows four categories of products to use the word "organic". These are "100% organic", "organic", "made with organic (specified ingredients or food group(s))", and products with less than 70% organic ingredients. The percentage of organic ingredients is calculated by dividing the total net weight or volume of combined organic ingredients by the total weight or volume of all ingredients (excluding salt and water).
A. HAVE ANY CHANGES BEEN MADE TO PRODUCTS LABELED AS "100% ORGANIC"?
If Yes, Please provide an updated Product Profile, and list below which products have updated profiles and have been attached to this submission.

# B. HAVE ANY CHANGES BEEN MADE TO PRODUCTS LABELED AS "ORGANIC" (AT LEAST 95% CERTIFIED ORGANIC INGREDIENTS)?

□ YES □ NO □ N/A

If Yes, Please provide an updated Product Profile, and list below which products have updated profiles and have been attached to this submission.

# C. HAVE ANY CHANGES BEEN MADE TO PRODUCTS LABELED AS "MADE WITH ORGANIC (SPECIFIED INGREDIENTS OR FOOD GROUP(S))?

YES	NO NO	□ N/A

If Yes, Please provide an updated Product Profile, and list below which products have updated profiles and have been attached to this submission.

#### Section 5: Product Ingredient Verification

A. HAVE ANY CHANGES BEEN MADE TO THE PRODUCT INGREDIENT INFORMATION (PLEASE NOTE, IF ANY CHANGES REQUIRE ADDITIONAL DOCUMENTATION SUCH AS NATURAL FLAVOR AFFIDAVITS, UPDATED ORGANIC CERTIFICATES, PROCESSING AID LABELS/MSDA AND THE LIKE, PLEASE ATTACH, AND LIST ATTACHMENTS HERE)?

YES NO

If Yes, Please update and attach the adjusted page of the OSP, and list below the page number and question updated (if the question is numbered).

NOP Rule Subpart D

#### Section 6: Harvest and Transportation

#### A. HAVE ANY CHANGES BEEN MADE TO THE HARVEST AND TRANSPORTATION INFORMATION INDICATED IN THE PLAN?

□ NO T YES

If Yes, Please update and attach the adjusted page of the OSP, and list below the page number and question updated (if the question is numbered).

Section 7: Incoming Organic Products

A. HAVE ANY CHANGES BEEN MADE TO THE RECEIVING - INCOMING ORGANIC PRODUCTS INFORMATION INDICATED IN THE PLAN?

T YES NO NO

If Yes, Please update and attach the adjusted page of the OSP, and list below the page number and question updated (if the question is numbered).

#### Section 8: Cleaning, Sanitation

The NOP Rule requires that handling practices and procedures present no contamination risk to organic products from commingling with non-organic products or contact with prohibited substances. Procedures used to maintain the organic integrity of ingredients or products must be documented.

Chlorine: For food handling facilities and equipment: chlorine materials may be used up to maximum - labeled rates for disinfecting and sanitizing food contact surfaces. Rinsing is not required unless mandated by the label use directions. Direct post-harvest crop or food contact (including flume water to transport fruit or vegetables, wash water in produce lines, egg or carcass washing): water is permitted to contain chlorine materials at levels approved by the FDA or the EPA. Also, certified operations should monitor the chlorine level of the final rinse water, the point which the water last contacts the organic product. The level of chlorine in the final rinse water must meet limits as set forth by the SDWA.

A. HAVE ANY CHANGES BEEN MADE TO THE CLEANING AND SANITATION PROGRAM? PLEASE ALSO CAREFULLY REVIEW THE LIST OF MATERIALS THAT HAVE BEEN APPROVED FOR USE, IF THERE ARE ANY CHANGES TO THIS LIST, ENSURE THE OSP IS UPDATED TO REFLECT THE NEW MATERIALS, AND SUBMIT LABELS AND INGREDIENT LISTS FOR THE UPDATED PRODUCTS.

] YES		NO
ILJ	L 4	NU

If Yes, Please update and attach the adjusted page of the OSP, and list below the page number and guestion updated (if the guestion is numbered).

# NOP Rule 205.103, 205.270, 205.272

#### NOP Rule 205.103, 205.270, 205.272

NOP Rule 205.103, 205.270, 205.272

#### Section 9: Packing and Processing

#### A. HAVE ANY CHANGES BEEN MADE TO THE PACKING AND PROCESSING SECTION OF THE ORGANIC SYSTEM PLAN?

YES NO

If Yes, Please update and attach the adjusted page of the OSP, and list below the page number and question updated (if the question is numbered).

Section 10: Post Harvest Materials

A post harvest material is a substance that is used on a raw organic crop prior to packaging or processing of the crop. In order to use a post harvest material on an organic crop product, the material must be an approved agricultural product or must be listed in section 205.601 of the National List.

#### A. HAVE ANY CHANGES BEEN MADE TO THE POST HARVEST MATERIALS?

YES	NO NO	□ N/A
-----	-------	-------

If Yes, Please update and attach the adjusted page of the OSP, and list below the page number and question updated (if the question is numbered).

#### Section 11: Processing Aids

According to the NOP, a processing aid is defined as (a) substance that is added to a food during processing, but is removed in some manner from the food before it is packaged in its finished form; (b) a substance that is added to a food during processing, is converted into constituents normally present in the food, and does not significantly increase the amount of the constituents naturally found in the food; and (c) a substance that is added to a food for its technical or functional effect in the processing, but is present in the finished food at insignificant levels and does not have any technical or functional effect in that food.

• In order to use a processing aid in or on an organic product labeled as "100% organic" the processing aid must be certified organic.

 In order to use a processing aid in or on an organic product labeled as "organic," or "made with organic (specific ingredients or food groups)," the processing aid must be an approved agricultural product or must be listed in section 205.605 of the National List.

#### A. HAVE ANY CHANGES BEEN MADE TO THE PROCESSING AIDS?

YES		□ N/A
-----	--	-------

If Yes, Please update and attach the adjusted page of the OSP, and list below the page number and question updated (if the question is numbered).

#### NOP Rule 205.272, 205.601

NOP Rule 205.272, 205.605-205.606

#### A. HAVE ANY CHANGES BEEN MADE TO THE USE OF WATER?

YES	NO

If Yes, Please update and attach the adjusted page of the OSP, and list below the page number and question updated (if the question is numbered).

#### Section 13: Storage

The NOP rules require that no commingling or contamination of organic products occur during storage. All storage sites must be properly documented and organic products clearly identified in storage.

#### A. HAVE ANY CHANGES BEEN MADE TO THE STORAGE SYSTEM?

YES	
-----	--

If Yes, Please update and attach the adjusted page of the OSP, and list below the page number and question updated (if the question is numbered).

If any off-site storage is utilized, please contact CDA for a Storage Facility Affidavit.

#### Section 14: Packing, Storage Containers, and Shipping Containers

The NOP Rule requires that handling practices and procedures present no contamination risk to organic products from commingling with non-organic products or contact with prohibited substances. Packaging materials, bins, and storage containers must not contain a synthetic fungicide, preservative, or fumigants. Reusable bags or containers that have been in contact with any substance in such a manner as to compromise the organic integrity unless the bag or container has been thoroughly cleaned. Procedures used to maintain the organic integrity of ingredients or products must be documented.

#### A. HAVE ANY CHANGES BEEN MADE TO THE PACKAGING, STORAGE CONTAINERS OR SHIPPING CONTAINERS?

T YES

NO NO

If Yes, Please update and attach the adjusted page of the OSP, and list below the page number and question updated (if the question is numbered).

#### NOP Rule 205.270, 205.272

NOP Rule 205.270, 205.272

#### Section 15: Shipping - Outgoing Organic Products

#### A. HAVE ANY CHANGES BEEN MADE TO THE OUTGOING SHIPPING?

YES NO

If Yes, Please update and attach the adjusted page of the OSP, and list below the page number and question updated (if the question is numbered).

#### Section 16: Pest Management

The NOP Rule requires a certified handling company to use management practices to prevent pests that includes, but is not limited to, the removal of pest habitat, food sources and breeding areas, and prevention of access to the facility. Environmental factors such as temperature, light, humidity, atmosphere, and air circulation may also be used to prevent pests. Control of pests may be accomplished by mechanical or physical controls including, but not limited to, traps, light, sound, or lures and repellants that use nonsynthetic or synthetic substances consistent with the National List. If these measures are not effective, a synthetic substance not on the National List may be used, provided the certifying agent approves use of the substance, method of application, and measures taken to prevent contact with ingredients or organic products. Use of pest control products must be documented and included as part of the organic system plan.

A. HAVE ANY CHANGES BEEN MADE TO THE PEST MANAGEMENT SYSTEM? PLEASE ALSO CAREFULLY REVIEW THE MATERIALS APPROVED, IF THERE ARE ANY ADDITIONS OR DELETIONS TO THIS LIST, PLEASE UPDATE THE TABLE IN THE OSP AND SUBMIT LABELS AND INGREDIENT LISTS FOR ALL NEW MATERIAL.

YES	

If Yes, Please update and attach the adjusted page of the OSP, and list below the page number and question updated (if the question is numbered).

#### B. HAVE ANY CHANGES BEEN MADE TO THE PEST CONTROL MAP?

YES	
-----	--

If there are any changes, please attach the updated pest control map.

NOP Rule 205.271

#### Section 17: Product Flow

A flow chart is used to identify organic control points throughout your facility. The Flow Chart must be clear, complete and detailed.

Please attach a schematic product flow chart for each different processing and/or handling line at your facility. The flow chart(s) must:

- $\cdot$  Show the movement of all organic products, from incoming/receiving through production to outgoing/shipping.
- Indicate where ingredients are added.

NO NO

- $\cdot$  Indicate where post harvest materials and/or processing aids are used.
- · Indicate all equipment and storage areas associated with organic products.

#### A. HAVE ANY CHANGES BEEN MADE TO THE PRODUCT FLOW CHART? PLEASE CAREFULLY REVIEW TO ENSURE THE CHART INCLUDES ALL STEPS IN PRODUCTION. IF SEVERAL TYPES OF PRODUCTS OR SEVERAL STEPS ARE UTILIZED, MULTIPLE FLOW CHARTS MAY BE REQUIRED.

If Yes, Please update and attach the adjusted page of the OSP, and list below the page number and question updated (if the question is numbered).

#### Section 18: Quality Assurance

#### NOP Rule 205.103, 205.270, 205.272

The National Organic Program requires a certified operation to maintain records regarding the handling of organic products. These records must be adapted to the particular business or operation, must fully disclose all activities and transactions of the certified operation in sufficient detail to be readily understood and audited, must be maintained for five years, and must be sufficient to demonstrate compliance with the National Organic Program Rule.

In order to gain a better understanding of your company and the quality assurance systems, or recordkeeping systems, in place at your facility, please complete the following section.

#### A. HAVE ANY CHANGES BEEN MADE TO THE QUALITY ASSURANCE SECTION OF THE ORGANIC SYSTEM PLAN?

YES	NO
-----	----

If Yes, Please update and attach the adjusted page of the OSP, and list below the page number and question updated (if the question is numbered).

#### Section 19: Affirmation

I affirm that all statements made in this application are true and correct. I understand that the operation may be subject to unannounced inspection and/or sampling for residues at any time as deemed appropriate to ensure compliance with the NOP Rules. I agree to abide by the provisions of the USDA National Organic Final Rule, policies issued by the National Organic Program, the Colorado Department of Agriculture Operator Agreement, and Colorado Department of Agriculture Organic Program policies.

Signature of Operator	Date
I have attached the following additional documents:	
Description of corrective actions taken regarding previous non-complia	nce(s) and evidence of such actions
Maps of facility showing all areas where organic product is handled an	d stores
Product flow chart(s)	
Input product labels, if applicable	
Organic product labels, if applicable	
Inspection Appointment Form with directions to inspection locati	on
Fee Schedule and appropriate fees	
Operator Agreement	
Product Profile Sheet(s)	
Non Organic Product Statement	
Other (please list):	
Items identified in bold MUST be attached.	

I have made copies of this questionnaire and any other supporting documents for my own records.

#### Submit completed application, fees and supporting documentation to:

#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway Broomfield, Colorado, 80021

#### DOCUMENTS MAY BE EMAILED TO cda.organic@state.co.us IF EMAILING, PLEASE PRINT THE THIRD PAGE OF THIS FORM AND MAIL IN WITH PAYMENT



### Organic Certification – Organic System Plan Storage Facility Affidavit

Per NOP Rule 205.101(b)(1) certified organic operations may store their products at non-certified facilities as long as the products are packaged or otherwise enclosed in a container prior to being received or acquired by the operation and may not be repacked or relabeled while in control of the storage operation. CDA can waive the requirement for an annual inspection of storage facilities if the storage facility complies with the requirements to safeguard the product from contacting prohibited substances.

<b>CDA Certified Operation Name:</b>		
Name of Storage Facility: Manager/Owner:		
Physical Address:	Email:	Phone:

- The manager of the storage facility must answer the questions below.
- Copies of the Storage Facility Affidavit must be kept by both the CDA certified operation and the storage facility.
- The Storage Facility Affidavit must be submitted to CDA annually by the certified operation

Which types of storage occur at this facility?

□ Dry

	Cald
	LOIO

□ Freezer

□ Other, Specify:

Please complete the table below to describe the storage facilities				
	YES	NO	NA	
1. Does the storage facility implement necessary measures to protect the organic product from contacting prohibited substances such as pesticides?				
2. Does the CDA certified operation retain ownership of the product during storage?				
3. Is the organic product packaged or enclosed in a container prior to being received and does it remain in that enclosed container during storage?				
4. Do the appropriate records indicate that the product is "organic"?				
5. Are the records detailed enough to disclose description and amounts of organic products transferred, and to link any lot numbers assigned by the CDA-certified operation with tracking numbers or lot numbers assigned at the storage facility?				
6. If pesticide fogging is performed or pesticide sprays are applied to areas where packaged or otherwise enclosed organic products are stored, are the organic products removed prior to application or covered with impermeable coverings, or otherwise protected from contacting pesticides and is this documented with written records?				
7. Does the storage facility further process the organic product, including sorting, culling, cleaning, icing, hydro cooling or hydro vacuuming?				
8. Does the storage facility label or re-label the organic product?				
9. Does the storage facility apply any substance to the organic product or its packaging or container, including water, ethylene or controlled atmosphere treatment?				

Name:

Signature:

Date:

CDA reserves the right to inspect any facility storing organic product owned by a CDA certified operation as specified in NOP 205.400. If it is determined that the storage operation has misrepresented policies or procedures as stated on this waiver, or acts in a manner that might jeopardize organic integrity or tracking of the organic product, the CDA client using the facility will be notified. The CDA client will be held responsible for correcting any noncompliance issues according to the timeline set by CDA.



# Organic Certification Program Uncertified Handler Declaration

The purpose of this form is to verify eligibility for the exclusion from certification under 205.101(b)(1). This form must be completed by any uncertified operation that sells and/or handles agricultural products labeled as "100 percent organic," "organic," or "made with organic" (specified ingredients or food group(s))"

Name and Address of Handling Operation:			
Name and Title of Responsible Party (must	t match signature):		
Phone:	Email:	Website:	

- Do you handle any organic products that are not enclosed in a package or container when you receive them?
   □Yes □No If yes, please explain:
- 2. Do you open packages or containers of organic products? 
  Yes 
  No If yes, please explain:
- 3. Do you re-label any organic products? □Yes □No If yes, please explain:
- 4. Do you process any organic products? □Yes □No If yes, please explain:
- 5. Do all organic products remain in the same package or container for the entire time they are in your possession? □Yes □No If no, please explain:
- 6. What do you do when incoming packages or containers of organic product have been damaged?
- 7. Describe the measures implemented to prevent commingling of organic and nonorganic products:
- 8. Describe the measures you have implemented to prevent contamination of organic products from substances such as cleaners, sanitizers, and pest control products:
- 9. Explain how you maintain audit trail records sufficient to track organic product back to its certified organic source:
- 10. Do you agree to provide copies of audit trail records to Colorado Department of Agriculture upon request?
   Yes No If no, please explain:

Any information about your suppliers and sources will be kept confidential in accordance with:

**§205.501(a)** A private or governmental entity accredited as a certifying agent under this subpart must:

(10)Maintain strict confidentiality with respect to its clients under the applicable organic certification program and not disclose to third parties (with the exception of the Secretary or the applicable State organic program's governing State 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 § 205.504(b)(5);

#### § 205.100 (c) Any operation that:

(1) 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 the amount specified in \$3.91(b)(1) of this title per violation.

(2) Makes a false statement under the Act to the Secretary, a governing State official, or an accredited certifying agent shall be subject to the provisions of section 1001 of title 18, United States Code.

*I declare under penalty of perjury (under the laws of the United States of America) that the foregoing is true and correct.* 

Executed on: \_\_\_\_\_\_ (date)

Signature:

Printed Name:



Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### **SECTION 3 - PACKAGING**

#### Module 16, Cont'd

The NOP rule defines "packaging" as a sealed container or material that encloses a product. Non-retail containers used only to ship or store organic products must clearly identify the organic status of the product. If lot numbers are used, non-retail containers must display the production lot number of the product. For packaged (sealed), retail products, the label must state "Certified Organic by the Colorado Department of Agriculture" or similar, directly below the name and contact information for the operation. Please see Subpart D - Lables, Labeling, and Market Information - of the NOP Rule for more specific requirements.

1.	How are products identified as organic during sale or at the point of sale? Check all	that apply	9
	Retail labels Non-retail labels Invoices		e tickets
	Bin tags Bills of lading Other(Specify):	40 70	
2.	Are organic products packaged (see definition above) in any way?	Yes	🗖 No
	a. If yes, what types of packaging or containers are used? Mark all that apply.		
		S	
	Plastic bags Solid plastic Metal Foil		
	Other (Specify):		
	b. Are packaging materials or containers food grade?	Yes	No No
	If no, please explain:		
	c. Are packaging materials or containers re-used?	Yes	No No
	If yes, explain how organic products are protected from potential contamin	ation:	
	d. Are retail labels applied to packaging?	Yes	No
	e. Are non-retail labels applied to packaging?	Yes	No
	f. Is the USDA seal applied to packaging or marketing information?	Yes	No
	g. Is the Colorado Organic seal applied to packaging or marketing information?	Yes	No No
**	Please submit color copies of all labels used by the operation (photographs and printin	ig proofs a	re acceptable)
Op	perator Review, Initial and Date: Inspector Review, Initial and	d Date:	

Company Name:

Crop OSP Module 16 Harvest.Post Harvest Handling.Packaging



July 21, 2017

Karim Amirfathi Boulder Altan Alma Organic Farm 7150 South Boulder Rd. Boulder, CO 80303

Subject: Notice of Suspension of Organic Certification

Dear Mr. Amirfathi:

This letter is to notify you that as of July 24, 2017, your organic certification has been suspended as an organic operator with the National Organic Program (NOP) pursuant to §205.662(e) of the National Organic Program Standards. As the organic certification of Boulder Altan Alma Organic Farm has been suspended, no product may be represented, labeled, marketed, or identified as organic. In addition to suspension, any operation that knowingly sells or labels product as organic, except in accordance with the Act, shall be subject to a civil penalty.

The suspension of your operation's organic certificate is due to the failure to correct the following violation:

According to our records, we have not received the annual update to the Organic System Plan material for Boulder Altan Alma Organic Farm. Please note this refers to both the greenhouse growing operation, and the retail repackaging operation. Renewal information was required by October 1, 2015. As a result, your operation is not in compliance with standard 205.406(a), National Organic Program Final Rule, which states that in order to continue certification, a certified operation must annually pay the certification fees and submit the following information, as applicable, to the certifying agent:

(1) An updated organic production or handling system plan which includes a summary statement, supported by documentation, detailing any deviations from, changes to, modifications to, or other amendments made to the previous year's organic system plan during the previous year, and any additions or deletions to the previous year's organic system plan, intended to be undertaken in the coming year, detailed pursuant to 205.200;

(2) Any additions or deletions from the information required pursuant to 205.401(b);



(3) An update on the correction of minor noncompliances previously identified by the certifying agent as requiring correction for continued certification; and

(4) Other information as deemed necessary by the certifying agent to determine compliance with the Act and the regulations in this part.

Our records showed that on May 18, 2016, the Colorado Department of Agriculture (CDA) sent you an official Notice of Noncompliance (delivery receipt verified on May 18, 2016). A response to the Notice of Noncompliance was required to be submitted by June 18, 2016. No response was received to this communication. The failure to respond resulted in issuance of a Notice of Proposed Suspension on June 21, 2016 (delivery receipt verified on June 21, 2016). The Notice of Proposed Suspension stated that you must request medication from the CDA or file an appeal of the Notice of Proposed Suspension with the USDA National Organic Program by July 21, 2016. No request for medication was requested and no appeal was filed with the NOP. You did provide information regarding your OSP, but once a notice of proposed suspension is received the only two options for addressing this action is to request mediation or file an appeal. Again, this was stated in the letter. On July 13<sup>th</sup> Amy Stafford sent Boulder Altan Alma an email explaining that you would need to file an appeal with the USDA National Organic Program. Therefore effective July 24, 2017 your organic certification is suspended.

Section §205.662(f)(1) of the National Organic Standards state: "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."

To begin the reinstatement process, please contact the Colorado Department of Agriculture or another accredited certifying agent and submit all documents required by the certifying agent for reinstatement. If this is a different certifying agency than the CDA, you must inform them of your suspended status and the reasons for the suspension.

Sincerely,

Mitelel yagent

Mitchell Yergert Director, Division of Plant Industry

Enclosures

cc: NOP Adverse Actions Alyssa Mack, CDA



July 6, 2017

C & C Cattle Co., LLC Julie Padilla 28271 Road L Brush, CO 80723

Dear Ms. Padilla:

This is to notify you that we received your Organic Systems Plan and your check in the amount of \$2700.00 was postmarked on June 15, 2017. We will begin processing your application.

The application process involves an initial review by an organic certification specialist and the gathering of any additional information, if needed, prior to your inspection.

Your file will be assigned to one of our inspectors. The inspector will contact you to arrange a date and time for the inspection based on the information, which you provided to us on your inspection appointment form.

We estimate the inspection time to be approximately 6 hours and travel time to be 2 hours and mileage to be invoiced at .25 per mile (time may vary due to inspector's place of origin). We estimate your total inspection cost to be approximately \$275.00. You will be invoiced after the inspection is performed and actual costs are known.

If you have any questions concerning the process outlined above, please contact Alyssa Mack at 303-869-9075.

Sincerely,

Barbara A. Rosenbach Program Assistant Division of Plant Industry

BR:bar





COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### ORGANIC CERTIFICATION PROGRAM APPLICATION FEE SCHEDULE

This form can be filled out electronically and will automatically calculate your fee. Please complete this form to determine your application fees for the current year. Application fees are annual fees and must be submitted for both initial applications and renewals. All applicants pay a \$400.00 base fee. Additional fees are broken down into 5 scopes (Crop, Process Handler, Livestock, Wild Crop, and Poultry & Livestock Processing). For operations that include multiple scopes, each additional scope is \$200.00.

Certification Renewals: Renewal Forms and Fees must be postmarked by the specified date in your renewal cover letter. The base fee increases \$100 per month if not postmarked by the date specified (1 - 30 days past due = \$100; 31 - 60 days past due = \$200; up to a maximum of \$300).

**Initial Applicants: New applicants requesting crop certification must submit the application and Organic System Plan by June** 1<sup>st</sup> to receive certification for the year. There are no late fees for initial certifications.

Applicant/Company Name: C & C Cattle Co. LLC		DBA, if applicab	le:	
Primary Contact's Name: Julie Padilla	<b>Phone Number:</b> 970-768-4630	1	Email Address: bcdairy1@yahoo	o.com
Mailing Address: same	City: Brush	State: CO	Zip Code: 80723	County: Morgan
Physical Address: 28271 Road L	City:	State:	Zip Code:	County:

BASE FEES			
What is your Primary scope?			
(CHECK ONE ONLY - The pa	rt of your operation that produces the most i	income)	
Crops	<b>Poultry and Livestock Processing</b>		
Livestock	Process Handler		
Wild Crop			
	Primary Scope = \$400.00	If entering by hand enter \$400 here: 400.00	
Which additional scopes are y	ou wishing to certify?		
(Ruminant Livestock Producers	s must select crops as an additional scope)		
(Check all that apply, additional scopes = \$200 each)		If entering by hand enter \$200 for each checked box, below	
Crops (must be selected if ruminant livestock is part of operation)		200.00	
Livestock		0.00	
Wild Crop		0.00	
Process Handler		0.00	
<b>Poultry and Livestock Pr</b>	ocessing	0.00	
Ba	ase Fee Total (Primary Scope + additional scopes)	600.00	

\*Continue to Page two for Scope Fees



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### ORGANIC CERTIFICATION PROGRAM - APPLICATION FEE SCHEDULE CONT'D

				0.0
6 or greater sites	\$2100.00			
3 - 5 sites	\$850.00			
1-2 sites	\$400.00			
Vild Crop Harvesting				
COPE 5: WILD CROP				
				0.0
501 or greater head	\$2100.00	9001 or greater head	\$2100.00	
301 – 500 head	\$850.00	3001 – 9000 head	\$850.00	
1 – 300 head	\$400.00	1 – 3000 head	\$400.00	
ivestock Processing		Poultry Processing		
COPE 4: POULTRY AND I	LIVESTOCK PRO	DCESSING		
				0.
41 or greater products	\$2100.00	16 or greater products	\$2100.00	
21 – 40 products	\$850.00	6 - 15 products	\$850.00	
1 - 20 products	\$400.00	1 - 5 products	\$400.00	
ingle Ingredient Finished Pi		Multi-Ingredient Finished Pi		
		ducts are being requested, enter t	the highest fee	of the two.
COPE 3: PROCESS HAND				2,100.
500 or greater head	Contact CDA			2,100.
251 – 500 head	\$850.00			
□ 1 – 250 head	\$400.00			
Other (Beef cattle, sheep, pig	5)			
	\$2100.00	- SOT OF greater head	\$2100.00	
6001 or greater head	\$850.00 \$2100.00	■ 301 or greater head	\$850.00 \$2100.00	
1 - 1000 head	\$400.00	1 - 100  head 101 - 300 head	\$400.00	
<b>oultry</b> 1 – 1000 head	<b>. . . . . . . . . .</b>	<b>Dairy</b> 1 – 100 head	£ 400.00	
	s to the type and hu	mber of livestock you are reques	ting for certific	cation.
COPE 2: LIVESTOCK		1 61 4 1		
	-			8
41 or greater acres	\$2100.00	□ 15001 or greater sq. ft.	\$2100.00	0.0
6 – 40 acres	\$850.00	□ 12001 – 15000 sq. ft.	\$850.00	
□ 1 – 5 acres	\$400.00	□ 1 – 12000 sq. ft.	\$400.00	
erennial Fruit	\$2100.00	Greenhouse/Specialty Crop	\$2100.00	
201 or greater acres	\$2100.00	4001 or greater acres	\$2100.00	
21 – 200 acres	\$850.00	1501 - 4000 acres	\$850.00	
1 – 20 acres	\$400.00	1 - 1500  acres	\$400.00	
ccurs, enter the one which pro rrigated Acres	duces the most inc	Dryland Acres		
			for certification	on. If more than one type of production

Print this form and mail it along with a check made payable to: Colorado Department of Agriculture

**Colorado Department of Agriculture** 

**Division of Plant Industry** 

305 Interlocken Parkway

Broomfield, CO 80021



#### ORGANIC CERTIFICATION PROGRAM APPLICATION FEE SCHEDULE CONT'D

**Application Fee Refund Policy:** The entire application fee can be refunded if an applicant decides to withdraw from the certification process, prior to the on-site inspection. Once the on-site inspection is conducted, the entire application fee becomes non-refundable. In order to obtain a refund, the applicant must inform the Colorado Department of Agriculture in writing that they no longer wish to proceed with the organic certification process and request a refund of their application fee.

**Inspection Fees**: Inspection fees are calculated separately and are determined by hourly rates. In the event of an Unannounced Inspection, an operation will only be charged if the unannounced inspection replaces the required annual inspection.

#### Inspection Fee Schedule

Hourly Rates		Mileage	Per Diem
Inspection Time	\$34/hour		
Driving Time	\$34/hour	Mileage Rate: \$0.25/mile	Varies by Location
Report Write-Up Time	\$34/hour		

## THIS PAGE CAN BE KEPT BY THE APPLICANT



#### ORGANIC CERTIFICATION PROGRAM - ORGANIC SYSTEM PLAN MODULE 1: GENERAL INFORMATION

SECTION 1 – GENERAL INFORMATION									
Company/Applicant Name (This will be printed on your certificate):DBA (If applicable):C & C Cattle Co. LLCDBA (If applicable):									
Owner's Name: Curtis Weitzel	Manager's Name: Julie Padilla		<b>Primary Contact</b> Julie Padilla	's Name:					
Physical Address: 28271 Road L	City: Brush	State: CO	Zip Code: 80723	County: Morgan					
Mailing Address: same	City:	State:	Zip Code:	County:					
<b>Phone, Business:</b> 970-842-4804	Phone, Cell: (b) (6)		Email Address: bcdairy1@yahoo	.com					
Website URL:	Year first certified: 2004		Do you need a co standards? No	py of the organic					
		so be certified.)		vestock, Poultry					
Which category best describes this operat <ul> <li>100% Organic</li> </ul>	ion? ∃ Organic and Conventional/N	lonorganic							
Through what avenues does the operation         Wholesale       On-farm regime         Farmers markets       Sale to a regime         Other (specify):	etail 🗆 CSA etail establishment 🗆 Bul	products? Mar A/subscription k commodities porting (where?	to processor	Contract to buyer					
For producers, are organic products purc If yes, a Process Handler OSP must b		sell or otherwi	se distribute? 🛛 🗋	Yes 🗆 No					
Please provide a brief description of this operation: (b) (4) (b) (b) (b) (b) (b) (b) (b) (b) (b) (b)									

Operator Review, Initial and Date: JP 6-12-17

Inspector Review, Initial and Date:



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

7.6% 7.6% 12

#### MODULE 1: GENERAL INFORMATION Cont'd

SECTION 1 – GENERAL INFORMATION, CONT'D			
The business is operating as a: Sole Proprietorship Other, describe: C & C Cattle Co. LLC	🗆 Partnership	Corporation     Date Incorporate	Limited Liability Co.
List the person(s) authorized to receive and accept service the state of Colorado.	e of summons and	legal notices of all l	xinds for the applicant in
Name(s): Curtis Weitzel	Title: Owner		2
Complete Address (if different from operation's address): JP 6-12-17	:		

SECTION 2 - PREVIOUS CERTIFICATION
This section must be filled out each year.
For re-certification, were conditions placed on the previous year's certification? If yes, what were the conditions?
Were all the conditions addressed?  Yes No If yes, how?
C & C Cattle Co. LLC
Has certification ever been denied for this operation (by any USDA-accredited organic certification agent)? Yes INO If yes, describe the circumstances:
Are there any outstanding non-compliances for the operation (from any USD-accredited organic certification agent)? Yes INO If yes, what is the non-compliance?



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### MODULE 1: GENERAL INFORMATION Cont'd

#### SECTION 3 – ATTACHEMENTS

#### This section must be filled out each year.

Detailed field and facility maps are required to be on file with the CDA. Attachments for the following may be required as supporting documentation. If you have already submitted a particular piece of information, it does not need to be included again unless a change or update has occurred. Please select all documents that have been attached to the OSP for the current year.

#### **Crop/Plant Production**

- Field maps (with Field ID, buffers/dimensions, adjoining land use, notable structures)
- □ Soil/plant tissue tests
- Seed documentation
- □ Non GMO, Nonorganic verification
- Compost documentation
- □ Input (Fertilizers, pesticides, etc.) product labels
- □ Input product OMRI or WSDA certificates
- Labels for product sold by the operation as organic
- Prior land use affidavits
- Fees
- Inspection Appointment Form
- □ Other, Please list:

#### **Livestock Production**

Field maps (with pasture/outdoor areas, housing and handling structures, adjoining land use, etc.)

- □ Water tests
- Organic certificates for purchased animals
- Organic certificates for purchased feed
- □ Labels/ingredient statements for supplements and additives
- □ Labels for all vaccines and medications/health care products
- □ Input product OMRI or WSDA certificates
- □ Labels for product sold by the operation as organic
- Prior land use affidavits
- Fees
- Inspection Appointment Form
- □ Other, Please list:

#### **Process Handling**

- □ Process flow chart/narrative
- □ Facility map/diagram
- Organic ingredients supplier certificates
- □ Nonorganic ingredients verification
- Natural Flavor Affidavits
- □ Processing aid labels/MSDS/spec. sheets
- □ Water test results
- □ Boiler additive labels/MSDS
- Cleanser/sanitizer labels/MSDS
- □ Pest control product labels/MSDS
- □ Inspection Appointment Form
- Inspection Appointment Form
- □ Other, Please list:



#### **MODULE 1: GENERAL INFORMATION Cont'd**

#### SECTION 4 - AFFIRMATION & SIGNATURE

The following must be signed by the Applicant. By signing this document, the Applicant acknowledges and agrees to:

1. Fully comply with all applicable organic product and handling regulations in accordance with Title 7 CFR Part 205 National Organic Program Rule issued by the United States Department of Agriculture (USDA), Agricultural Marketing Service.

2. Establish, implement, and update annually, an organic production and handling system plan (OSP) that will be submitted to the Colorado Department of Agriculture (CDA) Organic Program.

3. Supply the CDA Organic Program with all information required to verify compliance with the National Organic Program Rule.

4. Permit on-site inspections with complete and unrestricted access to the production and handling operation, including noncertified production and handling areas, structures, and offices by the CDA Organic Program. This inspection may occur with or without an authorized representative of the operation present. These inspections may be announced or unannounced at the discretion of the CDA Organic Program or as required by the Administrator of the National Organic Program.

5. Understand that the CDA Organic Program may use subcontractors for inspecting, testing, and other technical services, as necessary.

6. Maintain all records applicable to the organic operation for not less than five (5) years beyond their creation.

7. Allow authorized representatives of the CDA Organic Program, of the Secretary of Agriculture (USDA) access to these records under normal business hours for review and copying to determine compliance with the National Organic Program Rule.

8. Submit to the CDA Organic Program the applicable fees as described on the most current fee schedule.

9. Immediately notify the CDA Organic Program about any application, including drift, of a prohibited substance to any field, production unit, site, facility, livestock or part of an operation.

10. Understand that the use of the CDA name and seal must be in accordance with the Colorado Department of Agriculture's guidelines

11. Immediately notify the CDA Organic Program of any change in the certified operation or portion of it that may affect its compliance with the National Organic Program Rule.

I, the owner or legally authorized representative, acknowledge the above General Requirements for CDA Organic Certification and understand that failure to meet the above requirements may be cause for denial of an application and sanctioning of certification.

I affirm that all statements made in this application are true and correct. No prohibited products have been applied to any of my organically managed fields during the three-year period prior to projected harvest. I understand that the operation may be subject to unannounced inspection and/or sampling for residues at any time as deemed appropriate to ensure compliance with the NOP Rules. I understand that acceptance of this form in no way implies granting of certification by the Colorado Department of Agriculture. I agree to follow all the applicable organic standards set forth in the National Organic Program regulations, 7 CFR Part 205.

	6-12-17	
Signature of Operator:	Date:	



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

# **MODULE 2: CROP/PRODUCTS REQUESTED FOR CERTIFICATION**

#### **CROPS/PRODUCTS REQUESTED FOR CERTIFICATION**

The crops and/or products being requested for certification must be listed each year. This is what will be on the operation's certificate. List all products and check the box if you are continuing to grow this crop for the current year, strike through any crops that were listed last year that you will not be growing this year, add any new crops or products to the bottom of the list. It is not necessary to list individual crop varieties (carrots vs. yaya carrots, purple haze carrots, bolero carrots, etc.) unless it is important for you to have them listed on the certificate this way. Please list all forms that you wish to market the crop (example: Oats and Oat Straw). If crops are grown for harvest as well as to market as transplants or seed, please list all of these forms separately and specify the use.

<u>Crop/Product</u>	2016	Last yr. certified	Crop/Product, Cont'd	2016	Last yr. certified
Rye & Grass - Pasture		2015			
Rye - Seed		2015			
Rye Hay		2015			
Dairy Heifers (Managed organically		2015			
			_		
		23			
		3			

Operator Review, Initial and Date: C & C Cattle Co. LLC

CDA Inspector Initial and Date:

Company Name:



**Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

CROPS/PRODUCTS REQUESTED FOR CERTIFICATION Cont'd									
Crop/Product	2016	Last yr. certified	Crop/Product, Cont'd	2016	Last yr. certified				
		22							

Operator Review, Initial and Date:

CDA Inspector Review, Initial and Date:

Company Name:

C & C Cattle Co. LLC



COLORADO DEPARTMENT OF AGRICULTURE **Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### ORGANIC CERTIFICATION PROGRAM **APPLICATION FEE SCHEDULE**

This form can be filled out electronically and will automatically calculate your fee. Please complete this form to determine your application fees for the current year. Application fees are annual fees and must be submitted for both initial applications and renewals. All applicants pay a \$400.00 base fee. Additional fees are broken down into 5 scopes (Crop, Process Handler, Livestock, Wild Crop, and Poultry & Livestock Processing). For operations that include multiple scopes, each additional scope is \$200.00.

Certification Renewals: Renewal Forms and Fees must be postmarked by the specified date in your renewal cover letter. The base fee increases \$100 per month if not postmarked by the date specified (1 - 30 days past due = \$100; 31 - 60 days past due = \$200;6-15-17 PM up to a maximum of \$300).

Initial Applicants: New applicants requesting crop certification must submit the application and Organic System Plan by June 1<sup>st</sup> to receive certification for the year. There are no late fees for initial certifications.

Applicant/Company Name: C & C Cattle Co. LLC		DBA, if applicable:				
Primary Contact's Name: Julie Padilla	<b>Phone Number:</b> 970-768-4630	Email Address: bcdairy1@yahoo.com				
Mailing Address:	City:	State:	Zip Code:	County:		
28271 Road L	Brush	со	80723	Morgan		
Physical Address: same	City:	State:	Zip Code:	County:		

BASE FEES -					
What is your Primary scope?					
(CHECK ONE ONLY - The pa	art of your operation that produces the most i	ncome)			
	Poultry and Livestock Processing				
Livestock	Process Handler				
Wild Crop					
	Primary Scope = \$400.00	If entering by hand enter \$400 here: 400.00			
Which additional scopes are (Ruminant Livestock Produce	you wishing to certify? rs must select crops as an additional scope)				
(Check all that apply, additional	al scopes = \$200 each)	If entering by hand enter \$200 for each checked box, below			
Crops (must be selected	if ruminant livestock is part of operation)	200.00			
		0.00			
		0.00			
		0.00			
Process Handler		0.00			
Poultry and Livestock H	Processing				
L	Base Fee Total (Primary Scope + additional scopes)	600.0			

\*Continue to Page two for Scope Fees

6311716279 6/30/2017 C & C Cattle Co., LLC 11975 \$2,700.00 23S0 4200 BPAA 1602 BCAACL001 6130 6270

Fee Schedule



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

# ORGANIC CERTIFICATION PROGRAM - APPLICATION FEE SCHEDULE CONT'D

SCOPE 1: CROPS	to the tune and nu	wher of agree you are requesting	for certificatio	on. If more than one type of production
Check the box that corresponds occurs, enter the one which pro	duces the most inco	mber of acres you are requesting	for certificatio	and the open of production
Irrigated Acres	duces the most met	Dryland Acres		
$\Box 1 - 20$ acres	\$400.00	□ 1 – 1500 acres	\$400.00	
20  deres	\$850.00	1501 - 4000 acres	\$850.00	
201 or greater acres	\$2100.00	4001 or greater acres	\$2100.00	
Perennial Fruit		Greenhouse/Specialty Crop		
$\Box 1 - 5$ acres	\$400.00	1 - 12000 sq. ft.	\$400.00	
$\Box$ 6 – 40 acres	\$850.00	□ 12001 – 15000 sq. ft.	\$850.00	
41 or greater acres	\$2100.00	15001 or greater sq. ft.	\$2100.00	0.0
SCOPE 2: LIVESTOCK				
Check the box that corresponds	s to the type and nur	mber of livestock you are reques	ting for certific	cation.
Poultry		Dairy		
□ 1 – 1000 head	\$400.00	□ 1 – 100 head	\$400.00	
□ 1001 – 6000 head	\$850.00	□ 101 – 300 head	\$850.00	
6001 or greater head	\$2100.00	301 or greater head	\$2100.00	
Other (Beef cattle, sheep, pig	s)			
$\Box$ 1 – 250 head	\$400.00			
251 – 500 head	\$850.00			
500 or greater head	Contact CDA			2,100.0
<b>SCOPE 3: PROCESS HAND</b>	LING			· · · · · · · · · · · · · · · · · · ·
	f let T l'automa	ducts are being requested, enter	the highest fee	of the two.
If both Single-Ingredient and M			Contraction of the second s	
If both Single-Ingredient and M Single Ingredient Finished Pr	roducts	Multi-Ingredient Finished P	roducts	
Single Ingredient Finished Pr	s400.00	Multi-Ingredient Finished P	s400.00	
Single Ingredient Finished Pr 1 – 20 products 21 – 40 products	roducts	Multi-Ingredient Finished P 1 – 5 products 6 – 15 products	roducts \$400.00 \$850.00	
Single Ingredient Finished Pe	s400.00	Multi-Ingredient Finished P	s400.00	0.0
Single Ingredient Finished Pr 1 – 20 products 21 – 40 products 41 or greater products	s400.00           \$850.00           \$2100.00	Multi-Ingredient Finished P 1 – 5 products 6 – 15 products 16 or greater products	roducts \$400.00 \$850.00	0.0
Single Ingredient Finished Pr 1 – 20 products 21 – 40 products 41 or greater products SCOPE 4: POULTRY AND	s400.00           \$850.00           \$2100.00	Multi-Ingredient Finished P 1 – 5 products 6 – 15 products 16 or greater products OCESSING	roducts \$400.00 \$850.00	0.0
Single Ingredient Finished Pr 1 – 20 products 21 – 40 products 41 or greater products SCOPE 4: POULTRY AND Livestock Processing	roducts \$400.00 \$850.00 \$2100.00 LIVESTOCK PR(	Multi-Ingredient Finished P 1 – 5 products 6 – 15 products 16 or greater products OCESSING Poultry Processing	roducts \$400.00 \$850.00 \$2100.00	0.0
Single Ingredient Finished Products          1 - 20 products         21 - 40 products         41 or greater products         SCOPE 4: POULTRY AND         Livestock Processing         1 - 300 head	roducts \$400.00 \$850.00 \$2100.00 LIVESTOCK PRO \$400.00 \$400.00	Multi-Ingredient Finished P 1 – 5 products 6 – 15 products 16 or greater products OCESSING Poultry Processing 1 – 3000 head	s400.00           \$850.00           \$2100.00           \$400.00	0.0
Single Ingredient Finished Pr 1 – 20 products 21 – 40 products 41 or greater products SCOPE 4: POULTRY AND Livestock Processing 1 – 300 head 301 – 500 head	roducts \$400.00 \$850.00 \$2100.00 LIVESTOCK PRO \$400.00 \$400.00 \$850.00	Multi-Ingredient Finished P 1 – 5 products 6 – 15 products 16 or greater products OCESSING Poultry Processing 1 – 3000 head 3001 – 9000 head	s400.00           \$850.00           \$2100.00           \$2100.00           \$350.00           \$850.00	0.0
Single Ingredient Finished Products          1 - 20 products         21 - 40 products         41 or greater products         SCOPE 4: POULTRY AND         Livestock Processing         1 - 300 head	roducts \$400.00 \$850.00 \$2100.00 LIVESTOCK PRO \$400.00 \$400.00	Multi-Ingredient Finished P 1 – 5 products 6 – 15 products 16 or greater products OCESSING Poultry Processing 1 – 3000 head	s400.00           \$850.00           \$2100.00           \$400.00	0.0
Single Ingredient Finished Pr 1 – 20 products 21 – 40 products 41 or greater products SCOPE 4: POULTRY AND Livestock Processing 1 – 300 head 301 – 500 head	roducts \$400.00 \$850.00 \$2100.00 LIVESTOCK PRO \$400.00 \$400.00 \$850.00	Multi-Ingredient Finished P 1 – 5 products 6 – 15 products 16 or greater products OCESSING Poultry Processing 1 – 3000 head 3001 – 9000 head	s400.00           \$850.00           \$2100.00           \$2100.00           \$350.00           \$850.00	
Single Ingredient Finished Products          1 - 20 products         21 - 40 products         41 or greater products         SCOPE 4: POULTRY AND         Livestock Processing         1 - 300 head         301 - 500 head         501 or greater head	roducts \$400.00 \$850.00 \$2100.00 LIVESTOCK PRO \$400.00 \$400.00 \$850.00	Multi-Ingredient Finished P 1 – 5 products 6 – 15 products 16 or greater products OCESSING Poultry Processing 1 – 3000 head 3001 – 9000 head	s400.00           \$850.00           \$2100.00           \$2100.00           \$350.00           \$850.00	
Single Ingredient Finished Products          1 - 20 products         21 - 40 products         41 or greater products         SCOPE 4: POULTRY AND         Livestock Processing         1 - 300 head         301 - 500 head         501 or greater head	roducts \$400.00 \$850.00 \$2100.00 LIVESTOCK PRO \$400.00 \$400.00 \$850.00	Multi-Ingredient Finished P 1 – 5 products 6 – 15 products 16 or greater products OCESSING Poultry Processing 1 – 3000 head 3001 – 9000 head	s400.00           \$850.00           \$2100.00           \$2100.00           \$350.00           \$850.00	
Single Ingredient Finished Portuge 1 – 20 products 21 – 40 products 41 or greater products SCOPE 4: POULTRY AND Livestock Processing 1 – 300 head 301 – 500 head 501 or greater head SCOPE 5: WILD CROP Wild Crop Harvesting	roducts \$400.00 \$850.00 \$2100.00 LIVESTOCK PRO \$400.00 \$400.00 \$2100.00 \$2100.00 \$2100.00	Multi-Ingredient Finished P 1 – 5 products 6 – 15 products 16 or greater products OCESSING Poultry Processing 1 – 3000 head 3001 – 9000 head	s400.00           \$850.00           \$2100.00           \$2100.00           \$350.00           \$850.00	
Single Ingredient Finished Portugation 1 – 20 products 21 – 40 products 41 or greater products SCOPE 4: POULTRY AND Livestock Processing 1 – 300 head 301 – 500 head 501 or greater head SCOPE 5: WILD CROP Wild Crop Harvesting 1 – 2 sites	roducts \$400.00 \$850.00 \$2100.00 \$400.00 \$2100.00 \$400.00 \$400.00 \$2100.00 \$400.00 \$400.00 \$2100.00 \$2100.00 \$2100.00	Multi-Ingredient Finished P 1 – 5 products 6 – 15 products 16 or greater products OCESSING Poultry Processing 1 – 3000 head 3001 – 9000 head	s400.00           \$850.00           \$2100.00           \$2100.00           \$350.00           \$850.00	0.
Single Ingredient Finished Products          1 - 20 products         21 - 40 products         41 or greater products         SCOPE 4: POULTRY AND         Livestock Processing         1 - 300 head         301 - 500 head         501 or greater head         SCOPE 5: WILD CROP         Wild Crop Harvesting         1 - 2 sites         3 - 5 sites	roducts \$400.00 \$400.00 \$850.00 \$2100.00 LIVESTOCK PR( \$400.00 \$850.00 \$2100.00 \$850.00 \$2100.00 \$850.00 \$2100.00 \$850.00 \$2100.00 \$850.00 \$2100.00 \$850.00	Multi-Ingredient Finished P 1 – 5 products 6 – 15 products 16 or greater products OCESSING Poultry Processing 1 – 3000 head 3001 – 9000 head	s400.00           \$850.00           \$2100.00           \$2100.00           \$350.00           \$850.00	

Print this form and mail it along with a check made payable to: Colorado Department of Agriculture

**Colorado Department of Agriculture** 

Division of Plant Industry 305 Interlocken Parkway Broomfield, CO 80021

Fee Schedule



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### MODULE 3: FIELDS AND ELIGIBILITY

#### FIELDS AND ELIGIBILITY

Please complete or review the following information about this operation. Include all land including conventional, transitional, and organic fields. The NOP Rule requires that to be eligible for certification, a site producing crops intended to be sold, labeled or represented as organic must have had no prohibited substances applied for at least 36 months preceding harvest of the crop. Transitional means that a field is being managed in accordance with the organic standards, but has not yet met the standard for 36 months without use of a prohibited product. If a field being used for organic production has not been managed by the operator for 3 or more vears, a Previous Land Use Affidavit from the previous land manager must be attached. The Field Identifications and acreages must be the same as what is listed on maps and the Crop and Input Information section. For new fields, please be sure to complete the column "New to operation...?"

Field ID/name/ number	Address/legal description (if different from main operation address)	whe Ti	acreag ther Or ransitio onventio T	ganic, nal,	Rent or Own	Date management began	Last date prohibited substance applied & material	Date eligible for organic (CDA to enter)	New to Operation since last OSP update? (Yes or No)	*Operator - note change, addition or deletion. Date and initial in parenthesis.
(b) (4)		150			Own	2004		Current	No	
b) (4)					Own	2008		Current		
b) (4)		600			Own	2009		Current		
b) (4)		1932			Own	2009		Current		
b) (4)		160			Own	2008		Current		
b) (4)		155			Own	2008		Current		
Total this page		3337	0	0		584 S	1	1 504		1

Operator Review, Initial and Date: JP 6-12-17

Inspector Review, Initial and Date:

Company Name: C & C Cattle Co. LLC

F-E-202 10/10/2015



**Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

### MODULE 3: FIELDS AND ELIGIBILITY, Cont'd

Field ID/name/ number	Address/legal description (if different from main operation address)	wheth Tra Cor	acreag her Or ansitio nventio	ganic, nal, onal	Rent or Own	Date management began	Last date prohibited substance applied & material	Date eligible for organic (CDA to enter)	New to Operation since last OSP update?	*Operator - note change, addition or deletion. Date and initial in parenthesis.
		0	Т	С					(Yes or No)	
(b) (4)		790			Own	2011		Current	No	
(b) (4)					Own	2012		Current	No	
(b) (4)					Rent	2012		Current	No	Delete - did not rent
(b) (4)			2	а. — 24	Own	2-7-17	N/A		Yes	
(b) (4)		315			Own	2-7-17	N/A		Yes	
(b) (4)					Rent	1-30-17	N/A		Yes	
(b) (4)			160		Own	11/8/16	6/10/16		Yes	
Total this page		3560	160	0				20.	uds.	3
Total Prev.		3337	0	0						

Operator Review, Initial and Date: JP 6-12-17

6897

160

0

Inspector Review, Initial and Date:

Company Name: C & C Cattle Co. LLC

Total all pages



**Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

**MODULE 4: FIELD HISTORY-CROPS AND INPUTS** 

#### FIELD HISTORY – CROPS AND INPUTS

The <u>planned</u> information for each field, as well as each hoop house where crops are grown in the ground, must be filled in each year. For fields not previously included in the OSP, one of the following must be provided: 1) A Prior Land Use Affidavit from the previous land manager, 2) three years of previous field history, 3) the last date a prohibited substance was applied. Include all ORGANIC (O) AND TRANSITIONAL (T) fields (it is not necessary to list conventional fields unless they have begun transition to organic) under the care and control of the operation. Transitional means that a field is being managed in accordance with the organic standards, but has not yet met the standard for 36 months without use of a prohibited product. The Field ID and acreage should correspond with what is listed on maps and the "Fields and Eligibility" module.

FIELD	ID: Weit	zel 1 & 2		ACRES: 150				
Year	O, T or C	Fertility Inputs	Pest & Disease Inputs	Crop(s)	Acres/ft <sup>2</sup> per crop	Projected Yield		
2017	0	On farm manure	None	Rye & Grass Pasture		$\frac{1}{2}$ to 1 ton per acre		
2016	0	On farm manure	None	Rye & grass pasture		$\frac{1}{2}$ to 1 ton per acre		
2015		See attachment for prev. years						
2014								
FIELD	ID: Marv	witz 1 & 2		ACRES: 940				
Year	O, T or C	Fertility Inputs	Pest & Disease Inputs	Crop(s)	Acres/ft <sup>2</sup> per crop	Projected Yield		
2017	0	On farm manure	None	Rye & grass pasture/Rye Seed		1 to 2 ton per acre		
2016	0	On farm manure	None	Rye & grass pasture/rye seed/rye hay		1 to 2 ton per acre		
2015								
2014								
FIELD	ID: Judy	s		ACRES: 95				
Year	O, T, or C	Fertility Inputs	Pest, Disease Inputs	Crop(s)	Acres/ft <sup>2</sup> per crop	Projected Yield		
2017	0	On farm manure	None	Rye Pasture		1 to 2 ton per acre		
2016	0	On farm manure	None	Rye seed		20 to 40 bushels per acre		

Operator Review, Initial and Date: JP 6-12-17

Inspector Review, Initial and Date:

Company Name: C & C Cattle Co. LLC

2015

2014



Division of Plant Industry

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

FIELD HISTORY – CROPS AND INPUTS CONT'D

### Module 4

FIELD	ID: Marv	vitz 3	5	ACR	ES: 1932		
Year	O, T, or C	Fertility Inputs	Pest, Disease Inj	puts	Crop(s)	Acres/ft <sup>2</sup> per crop	Projected Yield
2017	0	On farm manure	None		Rye & grass Pasture		<sup>1</sup> / <sub>4</sub> to <sup>1</sup> / <sub>2</sub> ton per acre
2016	0	On farm manure	None		Rye & grass pasture		<sup>1</sup> / <sub>4</sub> to <sup>1</sup> / <sub>2</sub> ton per acre
2015							
2014							
FIELD	ID: Atkir	1son 1, 2, 3, 4	1	ACR	ES: 315		
Year	O, T, or C	Fertility Inputs	Pest, Disease Inj	puts	Crop(s)	Acres/ft <sup>2</sup> per crop	Projected Yield
2017	0	On farm manure	None		Rye pasture		1 to 2 ton per acre
2016	0	On farm manure	None		Rye pasture		1 to 2 ton per acre
2015							
2014							
FIELD	ID: Wind		8	ACR	ES: 790		
Year	O, T, or C	Fertility Inputs	Pest, Disease Inj	Pest, Disease Inputs		Acres/ft <sup>2</sup> per crop	Projected Yield
2017	0	On farm manure	None		Rye & grass pasture		<sup>1</sup> / <sub>4</sub> to <sup>1</sup> / <sub>2</sub> ton per acre
2016	0	On farm manure	None		Rye & grass pasture		<sup>1</sup> / <sub>4</sub> to <sup>1</sup> / <sub>2</sub> ton per acre
2015							
2014							

Operator Review, Initial and Date: JP 6-12-17

Inspector Review, Initial and Date:

Company Name: C & C Cattle Co. LLC



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

# FIELD HISTORY - CROPS AND INPUTS CONT'D

	lod	nla	1
1.7	LUU	ure	

FIELD ID: Atkinson East Grass Pasture				ACRES: 640					
Year	O, T, or C	Fertility Inputs	Pest, Disease Inputs		Crop(s)	Acres/ft <sup>2</sup> per crop	Projected Yield		
2017	0	None	None		Grass Pasture		<sup>1</sup> / <sub>4</sub> to <sup>1</sup> / <sub>2</sub> ton per acre		
2016									
2015									
2014									
FIELD ID: Atkinson West Grass Pasture					ACRES: 315				
Year	O, T, or C	Fertility Inputs	Pest, Disease II	iputs	Crop(s)	Acres/ft <sup>2</sup> per crop	Projected Yield		
2017	0	None	None		Grass Pasture		<sup>1</sup> / <sub>4</sub> to <sup>1</sup> / <sub>2</sub> ton per acre		
2016									
2015				9.					
2014									
FIFLDU	Croot	ner Grass Pasture		ACRES: 320					
Year	O, T, or C	Fertility Inputs	Pest, Disease I	-	Crop(s)	Acres/ft <sup>2</sup> per crop	Projected Yield		
2017	0	None	None		Grass Pasture		<sup>1</sup> / <sub>4</sub> to <sup>1</sup> / <sub>2</sub> ton per acre		
2016									
2015									
2014									

Operator Review, Initial and Date: JP 6-12-17

Inspector Review, Initial and Date:

Company Name: C & C Cattle Co. LLC



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

# FIELD HISTORY - CROPS AND INPUTS CONT'D

Lad.		~	
lod	u	le	4

FIELD II	D: Coue	у	AC	ACRES: 160				
Year	O, T, or C	Fertility Inputs	Pest, Disease Inputs	Crop(s)	Acres/ft <sup>2</sup> per crop	Projected Yield		
2017	Т	On farm manure	None	Fallowed – will be planted to		None		
2016								
2015								
2014								
FIELD II	D:		AC	ACRES:				
Year	O, T, or C	Fertility Inputs	Pest, Disease Inputs	Crop(s)	Acres/ft <sup>2</sup> per crop	Projected Yield		
2017								
2016								
2015								
2014								
FIELD I			r	RES:	Acres/ft <sup>2</sup>	Projected		
Year	O, T, or C	Fertility Inputs	Pest, Disease Inputs	Crop(s)	per crop	Yield		
2017								
2016								
2015								
2014								

Operator Review, Initial and Date: JP 6-12-17

Inspector Review, Initial and Date:

Company Name: C & C Cattle Co. LLC



# FIELD HISTORY - CROPS AND INPUTS CONT'D

FIELD ID:					ACRES:			
Year	O, T, or C	Fertility Inputs	Pest, Disease In	puts	Crop(s)	Acres/ft <sup>2</sup> per crop	Projected Yield	
2017								
2016								
2015								
2014								
				1 6 7 7				
FIELD II	87.70			ACR	ES:	_		
Year	O, T, or C	Fertility Inputs	Pest, Disease In	puts	Crop(s)	Acres/ft <sup>2</sup> per crop	Projected Yield	
2017								
2016								
2015								
2014								
FIELD II	):			ACR	ES:			
Year	O, T, or C	Fertility Inputs	Pest, Disease In	puts	Crop(s)	Acres/ft <sup>2</sup> per crop	Projected Yield	
2017								
2016								
2015								
2014								

Operator Review, Initial and Date: JP 6-12-17

Inspector Review, Initial and Date:

Company Name: C & C Cattle Co. LLC

Module 4



# FIELD HISTORY - CROPS AND INPUTS CONT'D

FIELD ID:					ACRES:			
Year	O, T, or C	Fertility Inputs	Pest, Disease In	puts	Crop(s)	Acres/ft <sup>2</sup> per crop	Projected Yield	
2017								
2016								
2015								
2014								
				12 000000	224			
FIELD II	577			ACR	ES:			
Year	O, T, or C	Fertility Inputs	Pest, Disease In	puts	Crop(s)	Acres/ft <sup>2</sup> per crop	Projected Yield	
2017								
2016								
2015								
2014								
2017							<i>a</i>	
FIELD II	<b>D</b> :			ACR	ES:			
Year	O, T, or C	Fertility Inputs	Pest, Disease In	puts	Crop(s)	Acres/ft <sup>2</sup> per crop	Projected Yield	
2017								
2016								
2015								
2014								

Operator Review, Initial and Date: JP 6-12-17

Inspector Review, Initial and Date:

Company Name: C & C Cattle Co. LLC

Module 4



# FIELD HISTORY - CROPS AND INPUTS CONT'D

FIELD ID:					ACRES:			
Year	O, T, or C	Fertility Inputs	Pest, Disease In	puts	Crop(s)	Acres/ft <sup>2</sup> per crop	Projected Yield	
2017								
2016								
2015								
2014								
				11				
FIELD II				ACR	ES:			
Year	O, T, or C	Fertility Inputs	Pest, Disease In	puts	Crop(s)	Acres/ft <sup>2</sup> per crop	Projected Yield	
2017								
2016								
2015								
2014								
FIELD II	<b>D</b> :			ACR	ES:			
Year	O, T, or C	Fertility Inputs	Pest, Disease In	puts	Crop(s)	Acres/ft <sup>2</sup> per crop	Projected Yield	
2017								
2016								
2015								
2014								

Operator Review, Initial and Date: JP 6-12-17

Inspector Review, Initial and Date:

Company Name: C & C Cattle Co. LLC

Module 4



# FIELD HISTORY - CROPS AND INPUTS CONT'D

FIELD ID:					ACRES:			
Year	O, T, or C	Fertility Inputs	Pest, Disease In	puts	Crop(s)	Acres/ft <sup>2</sup> per crop	Projected Yield	
2017								
2016								
2015								
2014								
				1 6 7 7				
FIELD II	87.70			ACR	ES:			
Year	O, T, or C	Fertility Inputs	Pest, Disease In	puts	Crop(s)	Acres/ft <sup>2</sup> per crop	Projected Yield	
2017								
2016								
2015								
2014								
FIELD II	):			ACR	ES:			
Year	O, T, or C	Fertility Inputs	Pest, Disease In	puts	Crop(s)	Acres/ft <sup>2</sup> per crop	Projected Yield	
2017								
2016								
2015								
2014								

Operator Review, Initial and Date: JP 6-12-17

Inspector Review, Initial and Date:

Company Name: C & C Cattle Co. LLC



### **MODULE 5: BUFFERS AND ADJOINING LAND USE**

#### **BUFFERS AND ADJOINING LAND USE**

ADJOINING LAND USE: The NOP Rule requires organic production areas to have distinct boundaries and buffer zones to prevent the unintended application of a prohibited substance or contact with a prohibited substance (including cross pollination from GMO crops) applied to adjoining land not under organic management. Adjoining land includes cropland, pasture, residential property, fallow land, etc. Though the NOP does not specify a minimum buffer size requirement, it is required that the buffer must be sufficient in size or other features to prevent unintended contact by prohibited substances. If the buffer consists of crops, these crops must be left unharvested or if harvested, must be harvested and sold (represented) as NON-organic. Field maps must indicate buffer zones (widths and make-up: road, field road, trees, etc.) and show all adjoining land uses (organic cropland, conventional cropland, un-sprayed fallow or pasture, residential, etc.).

List Specific buffers for all organic and transitional fields. Multiple fields/field IDs can be listed in one row, if those fields are contiguous within a block. If individual fields are all organic and contiguous, list the Field ID as "entire farm" and enter buffer information.

Field ID(s)		Type of Buffer	Width of Buffer	Adjoining Land Use (include whether conventional, organic or untreated)
(b) (4)	North	Organic Pasture		Organic Pasture
	South	County Road		County Road
	East	Native Pasture		Untreated Pasture
	West	Organic Pasture		Organic Pasture
	North			
	South			
	East			
	West			
	North			
	South			
	East			
	West			
	North			
	South			
	East			
	West			
	North			
	South			
	East			
	West			

Operator Review, Initial and Date:

Inspector Review, Initial and Date:

Company Name: JP 6-12-17



## **MODULE 5: BUFFERS AND ADJOINING LAND USE**

#### **BUFFERS AND ADJOINING LAND USE**

ADJOINING LAND USE: The NOP Rule requires organic production areas to have distinct boundaries and buffer zones to prevent the unintended application of a prohibited substance or contact with a prohibited substance (including cross pollination from GMO crops) applied to adjoining land not under organic management. Adjoining land includes cropland, pasture, residential property, fallow land, etc. Though the NOP does not specify a minimum buffer size requirement, it is required that the buffer must be sufficient in size or other features to prevent unintended contact by prohibited substances. If the buffer consists of crops, these crops must be left unharvested or if harvested, must be harvested and sold (represented) as NON-organic. Field maps must indicate buffer zones (widths and make-up: road, field road, trees, etc.) and show all adjoining land uses (organic cropland, conventional cropland, un-sprayed fallow or pasture, residential, etc.).

List Specific buffers for all organic and transitional fields. Multiple fields/field IDs can be listed in one row, if those fields are contiguous within a block. If individual fields are all organic and contiguous, list the Field ID as "entire farm" and enter buffer information.

Field ID(s)		Type of Buffer	Width of Buffer	Adjoining Land Use (include whether conventional, organic or untreated)
(b) (4)	North	Organic Pasture		Organic Pasture
	South	County Road		County Road
	East	Native Pasture		Untreated Pasture
	West	Organic Pasture		Organic Pasture
	North			
	South			
	East			
	West			
	North			
	South			
	East			
	West			
	North			
	South			
	East			
	West			
	North			
	South			
	East			
	West			

Operator Review, Initial and Date:

Inspector Review, Initial and Date:

Company Name: JP 6-12-17



#### **MODULE 5: BUFFERS AND ADJOINING LAND USE**

#### **BUFFERS AND ADJOINING LAND USE**

ADJOINING LAND USE: The NOP Rule requires organic production areas to have distinct boundaries and buffer zones to prevent the unintended application of a prohibited substance or contact with a prohibited substance (including cross pollination from GMO crops) applied to adjoining land not under organic management. Adjoining land includes cropland, pasture, residential property, fallow land, etc. Though the NOP does not specify a minimum buffer size requirement, it is required that the buffer must be sufficient in size or other features to prevent unintended contact by prohibited substances. If the buffer consists of crops, these crops must be left unharvested or if harvested, must be harvested and sold (represented) as NON-organic. Field maps must indicate buffer zones (widths and make-up: road, field road, trees, etc.) and show all adjoining land uses (organic cropland, conventional cropland, un-sprayed fallow or pasture, residential, etc.).

List Specific buffers for all organic and transitional fields. Multiple fields/field IDs can be listed in one row, if those fields are contiguous within a block. If individual fields are all organic and contiguous, list the Field ID as "entire farm" and enter buffer information.

Field ID(s)		Type of Buffer	Width of Buffer	Adjoining Land Use (include whether conventional, organic or untreated)
(b) (4)	North	Organic Pasture		Organic Pasture
	South	County Road		County Road
	East	Native Pasture		Untreated Pasture
	West	Organic Pasture		Organic Pasture
	North			
	South			
	East			
	West			
	North			
	South			
	East			
	West			
	North			
	South			
	East			
	West			
	North			
	South			
	East			
	West			

Operator Review, Initial and Date:

Inspector Review, Initial and Date: C & C Cattle Co. LLC



# COLORADO DEPARTMENT OF AGRICULTURE

**Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

BUFFERS AND	ADJOINING LAND U	USE Cont'd		Module 5 Cont'd					
a. Written n	otification to: vay Departments	nt accidental contamination of	Oil and Gas Companies						
	Spray Companies Service Offices	<ul> <li>Adjoining Landowners/Neigh</li> <li>Other, please specify:</li> </ul>	ibors						
<ul><li>Postin</li><li>Delay</li></ul>	<ul> <li>b. Other safeguards:</li> <li>Posting signs regarding organic status</li> <li>Delayed Planting (GMO contamination)</li> <li>Other, please specify: JP 6-12-17</li> <li>Registration with DriftWatch (<u>https://driftwatch.org/</u>)</li> <li>Ongoing monitoring of neighboring management practices</li> </ul>								
	nonitor for crop conta								
	l Observation	Residue Analysis	GMO Testing						
Photo	graphs	Wind Speed/Direction	Other (Specify):						
3. How often do	you monitor for crop	contamination?							
□ Week		□ Monthly	□ Annually						
As ne	eded	□ Other (Specify): C & C Cattle							
NOP Rule 205 20	6(f) states that lumbor	r treated with arsenate or othe	r prohibited substances may not b	e used for <i>ne</i> w					
		here it comes in contact with so							
5. Has any lumb	oer been used that has	been treated with arsenate or	other prohibited substances?						
If yes, please describe what type of structure(s) (greenhouses, fence posts, other building or construction), where the installation is on the farm, how far between the installation and where organic crops are grown, and if any measures have been taken to prevent direct or indirect contact of the treated wood with the soil:									
Operator Review, In	itial and Date:	Inspec	ctor Review, Initial and Date: JP 6-12-7	17					



# COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### MODULE 6: GREENHOUSES AND HOOP HOUSES/HIGH TUNNELS

#### GREENHOUSES AND HOOP HOUSES/HIGH TUNNELS

For the purposes of this application, the terms hoop house and high tunnel are considered to have equal meanings and describe structures at least 6 feet high that are generally unheated and have no electrical climate controls. Typically, crops are grown in the ground in hoop houses. Conversely, the term greenhouse normally describes a heated structure where crops are grown on benches or tables. However, it is recognized that these terms exist on a continuum. Please note, lumber treated with arsenate or other prohibited substances may not be used for *new installations or replacement purposes* where it comes in contact with soil or crops.

	No greenhouses or hoop houses used for this operation. Skip to Module 7 – Seeds, Seedlings, and Planting Stock									
1.	Are seedlings grown on-farm?	D No								
2.	Are seedlings used only on-farm, sold, or both?	□ On farm use only	□ For sale only	□ Seedlings are grown for both on-farm use and sale						
3.	Are any crops produced in the ground in hoop houses/greenhouses? I Yes I No									
Ple	ase complete the following information for each st	tructure:								

ID/Name	Organic, Conventional, Both	Dimension & size (sf)	Heated?	Crops grown in ground?	Seedlings grown?	Treated wood?	Description of structure - location of treated wood, venting, roll up sides, structural materials, doors, etc. heating source, etc.	Operator indicate changes and date
							<b>S</b>	
			- 80	04	-	10		5
*Please include greenhouses/hoop houses on any field maps that have been submitted and identify them with the same name or number listed on the table above. If								
houses do not fall within any of these maps, provide separate maps locating the houses on the farm property.								
*List all fertility	inputs used in g	reenhouses and ho	op houses,	including so	oil/seed starti	ing/potting	mixes, on the "Soil and Fertility Materials and	Inputs" Section. Also
list all pest, wee	d or disease prod	lucts in that section	and note t	hev are use	d in houses.		параментали бала балан арынин килады. — таки карын нарыккырдай 2000 ферелаларда — — — — — — — — — — — — — — — — — — —	1.0010 - 40000000 (0.0000.0000000000000000000000

Operator Review, Initial and Date:

Inspector Review, Initial and Date:

Company Name: JP 6-12-17

F-E-203 10/10/2015



305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

GRE	) EN	NHOUSES AND HOOP HOUSES Cont'd Module 6 cont'd
	Are	e any inputs applied through greenhouse or hoop house watering systems? I Yes I No f yes, please list all inputs in Module 10 (Fertility Inputs) or Module12 – Weed, Pest, and Disease Inputs:
5. 1		chlorine used to clean the watering system? Yes No f yes, please indicate rates used:
		e non-organic (conventional) plants grown in or near any of the greenhouses/hoop houses? Yes No yes, please answer the following questions:
1	a.	How are organic and non-organic growing areas identified? C & C Cattle Co. LLC
1	b.	How is commingling of organic and non-organic soil mixes prevented during: Mixing -
		Planting -
		JP 6-12-17
		Storage -
	c.	How are organic and non-organic plants identified or differentiated?
		C & C Cattle Co. LLC
	d.	How are seedling containers and equipment cleaned?
	e.	<b>How is drift or contamination from prohibited materials prevented:</b> Within the house –
		Through ventilation systems -
		Through watering systems -
		C & C Cattle Co. LLC
Opera	ator	Review, Initial and Date: All Inspector Review, Initial and Date: 24 hours



### MODULE 7: SEEDS, SEEDLINGS, PLANTING STOCK

□ No Seeds, Seedlings or Planting Stock used this year. Skip to Module 8 – Non-Organic Production
Information on crop seeds and planting stock must be submitted each year. Include cover crop seed and seed used for orchard understory plantings. The NOP Rule requires the use of certified organic seeds, unless the variety is not commercially available, except that, organically produced seed must be used for the production of edible sprouts. Cost is not an acceptable reason for exemption. Synthetic seed treatments are prohibited unless included on the National List. Genetically engineered (GMO) seeds, planting stock, and inoculants are prohibited in organic production. If a given crop is available in GMO form (alfalfa; apple – green, Granny Smith types & Golden Delicious types; canola; corn; potato – russet types; soybean; summer squash; sugar beets), you must provide non-GMO documentation from the supplier.
Are any crops grown on contract, such that seeds or planting stock are selected or provided by the buyer?
SECTION 1 - SEEDS
1. Is seed harvested and saved to use as seed stock for following years?       Yes       No         a. If yes, how is seed quality maintained?       Yes       No
b. Where is seed being cleaned (or other "processing") and stored?
2. Describe any efforts to trial certified organic varieties to potentially replace conventional varieties:
JP 6-12-17
Operator Review, Initial and Date: C & C Cattle Co. LLC Inspector Review, Initial and Date:



# COLORADO DEPARTMENT OF AGRICULTURE

**Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### **SECTION 1 - SEEDS Cont'd**

#### List All Seeds used in organic production For each seed variety that is not certified organic, an attempt to find organic seed of that type must be made by contacting a minimum of three organic seed suppliers. You may submit your own list of seeds, rather than entering them here, but it must contain all the required information from the table below. **Type of Treatment** Certified If not certified organic - reason for If not certified organic - Suppliers Variety (inoculents, Crop Source **Exemption and explain** Contacted and date contacted **Organic?** pelleting, etc) G Form: JP 6-12-17 Rye None Yes □ Quality: Quantity: Form: b) (4) **Dryland Grass** Arnba Western C & C Cattle Co. LLC None No □ Quality: Wheatgrass **Quantity**: Fairway Crested Girm: C & C Cattle Co. LLC Quality: Quantity: G Form: **Quality**: Quantity: Girm: Quality: Quantity: G Form: Quality: **Quantity**: Girm: C & C Cattle Co. LLC □ Ouality: Quantity: Girm: All Quality: □ Ouantity: Girm: 24 hours Quality: Quantity:

Operator Review, Initial and Date: JP 6-12-17

Inspector Review, Initial and Date:

Company Name:

F-E-207 10/10/2015 Module 7, Cont'd



#### SECTION 2 - SEEDLINGS AND PERENNIAL STOCK

#### Module 7, Cont'd

#### ■ No Seedlings or Perennial Stock Purchased This Year. No Grafting. Skip to Module 8

**This section must be filled out each year if seedlings or perennial stock are purchased.** *If you propagate your own seedlings and/or perennial stock please see Module 6.* Annual seedlings must be organically produced. Non-organic perennial plants (and planting stock) must be managed organically for at least one year prior to harvest of crop or sale of the plant as certified organic. Organic planting stock must be used if commercially available. Organic certificates of suppliers should be available.

Сгор	Variety	Supplier	Organic? Certified by whom?	Date purchased	If not organic, date crop becomes eligible for certification
SECTION 3 - G	RAFTING				
If yes, pleas	e fill out the foll	ft any perennial cro owing table. If grat iterials" column.	ops this year? fting stock or scionwoo	Yes Yes od was purchased,	No enter the supplier
Сгор	Variety	Location/Field	Grafting Materials	Date Planted	Expected Harvest Date
		27 X			

Operator Review, Initial and Date: 4000 tons

Inspector Review, Initial and Date: C & C Cattle Co. LLC

Company Name: Slabs are cleaned at least once a week with a manure vacuum or skid loader

**Revision A** 



#### **MODULE 8: SPLIT and PARALLEL PRODUCTION**

# CONVENTIONAL, PARALLEL AND SPLIT PRODUCTION If the operation produces both organic and NON-organic crops, then the operation is considered a "split" operation. If the same exact crops are grown as organic and NON-organic such that the crops are not visually distinguishable, then the operation is considered to have "parallel" production. This operation is 100% organic. No non-organic production occurs (other than harvesting of buffers on an otherwise 100% organic operation). Skip to Module 9 – Fertility Management **1.** Does the operation produce both organic and conventional crops? Yes No 2. Does the operation produce the same crop in organic and conventional form? Yes No 3. What crops are produced non-organically? What crops are produced in both non-organic and organic form? 4. C & C Cattle Co. LLC No 5. Are any GMO varieties produced for the non-organic part of the operation? Yes If yes, please list: 6. How are crops in parallel production distinguished during harvest and post-harvest? JP 6-12-17 7. List inputs (fertilizers, pesticides, fungicides, herbicides) used in non-organic production: 8. Where are non-organic inputs stored and how are they kept separate from organic-approved inputs? C & C Cattle Co. LLC 9. Are employees made aware of the difference between organic-approved and non-organic inputs? Yes No **Please explain:**

Operator Review, Initial and Date:



# **MODULE 9: FERTILITY MANAGEMENT**

#### FERTILITY MANAGEMENT

The NOP Rule requires active management to build soil fertility, manage plant nutrients, protect natural resources, and prevent soil erosion through; rotation of crops, cover cropping, and applications of plant and animal materials. These applications must be managed in such a way that they do not contribute to contamination of crops, soil or water from pathogens, heavy metals, nutrients, or prohibited substances. The operator must conduct cultivation and tillage practices in a way that minimizes soil erosion and maintains or improves the condition of the soil including physical, chemical and biological properties. The application of sewage sludge is prohibited in organic agriculture.

1						
1.	What are the soil types	of this operation?				
2	What are the nuture .	deficionaise?				
2.	What are the nutrient of	uenciencies?				
3.	What are the major co	monants of the se	and/or crop fo	rtility plan <sup>9</sup>		
3.	Crop rotation	Soil amendme	The second s	Finity plan:		Compost
	Manure	Cover crops	1113			□ Soil inoculants
					-	
	Fallowing	Conservation	tillage	Biodyna		
	Incorporation of crop 1	residue		⊔Other (sp	pecify): JP 6-1	2-17
	D 11					T
						requency. If production is
		ucidae informatio	n on any cover ci	ops, diversi	med planting	, orchard understory plantings
etc	•					
5	Are crop residues burn	ed?  Yes				
э.	-					
	If yes, please describe	what materials are	e burned and wh	у.		
	C & C Cattle Co. LLC					
6	Ana liquid fontilizons mi	ith a nituagan agai	contration greats	uthan 20/ r	Chean	Var 🗖 Na
	Are liquid fertilizers wi		centration greate	r than 5% t	ised.	Yes No
	yes, please submit docum		utilizan with Nitnoo	a cusatan tha	20/ unloss it	is approved by OMRI or WSDA.)
(As	oj 2015, ine CDA wiu noi a	pprove any liquia je	ruuzer wun Muroge	n greater ind	in 3% unless it	is approved by OMRI or WSDA.)
7	How is the effectiveness	s of the fertility m	anagement progr	am monitor	red?	
1.	Soil testing	s of the fer thirty in	☐ Microbiologic			□ Tissue testing
	<ul> <li>Observation of crop h</li> </ul>	ealth				Crop quality testing
	<ul> <li>Observation of crop h</li> <li>Observation of soil he</li> </ul>		Section of the sectio			L Crop quanty testing
	U Observation of soil he	aith	Other (Specify	y):		
0	How often is foutility	onitoning conduct	ad 2			
0.	How often is fertility m	(177)			Acnorded	Other (See Star)
	U Weekly	Monthly	□ Annually		As needed	Other (Specify):
						JP 6-12-17
0	Data the offertiveness	f the foutility men	a mont and a			
9.	Rate the effectiveness o					
	Excellent	Satisfactory		Needs in		and Data:
Op	erator Review, Initial and Da	C & C Cattle Co.	LLC	inspector l	Review, Initial	and Date:
Co	mpany Name:					



305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

COMPOST – SECTION 2 Module 9, Cont'd
Compost not used this year – Skip to Section 3, Manure
*This section must be completed each year if compost is purchased or produced on-farm. NOP Rule 205.203(c)(2) requires that when compost contains animal materials, composting processes must include an initial C:N ratio of between 25:1 and 40:1 and maintain temperatures between 131 and 170 degrees, depending on the method. If you produce compost on-farm, production records must be kept to verify compliance with the above. If compost is purchased, this information must be obtained from the supplier. If records are not kept or do not document compliance, it will be considered raw manure and must meet the pre-harvest interval when used on products for human consumption according to 205.203(c)(1).
1. Was compost purchased?          □ Yes         □ No         □         □         □
If compost was purchased, attach documentation from the supplier stating the requirements of NOP Rule 205.203(c)(2) have been met and include it on the Soil and Fertility Materials and Inputs list (Section 9). 2. Was/Is compost produced on farm? Yes No
If yes, what are the raw ingredients used and what is the source of each?
3. What is the composting method?
☐ Windrows or aerated pile. Must reach 131-170 degrees for at least 15 days and be turned at least 5 times.
☐ In-vessel or static system. Must be aerated and reach 131–170 degrees for at least 3 days.
Information on the following will be verified at inspection:
The initial C:N Ratio
The final temperature reached
<ul> <li>How long this temperature is maintained</li> <li>If compost is windrowed, how many times the materials are turned</li> </ul>
PELLETED/PROCESSED MANURE  Pelleted or processed manure not used this year
Processed or pelleted manure may be used as a fertility input without a specific interval between application and harvest as long as it is treated so that all portions of the product, without causing combustion, reach a minimum temperature of either 150° F (66° C) for at least one hour or 165° F (74° C), and are dried to a maximum moisture level of 12%; or an equivalent heating and drying process could be used. In determining the acceptability of an equivalent process, processed manure products should not contain more than 1x103 (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.
If you are applying pelleted or processed manure this year:
1. How do you confirm that the product meets the heat processing requirements described above?
*Any pelleted or processed manure products must be listed in the Soil and Fertility Materials and Inputs List (Module 10).
Operator Review, Initial and Date: All Inspector Review, Initial and Date: C & C Cattle Co. LLC

Company Name: 24 hours



# COLORADO DEPARTMENT OF AGRICULTURE

**Division of Plant Industry** 305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### MANURE – SECTION 3

#### Module 9, Cont'd

#### MANURE

Animal manures must be composted unless: they are applied to land used for a crop not intended for human consumption; OR 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 surface particles; OR 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.

No raw or unprocessed manures used this year – Skip to Module 10, Soil & Fertility Input List

1. What is the source of manure applied this year?

2. How do you ensure that manure does not contaminate wells, rivers, streams, lakes, or ponds? JP 6-12-17

#### 3. What types of crops are grown on fields to which manure is applied?

- Crops not used for human consumption
- Crops for human consumption whose edible portion HAS direct contact with the soil or soil particles.

Crops for human consumption whose edible portion DOES NOT have contact with the soil or soil particles

If you grow crops for human consumption and use un-composted manure, complete the following table. Include manure deposited by grazing livestock.

Field Number/ID	Crop(s)	Date manure is incorporated	Expected Harvest Date

Operator Review, Initial and Date: C & C Cattle Co. LLC

Inspector Review, Initial and Date:

Company Name: 4000 tons



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

## MODULE 10: SOIL AND FERTILITY INPUTS

#### SOIL AND FERTILITY INPUTS

#### □ No Soil or Fertility Inputs used. Skip to Section 11 – Weed, Pest and Disease Management

List all fertility inputs intended for use on proposed organic fields including compost and manure. Fertility inputs must also be listed on Field History sheets. Please note, many micro-nutrient products (boron, copper, iron, magnesium, manganese, zinc) require a documented deficiency for their use. Please submit soil or plant tissue test results or other documentation for approval. Product labels and/or OMRI/WSDA certificates for all inputs must be on file. If you have previously submitted labels, you do not need to resubmit them. If you have discontinued use of a product and don't intend to use it again, write "no longer in use" and the date in parentheses.

Product	Manufacturer	Number of Applications Annually	Use & How Applied	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)
N/A		1		No	Allowed	9/21/16 AM
				No	Allowed	9/21/16 AM
				No	Allowed	9/21/16 AM
				No	Allowed	9/21/16 AM
				No	Allowed	9/21/16 AM
				No	Allowed	9/21/16 AM
				No	Allowed	9/21/16 AM
*NOP Rule Referen	nces (CDA to enter) -	I		1		

Operator Review, Initial and Date: C & C Cattle Co. LLC

Inspector Review, Initial and Date:

Company Name:

F-E-209 10/10/2015



# COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

# MODULE 10: SOIL AND FERTILITY INPUTS, Cont'd

Product	Manufacturer	Number of Applications Annually	Use & How Applied	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)
				Garlic - CCOF Vinegar - CCOF	Allowed	9/21/16 AM
				QAI	Allowed	9/21/16 AM
				No		
				No	Allowed	9/21/16 AM
				OMRI	Allowed	9/21/16 AM

Operator Review, Initial and Date:

Inspector Review, Initial and Date:

Company Name: JP 6-12-17

F-E-209 10/10/2015



# MODULE 11: WEED, PEST and DISEASE MANAGEMENT

#### WEED, PEST AND DISEASE MANAGEMENT

The NOP requires crop rotation plans that maximize soil organic matter and prevent weed, pest and disease problems. Producers must utilize sanitation measures to remove disease vectors, weed seeds and habitat for pests. Cultural practices must be used to enhance crop health. Approved synthetic materials listed on the National List 205.601 may only be used when management practices are insufficient to prevent or control problems. All weed, pest and disease inputs must be approved. A "restricted" input has specific annotations for its use. If a restricted input is used, evidence of how the annotation is addressed must be provided. Please include all weed, pest and disease products in Module 12 - "Weed, Pest, and Disease Control Inputs" list.

# SECTION 1 - WEEDS

WORKS/	CHORT-WEEDS			
1.	What are the weed problems (ty	ypes) for this operation?		
	JP 6-12-17			
2.	How often is weed monitoring c	onducted?		
1000	U Weekly Monthly	□ Annually	As needed	□ Other (Specify):
		,		N 22 AVERAGES
				2300 acres
3.	What weed control methods are	used? Check all that apply		
5.	Mechanical cultivation	Hand weeding	□Flame weeding	
	A to see the second sec			Ct. 1. C
	Crop rotation	Smother/cover crops		ing of tools & equipment
	□ Soil solarization	Approved herbicides	□ Stale seedbed p	-
	□ Mulching, specify type:	Timing of planting	□ Prevention of w	
	□ Weed seed screens on irrigation	inlets	Other (specify):	Manure is applied at 2 to 3 ton
				to the acre in the fall
4.	Please describe in further detail	the selections made above:		
	Compost/Manure storage drains to	alagoon		
	sempession and standy a same to			
5.	Are records kept of how often t	hese weed control methods a	e utilized?	Yes No
62.5				
6.	How is the effectiveness of the w	veed management program n	onitored?	
	Observation of weed types	Observations of crop hea	and a second	parison of crop yields
				· · · ·
	Records of weed counts	Other (Specify): Slabs a	re cleaned at least once	a week with a manure vacuum
-			NOT ANOTHER TO AN A REAL PROPERTY OF A DESCRIPTION OF A D	nanure spreader. Manure is
7.	Are plastic or synthetic mulches		Yes	No
	es, please note: per NOP Rule 205.20			
				he season unless applied to perennial
cro	ps, in which case the mulch must be r	emovea before the plastic accomp	oses or breaks into piec	es.
0	Data the offection of the	-d		
ð.	Rate the effectiveness of the wee	eo management program: L	Excellent Sati	sfactory Deeds improvement
Ope	erator Review, Initial and Date: C&C	Cattle Co. LLC	Inspector Review, Initial	and Date:

Company Name: 4000 tons

**Revision A** 



305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

1.	What are the pest problems for this operation?
	JP 6-12-17
2.	How often is pest monitoring conducted?
	Weekly     Monthly     Annually     As needed     Other (Specify):
3.	What strategies are utilized to prevent and control pest damage to field crops?
	□ Crop rotation □ Timing of planting □ Selection of resistant crop varieties □ Physical removal
	Physical barriers   Traps   Repellents   Natural enemy habitat
	□ Trap crops □ Companion planting □ Lures □ Approved pesticides □ Other (specify): 24 hours
	□ Release of beneficial organisms □ Other (specify): 24 hours
4.	Please describe in further detail the selections made above:
	All
5	Is a record kept of how often these pest control methods are utilized?
5.	is a record kept of now often these pest control methods are utilized:
6.	How is the effectiveness of the pest management program monitored?
	□ Insect monitoring with traps ■ Observation of crop health or quality □ Comparison of crop yield
	Crop quality testing Monitoring records kept Other (Specify):
	C & C Cattle Co. LLC
7.	Rate the effectiveness of the pest management program: DExcellent Satisfactory Deeds improvement
8	Is a pest control advisor used? If yes, provide name:
0.	is a proceeding as a set. If yes, provide numer

Operator Review, Initial and Date:

Inspector Review, Initial and Date: C & C Cattle Co. LLC



SE	CTION 3 - DISEASES			Module 11, Cont'd
1.	What are the disease problems	s of this operation?		
2.	How often is disease monitorin □ Weekly □ Monthl		■As needed	□ Other (Specify):
			BASheeded	JP 6-12-17
3.	What disease prevention strate	egies and control methods are Crop and soil health	used?	□ Seed treatments
	□ Plant spacing/Promotion of air	and 20 and provide of 52	☐ Irrigation management	
	□ Selection of resistant varieties			
	Use of organic-approved inputs	□ Timing of planting s □ Other (Specify):	□ Sanitation practices	
	in ose of organic approved input			
4.	Please describe in further deta	il the selections made above:		
	C & C Cattle Co. LLC			
	How is the effectiveness of the Observation of crop health Microbiological testing Monitoring records kept Other (specify):	<ul> <li>□ Comparison of crop yields</li> <li>□ Tissue Testing</li> </ul>	n monitored? □ Observation of soil □ Observation of crop qual	□Soil testing lity
6.	Rate the effectiveness of the di			
Oper	ator Review, Initial and Date:		Inspector Review, Init	ial and Date:
Com	pany Name: JP 6-12-17			



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### **MODULE 12: WEED, PEST and DISEASE INPUTS**

#### WEED, PEST AND DISEASE INPUTS

#### CONTROL PRODUCTS

□ No Weed, Pest, or Disease Control Products Used. Skip to Module 13 - Irrigation

List all weed, pest and disease products that are intended for use on proposed organic fields/crops. If you have discontinued use of a product and are unlikely to use it again, please cross out the entry. Labels and/or OMRI/WSDA certificates (if applicable) for each product need to be on file with CDA. If you have received approval for a product and have submitted a product label, you do not need to resubmit the label each year. If a product is not listed with OMRI or WSDA, CDA will need a complete ingredients list and processing methods from the manufacturer to determine whether it complies with NOP Subpart G – Allowed and Prohibited Substances.

Control Product	Manufacturer	Weed, Pest, or Disease problem being addressed (specific)	Preventative Mechanical and Physical Control Strategies	OMRI/ WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)
					Allowed	9/21/16 AM
					Allowed	9/21/16 AM
					Allowed	9/21/16 AM
					Allowed	9/21/16 AM
					Allowed	9/21/16 AM
					Allowed	9/21/16 AM
					Allowed	9/21/16 AM

Operator Review, Initial and Date:

Inspector Review, Initial and Date:

Company Name: JP 6-12-17

F-E-211 10/10/2015



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

## MODULE 12: WEED, PEST and DISEASE INPUTS, Cont'd

Control Product	Manufacturer	Weed, Pest, or Disease problem being addressed (specific)	Preventative Mechanical and Physical Control Strategies	OMRI/ WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)
					Allowed	9/21/16 AM
					Allowed	9/21/16 AM
					Allowed	9/21/16 AM
					Allowed	9/21/16 AM
*NOP Rule Reference	es (CDA to enter) -					

Operator Review, Initial and Date: C & C Cattle Co. LLC

Inspector Review, Initial and Date:



#### **MODULE 13: IRRIGATION**

IK	RIGATION
	□ Water not used for irrigation. Skip to Module 14 – Natural Resources and Biodiversity
1.	List the types of irrigation systems (flood, drip, overhead, center pivot, etc.) employed on this operation:
2.	What is the source(s) of water used on this operation for irrigation?
3.	What is the name of the municipal and/or irrigation district, if applicable?
4.	List known contaminants in water supplies in your area: C & C Cattle Co. LLC
5.	How are the water contamination problems listed above minimized?
6.	Please describe how and how often water quality is monitored? JP 6-12-17
7.	Are any input products applied through irrigation systems? If yes, please provide details:
8.	What, if any, products are used to clean irrigation systems? Please list the product and provide rates of use: C & C Cattle Co. LLC
9.	Are any irrigation systems shared with other users?
pro	a. If irrigation systems are shared with another user or if your operation also consists of conventional crop oduction, how do you ensure there is no contamination of organic crops in terms of the irrigation system?

Operator Review, Initial and Date:

Inspector Review, Initial and Date:

Company Name: JP 6-12-17



# **MODULE 14: NATURAL RESOURCES and BIODIVERSITY**

NATURAL RESOURCES AND BIODIVERSITY							
The conservation of natural resources and biodiversity is a primary tenet of organic production. NOP Rules 205.200 and 205.203(a) require that production practices maintain or improve the natural resources of the operation, including soil, water, wetlands, woodlands, grasslands and wildlife. Practices must minimize erosion. Irrigation water should not contaminate organic crops or soils with prohibited materials. Methods to conserve water should be part of the irrigation plan.							
<ul> <li>What features does this operation contain? Check all that apply.</li> <li>□ Forest or Woodland □ Grassland □ Shrub Land □ Riparian or Wetland Areas</li> <li>□ Other, please specify: JP 6-12-17</li> </ul>							
<ul> <li>2. What features does this operation border (not owned or managed by this operation)?</li> <li>□ Forest or Woodland □ Grassland □ Shrub Land □ Riparian or Wetland Areas</li> <li>□ Other, please specify:</li> </ul>							
3. In general, what conservation practices are in use? Check all that apply.							
4. Please describe, in further detail, any boxes checked from above: All							
5. Describe any practices in place to maintain native plant and pollinator populations: C & C Cattle Co. LLC							
Operator Review, Initial and Date: Inspector Review, Initial and Date:							



**Division of Plant Industry** 305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

NATURA	L RESOURCES AND BIODIVERSITY		Module 14 Cont'd
	the operation participate in any NRCS (Natural Resources Conservation S acentives Program) activities or work with an NRCS advisor? as	ervice) or EQ	UIP (Environmental
If ye	s, please describe:		
C & C	Cattle Co. LLC		
	here any areas of the operation that have evidence of soil erosion? res, please describe:	□Yes	□ No
8. What JP 6-	practices are being used to minimize the soil erosion problems listed abov 2-17	e?	
9. What	practices are used to protect <i>water quality</i> ?		
ACTUAL DEDITED IN THE REPORT OF THE	nt <i>water conservation</i> practices are used on this operation? Cattle Co. LLC		
	ribe how manure and compost are managed to protect crops, soil, and wat heavy metals or pathogenic organisms:	er from conta	mination by excess

Operator Review, Initial and Date:

Inspector Review, Initial and Date:

Company Name: JP 6-12-17



#### **MODULE 15: EQUIPMENT, TRANSPORTATION AND STORAGE**

#### SECTION 1 - EQUIPMENT AND TOOLS

To prevent commingling and contamination, all equipment used in organic crop production must be free of non-organic crop material (including residues of) and prohibited materials. Contamination includes that from oil, fuel and hydraulic fluids. Equipment used for both organic and non-organic farming must be cleaned prior to use on organic fields and crops. Records of equipment cleaning, including cleaning by an outside business, must be available during your inspection.

1.	Is any equipment owned by the operation loaned out or otherwise used on land not controlled by the operation?
	If yes to the above, please explain: C & C Cattle Co. LLC
2.	Is any equipment used by the operation used on both organic and non-organic fields? If yes, please list all equipment used on both organic and non-organic fields:
	Describe the use of any custom operators/custom equipment that occurs on this operation. Include what type of nipment, which crops, for what purpose (input application, harvest, soil preparation, etc.): JP 6-12-17
4.	List names of any custom operators used by this operation:
5.	How is equipment cleaned before use on organic fields (if different for different pieces of equipment, please list all)? 24 hours
6.	Are any products used to clean or sanitize equipment or tools? If yes, please list the product and the rate used: All
7.	Is cleaning documentation maintained?  Yes No If yes, please describe:
	C & C Cattle Co. LLC
8.	Is equipment maintained so that fuel, oil, and hydraulic fluid do not leak?
9.	Could any of the equipment used on the operation be contaminated by previous uses? If Yes No If yes, please describe:
Op	erator Review, Initial and Date: Inspector Review, Initial and Date: C & C Cattle Co. LLC



# COLORADO DEPARTMENT OF AGRICULTURE

**Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

SE	ECTION 2 - STORAGE AND TRANSPORTATION Module 15, Cont'd								
				ed during storage and transpo	rt. Storage records and				
		ist be maintained if applic for transporting the fina							
1.	Self/Operation	Buyer	Third Party	□ Other (specify):	□Not applicable				
2	Who is responsible	for <i>arranging</i> the final tr	ansportation of or	anic products?					
2.	Self/Operation	Buyer	Third Party	☐ Other (specify): JP 6-12-17	□ Not applicable				
3.	When do organic cr	ops leave the operation's	s custody?	01 0 12 11					
	At the point of sal	sale							
		ne ouyer, transported by an		olici (specify).					
4.		used to protect the integ	rity of organic crop	os during transport?					
	Use of clean truck/tr		edicated organic tran		sport units prior to loading				
	□Inspecting transport		etter or contract with	transport agency stating organic	requirements				
	Other (Specify): C 8	C Cattle Co. LLC							
5.	Describe how crops	are stored at this operat	ion (where, length	of time, climate control, etc.)	:				
6.	Are the same storage	ge areas used for organic	and non-organic c	rops? 🗆 Yes 🗆 No					
•••		s segregated and identifi							
	4000 tons	0 0							
_									
7.		l to control rodents, insec rials in Module 17 - Post			$\Box$ Yes $\Box$ No				
	Thease list any mate	Tials III Widdule 17 - 1 Ost							
8.	and the second second standing and the second second second second	l to clean and/or sanitize		□ Yes □ No					
	Please list any input	ts/materials in Module 17	7 – Post Harvest M	aterials					
9.	Is off-site storage ut	tilized?		Yes	No				
		rage controlled exclusive	ly by this operatio	n? 🛛 Yes 🗖 No	0				
		5 52 12250 SSC21 2	8.10						
	If yes, is the off-site	e storage facility certified	organic?	Yes No					
In	the table below, descr	ribe storage locations or	structures includin	g off-site storage:					
	Storage Name/ID	Туре	Capacity	On Site or address for Off-Site	Dedicated Organic?				
Во	xcar	Seed	4000 ton	On site	Yes				
На	ly Sheds	Нау	4500 ton	On site	Yes				
На	lay Yard Hay 800 ton On site Yes								
Gr	Grain bin Seed On site								

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



# MODULE 16: HARVEST, POST-HARVEST HANDLING AND PACKAGING

SE	CCTION 1 - HARVESTING			
	□ No harvesting occurs – <i>all</i> land is fallow or maintained solely for g			
	DP Rule 205.272(b)(1)(2) requires that containers, bins and packaging mate eservatives, or fumigants. All reusable containers must be thoroughly clean			
	ops prior to use. If crops are harvested through custom harvesters, clean eq	Care products in the care and the care of		
1.	Are any crops custom harvested?	Yes	No	
	If yes, which crops and by whom?			
		1920. V		
2.		Yes	No	
	If yes, please describe:			
3	Is harvest equipment used for both organic and conventional crops?	Yes	No	
5.	If yes, describe how the operation ensures there is no risk of contamin			due
	left on equipment (cleaning methods, etc.):		· · · · · · · · · · · · · · · · · · ·	
	C & C Cattle Co. LLC			
4.	Are containers used to harvest crops?	Yes	No	
	If yes, list the types of containers and whether they are new or used:			
-	Ann ann tais an an d'fan hath ann air an d'anna tian a' ann 2	No.		
э.	Are containers used for both organic and conventional crops? If yes, describe how the operation ensures that there is no risk of cont	Yes	residues left in the	
	Container:		residues ien in the	
	JP 6-12-17			
6.	Are containers cleaned prior to harvest?	Yes	No	
	If yes, describe methods:			
	2300 acres			
				3
Op	erator Review, Initial and Date: In	spector Review, In	nitial and Date: Compo	st/Manure
Co	mpany Name: Manune is complicated at 2 to 2 to 1		enranz	in ame in a
20	mpany Name: Manure is applied at 2 to 3 ton to the acre in the fall.			
F-E	-214 Crop OSP Module 16 Harvest.Post Harvest Ha	ndling.Labeling		Revision A

Page 1 of 4



# COLORADO DEPARTMENT OF AGRICULTURE

**Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

SE	CTION 2 - POST HARVEST			Module 16, Cont'd
	🔳 No post-harvest activities occu	ur (No cooling, rinsing, wa	shing, packing or application of a	ny materials, occurs to
	crops post-harvest.). Skip to Moo			
1.	Indicate what methods are used t			
			he Module 17 - Post-Harvest Mate	
	☐ Manual Washing	□ Soap and Water	□ Sanitizing	□ Scraping
	□ Sweeping	□ Vacuuming	Compressed Air	□ Steam Cleaning
	□ Purging of Equipment	Va	abs are cleaned at least once a week v cuum or skid loader and tractor with m	vith a manure anure spreader.
2.	Are quaternary ammonia produc	ts used for cleaning or san	nitation?  Yes  No	
ens	ease note, Quaternary Ammonia prod ure that no residues remain on any f ethyl ammonium chloride)			
3.	How does the operation ensure the 4000 tons	at organic products are no	ot contaminated by a cleanser or s	anitizer?
4.	Does the operation document/rec Yes No If yes, please describe: C & C Cattle Co. LLC	ord cleaning, sanitation an	nd/or purging practices and procee	lures?
5.	Are products containing chlorine direct contact with any crops (wa If yes, please answer the followin	sh water, flume water, etc		rite used in ] Yes □ No
	a) What is the rate used?			
			t with crops, may not exceed the m Act. Please describe how this rest	
6.	What is the source of water used	2005 B	os? Other (Specify):	
7.	Is water treated on site? If yes, how? 24 hours	Yes	No	
8.	Is water quality monitored? Please describe: All	□ Yes	No	
	maton Derrienty Initial and Data		Increastor Deview, Initial and Data	

Operator Review, Initial and Date:

Inspector Review, Initial and I	Date:
---------------------------------	-------

Company Name: C & C Cattle Co. LLC



# COLORADO DEPARTMENT OF AGRICULTURE

**Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

SECTION 2 - POST H	ARVEST CONT'D			Module 16, Cont'd					
Yes No	applied to any crops post			etc.)?					
Yes	0. Are any pest control methods used in areas/structures where cooling, washing, bagging occurs? Yes No If yes, please list the materials in the "Post-Harvest Materials" section.								
operation?	l crops processed (grind, ☐Yes ☐No	N 75.7 98	tract, dehydrate, can, ja	r, cook, etc.) by this					
12. Is a different certiany of this operation	Yes ar acility is used to process a	d ownership is transferr ad the operation retains o	red at delivery ownership of the final pro	oduct					
Product	Label Claim (100% Organic, Organic,	Label or Brand Name	Name of Processor	Organic Certifier of Processor					
N/A	Made with Organic)								

Operator Review, Initial and Date: C & C Cattle Co. LLC

Inspector Review, Initial and Date:



305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### SECTION 3 - PACKAGING

#### Module 16, Cont'd

The NOP rule defines "packaging" as a sealed container or material that encloses a product. Non-retail containers used only to ship or store organic products must clearly identify the organic status of the product. If lot numbers are used, non-retail containers must display the production lot number of the product. For packaged (sealed), retail products, the label must state "Certified Organic by the Colorado Department of Agriculture" or similar, directly below the name and contact information for the operation. Please see Subpart D – Lables, Labeling, and Market Information - of the NOP Rule for more specific requirements.

1. How are products identified	as organic during sale or a	t the point of sale? Cl	heck all that apply.				
□ Retail labels	□ Non-retail labels	Invoices	□ Scale t	tickets			
□ Bin tags	□ Bills of lading	□ Other(Specify	y): JP 6-12-17				
2. Are organic products package	ged (see definition above) in	any way?	□ Yes	□ No			
a. If yes, what types of packaging or containers are used? Mark all that apply.							
□ Cardboard	Paper		Glass				
Plastic bags	□ Solid plastic		LI F011				
□ Other (Specify):							
		-					
	ils or containers food grade	?	■ Yes	No			
If no, please explain	:						
C & C Cattle Co. LLC							
	als or containers re-used?		Yes	No			
If yes, explain how	organic products are protec	ted from potential co	ontamination:				
d. Are retail labels appli	ed to packaging?		Yes	No			
			_				
e. Are non-retail labels a	pplied to packaging?		Yes	No			
f. Is the USDA seal appl	ied to packaging or market	ing information?	Yes	No			
g. Is the Colorado Organ	ic seal applied to packagin	g or marketing inform	mation? Yes	No			
5			Pro-				
**Please submit color copies of a	ll labels used by the operat	ion (photographs and	l printing proofs are	acceptable)			
1.000				•			

Operator Review, Initial and Date:

Inspector Review, Initial and Date:

Company Name: JP 6-12-17

Page 4 of 4



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

### MODULE 17: CLEANING, SANITIZING & POST HARVEST INPUTS

#### **Cleaning, Sanitizing & Post-Harvest Inputs**

List all products used after products have been harvested including tool and equipment cleaners and sanitizers, pest control products used in handling and storage areas, and materials applied to products. If you have discontinued use of a product and are unlikely to use it again, please strike through or cross out the entry. Labels for each product need to be on file with CDA. If you have received approval for a product and have submitted a product label, you do not need to resubmit the label each year.

Product	Manufacturer	Use & How Applied	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)
N/A			No	Allowed	9/21/16 AM
			No	Allowed	9/21/16 AM
			No	Allowed	9/21/16 AM
			No	Allowed	9/21/16 AM
			No	Allowed	9/21/16 AM
			No	Allowed	9/21/16 AM
			No	Allowed	9/21/16 AM
*NOP Rule References (C	DA to enter) -				

Operator Review, Initial and Date:

Inspector Review, Initial and Date:

Company Name: JP 6-12-17 F-E-215 10/10/2015

All OSP Module 17 Post Harvest Handling Inputs



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

# **MODULE 18: RECORD KEEPING**

#### **Record Keeping**

The NOP Rule requires that records disclose all activities and transactions of the operation, be maintained for 5 years, and demonstrate compliance with the Rule. Organic products must be able to be traced back to the field/location where they were produced/harvested. All records must be available to view and/or copy.

<ul> <li>Field maps</li> <li>Field activity logs</li> <li>Machine use logs</li> <li>Planting records</li> <li>Documentation of previous land use</li> <li>Input records for soil amendments, fertilizers, pest, weed and disease controls</li> <li>Documentation of stempts to source organic seeds and/or planting stock</li> <li>Documentation of seed and planting stock sources</li> <li>Compost production records</li> <li>Monitoring records (soil, tissue, and water tests, etc.)</li> <li>Equipment cleaning records</li> <li>Harvest records</li> <li>Labor records</li> <li>Storage records</li> <li>Clean transport records</li> <li>Sales records (invoices, purchase orders, receipts)</li> <li>Shipping records (scale tickets, bill of lading, etc.)</li> <li>Transaction certificates</li> <li>Audit control summary</li> <li>Other (Specify):</li> </ul> 2. How long are records kept? If less than 5 years, explain why:
<ul> <li>Field activity logs</li> <li>Machine use logs</li> <li>Planting records</li> <li>Documentation of previous land use</li> <li>Input records for soil amendments, fertilizers, pest, weed and disease controls</li> <li>Documentation of attempts to source organic seeds and/or planting stock</li> <li>Documentation of seed and planting stock sources</li> <li>Compost production records</li> <li>Monitoring records (soil, tissue, and water tests, etc.)</li> <li>Equipment cleaning records</li> <li>Itabor records</li> <li>Storage records</li> <li>Clean transport records</li> <li>Sales records (invoices, purchase orders, receipts)</li> <li>Shipping records (scale tickets, bill of lading, etc.)</li> <li>Transaction certificates</li> <li>Audit control summary</li> <li>Other (Specify):</li> </ul>
<ul> <li>Machine use logs</li> <li>Planting records</li> <li>Documentation of previous land use</li> <li>Input records for soil amendments, fertilizers, pest, weed and disease controls</li> <li>Documentation of attempts to source organic seeds and/or planting stock</li> <li>Documentation of seed and planting stock sources</li> <li>Compost production records</li> <li>Monitoring records (soil, tissue, and water tests, etc.)</li> <li>Equipment cleaning records</li> <li>Harvest records</li> <li>Storage records</li> <li>Clean transport records</li> <li>Shipping records (scale tickets, bill of lading, etc.)</li> <li>Transaction certificates</li> <li>Audit control summary</li> <li>Other (Specify):</li> </ul>
<ul> <li>Planting records</li> <li>Documentation of previous land use</li> <li>Input records for soil amendments, fertilizers, pest, weed and disease controls</li> <li>Documentation of attempts to source organic seeds and/or planting stock</li> <li>Documentation of seed and planting stock sources</li> <li>Compost production records</li> <li>Monitoring records (soil, tissue, and water tests, etc.)</li> <li>Equipment cleaning records</li> <li>Harvest records</li> <li>Labor records</li> <li>Storage records</li> <li>Clean transport records</li> <li>Sales records (invoices, purchase orders, receipts)</li> <li>Shipping records (scale tickets, bill of lading, etc.)</li> <li>Transaction certificates</li> <li>Audit control summary</li> <li>Other (Specify):</li> </ul>
<ul> <li>Documentation of previous land use</li> <li>Input records for soil amendments, fertilizers, pest, weed and disease controls</li> <li>Documentation of attempts to source organic seeds and/or planting stock</li> <li>Documentation of seed and planting stock sources</li> <li>Compost production records</li> <li>Monitoring records (soil, tissue, and water tests, etc.)</li> <li>Equipment cleaning records</li> <li>Labor records</li> <li>Storage records</li> <li>Clean transport records</li> <li>Shipping records (scale tickets, bill of lading, etc.)</li> <li>Transaction certificates</li> <li>Audit control summary</li> <li>Other (Specify):</li> </ul>
<ul> <li>Input records for soil amendments, fertilizers, pest, weed and disease controls</li> <li>Documentation of attempts to source organic seeds and/or planting stock</li> <li>Documentation of seed and planting stock sources</li> <li>Compost production records</li> <li>Monitoring records (soil, tissue, and water tests, etc.)</li> <li>Equipment cleaning records</li> <li>Harvest records</li> <li>Labor records</li> <li>Storage records</li> <li>Clean transport records</li> <li>Shipping records (scale tickets, bill of lading, etc.)</li> <li>Transaction certificates</li> <li>Audit control summary</li> <li>Other (Specify):</li> </ul>
<ul> <li>Documentation of attempts to source organic seeds and/or planting stock</li> <li>Documentation of seed and planting stock sources</li> <li>Compost production records</li> <li>Monitoring records (soil, tissue, and water tests, etc.)</li> <li>Equipment cleaning records</li> <li>Harvest records</li> <li>Labor records</li> <li>Storage records</li> <li>Clean transport records</li> <li>Sales records (invoices, purchase orders, receipts)</li> <li>Shipping records (scale tickets, bill of lading, etc.)</li> <li>Transaction certificates</li> <li>Audit control summary</li> <li>Other (Specify):</li> </ul>
<ul> <li>Documentation of seed and planting stock sources</li> <li>Compost production records</li> <li>Monitoring records (soil, tissue, and water tests, etc.)</li> <li>Equipment cleaning records</li> <li>Harvest records</li> <li>Labor records</li> <li>Storage records</li> <li>Clean transport records</li> <li>Sales records (invoices, purchase orders, receipts)</li> <li>Shipping records (scale tickets, bill of lading, etc.)</li> <li>Transaction certificates</li> <li>Audit control summary</li> <li>Other (Specify):</li> </ul>
<ul> <li>Compost production records</li> <li>Monitoring records (soil, tissue, and water tests, etc.)</li> <li>Equipment cleaning records</li> <li>Harvest records</li> <li>Labor records</li> <li>Storage records</li> <li>Clean transport records</li> <li>Sales records (invoices, purchase orders, receipts)</li> <li>Shipping records (scale tickets, bill of lading, etc.)</li> <li>Transaction certificates</li> <li>Audit control summary</li> <li>Other (Specify):</li> </ul>
<ul> <li>Monitoring records (soil, tissue, and water tests, etc.)</li> <li>Equipment cleaning records</li> <li>Harvest records</li> <li>Labor records</li> <li>Storage records</li> <li>Clean transport records</li> <li>Sales records (invoices, purchase orders, receipts)</li> <li>Shipping records (scale tickets, bill of lading, etc.)</li> <li>Transaction certificates</li> <li>Audit control summary</li> <li>Other (Specify):</li> </ul>
<ul> <li>Equipment cleaning records</li> <li>Harvest records</li> <li>Labor records</li> <li>Storage records</li> <li>Clean transport records</li> <li>Sales records (invoices, purchase orders, receipts)</li> <li>Shipping records (scale tickets, bill of lading, etc.)</li> <li>Transaction certificates</li> <li>Audit control summary</li> <li>Other (Specify):</li> </ul>
<ul> <li>Harvest records</li> <li>Labor records</li> <li>Storage records</li> <li>Clean transport records</li> <li>Sales records (invoices, purchase orders, receipts)</li> <li>Shipping records (scale tickets, bill of lading, etc.)</li> <li>Transaction certificates</li> <li>Audit control summary</li> <li>Other (Specify):</li> </ul>
<ul> <li>Labor records</li> <li>Storage records</li> <li>Clean transport records</li> <li>Sales records (invoices, purchase orders, receipts)</li> <li>Shipping records (scale tickets, bill of lading, etc.)</li> <li>Transaction certificates</li> <li>Audit control summary</li> <li>Other (Specify):</li> </ul>
<ul> <li>Clean transport records</li> <li>Sales records (invoices, purchase orders, receipts)</li> <li>Shipping records (scale tickets, bill of lading, etc.)</li> <li>Transaction certificates</li> <li>Audit control summary</li> <li>Other (Specify):</li> </ul>
<ul> <li>Clean transport records</li> <li>Sales records (invoices, purchase orders, receipts)</li> <li>Shipping records (scale tickets, bill of lading, etc.)</li> <li>Transaction certificates</li> <li>Audit control summary</li> <li>Other (Specify):</li> </ul>
<ul> <li>Sales records (invoices, purchase orders, receipts)</li> <li>Shipping records (scale tickets, bill of lading, etc.)</li> <li>Transaction certificates</li> <li>Audit control summary</li> <li>Other (Specify):</li> </ul>
□ Transaction certificates □ Audit control summary □ Other (Specify):
□ Transaction certificates □ Audit control summary □ Other (Specify):
□ Other (Specify):
2. How long are records kept? If less than 5 years, explain why:
2. How long are records kept? If less than 5 years, explain why:
2. How long are records kept? If less than 5 years, explain why:
3. What records are kept for non-organic production?
■ Not applicable (no non-organic production) □ Input records □ Field history sheets
□ Harvest records □ Sales records □ Storage records
□ Shipping records □ Complaints to operators □ Field maps
□ Labor records □ Other:
Operator Review, Initial and Date: Inspector Review, Initial and Date: JP 6-12-17

Company Name: C & C Cattle Co. LLC



### Livestock Production - Organic System Plan MODULE 60: Operation Profile

#### **Operation Profile**

In the table below, please enter the requested information. Depending on the operation, numbers of animals should reflect the maximum number during a season or the average number to give the best understanding of the operation. A production group or class is a group of animals managed separately based on age, sex, diet, reproductive stage, etc. Production groups listed here should be the same throughout this OSP.

Type and Breed of Livestock	Total # of animals	# of Females	# of Males	# of Nonorganic Breeding Stock	# of Organic Animals Eligible for Slaughter (managed organically from last third of gestation)	Classes or Production Groups (if applicable)	Products for Organic Certification (Dairy, Meat, Fiber, Live Animals, etc.)
Holstein Heifers	(b) (4)	(b) (4)		20	(b) (4)	Open Hfrs 4-11 months Open Hfrs 12-16 months Pregnant Heifers	Live Animals

Operator Review, Initial and Date:

Inspector Review, Initial and Date:

Company Name: JP 6-12-17 F-E-409 2/29/2016

Livestock OSP Module 60 Operation Profile



## MODULE 60: Operation Profile Cont'd

1. Describe the flow of animals through the operation during a given year. This can be done in a narrative form below or in a flow chart(s) or diagram(s). Include and explain major aspects of the operation.
JP 6-12-17
2. A map or diagram of the operation must be submitted. This should include all relevant espects of the operation including
2. A map or diagram of the operation must be submitted. This should include all relevant aspects of the operation including pasture areas, housing/shelter structures, yards, feed pads, manure storage, etc.
3. Does any custom grazing or boarding of animals owned by the operation ever take place at locations not owned or managed by this operation? Please explain. $\Box$ N/A
4. Does the operation maintain any other types of certifications? If yes, please list
C & C Cattle Co. LLC
5. NOP Rule 205.236(c) requires that a producer of an organic livestock operation maintain records sufficient to preserve the
individual identity of all organically managed animals. Please describe the animal identification system used at this operation.
6. If an animal needs to be treated with prohibited materials, how are they identified and/or kept segregated?
Please Note: A list of individual animals must be maintained by the operation. This list must include the following for each animal:
Animal ID, breed (if multiple breeds), date of birth or date of purchase, date placed under organic management, notations regarding any
medical treatments including antibiotics or prohibited materials, any event and reason of animal leaving the operation. This list will be verified at inspection.
Operator Review, Initial and Date: C & C Cattle Co. LLC
Company Name:



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

## Livestock Production – Organic System Plan MODULE 61: Origin of Livestock

NOP Rule 205.236 requires that 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 <i>except</i> that milk or milk products from a									
herd must be from animals that have been under continuous organic management for at least one year prior to production									
of organic products. Once an entire distinct herd (dairy) has been converted to organic production, all dairy animals shall be under organic management from the last third of gestation.									
1. Are dairy animals	<u> </u>		Yes INO						
a) If yes, is a dairy herd currently being transitioned to organic management? 🛛 Yes 🔳 No									
i) If yes, list the	date conversio	n began							
2. How does this open	ration obtain re	eplacement or a	additional animals?						
Organic animals (or	ganically manag	ged from the las	t third of gestation) are purcl	hased.					
-	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		to organic (only allowed for ntinuous organic management		5.25%2 X5				
□ Nonorganic breeder dairy operations).	stock are obtain	ned to raise offsp	pring organically from the la	st third of gestation (does	not apply to				
Replacement animal sooner.	ls are bred and b	orn on this oper	ration and managed organica	lly from the last third of g	estation or				
Other, explain:									
Please complete the ta	ble below for a	ny animals pu	rchased since the last OSP	update					
Type/Class of Livestock Purchased	Number of head purchased	Date of Purchase	Source (name and address of seller)	Certified? If yes, list certifier	Last third of gestation animal?				
Organic Heifers	2016 per year	168 per month	(b) (4)	Yes Colorado Department of	Yes				

Operator Review, Initial and Date:

Inspector Review, Initial and Date: JP 6-12-17

Company Name:



## Livestock Production – Organic System Plan MODULE 62: Nonorganic Livestock Production

### **Non-Organic Livestock Production**

■ No Nonorganic Livestock Production occurs on this operation. All livestock on this operation	tion are Organ	ic.			
Skip to Module 63: Feed and Pasture					
1. Which types of Livestock are being raised nonorganically on this operation:					
<ul><li>2. Does the operation raise the same types of Livestock organically and nonorganically?</li><li>a) If yes, please list the types of livestock raised both organically and nonorganically:</li></ul>	□ Yes	□ No			
b) If yes, how are nonorganic and organic livestock kept separate and distinguishable? JP 6-12-17					
3. How are organic feeds and healthcare products kept separate and distinguishable from n	onorganic?				
<ul> <li>How are organic and nonorganic products kept separate and distinguishable during harvand packaging?</li> <li>C &amp; C Cattle Co. LLC</li> </ul>	vest/collection,	processing,			

Operator Review, Initial and Date:

Inspector Review, Initial and Date: JP 6-12-17

Company Name:



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

## Livestock Production – Organic System Plan MODULE 63: Feed and Water

FEED			Section 1			
NOP Rule 205.237 requires the producer of an organic livestock operation to provide a products, including pasture and forage, that are organically produced and handled by synthetic substances listed in 205.603 and nonsynthetic substances not prohibited in 205 supplements. All agricultural ingredients for such additives and supplements must have	operations 5.604 may ve been pro	s certified to be used as fo oduced and l	the NOP <i>except</i> that eed additives and handled organically.			
Using animal drugs, including hormones and antibiotics, to promote growth is prohibit additives in amounts above those needed for adequate nutrition and health maintenance formulas containing urea or manure, and feeding of mammalian or poultry by-product	e. Feedin	g of plastic p				
1. Does this operation grow crops for livestock feed (other than pasture)?	Yes	🗆 No				
If yes, what types of feed crops does this operation grow (other than pasture	e)?					
2. Are fodder sprouts (sprouted grain) grown as livestock feed?	No No					
If yes, please describe the system for growing fodder sprouts.						
3. Are young stock (under 6 months) raised at this operation? Search Yes If yes, please indicate by what means young stock are fed, by checking all a	□ No pplicable	boxes below	<i>.</i>			
Raised on/with mother or nurse animal       Image: Organic milk from organic on-farm         Milk replacer       Image: Organic forage         Other, list: JP 6-12-17       Image: Organic forage	animals		urchased organic milk organic grains			
4. Is feed purchased? ■ Yes □ No If yes, please enter all feed purchases in Module 44: Feed and Feed Supplement	ent List					
5. Is any organic feed processed (mixed, ground, roasted, extruded, etc) at this ope (If yes, a Process Handler OSP must be submitted.)	eration?	Yes	□ No			
If yes, is equipment used to process organic feed also used for nonorganic feed	eed?	□ Yes	□ No			
If yes, how does the operation ensure there is no contamination from nonorganic products?						
6. What is the operation's plan for emergency feed supplies?						
C & C Cattle Co. LLC						
<ul> <li>7. Is the feed ration provided at this operation sufficient to meet nutritional require of growth, including vitamins, minerals, protein and/or amino acids, fatty acids, en</li> <li>■ Yes</li> <li>□ No</li> </ul>						
Operator Review, Initial and Date: Inspector Review,	, Initial and	Date: JP 6-	12-17			



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

## Livestock Production – Organic System Plan MODULE 63: Feed and Water

FEED Cont'd				Section 1 Cont'd		
8. Please indicate where and how feed is stored in the table below.						
Storage Name or ID	Type of Feed Stored	Type of Storage	Capacity	Dedicated Organic?		
Hay Yard	Hay Bales	Flat Ground	4000 ton	Yes		
Hay Sheds	Hay Bales	Hay Sheds	4500 ton	Yes		
Feed Shed	Millet & Oat Pellets/Ground Corn	Feed Shed	800 ton	Yes		
	tions other than this operation afte a Storage Facility Affidavit.	er purchase? 🛛 Yes	No No			
6 G.	J .					
	thods used in feed storage areas? Iodule 17: Cleaning, Sanitizing an	☐ Yes ■ No d Post Harvest Inputs.				

Operator Review, Initial and Date: C & C Cattle Co. LLC



### Livestock Organic System Plan Module 63: Feed and Water Cont'd

WATER				Section 2
1. What are the sources of water for l		all that appl	ly.	
On-site well	Municipal		Natural river/creek/pond	
Man-made farm pond	Spring		Other, specify: 4000 tons	
2. If livestock have access to a river, o	rreek or pond, how i	is water quali	ty maintained and erosion controlled?	□ N/A
	raa. 1010			
3. Are any additives used in livestock If yes, please list them in Modu		☐ Yes d Feed Suppl	No ements.	
4. Describe how the operation ensure	s there is year round	d access to cle	ean water sources for livestock.	
C & C Cattle Co. LLC				
5. Are any water contamination prob		□ Yes	I No	
If yes, how are contamination is All	ssues minimized?			
6. Is water regularly tested?	Yes INO			
24 hours				
If yes, when were water tests m	ost recently perform	ned?		
Please note, copies of water test	results should be avo	ailable at insp	pection.	

Operator Review, Initial and Date: JP 6-12-17

Inspector Review, Initial and Date:



#### **MODULE 64: Feed and Feed Supplements**

#### Feed and Feed Supplements

Please list all purchased feed and feed supplements in the table below. Include anything added to water, minerals, and silage inoculants. Labels for products and/or verification of organic certification must be submitted. Products administered for healthcare/medical reasons should be listed in Module 68: Health Care Materials list.

Type of Feed or Supplement Product Name	Source/Supplier or Manufacturer	Certifier of Supplier (if applicable)	Status (CDA to enter)	Review Date (CDA to enter)
(b) (4)	(b) (4)	Colorado Dept. of Agriculture	Allowed	9/21/16 AM
		Global Organic Alliance	Allowed	9/21/16 AM
		International Certification Services	Allowed	9/21/16 AM
		N/A	Allowed	9/21/16 AM
		N/A	Allowed	9/21/16 AM
			Allowed	9/21/16 AM
		N/A	Allowed	9/21/16 AM
		OCIA International Organic		
		Global Organic Alliance		

Operator Review, Initial and Date:

Inspector Review, Initial and Date: JP 6-12-17

Company Name:



#### MODULE 64: Feed and Feed Supplements Cont'd

Type of Feed or Product Name	Source/Supplier or Manufacturer	Certifier of Supplier (if applicable)	Status (CDA to enter)	Review Date (CDA to enter)
	(b) (4)		Allowed	9/21/16 AM
	-		Allowed	9/21/16 AM
	-	_		
	_		Allowed	9/21/16 AM
	_		Allowed	9/21/16 AM
	_			
	-			
				Date: C & C Cattle Co. LLC

Company Name:

Livestock Module 64: Feed and Feed Supplements



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### Livestock Production – Organic System Plan MODULE 66: Ruminant Livestock Feed and Pasture

#### Dry Matter Demand and Dry Matter Intake

□ No <u>ruminant</u> animals/animal products are being requested for certification at this operation. Instead, fill out Module 65: Non-ruminant Livestock Feed.

1. Please complete the table below regarding Dry Matter Demand. An operation may submit their own documents as long as they contain all of the requested information.

Production Group/Class	Approximate average animal weight (lbs.)	Dry Matter Demand (lbs.per animal/day)
Open Heifers 4-12 months of age	520 lbs	13 lbs per day
Open Heifers 12-16 months of age	800 lbs	16.5 lbs per day
Pregnant Heifers	1030 lbs	23.5 lbs per day

2. How are the Dry Matter Demand values, listed above, determined?

3. How is Dry Matter Intake determined at this operation?

Operator Review, Initial and Date: JP 6-12-17

Inspector Review, Initial and Date: C & C Cattle Co. LLC

Company Name:

Section 1



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### MODULE 66: Ruminant Livestock Feed and Pasture cont'd

#### FEED RATIONS

Section 2

During the grazing season, producers must provide an average of no less than 30% of a ruminant animal's dry matter intake from grazing. The grazing season is defined as the period of time when pasture is available for grazing given climate factors, natural precipitation or irrigation. The grazing season must be at least 120 days per year; however, these days do not need to be continuous.

1. Describe feed rations <u>during the grazing season</u> by each animal class or production group in the table below. Include DMI from grazing, all other feed and feed supplements. This information can be submitted on your own forms as long as all requested information is included.

□ N/A. All animals' total ration is 100% pasture during the grazing season and the grazing season is at least 120 days. Skip to "Non Grazing Season Feed Rations" on page 3 of this module.

GRAZING SEASON FEED RATIONS							
<b>Class or Production Group</b>	Feed Type or Ration Component	Amount (per animal per day)					
	see attachment						

Operator Review, Initial and Date:

Inspector Review, Initial and Date:

Company Name: JP 6-12-17



### MODULE 66: Ruminant Livestock Feed and Pasture Cont'd

#### FEED RATIONS Cont'd

Section 2 Cont'd

2. Describe feed rations during the <u>Non-Grazing Season</u> by each animal class or production group in the table below. Include feed supplements. The non-grazing season must not be longer than 245 days. This information can be submitted on your own forms as long as all requested information is included.

N/A. Ruminant Livestock are not part of this operation during the non-grazing season. Skip to Section 3 of this module.

NON GRAZING SEASON FEED RATIONS						
<b>Class or Production Group</b>	Feed Type or Ration Component	Amount (per animal per day)				
Open Heifers 4-12 months of age	(b) (4)	(b) (4)				
	(b) (4)	(b) (4)				
ŝ						
Pregnant Heifers	(b) (4)	(b) (4)				

Operator Review, Initial and Date: C & C Cattle Co. LLC

Inspector Review, Initial and Date:



#### MODULE 66: Ruminant Livestock Feed and Pasture Cont'd

#### PASTURE AND GRAZING

Section 3

Per NOP Rule 205.240 Pasture and rangeland must be managed as a crop in compliance with NOP organic crop standards. A pasture plan (this module or the producer's own documents, provided they address all of the requirements of 205.240(c)1 - 8) must be updated annually.

1. From the Crop OSP, please list and describe the management of the fields that are used as pasture to graze animals, in the table below.

Pasture or Rangeland ID/Name	Acres	Pasture make-up/composition (perennial species, annual species, native pasture, rangeland, crop residue, etc.)	Irrigated? If yes, list type	Grazing Methods (Rotational, Continuous, Intensive, etc.)
b) (4)		Rye & Grass Pasture	No	Rotational
	0	Rye & Grass Pasture	No	Rotational/Continuous
		Rye & Grass Pasture	No	Rotational
	с	Rye & Grass Pasture	No	Rotational/Continuous
		Rye Pasture	No	Rotational
		Rye Pasture	No	Rotational
		Rye & Grass Pasture	No	Rotational/Continuous
		Rye Pasture	No	Rotational/Continuous
		Grass Pasture	No	Rotational
		Grass Pasture	No	Rotational
		Grass Pasture	No	Rotational
Total Acres Available for Grazing	5497			

2. Describe the grazing season of this operation including the approximate start and end dates and conditions that determine the grazing period.

3. During the grazing season, how many hours per day are animals on pasture? If this is different between classes or production groups, please list the number of hours for each group.

(b) (4) (b)

(b)

Operator Review, Initial and Date: C & C Cattle Co. LLC

Company Name: 24 hours



#### COLORADO DEPARTMENT OF AGRICULTURE

Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

## MODULE 66: Ruminant Livestock Feed and Pasture Cont'd

PASTURE AND GRAZING Cont'd				Section 3 Cont'd		
4. How does the operation ensure all animals ar	re grazing a minimum	of 120 day	s per year?			
5. How is it determined that animals are receiving no less than an average of 30% of their dry matter demand from pasture during the grazing season? JP 6-12-17						
6. Is pasture access ever denied to animals durin If yes, for what specific reasons is pastur			ture denied?			
7. How is the denial of pasture access document C & C Cattle Co. LLC	ted?					
8. How is it ensured that enough pasture of suff requirements during the grazing season? Check		ble to supp	ly 30% of animals' dry r	natter intake		
Resting periods	Periodic pasture reseedi Appropriate stocking de Fertilizing	-	<ul> <li>Irrigation</li> <li>Maintaining appropria</li> </ul>	U Weed control were were weed control were were were were were were were wer		
9. How do pasture management practices of this Slabs are cleaned at least once a week with a m at our manure pile or is moved to a field corner to	nanure vacuum or skid lo	bader and t	24 257. 5.59	1.54 0.54 0.54		
10. Are ruminants finished for slaughter at this	location?	🗆 Yes	□ No			
a) If yes, are these livestock grazed durin	ng the finish period?	🗆 Yes	🗆 No			
b) If no, how long is the finishing period? Compost/Manure storage drains to a lage	oon.					
Operator Review, Initial and Date:	Ins	spector Revi	ew, Initial and Date: Manue	re is applied at 2 to 3		
Company Name: 2300 acres						



## Livestock Production – Organic System Plan MODULE 67: Health Care

## HEALTH CARE, GENERAL

Section 1

Per NOP Rule 205.238, producers must establish and maintain preventative livestock health care practices. When preventative practices and veterinary biologics are inadequate to prevent sickness, a producer may administer synthetic medications, provided that such medications are allowed under 205.603. Medical treatment must not be withheld from a sick animal in an effort to preserve its organic status. Livestock treated with a prohibited substance must be clearly identified and shall not be sold, labeled, or represented as organically produced.						
		eration's livestock health care pla	an? Check all that apply.			
Selection of well adapted s	species	Selective breeding	□Raising own replacement stock			
Good quality feed		Nutritional supplements	□Multi species grazing			
Access to the outdoors		Dry bedding	Good ventilation in housing			
■Low stress handling		Good sanitation	Biological control of pests, parasites			
Quarantine/isolation of sic	k animals	Administration of vaccines/ot				
Allowed health materials/		□Other(s):	0			
2. Describe how indoor and ou	itdoor stocking	densities allow for exercise and fi	reedom of movement?			
3. Describe how the physical se JP 6-12-17	et up of the oper	ration allows for freedom of mov	ement, exercise and reduction of stress?			
PHYSICAL ALTERATIONS			Section 2			
NOP Rule 205.238 permits the physical alteration of livestock as needed to promote the animal's welfare providing it is in a manner that minimizes pain and stress.						
		on of investors as include to promot	e the animal's wenare providing it is in a			
manner that minimizes pain and	d stress.					
manner that minimizes pain and	d stress. any physical al		Include ear tagging, ear notching, branding,			
manner that minimizes pain and 1. In the table below, describe	d stress. any physical alt N/A No	terations performed on animals.	Include ear tagging, ear notching, branding,			
manner that minimizes pain and 1. In the table below, describe castration, dehorning, etc.	d stress. any physical alt N/A No	terations performed on animals. physical alterations are perform	Include ear tagging, ear notching, branding, ed at this operation.			
manner that minimizes pain and 1. In the table below, describe castration, dehorning, etc.	d stress. any physical alt N/A No	terations performed on animals. physical alterations are perform	Include ear tagging, ear notching, branding, ed at this operation.			
manner that minimizes pain and 1. In the table below, describe castration, dehorning, etc.	d stress. any physical alt N/A No	terations performed on animals. physical alterations are perform	Include ear tagging, ear notching, branding, ed at this operation.			
manner that minimizes pain and 1. In the table below, describe castration, dehorning, etc.	d stress. any physical alt N/A No	terations performed on animals. physical alterations are perform	Include ear tagging, ear notching, branding, ed at this operation.			
manner that minimizes pain and 1. In the table below, describe castration, dehorning, etc.	d stress. any physical alt N/A No	terations performed on animals. physical alterations are perform	Include ear tagging, ear notching, branding, ed at this operation.			
manner that minimizes pain and 1. In the table below, describe castration, dehorning, etc.	d stress. any physical alt N/A No	terations performed on animals. physical alterations are perform	Include ear tagging, ear notching, branding, ed at this operation.			
manner that minimizes pain and 1. In the table below, describe castration, dehorning, etc.	d stress. any physical alt N/A No	terations performed on animals. physical alterations are perform	Include ear tagging, ear notching, branding, ed at this operation.			
manner that minimizes pain and 1. In the table below, describe castration, dehorning, etc. Physical Alteration	d stress. any physical alt N/A No Age R	terations performed on animals. physical alterations are performed Reason for Alteration	Include ear tagging, ear notching, branding, ed at this operation. Method			
<ul> <li>manner that minimizes pain and</li> <li>1. In the table below, describe castration, dehorning, etc.</li> <li>Physical Alteration</li> <li>2. How do practices ensure that</li> <li>Handling time is minimized</li> <li>Separation time from the growther that and the second seco</li></ul>	d stress. any physical alt N/A No Age R	terations performed on animals. physical alterations are performed Reason for Alteration	Include ear tagging, ear notching, branding, ed at this operation. Method			
<ul> <li>manner that minimizes pain and</li> <li>1. In the table below, describe castration, dehorning, etc.</li> <li>Physical Alteration</li> <li>2. How do practices ensure that</li> <li>Handling time is minimized</li> <li>Separation time from the growther that and the second seco</li></ul>	d stress. any physical alt N/A No Age R at pain and stress up is minimized	terations performed on animals. physical alterations are performed Reason for Alteration ss associated with physical alteration Pain killers or anesthetics an Clean equipment/tools are u	Include ear tagging, ear notching, branding, ed at this operation. Method			



#### MODULE 67: Health Care Cont'd

#### PREVENTION AND TREATMENT

Section 3

1. An effective Health Care Program should anticipate potential health or disease issues and have a plan for the prevention and treatment of these issues. In the table below describe health problems and diseases livestock have had, are having or might have. A few issues have been indicated, but you must include the other specific problems or potential problems at your operation.

Health Problem/Disease	Preventative Practices	<b>Treatment or Control</b> (general – please list specific materials & products in Module 68)
External Parasites	N/A	
Flies	Fly predators	Pyganic is used during peak fly season.
Internal Parasites	N/A	
Predators, specify:	N/A	
BVD/IBR/BRSV	Vaccinations/Good Animal Care	Garlic Tincture/Probiotics
Pinkeye	Vaccinations/Good Animal Care	Eye Patches
Pneumonia	Vaccinations/Good Animal Care	Garlic Tincutre/Probiotics/Multimin
Off Feed	Good Animal Care	Electrolytes/Probiotics/Mulitmin
Severe Diarrhea	Good Animal Care	Electrolytes/Probiotics/Garlic Tincture/Multimin
Footrot	Free Choice Iodized Salt/Zinpro	Garlic Tincture & Sugar Wrap/Multimin
Poor Growth/Reproductive Problems	Good Animal Care	Multimin

Operator Review, Initial and Date: C & C Cattle Co. LLC

Inspector Review, Initial and Date:



## MODULE 67: Health Care Cont'd

Prevention and Treatment Cont'd			Section 3 Cont'd
2. Are synthetic parasiticides used o	on this operation?	🗆 Yes	I No
when preventative management does n	ot prevent infestation. De eder stock, treatment can	airy products j not occur dur	owed for emergency treatment in dairy and breeder stock ts from a treated animal cannot be labeled or sold as organic uring the last third of gestation if the progeny will be sold as k.
3. If an animal is treated with a proproducts from the animal are preve			the animal after treatment? How is it ensured that arket?
4. How is effectiveness of the health	care program monitor	ed?	
■Visual observation	Body condition scor		□Production analysis
□Testing for disease	□Fecal monitoring		Other, list: C & C Cattle Co. LLC
5. What is average percentage of de All	eath or loss on this opera	ation?	
6. What is the name and contact inf	cormation for the opera	tion's veterin	inarian?
24 hours			
7. Does the operation utilize other o	ff-farm specialists (e.g.	nutritionists	ts)? If yes, please list.
vaccinations and synthetic medication 205.603 – "Synthetic substances allow periods. All Health Care materials and	s. When determining the ed for use in organic lives d products must be approv	acceptability stock producti	e listed in Module 68: Health Care Materials List including y of a synthetic health care product, please refer to NOP Rule ttion." Special attention should be taken of withdrawal prior to use.
Operator Review, Initial and Date: JP 6	-12-17	Insp	spector Review, Initial and Date:



#### Livestock Organic System Plan MODULE 68: Health Care Materials

#### **Health Care Materials**

NOP Rule 205.238(b) states that when preventative practices and veterinary biologics are inadequate to prevent sickness, a producer may administer synthetic medications: *Provided*, that, such medications are allowed under 205.603. Please note: parasiticides allowed under 205.603 may be used on dairy stock only with a minimum of 90 days prior to production of milk/milk products that are to be sold, labeled or represented as organic. And only allowed in breeder stock prior to the last third of gestation, but not during lactation for progeny that are to be sold, labeled or represented as organically produced. In the table below, please list all health care materials administered or planned to be administered to livestock in the event of sickness. Product labels and/or certificates need to be submitted for all materials

Product Name	Source/Supplier or Manufacturer	Reason for Use	Frequency/ Duration	Milk or Meat Withholding Period (205.603)	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)
(b) (4)		Prevention of B∨D/IBR/PI3/Ma	Once upon arrival	21 days	No	Allowed	9/21/16 AM
		Prevention of IBR/PI3/BRSV	Once upon arrival	21 days	No	Allowed	9/21/16 AM
		Prevention of Pinkeye	Once upon arrival	21 days	No	Allowed	9/21/16 AM
		Prevention of Abortion caused	Once at 15 months	60 days	No	Allowed	9/21/16 AM
		Prevention of Brucellosis	Once	21 days	No	Allowed	9/21/16 AM
		Off Feed/Diarrhea/Pneumonia	Once a day/As nee	N/A	No	Allowed	9/21/16 AM
		Off Feed/Diarrhea/Pneumonia	Once a day/As nee	N/A	No	Allowed	9/21/16 AM

Operator Review, Initial and Date:

Inspector Review, Initial and Date:

Company Name: JP 6-12-17

F-E-215 10/10/2015



## Livestock Organic System Plan MODULE 68: Health Care Materials List Cont'd

Product Name	Source/Supplier or Manufacturer	Reason for Use	Frequency/ Duration	Milk or Meat Withholding Period (205.603)	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)
(b) (4)		Pneu/Severe Diarrhea/Mixed w/ Organic Sugar for Footrot	Once a day/as needed	N/A	Garlic - CCOF Vinegar - CCOF	Allowed	9/21/16 AM
		Mixed w/ Garlic Tincture and wrapped on foot for Footrot	Once a day/repeat after	N/A	QAI	Allowed	9/21/16 AM
		Off Feed, Diarrhea/Pneumonia	Once per day up to 4 days	N/A	No		
		Poor Growth/Reproductive Problems/Off Feed /Diarrhea	Can be given every 3 months	N/A	No	Allowed	9/21/16 AM
		Livestock Pest Control - Flies		N/A	OMRI	Allowed	9/21/16 AM
		Reduce Inflamation	Once a day	N/A			
		Pain Management during Surgical	Once before surgical	Meat - 90 davs			

Operator Review, Initial and Date:

Inspector Review, Initial and Date:



## Livestock Production – Organic System Plan MODULE 69: Living Conditions

#### Housing and Shelter

#### Section 1

Per NOP Rule 205.239, 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. This includes, 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, stage of life, climate and environment. Yards, feeding pads and feedlots may be used to provide ruminants with outdoor access during the non-grazing season and supplemental feeding during the grazing season provided that yards, feeding pads, and feed lots are large enough to allow all livestock occupying the space to feed simultaneously without crowding and without competition for food. Continuous total confinement indoors, or in yards, feeding pads or feed lots is prohibited. Maps of the operation should include the location of animal housing and shelter as well as yards, feeding pads, feedlots, etc.

1. In the table below please describe the types of housing and shelter available for livestock.

Shelter Type	Size (sq. ft.)	Production Group, Class or Age	Bedding or Flooring Type	# of Animals per Unit
Open Lot Corrals with Sheds	55000	Pregnant	Manure/Straw	150-160
Open Lot Corrals With Sheds	28500-55000	Breeding Heifers/Heifers	Manure/Straw	150-200
Open Lot Corrals With Sheds	20500-42000	Heifer 6-10 months	Manure/Straw	100-200
Open Lot Corrals With Sheds	3000-6000	Heifers 4-6 months	Manure/Straw	50-100

**2.** Are agricultural products (hay, straw, hulls, stalks, etc.) used as bedding? Yes No If agricultural products are used for bedding they must be from certified organic sources.

#### 3. For any <u>agricultural products used as bedding</u>, list the supplier and the supplier's certifier below.

Material	Source	Certifier
Cornstalks	(b) (4)	Global Organic Alliance
Straw	C & C Cattle Co. LLC	Colorado Department of

Operator Review, Initial and Date:

Inspector Review, Initial and Date:

Company Name: JP 6-12-17



## **MODULE 69: Living Conditions Cont'd**

HOUSING AND SHELTER Cont'd	Section 1 Cont'd
4. How often is housing cleaned out?	
5. How is housing cleaned? C & C Cattle Co. LLC	
6. Are any sanitation or cleaning products used in the cleaning of housing?	D
7. Are any fumigants or other pest control methods used in and around housing structures?	Yes No
ii yes, piease iist in Moune 17. Cleaning, Santizing and 10st-fratvest inputs	
8. What sources of light are used in animal housing?	
9. Is day length regulated using artificial light?	
If yes, please describe practices. JP 6-12-17	
10. Describe the locations of any treated wood that animals could come into contact with.	
OUTDOOR ACCESS	Section 2
<ol> <li>What outdoor areas, other than pasture, do animals have access to?</li> <li>N/A</li> <li>C &amp; C Cattle Co. LLC</li> </ol>	
2. Are the areas listed above large enough such that all animals can feed simultaneously without crow	wding?
■Yes □ No □ N/A	, und .
3. Within the outdoor areas listed above, do animals have access to shade?	$\square$ N/A
	Yes 🗆 No 🗆 N/A
Operator Review, Initial and Date: Inspector Review, Initial and Date:	
Company Name:	



## **MODULE 69: Living Conditions Cont'd**

OUTDOOR ACC	ESS Cont'd				Section 2 Cont'd
5. Are outdoor a	reas well-drained and managed to preven	t runoff of wastes?	Yes	🗆 No	□ N/A
6. How often is w C & C Cattle Co	<b>aste removed from outdoor areas?</b> D. LLC	□ N/A			
7. At what age do All	o animals have access to the outdoors?				
	hours per day do animals have access to depending on class or production group,				outdoor areas)?
and all and a second and a second sec	bject to temporary confinement? ease list the reason for and duration of te	□ Yes   ■ No mporary confinement be	low.		
Re	ason for Confinement	Duration of Confineme	nt		]
					_
10. How are perio	ods of confinement documented?				
Operator Review, In	nitial and Date: JP 6-12-17	Inspector Revie	ew, Initial and I	Date:	



## Module 69 - Living Conditions Cont'd

MANURE MANAGEMENT Section 3
NOP rule 205.239 requires manure be managed in a way to prevent runoff of wastes and contamination of crops, soil and
water by nutrients, heavy metals or pathogenic organisms. Manure management should optimize the recycling of nutrients.
1. What is the estimated quantity of manure generated per year at this operation?
4000 tons
2. Describe how manure is collected, stored and used at this operation.
Slabs are cleaned at least once a week with a manure vacuum or skid loader and tractor with manure spreader. Manure is piled at our manure pile or is moved to a field corner to be spread on that field.
3. Describe, specifically, how manure management practices prevent runoff of wastes and contamination of crops, soil and water.
Compost/Manure storage drains to a lagoon.
4. Are any additives applied to manure (lime, inoculants, preservatives, microbial digesters)? 🛛 Yes 🔳 No
If yes, please list them in Module 17: Cleaning, Sanitizing and Post-Harvest Inputs.
5. If manure is composted, please describe the methods by which it is composted.
6. If manure is spread on fields at this operation, describe the practice, including the months applied and rate of application.
$\Box$ N/A
Manure is applied at 2 to 3 ton to the acre in the fall.
7. If manure is spread on fields at this operation, how many acres are available for manure application?
2300 acres
Operator Review, Initial and Date: JP 6-12-17 Inspector Review, Initial and Date:



## Livestock Production – Organic System Plan MODULE 70: Milk Handling

MILK HANDLIN	G			Section 1
□ Milking of dairy	animals does not occur a	nt this operation	. Skip to Mo	dule 71.
movement from pas	sture or housing through The location of any rele	any holding per	ns to the area	must be submitted and should reflect animals' where they are milked and their exit back to ery used in the milking process as well as storage
2. Describe the milk	c handling system(s) used	l at this operatio	on (tie stall, p	arlor, etc.).
3. How is the operat				
□ Grade A	Grade B	□ Other		
4. How many times	a day are animals milkee	d and at what ap	pproximate ti	mes of the day?
5. Is milk tested for	somatic cell counts?	□ Yes	□ No	
	1	1		
6. In the table below	w, report production rate	es and somatic c	cell counts for	the last six days of milking.
ate Total number of animals milked Somatic Cell Count Total pounds of milk produced				
Date		Somatic Ce	ell Count	Total pounds of milk produced
Date	animals milked	Somatic Co	ell Count	Total pounds of milk produced
Date		Somatic Co	ell Count	Total pounds of milk produced
Date		Somatic Co	ell Count	Total pounds of milk produced
Date		Somatic Co	ell Count	Total pounds of milk produced
		Somatic Co	ell Count	Total pounds of milk produced
		Somatic Co	ell Count	Total pounds of milk produced
	animals milked			
7. Describe method				
Date 7. Describe method JP 6-12-17	animals milked			
<ul> <li>7. Describe method JP 6-12-17</li> <li>8. Are cleaners, det</li> </ul>	animals milked	juipment and sto	orage tanks, i king equipme	ncluding frequency.
<ul> <li>7. Describe method JP 6-12-17</li> <li>8. Are cleaners, det Please list these</li> <li>9. Are products use</li> </ul>	animals milked	uipment and sto sed to clean mill s, Sanitizing and to milking?	orage tanks, i king equipme	ncluding frequency.
<ol> <li>7. Describe method JP 6-12-17</li> <li>8. Are cleaners, det Please list these</li> <li>9. Are products use Please list these</li> <li>*If raw milk is process</li> </ol>	animals milked	uipment and sto sed to clean mill s, Sanitizing and to milking? are Materials.	orage tanks, i king equipme l Post-Harves □ Yes cts, a Process E	ncluding frequency.

Company Name:



## Livestock Production – Organic System Plan Module 71: Slaughter and Transportation

SLAUGHTER AND TRANSPORTATION				
No animals at this operation are requested for certification as slaughter stock. Skip to Module 72				
*Please note, If animals are slaughtered on this operatio	n, a Process Handler OS	SP must be submitted.		
1. Have all animals requested for organic slaughter sto Ves INO	ck been under organic 1	management since the last third of gestation?		
2. Where are animals slaughtered?	on-farm	]Slaughter/Processing facility		
3 List the name, address and contact information of the facility that slaughters your livestock.				
4. Is the facility listed above certified organic?	🛛 Yes 🛛 No			
5. Who is responsible for transporting or arranging for	r transportation of anim	als?		
The seller/this operation	The final buyer	□Third party		
6. How are animals transported to the slaughter facilit JP 6-12-17	ty? In what type of vehi	icle?		
7. Are organic animals transported with nonorganic as If yes, how are organic and nonorganic animals kep		□ N0		
If yes, how is it ensured that no prohibited material	ls or nonorganic feed ar	e used for organic animals?		
C & C Cattle Co. LLC				
8. How long does transportation to the slaughter facility	ty typically take?			
Operator Review, Initial and Date: JP 6-12-17		Inspector Review, Initial and Date:		



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

## Module 71: Slaughter and Transportation Cont'd

SLAUGHTER AND TRANSPORT Cont'd		
9. Are animals provided with food during transport?	Series 7	□ No
10. Are animals provided with water during transport?	□ Yes	🗆 No
11. Describe how animal stress and injury are minimized	during transp	ort.

Operator Review, Initial and Date:

Inspector Review, Initial and Date:

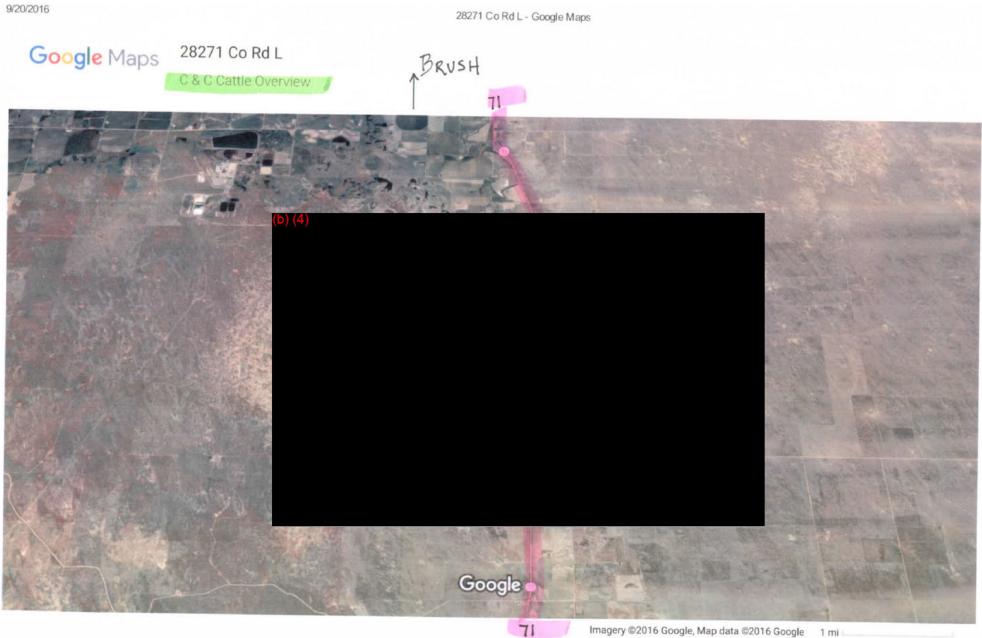


## Livestock Production – Organic System Plan Module 72: Marketing and Recordkeeping

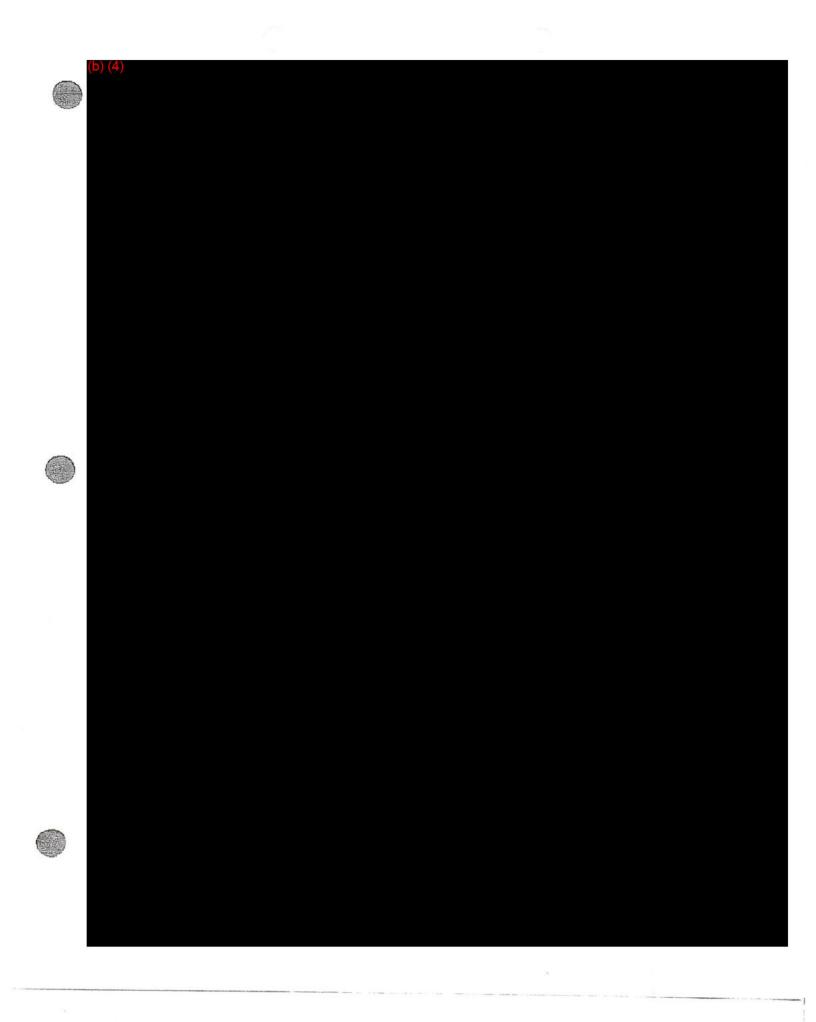
MARKETING					Section 1
1. How are livestock product	s sold? Check all that ap	oply			
□ In retail packaging	Bulk/wholesale to	o processor	🖬 As liv	e animals	
CSA/Subscription	□ On farm retail		□ Other	, Specify:	
2. Is the USDA organic seal us	sed on livestock product	packaging?	🗆 Yes	No	
3. Is the Colorado Departmen	t of Agriculture identifie	ed as the organ	ic certifier of t	he product on product	packaging?
4. Is the Colorado Organic log	go/seal used on product j	packaging?	□ Yes	I No	
*Please submit examples/cop	ies of any labels applied	to product pa	ckaging		
RECORDKEEPING					Section 2
The NOP Rule requires that					
years and demonstrate com				ble to be traced back	to the location where
they were produced. All rec					
1. What types of records are	e kept for organic lives	tock productio	on? Check all	that apply.	
Documentation of purchase	ed animals				
Animal ID lists					
Cull and/or death records					
Breeding records					
Pasture Access					
□ Periods of animal confinen	nent				
Purchased feed, including					
Feed supplements	0				
□ Feed rations					
Feed labels					
Feed storage					
Animal health					
Medical treatments					
□ Somatic cell/plate counts					
□ Milk production					
□ Slaughter records					
Sales					
Shipping and transportation	n				
Product quality test results					
1					
2. Are records maintained fo If no, please explain.	or at least 5 years?	🗆 Yes	🗆 No		

Operator Review, Initial and Date: JP 6-12-17

Inspector Review, Initial and Date:



Imagery ©2016 Google, Map data ©2016 Google 1 mi



# CERTIFIED ORGANIC

CERTIFIED TO THE USDA ORGANIC REGULATIONS 7 CFR PART 205

	(b) (4)		
(b) (4)			(b) (4)
Ur	ited States		United States
ANNIVERSARY DAT	Se of the second second second		CERTIFICATION NUMBER
Crops 6/1/	2016 Alfalfa,	Grass/Alfalfa Hay, Grass Hay, Oat/Alfalfa Hay	129 Initial Effective Date 7/19/2005
	DO		
LORADO DEPARTMENT OF AGR 305 Interlocken Parkway Broomfield, CO, 80021 (303) 869-9000 www.colorado.gov/ag	ICULTURE	Amy Stafford Organic Certification	Program Manager Date Issued
Once cert	ified, a production or handing op	peration's organic certification continues in effect until	surrendered or suspended or revoked.

C

28271 Co Rd L - Google Maps









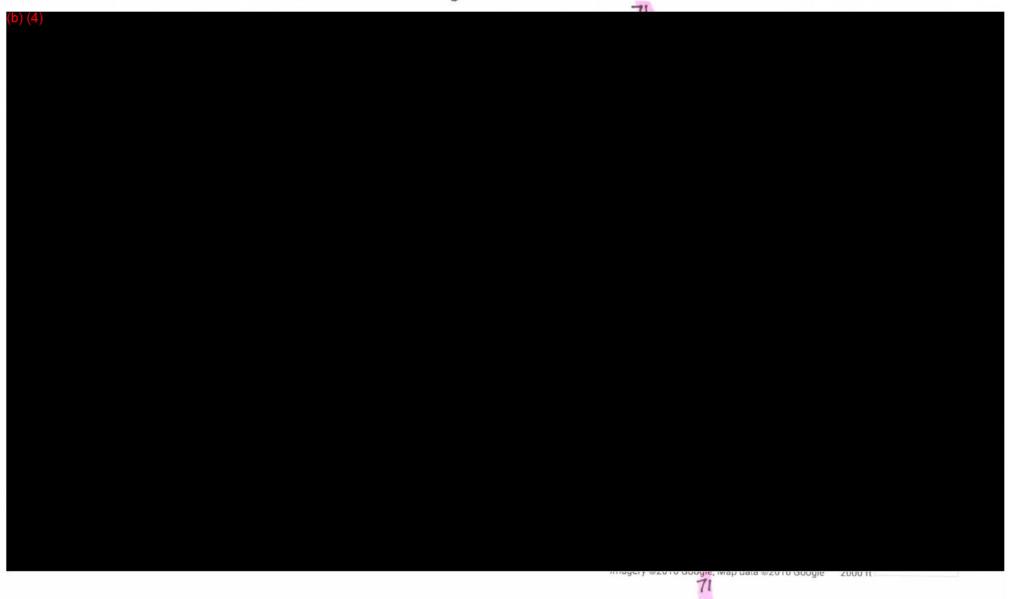
magery ©2016 Google, Map data ©2016 Google 1000 ft

11

30

https://www.google.com/maps/place/28271+Co+Rd+L,+Brush,+CO+80723/@40.1430456,-103.6013885,2786m/data=13m1!1e3!4m5!3m4!1s0x876df4b77359e5f7:0x9e14a153425b4390!8m2!3d40.1606441!4d-103.616... 1/1





#### (b) (4)

#### b) (4)

(b) (4)

#### b) (4)





ſ

### (b) (4)

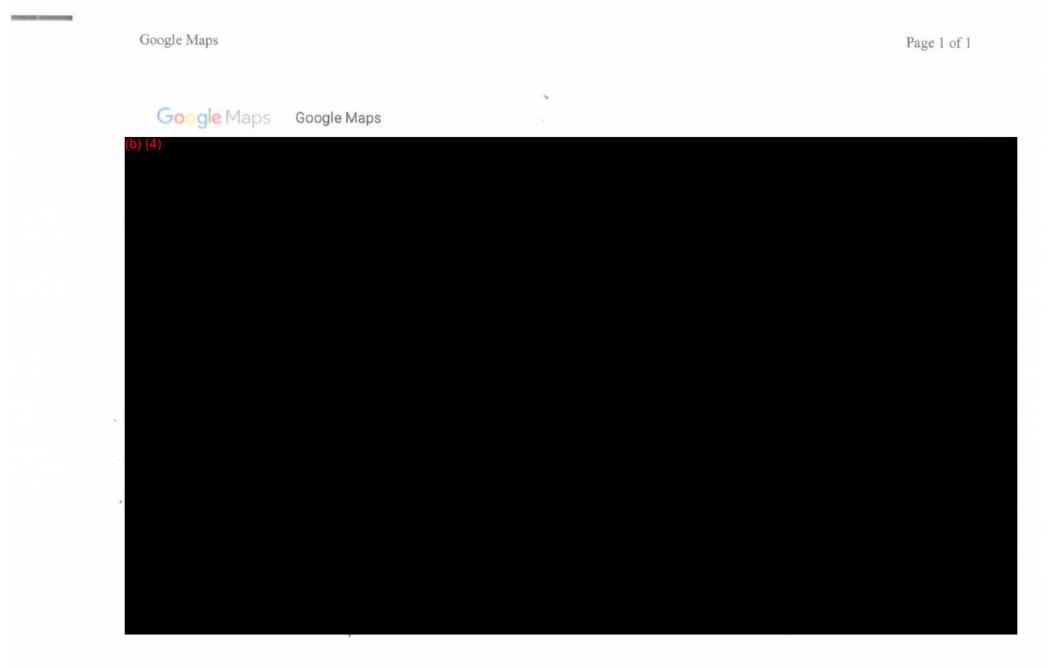


#### (b) (4)

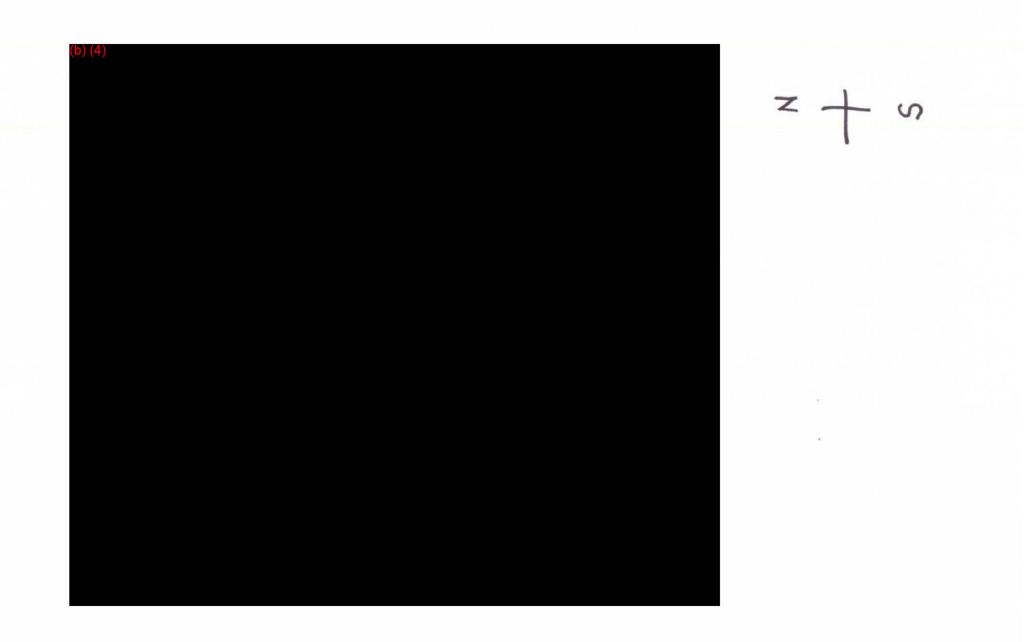
C & C	Cattle Co. LLC			2015	the second second	2014	1	and the second states	2013
Code	Field Name	Pasture Numbers	Total Acres	Crop	Inputs	Crop	Inputs	Crop	Inputs
	(b) (4)	(b) (4)				Rye & Grass		Rye & Grass	
0			150	Rye & Grass Pasture	Manure	Pasture	Manure	Pasture	Compost
						Rye & Grass		Rye & Grass	
0			340	Rye & Grass Pasture	None	Pasture	Manure	Pasture	None
						Rye & Grass		Rye & Grass	
0			600	Rye & Grass Pasture	Manure	Pasture	Manure	Pasture	None
						Rye & Grass		Rye & Grass	
0		9.	1932	Rye & Grass Pasture	None	Pasture	Manure	Pasture	None
				Rye & Grass Pasture/		Rye & Grass		Rye & Grass	Manure on non-
0			160	Rye Seed	Manure	Pasture	None	Pasture	planted strips
				Rye & Grass Pasture/		Rye & Grass		Rye & Grass	Manure on non-
0		5.	155	Rye Seed	Manure	Pasture	Manure	Pasture	planted strips
						Rye & Grass		Rye & Grass	
0		0.	790	Rye & Grass Pasture	None	Pasture	Manure	Pasture	Compost
0			95	None	None	Rye Seed	None	None	None
0			1400	Grass Pasture	None	Grass Pasture	None	Grass Pasture	None

Imagery Date: 9/17/2012 40°08'55.86" N 103°36'16.84" W elev 4313 ft eve alt 1187

(b) (4)



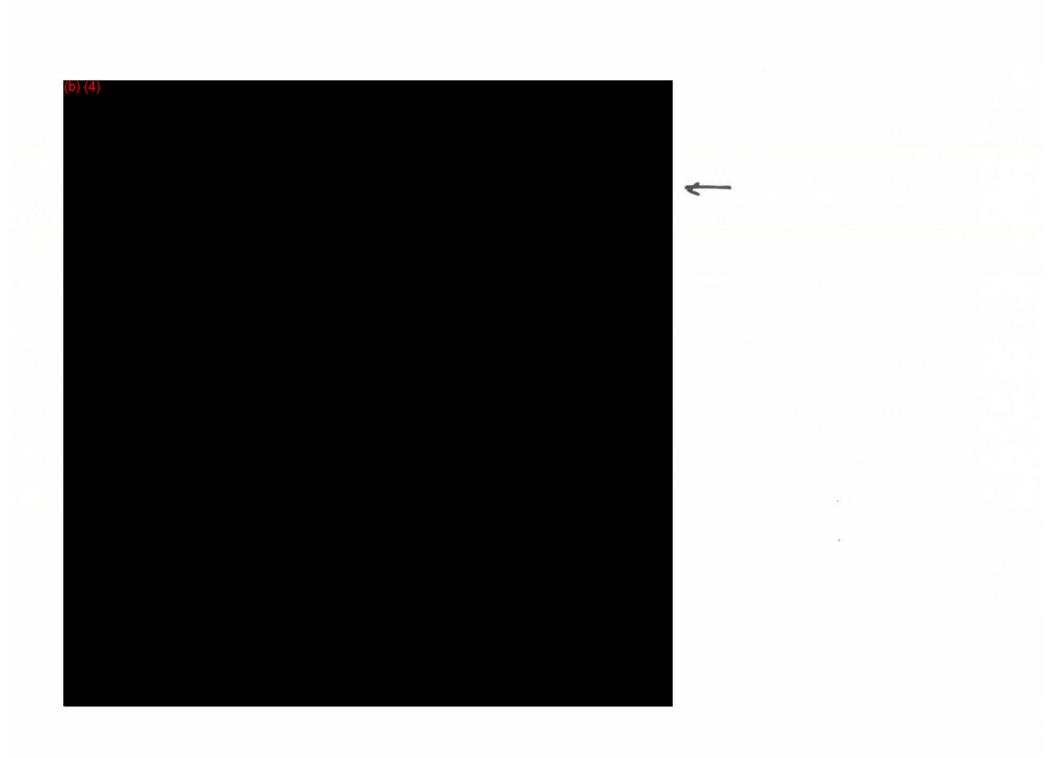
10/22/2015

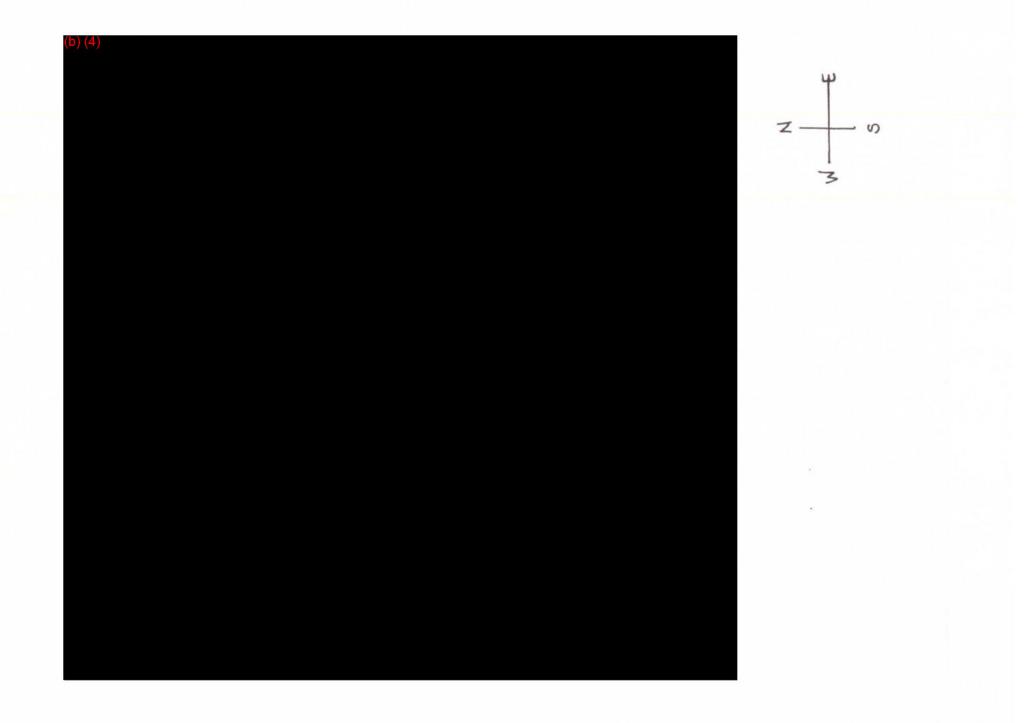






Personal Property in which the real of the local division in which the local division in the local division in





-----



C & C Cattle 28271 County Road L Brush, CO

### 28271 Co Rd L

N N

1000 ft

28271 Co Rd L

L

And L

@ 2016 Google

Google earth







### **CERTIFICATION PROFILE**

#### Global Organic Alliance, Inc.

This document must be accompanied by a valid GOA certificate and is compliance verification of the certified products to the identified certification program.

Entity:



Scope: Crops Certificate Number(s): 13310 - Issue/Revision Date: 9/1/16

**Certified Product or Service** 

Commodity or	Category			Compliance			
Commodity or Process	100% Organic	Organic	Made With	NOP	COR	US/CA	Brand Name
Hay				$\boxtimes$			
Oats				$\boxtimes$			
Yellow Corn, Shelled							
Corn Stalks							
	<u> </u>		<u> </u>	<u>    </u> _	<u>    </u>		
and the second se			- 14-	H			
			- H-	H	H		
			<u> </u>	<u> </u>			
		<u> </u>	<u> </u>		<u>    </u>	+ + + - + + + + + + + + + + + + + + +	¥
			<u> </u>			+ H +	
							š

Revision: 10; 24 March 15 Effective Date: Feb 09 Page 1 Global Organic Alliance

Certification Profile F033A



## **International Certification Services, Inc.**

## Certificate of Organic Operation

Client ID Number: 1101195

Effective Date: 10/18/2005 Issue Date: 07/08/2016

Certificate Number: ICS-11394-2016

Last Inspection Date: 05/13/2016



Certified Products: Handling/Processing

## Certified Organic to the USDA National Organic Program



**Certified Organic to the USDA National Organic Program regulations, 7CFR Part 205.** Once certified, a production or handling operation's organic certification continues in effect until surrendered, suspended or revoked.

International Certification Services, Inc. (ICS Inc.), in granting this certification, warrants it has reviewed the above Certified Party's application, inspection, and other records and determines the products identified on the schedule are organically grown and/or handled in accordance with applicable USDA National Organic Program standards and regulations.

This certificate is issued within the scope of ISO/IEC 65/17065 accreditation issued by the International Organic Accreditation Service (Registration Number 13).

#### This certificate is not valid without attached Organic Certification Schedule.

Customers of the ICS client named on this certificate are encouraged to contact the ICS office to confirm the client's current certification status.

INTERNATIONAL CERTIFICATION SERVICES, INC. 301 5th Ave SE, Medina, ND 58467, USA (701) 486-3578 - Fax: (701) 486-3580 www.ics-intl.com

histma Doctster

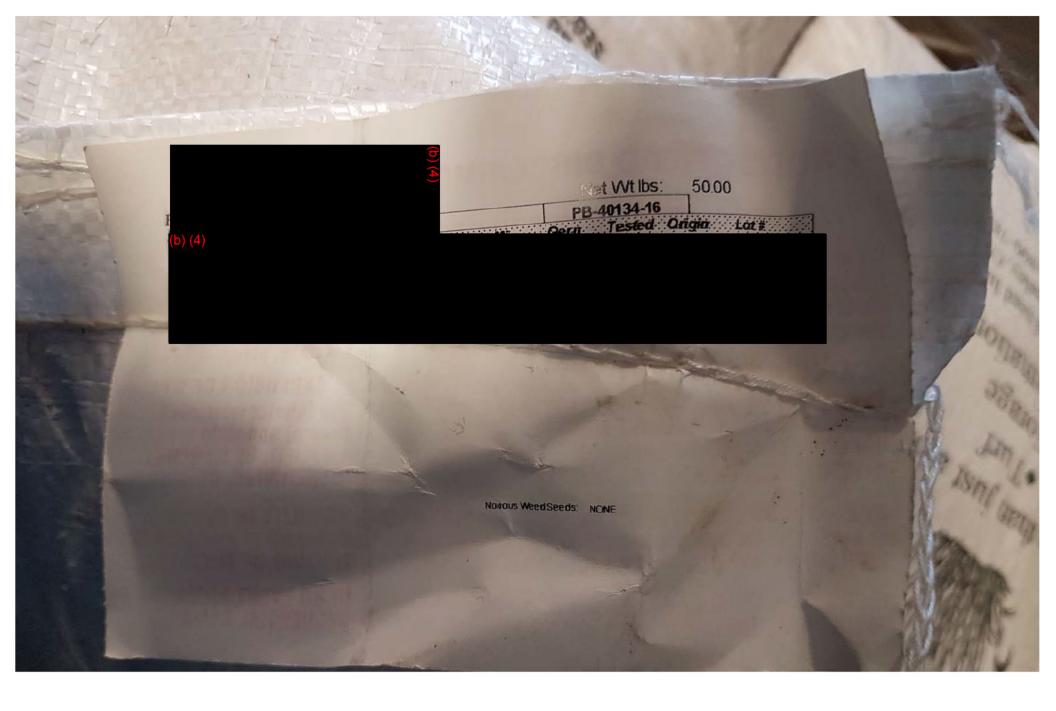
Chief Executive Officer

07/08/2016 Date

ICS Signature

Title

5-CE101 03/21/2016



(b) (4)

C & C Cattle Co LLC - Google Maps

### Page 1 of 2

# Google Maps C & C Cattle Co LLC



Imagery ©2017 Google, Map data ©2017 Google 2000 ft

https://www.google.com/maps/place/C+%26+C+Cattle+Co+LLC/@40.1632666,-103.5297534,4510m/data=!3m1!1e3!4m13!1... 6/14/2017

### Google Maps C & C Cattle Co LLC



COUEY FAMILY LLLP 6275 County Road 315 Silt, CO 81652 970-309-7614

October 24, 2016

Weitzel Land LLC 28271 MCR L Brush, CO 80723

Contract to Buy and Sell Real Estate Dated 10/4/2016 for E1/2 of SW1/4 and W1/2 of Re: SE1/4 of Section 12, T2N, R56W of 6th P.M., County of Morgan, Colorado

Dear Curtis and Carlene:

Pursuant to Section 30.4 of the above-referenced Contract, please see the attached Revised Notices of Application from Crop Production Services, Inc., indicating the most recent applications of chemicals or fertilizer to the subject property on 6/5/2015 and 6/10/2016:

Sincerely,

Kelly Coursy Kelly Course, General Partner

anie Dawn Com

Carrie Dawn Couey, General Partner

Attachments (2)

CROP PRODUCTION SERVICES, INC.		Page 1 of 1	Orden V.	
FORT MORGAN CO (5554) 22282 Highway 34			Order #: Application Order Date	4525675 n Date: 06/05/15 e: 06/04/15
970-542-2993 **DE000			Ship Via:	Company Vehicle
**REVISE	ED** Notice of Applicati	ion		
Permitee: Customer: KELLY COUEY (1		Crop:	FALL	OW CHEM. (9903)
6275 COUNTY RC Faran: COUEY01835(COUEY KELLY[COUE) SILT, CO 81652	OAD 315	Job Acres	5: 158,8	84
County: MORGAN (CO44)				r Morgan Co
PO#: DTH: REI: 970/876-2821		Sales Rep	o: 1074	96
MICHAEL BUCHANAN (2466 RON DICK) Start Time:	Wind Speed:	Rig:		Applicatio
22282 Hwy 34 Fort Morgan, CO 80707 Comp Date:	Wind Dir:	Driver:	•	Informati
9705422993 Method: Ground Comp Time:				
2466 RON DICK (Expires : 07/31/16)	Temp:	Rig Llc#:		
H2O/Acre: 0.00 H2O Gal; Crop Ht;	Humidity:	Nozzle:		Pressure:
Rate/Acre: 0.49 Weed Ht:	Soil Moisture:	Notificatio	on: Oral	/ Post
Product# Product/Service Description Manufacturer/	FDA#	6.1.7		
b) (4)	LINE	Rate/Acre	Total	Qty
APPLIED 6/5/15				
KC				
KC VC 06/04/15	Applicator			
KC W sman (see above)/Driver (delivered by) (Date)	Applicator/Grower Signa	Mure (received by)		(Date)
KC WC sman (see above) / Driver (delivered by) (Date) Eield Listing	Applicator/Grower Signa Acres S/T/R 158.84 12/2N/56W			(Date)
KC WC sman (see aboye)/Driver (delivered by) (Date) Eield Listing	<u>Acres</u> S/T/R			
KC WC sman (see above)/Driver (delivered by) (Date) Eleld Listing Eleft Description/Site ID / Location	<u>Acres</u> S/T/R			N
KC WC sman (see above)/Driver (delivered by) (Date) Eleld Listing Eleft Description/Site ID / Location	<u>Acres</u> S/T/R			N E

CROP PRODUCTION SERVICES, INC. FORT MORGAN CO (5554) 22282 Highway 34 Fort Morgan, CO 80701 970-542-2993	**REVISED*	* Notice of Application	Order #: Application Da Order Date: Ship Via:	Page 1 o 7118702 te: 6/10/2016 6/10/2016 Company Vehicle
	Customer: KELLY COUEY ( 6275 COUNTY SILT, CO 81652 REI: 24 970/876-2821	ROAD 315	Job Acres: 160.	MORGAN CO (5554
MICHAEL BUCHANAN (2433 RON DICK) 22282 Hwy 34 Fort Morgan, CO 80707 9705422993 Method: Ground 2433 RON DICK (Expires: 7/31/2019 H2O/Acre: 0.00 H2O Gai: H2O LB: Rate/Acre: 0.10 Product# Product/Service Descriptio (b) (4)	Weed Ht:	Wind Speed: Wind Dir: Temp: Humidity: Soli Moisture:	Rig: Driver: Rig Lic#: Nozzle: Notification: Oral /	Application Information Pressure: Post
ryland				
	6/10/2016			
sman (see above) / Driver (delivered by)	(Date)	Applicator/Grower Sig		

	N 1	County MORGAN	S/T/R 12/2N/56W	<u>Acres</u> 160.0000	Field Listing <u>Description / Site ID / Location</u> 1/4MILE W OF HWY 71 & RD K[90820] (90820)//	<u>Order #</u> 7118702
,	w	(CO44)				VC
					DC-	Kc C
	Checked By:					

## Google Maps C & C Cattle Co LLC

Imagery ©2017 Google, Map data ©2017 Google 500 ft

https://www.google.com/maps/place/C+%26+C+Cattle+Co+LLC/@40.1506853,-103.5969478,1510m/data=!3m1!1e3!4m13!1... 6/14/2017

# **OCIA** International Organic Certification

5079

Operator Number

NOP-01604

Certificate Number

Jumber



UNITED STATES

The Organic Crop Improvement Association has inspected this operation and determined that it is in compliance with the following certification program:

### **US National Organic Program (NOP)**

Certified Organic under the US National Organic Program 7 CFR Part 205

Certification Type: Handling

See Product Listing Addendum for certified list of products/services.

Effective Date:October 25, 2001Issue Date:January 18, 2017Anniversary Date:May 01, 2017

amanda J.Boouste



**OCIA** Executive Director

This certificate is valid only to document the OCIA certification of the operation named on this certificate. This certificate is not valid for trade, but only validates that the above operation may have product eligible for certification. By accepting this Certificate, the named operator agrees to maintain compliance and follow the approved management plan. The named operator agrees that this certificate will only be used as outlined in the regulations for the NOP program. This certificate is valid until certification is surrendered, suspended or revoked. An updated organic management plan and on-site inspection are required annually.

1340 N. Cotner Boulevard, Lincoln, NE 68505 - (402) 477-2323 - Fax (402) 477-4325 - www.ocia.org

# **OCIA** International Organic Certification

5079

**Operator** Number

OCIA-00367 Certificate Number



UNITED STATES

The Organic Crop Improvement Assocation has inspected this operation and determined that it is in compliance with the following certification programs:

### **OCIA** International Standards

Certification Type: Handling

See Product Listing Addendum for certified list of products/services.

Effective Date: January 18, 2017 **Expiration Date:** January 18, 2018 Last Annual Inspection Date: October 19, 2016

Umanda J.Bezuster



**OCIA** Executive Director

This certificate is valid only to document the OCIA certification of the operation named on this certificate. This certificate is not valid for trade, but only validates that the above operation may have product eligible for certification. By accepting this Certificate, the named operator agrees to maintain compliance and follow the approved management plan. The named operator agrees that this certificate will only be used as outlined in the regulations for the OCIA Standards program. This certificate is valid until certification is surrendered, suspended or revoked or surpasses the expiration date. An updated organic management plan and on-site inspection are required annually.

1340 N. Cotner Boulevard, Lincoln, NE 68505 - (402) 477-2323 - Fax (402) 477-4325 - www.ocia.org



# **Organic Product Listing Addendum**



Operator ID: 5079 Date of Issuance: 01/18/2017 Season: 2016

This Organic Product Listing Addendum verifies the specific products and programs for which the client was certified by OCIA International on the date of issuance. For verification of the current organic status of the operation, please request a copy of the operation's organic certificate(s) or contact OCIA International or any OCIA Regional Office.

Products & Services		
Certified in compliance with the ter	ms of the US-Canada Organ	nic Equivalency
Arrangement Product/Service	Brands	Status
Alfalfa - Alfalfa Meal		Organic
Alfalfa - Alfalfa Pellets		Organic
Alfalfa - Alfalfa Seed		Organic
Amaranth		Organic
Barley		Organic
Barley - Hulless Barley		Organic
Barley - Pearled Barley		Organic
Beeswax		Organic
Buckwheat		Organic
Buckwheat - Buckwheat Flour		Organic
Buckwheat - Buckwheat Grits		Organic
Buckwheat - Buckwheat Groats		Organic
Cane Sugar		Organic
Canola Seed - Canola Oil		Organic
Chia Seed		Organic
Corn		Organic
Corn - Corn Flour		Organic
Corn - White Corn		Organic

Standards and documentation available from OCIA.

Page 1 of 20



UNITED STATES

# **Organic Product Listing Addendum**



Operator ID: 5079 Date of Issuance: 01/18/2017 Season: 2016

This Organic Product Listing Addendum verifies the specific products and programs for which the client was certified by OCIA International on the date of issuance. For verification of the current organic status of the operation, please request a copy of the operation's organic certificate(s) or contact OCIA International or any OCIA Regional Office.

Certified in compliance with the term	is of the US-Canada Organ	ic Equivalency
Arrangement Product/Service	Brands	Status
Dried Distillers Grains (DDGs)		Organic
Edible Beans		Organic
Feed Milling Pellets		Organic
Flaxseed		Organic
Flaxseed - Brown Flax		Organic
Flaxseed - Flax Meal		Organic
Garbanzo Beans/Chickpeas		Organic
Hominy		Organic
Honey		Organic
Lentils		Organic
Lentils - Black Lentils		Organic
Lentils - Brown Lentils		Organic
Lentils - French Lentils		Organic
Lentils - Green Lentils		Organic
Lentils - Red Lentils		Organic
Lentils - Split Red Lentils		Organic
Millet		Organic
Molasses		Organic
Mustard Seed		Organic

Standards and documentation available from OCIA.

Page 2 of 20





Operator ID: 5079 Date of Issuance: 01/18/2017 Season: 2016

This Organic Product Listing Addendum verifies the specific products and programs for which the client was certified by OCIA International on the date of issuance. For verification of the current organic status of the operation, please request a copy of the operation's organic certificate(s) or contact OCIA International or any OCIA Regional Office.

Certified in compliance with the terms of the US-Canada Organic Equivalency Arrangement			
Product/Service	Brands	Status	
Oats		Organic	
Oats - Oat Flour		Organic	
Oats - Rolled Oats		Organic	
Oil - Lavandin Grosso Essential Oil		Organic	
Oil - Peppermint Essential Oil		Organic	
Oilseeds		Organic	
Peanuts - Peanut Meal		Organic	
Peas		Organic	
Pumpkin Seeds		Organic	
Quinoa		Organic	
Quinoa - Quinoa Flour		Organic	
Rice		Organic	
Rice - Broken Rice		Organic	
Rice - Brown		Organic	
Rice - Rice Flour		Organic	
Rice - White Rice		Organic	
Rye		Organic	
Screenings		Organic	
Screenings - Flax Screenings		Organic	

Standards and documentation available from OCIA.

Page 3 of 20



UNITED STATES

## **Organic Product Listing Addendum**



Operator ID: 5079 Date of Issuance: 01/18/2017 Season: 2016

This Organic Product Listing Addendum verifies the specific products and programs for which the client was certified by OCIA International on the date of issuance. For verification of the current organic status of the operation, please request a copy of the operation's organic certificate(s) or contact OCIA International or any OCIA Regional Office.

Arrangement Product/Service	Brands	Status
Screenings - Lentil Screenings		Organic
Sesame - Sesame Meal		Organic
Small Grains		Organic
Sorghum		Organic
Soybeans		Organic
Soybeans - Soy Meal		Organic
Soybeans - Soybean Oil		Organic
Soybeans - Soybean Splits		Organic
Sugar Cane Alcohol		Organic
Sunflower Seed - Sunflower Meal		Organic
Tapioca Starch		Organic
Wheat		Organic
Wheat Middlings		Organic
Wheat Middlings - Wheat Millrun Pellets		Organic
Brokering of Organic Products		Organic
Grain Bagging		Organic
Grain Cleaning		Organic
Grain Storage		Organic

Standards and documentation available from OCIA.

Page 4 of 20



UNITED STATES

## **Organic Product Listing Addendum**



Operator ID: 5079 Date of Issuance: 01/18/2017 Season: 2016

This Organic Product Listing Addendum verifies the specific products and programs for which the client was certified by OCIA International on the date of issuance. For verification of the current organic status of the operation, please request a copy of the operation's organic certificate(s) or contact OCIA International or any OCIA Regional Office.

National Organic Program		
Product/Service	Brands	Status
Alfalfa - Alfalfa Meal		100% Organic
Alfalfa - Alfalfa Pellets		100% Organic
Alfalfa - Alfalfa Seed		100% Organic
Amaranth		100% Organic
Barley		100% Organic
Barley - Hulless Barley		100% Organic
Barley - Pearled Barley		100% Organic
Beeswax		100% Organic
Buckwheat		100% Organic
Buckwheat - Buckwheat Flour		100% Organic
Buckwheat - Buckwheat Grits		100% Organic
Buckwheat - Buckwheat Groats		100% Organic
Cane Sugar		100% Organic
Canola Seed - Canola Oil		100% Organic
Chia Seed		100% Organic
Corn		100% Organic
Corn - Corn Flour		100% Organic
Corn - White Corn		100% Organic
Edible Beans		100% Organic
Feed Milling Pellets		100% Organic

Standards and documentation available from OCIA.

Page 5 of 20





Operator ID: 5079 Date of Issuance: 01/18/2017 Season: 2016

This Organic Product Listing Addendum verifies the specific products and programs for which the client was certified by OCIA International on the date of issuance. For verification of the current organic status of the operation, please request a copy of the operation's organic certificate(s) or contact OCIA International or any OCIA Regional Office.

National Organic Program		
Product/Service	Brands	Status
Flaxseed		100% Organic
Flaxseed - Brown Flax		100% Organic
Flaxseed - Flax Meal		100% Organic
Garbanzo Beans/Chickpeas		100% Organic
Hominy		100% Organic
Honey		100% Organic
Lentils		100% Organic
Lentils - Black Lentils		100% Organic
Lentils - Brown Lentils		100% Organic
Lentils - French Lentils		100% Organic
Lentils - Green Lentils		100% Organic
Lentils - Red Lentils		100% Organic
Lentils - Split Red Lentils		100% Organic
Millet		100% Organic
Molasses		100% Organic
Mustard Seed		100% Organic
Oats		100% Organic
Oats - Oat Flour		100% Organic
Oats - Organic Oat Mill By-Product		100% Organic

Standards and documentation available from OCIA.

Page 6 of 20





Operator ID: 5079 Date of Issuance: 01/18/2017 Season: 2016

This Organic Product Listing Addendum verifies the specific products and programs for which the client was certified by OCIA International on the date of issuance. For verification of the current organic status of the operation, please request a copy of the operation's organic certificate(s) or contact OCIA International or any OCIA Regional Office.

National Organic Program		
Product/Service	Brands	Status
Oats - Organic Oat Mill By-Product, Pelleted		100% Organic
Oats - Rolled Oats		100% Organic
Oil - Lavandin Grosso Essential Oil		100% Organic
Oil - Peppermint Essential Oil		100% Organic
Oilseeds	•	100% Organic
Peanuts - Peanut Meal		100% Organic
Peas		100% Organic
Pumpkin Seeds		100% Organic
Quinoa		100% Organic
Quinoa - Quinoa Flour		100% Organic
Rice		100% Organic
Rice - Broken Rice		100% Organic
Rice - Brown		100% Organic
Rice - Rice Flour		100% Organic
Rice - White Rice		100% Organic
Rye		100% Organic
Screenings		100% Organic
Screenings - Flax Screenings		100% Organic
Screenings - Lentil Screenings		100% Organic

Standards and documentation available from OCIA.

Page 7 of 20



UNITED STATES

## **Organic Product Listing Addendum**



Operator ID: 5079 Date of Issuance: 01/18/2017 Season: 2016

This Organic Product Listing Addendum verifies the specific products and programs for which the client was certified by OCIA International on the date of issuance. For verification of the current organic status of the operation, please request a copy of the operation's organic certificate(s) or contact OCIA International or any OCIA Regional Office.

National Organic Program		
Product/Service	Brands	Status
Sesame - Sesame Meal		100% Organic
Small Grains		100% Organic
Sorghum		100% Organic
Soybeans		100% Organic
Soybeans - Soy Meal		100% Organic
Soybeans - Soybean Oil		100% Organic
Soybeans - Soybean Splits		100% Organic
Sunflower Seed - Sunflower Meal		100% Organic
Tapioca Starch		100% Organic
Wheat		100% Organic
Wheat Middlings		100% Organic
Wheat Middlings - Wheat Millrun Pellets		100% Organic
Brokering of Organic Products		100% Organic
Grain Bagging		100% Organic
Grain Cleaning		100% Organic
Grain Storage		100% Organic
Denatured Alcohol - Specially Denatured Alcohol 38-B		Organic

Standards and documentation available from OCIA.

Page 8 of 20





Operator ID: 5079 Date of Issuance: 01/18/2017 Season: 2016

This Organic Product Listing Addendum verifies the specific products and programs for which the client was certified by OCIA International on the date of issuance. For verification of the current organic status of the operation, please request a copy of the operation's organic certificate(s) or contact OCIA International or any OCIA Regional Office.

National Organic Program		· · · · · · · · · · · · · · · · · · ·
Product/Service	Brands	Status
Denatured Alcohol - Specially Denatured Alcohol 38-B with Bergamot Oil		Organic
Denatured Alcohol - Specially Denatured Alcohol 38-B with Lavender Oil		Organic
Denatured Alcohol - Specially Denatured Alcohol 38-B with Lavender Oil-Lavandin Mix	•	Organic
Denatured Alcohol - Specially Denatured Alcohol 8-B with Peppermint Oil		Organic
Dried Distillers Grains (DDGs)		Organic
Sugar Cane Alcohol OCIA International Standards		Organic
Product/Service	Brands	Status
Alfalfa - Alfalfa Meal		Organic
Alfalfa - Alfalfa Pellets		Organic
Alfalfa - Alfalfa Seed		Organic
Amaranth		Organic
Barley		Organic
Barley - Hulless Barley		Organic

Standards and documentation available from OCIA.

Page 9 of 20



UNITED STATES

## **Organic Product Listing Addendum**



Operator ID: 5079 Date of Issuance: 01/18/2017 Season: 2016

This Organic Product Listing Addendum verifies the specific products and programs for which the client was certified by OCIA International on the date of issuance. For verification of the current organic status of the operation, please request a copy of the operation's organic certificate(s) or contact OCIA International or any OCIA Regional Office.

OCIA International Standards		
Product/Service	Brands	Status
Barley - Pearled Barley		Organic
Beeswax		Organic
Buckwheat		Organic
Buckwheat - Buckwheat Flour		Organic
Buckwheat - Buckwheat Grits		Organic
Buckwheat - Buckwheat Groats		Organic
Cane Sugar		Organic
Canola Seed - Canola Oil		Organic
Chia Seed		Organic
Corn		Organic
Corn - Corn Flour		Organic
Corn - White Corn		Organic
Dried Distillers Grains (DDGs)		Organic
Edible Beans		Organic
Feed Milling Pellets		Organic
Flaxseed		Organic
Flaxseed - Brown Flax		Organic
Flaxseed - Flax Meal		Organic
Garbanzo Beans/Chickpeas		Organic
Hominy		Organic

Standards and documentation available from OCIA.

Page 10 of 20





Operator ID: 5079 Date of Issuance: 01/18/2017 Season: 2016

This Organic Product Listing Addendum verifies the specific products and programs for which the client was certified by OCIA International on the date of issuance. For verification of the current organic status of the operation, please request a copy of the operation's organic certificate(s) or contact OCIA International or any OCIA Regional Office.

OCIA International Standards		
Product/Service	Brands	Status
Honey		Organic
Lentils		Organic
Lentils - Black Lentils		Organic
Lentils - Brown Lentils		Organic
Lentils - French Lentils		Organic
Lentils - Green Lentils		Organic
Lentils - Red Lentils		Organic
Lentils - Split Red Lentils		Organic
Millet		Organic
Molasses		Organic
Mustard Seed		Organic
Oats		Organic
Oats - Oat Flour		Organic
Oats - Rolled Oats		Organic
Oil - Lavandin Grosso Essential Oil		Organic
Oil - Peppermint Essential Oil		Organic
Oilseeds		Organic
Peanuts - Peanut Meal	· · · ·	Organic
Peas		Organic
Pumpkin Seeds		Organic

Standards and documentation available from OCIA.

Page 11 of 20





Operator ID: 5079 Date of Issuance: 01/18/2017 Season: 2016

This Organic Product Listing Addendum verifies the specific products and programs for which the client was certified by OCIA International on the date of issuance. For verification of the current organic status of the operation, please request a copy of the operation's organic certificate(s) or contact OCIA International or any OCIA Regional Office.

<b>OCIA</b> International Standards		
Product/Service	Brands	Status
Quinoa		Organic
Quinoa - Quinoa Flour		Organic
Rice		Organic
Rice - Broken Rice		Organic
Rice - Brown		Organic
Rice - Rice Flour		Organic
Rice - White Rice		Organic
Rye		Organic
Screenings		Organic
Screenings - Flax Screenings		Organic
Screenings - Lentil Screenings		Organic
Sesame - Sesame Meal		Organic
Small Grains		Organic
Sorghum		Organic
Soybeans		Organic
Soybeans - Soy Meal		Organic
Soybeans - Soybean Oil		Organic
Soybeans - Soybean Splits		Organic
Sugar Cane Alcohol		Organic
Sunflower Seed - Sunflower Meal		Organic

Standards and documentation available from OCIA.

Page 12 of 20





Operator ID: 5079 Date of Issuance: 01/18/2017 Second: 2016

UNITED STATES

Season: 2016

This Organic Product Listing Addendum verifies the specific products and programs for which the client was certified by OCIA International on the date of issuance. For verification of the current organic status of the operation, please request a copy of the operation's organic certificate(s) or contact OCIA International or any OCIA Regional Office.

<b>OCIA</b> International Standards		
Product/Service	Brands	Status
Tapioca Starch		Organic
Wheat		Organic
Wheat Middlings		Organic
Wheat Middlings - Wheat Millrun Pellets		Organic
Brokering of Organic Products		Organic
Grain Bagging		Organic
Grain Cleaning		Organic
Grain Storage USDA-MAFF Trade Agreement		Organic
Product/Service	Brands	Status
Alfalfa - Alfalfa Meal		Organic
Alfalfa - Alfalfa Pellets		Organic
Alfalfa - Alfalfa Seed		Organic
Amaranth		Organic
Barley		Organic
Barley - Hulless Barley		Organic
Barley - Pearled Barley		Organic
Buckwheat		Organic
Buckwheat - Buckwheat Flour		Organic

Standards and documentation available from OCIA.

Page 13 of 20





Operator ID: 5079 Date of Issuance: 01/18/2017 Season: 2016

This Organic Product Listing Addendum verifies the specific products and programs for which the client was certified by OCIA International on the date of issuance. For verification of the current organic status of the operation, please request a copy of the operation's organic certificate(s) or contact OCIA International or any OCIA Regional Office.

USDA-MAFF Trade Agreement		
Product/Service	Brands	Status
Buckwheat - Buckwheat Grits		Organic
Buckwheat - Buckwheat Groats		Organic
Cane Sugar		Organic
Canola Seed - Canola Oil		Organic
Chia Seed		Organic
Corn		Organic
Corn - Corn Flour		Organic
Corn - White Corn		Organic
Edible Beans		Organic
Feed Milling Pellets		Organic
Flaxseed		Organic
Flaxseed - Brown Flax		Organic
Flaxseed - Flax Meal		Organic
Garbanzo Beans/Chickpeas		Organic
Hominy		Organic
Lentils		Organic
Lentils - Black Lentils		Organic
Lentils - Brown Lentils		Organic
Lentils - French Lentils		Organic
Lentils - Green Lentils		Organic

Standards and documentation available from OCIA.

Page 14 of 20





UNITED STATES

Operator ID: 5079 Date of Issuance: 01/18/2017 Season: 2016

This Organic Product Listing Addendum verifies the specific products and programs for which the client was certified by OCIA International on the date of issuance. For verification of the current organic status of the operation, please request a copy of the operation's organic certificate(s) or contact OCIA International or any OCIA Regional Office.

USDA-MAFF Trade Agreement		
Product/Service	Brands	Status
Lentils - Red Lentils		Organic
Lentils - Split Red Lentils		Organic
Millet		Organic
Molasses		Organic
Mustard Seed		Organic
Oats		Organic
Oats - Oat Flour		Organic
Oats - Rolled Oats		Organic
Oil - Lavandin Grosso Essential Oil		Organic
Oil - Peppermint Essential Oil		Organic
Oilseeds		Organic
Peanuts - Peanut Meal		Organic
Peas		Organic
Pumpkin Seeds		Organic
Quinoa		Organic
Quinoa - Quinoa Flour		Organic
Rice		Organic
Rice - Broken Rice		Organic
Rice - Brown		Organic
Rice - Rice Flour		Organic

Standards and documentation available from OCIA.

Page 15 of 20



UNITED STATES

## **Organic Product Listing Addendum**



Operator ID: 5079 Date of Issuance: 01/18/2017 Season: 2016

This Organic Product Listing Addendum verifies the specific products and programs for which the client was certified by OCIA International on the date of issuance. For verification of the current organic status of the operation, please request a copy of the operation's organic certificate(s) or contact OCIA International or any OCIA Regional Office.

USDA-MAFF Trade Agreement		
Product/Service	Brands	Status
Rice - White Rice		Organic
Rye		Organic
Screenings		Organic
Screenings - Flax Screenings		Organic
Screenings - Lentil Screenings		Organic
Sesame - Sesame Meal		Organic
Small Grains		Organic
Sorghum		Organic
Soybeans		Organic
Soybeans - Soy Meal		Organic
Soybeans - Soybean Oil		Organic
Soybeans - Soybean Splits		Organic
Sugar Cane Alcohol		Organic
Sunflower Seed - Sunflower Meal		Organic
Tapioca Starch		Organic
Wheat		Organic
Wheat Middlings		Organic
Wheat Middlings - Wheat Millrun Pellets		Organic
Brokering of Organic Products		Organic

Standards and documentation available from OCIA.

Page 16 of 20



(b) (4)

UNITED STATES

35.4 8

TIODA

Operator ID: 5079 Date of Issuance: 01/18/2017 Season: 2016

This Organic Product Listing Addendum verifies the specific products and programs for which the client was certified by OCIA International on the date of issuance. For verification of the current organic status of the operation, please request a copy of the operation's organic certificate(s) or contact OCIA International or any OCIA Regional Office.

USDA-MAFF Trade Agreement		
Product/Service	Brands	Status
Grain Bagging		Organic
Grain Cleaning		Organic
Grain Storage		Organic
US-EU Equivalency		organie
Product/Service	Brands	Status
Alfalfa - Alfalfa Meal		Organic
Alfalfa - Alfalfa Pellets		Organic
Alfalfa - Alfalfa Seed		Organic
Amaranth		Organic
Barley		Organic
Barley - Hulless Barley		Organic
Barley - Pearled Barley		Organic
Beeswax		Organic
Buckwheat		Organic
Buckwheat - Buckwheat Flour		Organic
Buckwheat - Buckwheat Grits		Organic
Buckwheat - Buckwheat Groats		-
Cane Sugar		Organic
Canola Seed - Canola Oil		Organic
Chia Seed		Organic
		Organic

Standards and documentation available from OCIA.

Page 17 of 20





Operator ID: 5079 Date of Issuance: 01/18/2017 Season: 2016

This Organic Product Listing Addendum verifies the specific products and programs for which the client was certified by OCIA International on the date of issuance. For verification of the current organic status of the operation, please request a copy of the operation's organic certificate(s) or contact OCIA International or any OCIA Regional Office.

US-EU Equivalency		
Product/Service	Brands	Status
Corn		Organic
Corn - Corn Flour		Organic
Corn - White Corn		Organic
Edible Beans		Organic
Feed Milling Pellets		Organic
Flaxseed		Organic
Flaxseed - Brown Flax		Organic
Flaxseed - Flax Meal		Organic
Garbanzo Beans/Chickpeas		Organic
Hominy		Organic
Honey		Organic
Lentils		Organic
Lentils - Black Lentils		Organic
Lentils - Brown Lentils		Organic
Lentils - French Lentils		Organic
Lentils - Green Lentils		Organic
Lentils - Red Lentils		Organic
Lentils - Split Red Lentils		Organic
Millet		Organic
Molasses		Organic

Standards and documentation available from OCIA,

Page 18 of 20



UNITED STATES

Operator ID: 5079 Date of Issuance: 01/18/2017 Season: 2016

This Organic Product Listing Addendum verifies the specific products and programs for which the client was certified by OCIA International on the date of issuance. For verification of the current organic status of the operation, please request a copy of the operation's organic certificate(s) or contact OCIA International or any OCIA Regional Office.

US-EU Equivalency			
Product/Service	Brands	Status	
Mustard Seed		Organic	
Oats		Organic	
Oats - Oat Flour		Organic	
Oats - Rolled Oats		Organic	
Oilseeds		Organic	
Peanuts - Peanut Meal		Organic	
Peas		Organic	
Pumpkin Seeds		Organic	
Quinoa		Organic	
Quinoa - Quinoa Flour		Organic	
Rice		Organic	
Rice - Broken Rice		Organic	
Rice - Brown		Organic	
Rice - Rice Flour		-	
Rice - White Rice		Organic	
Rye		Organic	. [
Screenings		Organic	-
Screenings - Flax Screenings		Organic	
Screenings - Lentil Screenings		Organic	
Sesame - Sesame Meal		Organic	
Sesane Meat		Organic	- 1

Standards and documentation available from OCIA.

Page 19 of 20





Operator ID: 5079 Date of Issuance: 01/18/2017 Season: 2016

This Organic Product Listing Addendum verifies the specific products and programs for which the client was certified by OCIA International on the date of issuance. For verification of the current organic status of the operation, please request a copy of the operation's organic certificate(s) or contact OCIA International or any OCIA Regional Office.

US-EU Equivalency		
Product/Service	Brands	Status
Small Grains		Organic
Sorghum		Organic
Soybeans		Organic
Soybeans - Soy Meal		Organic
Soybeans - Soybean Oil		Organic
Soybeans - Soybean Splits		Organic
Sugar Cane Alcohol		Organic
Sunflower Seed - Sunflower Meal		Organic
Tapioca Starch		Organic
Wheat		Organic
Wheat Middlings		Organic
Wheat Middlings - Wheat Millrun Pellets		Organic
Brokering of Organic Products		Organic
Grain Bagging		Organic
Grain Cleaning		Organic
Grain Storage		Organic

Standards and documentation available from OCIA.

Page 20 of 20

Certificate # 12965

#### **GLOBAL ORGANIC ALLIANCE, INC**

**PO BOX 530** BELLEFONTAINE, OH 43311 PHONE 937-593-1232 FAX 937-593-9507

Email: goaorg@centurylink.net Website: www.goa-online.org

#### VERIFICATION OF COMPLIANCE WITH THE US-CANADA EQUIVALENCE ARRANGEMENT

GOA hereby verifies that the named operation and product specified on this certificate is compliant with the terms of the US - Canada Equivalence Arrangement. The product certification system operated by GOA is described by ISO/IEC 17067, Conformity Assessment - Fundamentals of product certification, System 6. Verification of Compliance is based upon the assessment of the Organic System Plan, results of the on-site inspection, audit trial documentation, and tests or other information deemed necessary by GOA to determine compliance and the non-use of prohibited materials.



Continuation of US-Canada Equivalence Arrangement Compliance is contingent upon continued compliance with the terms and subject to an annual on-site inspection and annual evaluation by GOA. This certificate is updated annually upon verification of continued compliance.

Producer number: C4050001-03

Certification Effective Date:

12-Oct-11 Certificate Issue Date: 01-Jun-16

> Renewal Date: 01-Aug-17

Inspector number: 4050IRP0-04

Betty J Kananen, President

Questions regarding this certification may be directed to the above office.

Must have embossed seal to assure validity



### **CERTIFICATION PROFILE**

Global Organic Alliance, Inc.

This document must be accompanied by a valid GOA certificate and is compliance verification of the certified products to the identified certification program.

Entity:



Scope: Crops Certificate Number(s): 12964,12965 Issue/Revision Date: 6/1/16

Certified Product or Service

Commodity or Process	Category			Compliance		e	
	100% Organic	Organic	Made With	NOP	COR	US/CA	Brand Name
Hard Red Winter Wheat				$\boxtimes$			
Black Beans		XX					
Green Lentils							
Pinto Beans		$\boxtimes$		$\square$			
Pinto Beans							
Soybeans							
Hay, Millet							and the second second
ALL A REAL PROPERTY AND AND A		- H	H	H	H	HH	

Page 1 Global Organic Alliance

Certificate # 12964

#### GLOBAL ORGANIC ALLIANCE, INC

PO BOX 530 BELLEFONTAINE, OH 43311 PHONE 937-593-1232 FAX 937-593-9507 Email: goaorg@centurylink.net Website: www.goa-online.org

#### NOP CERTIFICATION CERTIFICATE

GOA hereby verifies that the named operation, products and services specified on this certificate is compliant with the Organic Foods Production Act of 1990 (OFPA) as amended (7 U.S.C.6501 et seq.) and the USDA National Organic Program (NOP) (7 CFR, Part 205). This certification is based upon the assessment of the Organic System Plan, results of the on-site inspection, audit trail documentation, and tests or other information deemed necessary by GOA as well as on-going surveillance of the products or services.

#### **Crops - See Certification Profile For Products**



This certification remains in effect until surrendered by the certificate holder or until suspended or revoked by GOA, a State organic program's State official, or the Administrator of the NOP. Continuation of organic certification is contingent upon continued compliance with NOP requirements and standards and the Licensing Agreement and subject to an annual on-site inspection and annual evaluation by GOA. This certificate is updated annually upon verification of continued compliance.

Betty J Kananen, President

Producer number: C4050001-03

Inspector number: 4050IRP0-04

Certificate Issue Date: Anniversary Date:

Certification Effective Date: 19-Jun-03 01-Jun-16

01-Aug-17

Must have embossed seal to assure validity. Questions regarding this certification may be directed to the above office.

#### (b)(4)



COLORADO AGRICIII.TUE

Division of Plant Industry 700 Kipling Street, Suite 4000, Lakewood, CO 80215-8000 Tel: (303) 239-4140/4143 Fax: (303) 239-4177 www.colorado.gov/ag/dpi



### **Organic Certification Program** Prior Land Use Affidavit

### I. Applicant Information and Description of Land Parcel(s)

Applicant C & C Cattle Co. LLC	Farm/Ranch/Business Name (If Different) C & C Cattle Co. LLC	
Legal Description of Property (Township-Range-Section) Attached Exhibit A	Field Number(s) Atkinson Grass Pastures	

It is the applicant's responsibility to document that any land to be used for certified organic production qualifies under the NOP Rules and Regulations. By submitting this form along with an application for organic certification and field history sheet the applicant grants CDA permission to request and review all records pertaining to organic certification and the NOP rule.

To qualify all land that has not been under the applicant's control for at least the past 36 months, this form must be completed and verified by the previous land manager. The form must be signed by the applicant and the previous land manager. A previous land manager is someone who had managerial control of the property during the past 36 months.

#### **II. Responsible Entity**

Previous Land Manager Name			
Atkinson Properties LLC			
Previous Land Manager Mailing Address 2924 Galway Dr.	City Laporte	State CO	Zip 80535
Previous Land Manager Phone Number(s) 970-482-7681			

#### **III. Declaration**

I Laurine Ruppert declare that the parcel(s) of land described above were farmed by me o	r were
under my control during the crop years of 2001 to 2017. I also declare that during this time, to the	cest of
my knowledge, there were no herbicides, pesticides, fungicides, seed treatments, synthetic fertilizers or other mate	rials
applied to this land other than those approved under the National Organic Program (NOP) Regulation. I submit that	at the
above information is true and accurate.	

C & C Cattle Co. LLC

**Owner Name** 

Atkinson Properties, LLC

Prior Land Manager Name

**Owner Signature** 

Prior Land Manager Signature

Date

Date

**Exhibit** A

The W1/2NE1/4 and E1/2NW1/4 of Section 1, Township 2 North, Range 56 West of the 6<sup>th</sup> P.M.

The W1/2W1/2 of Section 1, Township 2 North, Range 56 West of the 6th P.M., Except parcel described in Book 640 at page 759.

The E1/2 of Section 3, Township 2 North, Range 55 West of the 6th P.M. The SW1/4 and W1/2E1/2 of Section 10, Township 2 North, Range 55 West of the 6th P.M.

### TE OF COLORADO COLORADO DEPARTMENT OF AGRICULTURE

COLORADO

Division of Plant Industry 700 Kipling Street, Suite 4000, Lakewood, CO 80215-8000 Tel: (303) 239-4140/4143 Fax: (303) 239-4177 www.colorado.gov/ag/dpi



### **Organic Certification Program**

Prior Land Use Affidavit

### I. Applicant Information and Description of Land Parcel(s)

Applicant	Farm/Ranch/Business Name (If Different)	
C & C Cattle Co. LLC	C & C Cattle Co. LLC	
Legal Description of Property (Township-Range-Section)	Field Number(s)	
S 1/2 of Section 9, T2N, Range 55W	Greener Grass Pasture	

It is the applicant's responsibility to document that any land to be used for certified organic production qualifies under the NOP Rules and Regulations. By submitting this form along with an application for organic certification and field history sheet the applicant grants CDA permission to request and review all records pertaining to organic certification and the NOP rule.

To qualify all land that has not been under the applicant's control for at least the past 36 months, this form must be completed and verified by the previous land manager. The form must be signed by the applicant and the previous land manager. A previous land manager is someone who had managerial control of the property during the past 36 months.

#### II. Responsible Entity

Previous Land Manager Name Charlotte Jean Greener	e Borne all'un		
Previous Land Manager Mailing Address 951 E. 7th	City Loveland	State CO	Zip 80537
Previous Land Manager Phone Number(s) 970 663 - 4650			

#### **III.** Declaration

Charlotte Jean Greener	declare that	t the p	parcel(s) of	f land described	above were	farmed by me or v	vere
under my control during the crop years of	2012	_to _	2017	I also declare	e that during	this time, to the be	est of
my knowledge, there were no herbicides,	pesticides, fi	ungici	ides, seed	treatments, syr	thetic fertilize	ers or other materi	als
applied to this land other than those appro	ved under th	ne Na	tional Org	anic Program (N	NOP) Regula	tion. I submit that	the
above information is true and accurate.							

C & C Cattle Co. LLC

**Owner Name** 

Padelle Owner Signature

May 1, 2017

Date

Charlotte Jean Greener

Prior Land Manager Name

Prior Land Manager Signature

May 1, 2017

Date

Date of Initial Review: 7.19.2017				Date Review Finalized:
PAGE	ISSUE OF CONCERN/ INCOMPLETE	REVIEWER or INSPECTOR	COMMUNICATION	REQUESTED INFORMATION AND RESOLUTION
(OSP)	(Clarification? Incomplete?)	(Issue handled before or at inspection?)	(email, during inspection, date due for items prior to inspection)	(specific notification to operation, and response received, specific request to inspector)
Module 9 Section 2 Question 2	Sounds like they are making compost. This is also in module 10.	Ι	During inspection	In module 9, sections 2, question 2 it sounds like the producer is making compost. Please verify compost is made from plant products only.
Module 11 Section 3 Question 4	No answer	Ι	During inspection	In module 11 section 3 question 4 the producer does not answer. Please see if the producer can answer this.
Module 14 Question 4	No answer	Ι	During inspection	In module 4 question 4. The producer does not answer. Please see if the producer can answer this.
Module 56 Question 3	Check to see if any of these apply.	Ι	During inspection	Please check to see if any of these apply.
Labels	Confirm all labels current especially Wildcat Garden Labels – is this a dba?	Ι	During Inspection	Confirm all labels current especially Wildcat Garden Labels – is this a dba?



### **Colorado Department of Agriculture**

### **Organic Inspection Report Cover Sheet**

<b>Operation's Name:</b> Earthstar Farms LLC	Person Interviewed:	
Physical Address: 151 Wildcat Ln. Boulder, CO 80304	Others Present for Inspection:	
Type of Inspection:        □ New Applicant	Has a Current Copy of NOP Stand	ards?
Inspector:	Date: Time In: Time Ou	

### **General Questions**

Does the operation have a complete copy of their current Organic System Plan?

□Yes □ No (if No, please explain)

Did you observe any obvious health and/or safety violations? □Yes □No (if Yes, Please Explain in Exit Interview Section)

Are any sections of the operation not fully under the care and control of the operation requesting organic certification? (Are any fields farmed by someone other than the operation? Are crops/products/ingredients held or stored at a rented facility? Etc.) **Yes No (If Yes, Please Explain in the Exit Interview Section)** 

Were any portions of the operation *not* visited during the inspection? **U**Yes **D** No (If Yes, please explain) 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 notes what was collected, or what clarification was provide.

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

Issue	Response
In module 9 sections 2 question 2 it sounds like the producer is making compost. Please verify compost is made from plant products only.	
In module 11 section 3 question 4 the producer does not answer. Please see if the producer can answer this.	
In module 4 question 4. The producer does not answer. Please see if the producer can answer this.	
Module 56, Question 3: Please check to see if any of these apply.	
Confirm all labels current especially Wildcat Garden Labels – is this a dba?	

#### Record Keeping System

NOP RULE § 205.103

Please use the 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:

Other Comments:

Recommended Sampling NOP §205.402, 205.403
<ul> <li>None Samples Obtained</li> <li>Number of samples taken</li> <li>Sample Type: Crop Degetation Soil Other</li> <li>Reason for sample(s) obtained:</li></ul>
What type of receipt was provided?

#### **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.

<u>Please remember</u> 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.

Additional documents needed

**Inspection Cover Sheet** 

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	
23	
3.	
4.	
5	
Comments:	
Please do not ask for these documents to be sent to you or into the office; the final reviewer may do tha	ıt.

Issues of concern (cite the standard)	NOP §205.403(d)
1	
2	
3	
4	
Comments	
	81

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.

Representative of Operation Signature

Date

**Inspector Signature** 

Date

Inspection Cover Sheet

Attachments:	Farm Questionnaire         Field Maps         Complete Field His         Other (specify)	
Pre- Inspection Time:		Driving Time:
Inspection Time:		
Inspection Narrative Write-up Time	hour(s)	Mileage:



May 4, 2017

Earthstar Farms LLC Ben Levi 151 Wildcat Lane Boulder, CO 80304

Dear Mr. Levi:

This is to notify you that we received your Organic Systems Plan and your check in the amount of \$1,200.00, was postmarked on April 27, 2017. We will begin processing your application.

The application process involves an initial review by an organic certification specialist and the gathering of any additional information, if needed, prior to your inspection.

Your file will be assigned to one of our inspectors. The inspector will contact you to arrange a date and time for the inspection based on the information, which you provided to us on your inspection appointment form.

We estimate the inspection time to be approximately 6 hours and travel time to be 2 hours and mileage to be invoiced at .25 per mile (time may vary due to inspector's place of origin). We estimate your total inspection cost to be approximately \$275.00. You will be invoiced after the inspection is performed and actual costs are known.

If you have any questions concerning the process outlined above, please contact Alyssa Mack at 303-869-9075.

Sincerely,

Barbara A. Rosenbach Program Assistant Division of Plant Industry

BR:bar





COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### ORGANIC CERTIFICATION PROGRAM APPLICATION FEE SCHEDULE

This form can be filled out electronically and will automatically calculate your fee. Please complete this form to determine your application fees for the current year. Application fees are annual fees and must be submitted for both initial applications and renewals. All applicants pay a \$400.00 base fee. Additional fees are broken down into 5 scopes (Crop, Process Handler, Livestock, Wild Crop, and Poultry & Livestock Processing). For operations that include multiple scopes, each additional scope is \$200.00.

Certification Renewals: Renewal Forms and Fees must be postmarked by the specified date in your renewal cover letter. The base fee increases \$100 per month if not postmarked by the date specified (1 - 30 days past due = \$100; 31 - 60 days past due = \$200; up to a maximum of \$300).

Initial Applicants: New applicants requesting crop certification must submit the application and Organic System Plan by June 1<sup>st</sup> to receive certification for the year. There are no late fees for initial certifications.

Applicant/Company Name: Earthstar Farms, LLC	requesting for eachingtion	DBA, if applical		alle box that correspon
Primary Contact's Name: Ben Levi	Phone Number: 303-546-0679	50000000000000000000000000000000000000	Email Address: ben@dialogue.o	rg <sub>been</sub> and a
Mailing Address:	City:	State:	Zip Code:	County:
151 Wildcat Ln.	Boulder	CO	80304	Boulder
Physical Address:	City:	State:	Zip Code:	County:
151 Wildcat Ln.	Boulder	CO	80304	Boulder

BASE FEES			
What is your Primary s		- o 🔄 🕴 00.0282 📔 240bo	12 21 - 49 pt
	The part of your operation that produces the most i	income)	istivity of the
Crops	Poultry and Livestock Processing		
Livestock	Process Handler		
Wild Crop			
	Primary Scope = \$400.00	If entering by hand enter \$400 here:	400
Which additional scope	s are you wishing to certify?	0.022 Bead	605 - 161 🗖
(Ruminant Livestock Pr	oducers must select crops as an additional scope)		
(Check all that apply, ad	ditional scopes = \$200 each)	If entering by hand enter \$200 for each checked	box, below
Crops (must be se	lected if ruminant livestock is part of operation)		0.00
Livestock			0.00
Wild Crop		00.0012 (antis C - 1	
Process Handler		00.0282	200
Poultry and Lives	tock Processing	r siles \$2100.00	0.00
00.0	Base Fee Total (Primary Scope + additional scopes)		800

\*Continue to Page two for Scope Fees

5031713464 5/3/2017 Earthstar Farms LLC 102 \$1,200.00 23S0 4200 BPAA 1602 BCAACL001 6130 6270

Form:DPI-ORG-AFS (rev. 10/2015) Code 6270 Fee Schedule

Page 1 of 3





SCOPE 1: CROPS				a state of the second
Check the box that corresponds			for certification	n. If more than one type of production
occurs, enter the one which pro	duces the most inc			
Irrigated Acres	-	Dryland Acres		
■ 1 – 20 acres	\$400.00	□ 1 – 1500 acres	\$400.00	
21 - 200 acres	\$850.00	1501 - 4000 acres		
201 or greater acres	\$2100.00	4001 or greater acres	\$2100.00	
Perennial Fruit		Greenhouse/Specialty Crop		
$\Box$ 1 – 5 acres	\$400.00	$\Box$ 1 – 12000 sq. ft.		
$\Box$ 6 – 40 acres	\$850.00	□ 12001 – 15000 sq. ft.	\$850.00	" to reach a contraction for the year. Th
41 or greater acres	\$2100.00	□ 15001 or greater sq. ft.	\$2100.00	40
SCOPE 2: LIVESTOCK		itlentione II antit		
Check the box that corresponds	s to the type and nu	imber of livestock you are reques	ting for certific	ation.
Poultry		Dairy		
$\Box$ 1 – 1000 head	\$400.00	□ 1 – 100 head	\$400.00	
1001 – 6000 head	\$850.00	□ 101 – 300 head	\$850.00	
6001 or greater head	\$2100.00	301 or greater head	\$2100.00	
Other (Beef cattle, sheep, pigs	Ain Codes	5000 CO	Citer: Beulded	
$\square$ 1 – 250 head	\$400.00			
$\Box$ 251 – 500 head	\$850.00	initial and a state	- Chief	
$\Box$ 500 or greater head	Contact CDA	I I I I I I I I I I I I I I I I I I I	BOUNDER	0.0
SCOPE 3: PROCESS HAND			Manual States	
		oducts are being requested, enter	the highest fee	of the two.
Single Ingredient Finished Pr		Multi-Ingredient Finished P		Constitution of the second
$\Box$ 1 – 20 products	\$400.00	$\Box 1 - 5$ products	\$400.00	
$\square$ 21 – 40 products	\$850.00	$\Box 6 - 15$ products	\$850.00	versen av en
41 or greater products	\$2100.00	☐ 16 or greater products	\$2100.00	CHECK & 651.V. The part of view
- 41 of greater products	\$2100.00		\$2100.00	0.0
				0.0
SCOPE 4: POULTRY AND I	LIVESTOCK PR			
Livestock Processing	C 100 00	Poultry Processing	6100.00	
1 – 300 head	\$400.00	1 – 3000 head	\$400.00	
301 – 500 head	\$850.00	3001 – 9000 head	4000.00	
501 or greater head	\$2100.00	9001 or greater head	\$2100.00	0.0
SCOPE 5: WILD CROP				0.0
Wild Crop Harvesting				
$\Box 1 - 2$ sites	\$400.00			
$\boxed{3}$ - 5 sites	\$850.00			
6 or greater sites	\$2100.00			There are consisted to a second
108		tenners hundtlike + w	and Primarie States	0.0
	And the second second second second	and the second second with the second s	The second for some built of the second	The second s

Total Application Fee = Total of Base Fees + Scope Fees

Print this form and mail it along with a check made payable to: Colorado Department of Agriculture

Colorado Department of Agriculture Division of Plant Industry 305 Interlocken Parkway Broomfield, CO 80021

Fee Schedule

	te of Initial Review: 6/23/2017 Date Review Finalized:			
PAGE	ISSUE OF CONCERN/ INCOMPLETE	REVIEWER or INSPECTOR	COMMUNICATION	REQUESTED INFORMATION AND RESOLUTION
(OSP)	(Clarification? Incomplete?)	(Issue handled before or at inspection?)	(email, during inspection, date due for items prior to inspection)	(specific notification to operation, and response received, specific request to inspector)
7	First Question is not answered.	R	R (Attach Mod.7)	Done, Okay.
7	Table in Module 7, is not complete, you must contact at least 3 suppliers for each variety of seed, to find organic seed.	R	R (Attach Mod.7)	Done, Okay.
7	Were seedlings or grafts used, answer questions at beginning of Sections 2 and 3 and/or fill in tables.	R	R (Attach Mod.7)	Done, Okay.
15/16/17	Mod. 15, Question 7 indicates that Post Harvest Materials are used to Control Rodents, Insects and/or Diseases. Question 8 indicates that Cleaning/Sanitizers are used. Neither is listed on Module 17. Mod. 16, Question 10 indicates that Post Harvest Materials are used. Please list in Mod. 17.	R	R(Attach Mod. 17)	Applicant sent in Module 17. Inspector, Please collect labels for the inputs listed in Module 17.
56	Question 1 indicates that a Pest Control Service is used, Please Identify the Pest Control Service.	Ι	Ι	



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

### **MODULE 3: FIELDS AND ELIGIBILITY**

### FIELDS AND ELIGIBILITY

Please complete or review the following information about this operation. Include all land including conventional, transitional, and organic fields. The NOP Rule requires that to be eligible for certification, a site producing crops intended to be sold, labeled or represented as organic must have had no prohibited substances applied for at least 36 months preceding harvest of the crop. Transitional means that a field is being managed in accordance with the organic standards, but has not yet met the standard for 36 months without use of a prohibited product. If a field being used for organic production has not been managed by the operator for 3 or more years, a Previous Land Use Affidavit from the previous land manager must be attached. The Field Identifications and acreages must be the same as what is listed on maps and the Crop and Input Information section. For new fields, please be sure to complete the column "New to operation...?"

Field ID/name/ number	Address/legal description (if different from main operation address)	List acreage and whether Organic, Transitional, Conventional O T C			Rent or Own	Date management began	Last date prohibited substance applied & material	Date eligible for organic (CDA to enter)	New to Operation since last OSP update? (Yes or No)	*Operator - note change, addition or deletion. Date and initial in parenthesis.
b) (4)			21		OWN	July '16	May '16	MAY '19	no	JH
			75		OWN	MAY '15	JUNE '15	MAY '18	no	JH
		55			rent	january '12	july '12	N/A	no	jh (field prev. managed by Sidwell. certified by CDA - ∎
		14			rent	dec '12	may '12 +	N/Aland use affidavit on file <del>+</del>	no	jh
			40		own	1976	June 1, 2015		no	jh
		150			rent	dec 2016	NEVER	current	yes	jh
Total this page		219	136	0		•	÷		-	

Operator Review, Initial and Date: JPH 3/14/17

Inspector Review, Initial and Date: FDB 6.30.16

Company Name: Hungenberg Produce

F-E-202 10/10/2015 OSP Module 3 Field Eligibility



# COLORADO DEPARTMENT OF AGRICULTURE

**Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

# MODULE 3: FIELDS AND ELIGIBILITY, Cont'd

Field ID/name/ number	Address/legal description (if different from main operation address)	wheth Tra	acreag ner Org ansition aventic T	ganic, nal,	Rent or Own	Date management began	Last date prohibited substance applied & material	Date eligible for organic (CDA to enter)	New to Operation since last OSP update? (Yes or No)	*Operator - note change, addition or deletion. Date and initial in parenthesis.
(b) (4)		51			R	March 1, 17	2011	current	YES	
	- 2.									
									-	
Total this page		51	0	0					90 1	
Total Prev.		219	136	0						
Total all pages		270	136	0						

Operator Review, Initial and Date: jph 3/14/17

Inspector Review, Initial and Date: FDB 6.30.16

Company Name: hungenberg produce



# MODULE 7: SEEDS, SEEDLINGS, PLANTING STOCK

No Seeds, Seedlings or Planting Stock used this year. Skip to Module 8 – Non-Organic Production	
Information on crop seeds and planting stock must be submitted each year. Include cover crop seed and seed used for orchard understory plantings. The NOP Rule re the use of certified organic seeds, unless the variety is not commercially available, except that, organically produced seed must be used for the production of edible sprouts. Cos an acceptable reason for exemption. Synthetic seed treatments are prohibited unless included on the National List. Genetically engineered (GMO) seeds, planting stock, and in are prohibited in organic production. If a given crop is available in GMO form (alfalfa; apple – green, Granny Smith types & Golden Delicious types; canola; corn; potato – rus types; soybean; summer squash; sugar beets), you must provide non-GMO documentation from the supplier.	t is not culants
Are any crops grown on contract, such that seeds or planting stock are selected or provided by the buyer?	
SECTION 1 - SEEDS	
<ol> <li>Is seed harvested and saved to use as seed stock for following years?</li> <li>Yes</li> <li>If yes, how is seed quality maintained?</li> </ol>	
b. Where is seed being cleaned (or other "processing") and stored?	
2. Describe any efforts to trial certified organic varieties to potentially replace conventional varieties:	
Operator Review, Initial and Date: JPH 6-14-17 Inspector Review, Initial and Date:	

Company Name: hungenberg produce inc



# COLORADO DEPARTMENT OF AGRICULTURE

**Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

### SECTION 1 - SEEDS Cont'd

For each seed v	s used in organic prod variety that is not certifi		find organic seed of the	at type must be	e made by contacting a minimum of three org	anic seed suppliers. You may submit
Сгор	Variety	Source	Type of Treatment (inoculents, pelleting, etc)	Certified Organic?	If not certified organic - reason for Exemption and explain	If not certified organic - Suppliers Contacted and date contacted
Organic Silage	P0157 Conventional	(b) (4)	None	No	<ul> <li>Form: Not treated - only available</li> <li>Quality:</li> <li>Quantity:</li> </ul>	(b) (4)
					Form:     Quality:     Quantity:	
Organic Carrots	purple	(b) (4)	None	No	Form: Quality: Quantity:	(b) (4)
Organic Carrots	Maverick		None	No	Form: Quality: Quantity:	
Organic Carrots	Uppercut		None	No	Form: Quality: Quantity:	
Organic Carrots	Choctaw		None	No	Form: Quality: Quantity:	
Organic Carrots	Sugarsax		None	No	Form: Quality: Quantity:	
					<ul> <li>Form:</li> <li>Quality:</li> <li>Quantity:</li> </ul>	
					Form:     Quality:     Quantity:	

Operator Review, Initial and Date: JPH 6-14-17

Inspector Review, Initial and Date:

Company Name: Hungenberger Produce, Inc

F-E-207 10/10/2015 Module 7, Cont'd



# SECTION 2 - SEEDLINGS AND PERENNIAL STOCK

Module 7, Cont'd

#### No Seedlings or Perennial Stock Purchased This Year. No Grafting. Skip to Module 8

**This section must be filled out each year if seedlings or perennial stock are purchased.** *If you propagate your own seedlings and/or perennial stock please see Module 6.* Annual seedlings must be organically produced. Non-organic perennial plants (and planting stock) must be managed organically for at least one year prior to harvest of crop or sale of the plant as certified organic. Organic planting stock must be used if commercially available. Organic certificates of suppliers should be available.

Сгор	Variety	Supplier	Organic? Certified by whom?	Date purchased	If not organic, date crop becomes eligible for certification
SECTION 3 - G	RAFTING				
If yes, pleas			ops this year? fting stock or scionwoo	☐ Yes od was purchased,	No enter the supplier
Сгор	Variety	Location/Field	Grafting Materials	Date Planted	Expected Harvest Date

Operator Review, Initial and Date: JPH 6-14-17

Inspector Review, Initial and Date:

Company Name: Hungenberg Produce



Tel: 303-869-9050 www.colorado.gov/ag/dpi

# MODULE 17: CLEANING, SANITIZING & POST HARVEST INPUTS

#### **Cleaning, Sanitizing & Post-Harvest Inputs**

List all products used after products have been harvested including tool and equipment cleaners and sanitizers, pest control products used in handling and storage areas, and materials applied to products. If you have discontinued use of a product and are unlikely to use it again, please strike through or cross out the entry. Labels for each product need to be on file with CDA. If you have received approval for a product and have submitted a product label, you do not need to resubmit the label each year.

Product	Manufacturer	Use & How Applied	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)
12.5 Sodium Hydroxide	Chem Station	used $@ < 4$ ppm free chlorine to clean product			
Glue Boards	Enviropest	for rodent control			
Bait Stations/Contrac Blox		outside use only			
Fly Lights		used to attract and trap flies and insects			
*NOP Rule References (C	DA to enter) -	•			•

Operator Review, Initial and Date: JPH 6/14/2017

Inspector Review, Initial and Date:

Company Name: Hungenberg Produce F-E-215 10/10/2015

All OSP Module 17 Post Harvest Handling Inputs



# COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry

305 Interlocken Parkway, Broomfield, Colorado, 80021 Tel: (303) 869-9050 Fax: (303) 466-2860 www.colorado.gov/ag/dpi INSPECTOR USE ONLY

Appointment Date:

Appointment Time:

DPI-ORG-OIAF (02/15)

# **Organic Certification Program**

# **Organic Inspection Appointment Form**

(Return form with completed Plan Questionnaire)

Farm/Business Name				Primary	Contact's Na	me:
Hungenberg Produce	INC			Jordan H	lungenberg	
Physical Address:						
31466 WCR 39.5 Gre	eley CO					
City:				State:	Zip Code:	County:
Greeley				со	80631	
Phone:		Fax:		Email:	·	
970 302 3656		970 356 0730	)	jordan@	hungenberg	produce.com
Best hours to call:	Indicate whi	ch day(s) of th	ne week are most o	convienient fo	or an Organic	Inspector to visit your operation:
9AM - 5PM	M-F					
Draw a clear map and	d provide writ	tten directions	to your farm or bu	isiness.		
	right on O S					n take a right on 6th st, at the ad 39.5. we are on the right hand



# **Colorado Department of Agriculture**

# **Organic Inspection Report Cover Sheet**

Operation's Name: Hungenberg Producer Inc.	Person Interviewed:	
Physical Address: 31466 WCR 39.5 Greeley, CO 80631	Others Present for Inspec	ction:
Type of Inspection:          New Applicant          Continuation	Has a Current Copy of N	OP Standards?
Inspector:	Date:	Time In: Time Out:

# **General Questions**

Does the operation have a complete copy of their current Organic System Plan?

□Yes □ No (if No, please explain)

Did you observe any obvious health and/or safety violations? □Yes □No (if Yes, Please Explain in Exit Interview Section)

Are any sections of the operation not fully under the care and control of the operation requesting organic certification? (Are any fields farmed by someone other than the operation? Are crops/products/ingredients held or stored at a rented facility? Etc.) □Yes □No (If Yes, Please Explain in the Exit Interview Section)

Were any portions of the operation *not* visited during the inspection? **UYes D** No (If Yes, please explain) 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 notes what was collected, or what clarification was provide.

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

Issue	Response
Get labels for appropriate inputs in Table in Module 17.	
In Module 56, Question 1 indicates that a Pest Control Service is used, Please Identify the Pest Control Service.	

#### Record Keeping System

Please use the 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:

Other Comments:

Recommended Sampling NOP §205.402, 205.403

NOP RULE § 205.103

□ None □ Samples Obtained			
Number of samples taken			
Sample Type:      Crop	□ Vegetation	□ Soil	□ Other
Reason for sample(s) obtained:			
What type of receipt was provided?			

### **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.

<u>Please remember</u> 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.

# Additional documents needed

	ents that the operation was unable to supply at the inspection that may be needed to
	ation on their organic certification:
1	
2.	
3.	
4.	
5.	
Comments:	
landa katalah sa katala katala katala <u>k</u>	
Please do not ask for	these documents to be sent to you or into the office; the final reviewer may do that
I Rust to not ask for	these documents to be sent to you of mito the office, the infar reviewer may do that

Issues of concern (cite the standard)

NOP §205.403(d)

1			
2			_
2			_
3	 	 	-
4			_
			_
Comments			
	 		-

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.

Representati	ive of Operation Signature	Da	ate
	Inspector Signature	Da	ate
Attachments:	Farm Questionnaire Field Maps Complete Field Histo Other (specify)		
Pre- Inspection Time:	I	Driving Time:	·
Inspection Time:			
Inspection Narrative Write-up Time	hour(s)	Mileage:	

Page 4 of 4



# Re: hungenberg organic audit

**Mack - CDA, Alyssa** <alyssa.mack@state.co.us> To: Jordan Hungenberg <jordan.hungenberg@hungenbergproduce.com> Cc: "Rosenbach - CDA, Barbara" <barbara.rosenbach@state.co.us> Fri, Jun 9, 2017 at 10:43 AM

Hi Jordan,

I attached your fee schedule with the first page filled out, which reflects that you are applying for both Crops and Processing. On the second page, please just check one box in the Crops Section based on your acreage. There is an additional processing fee for missing the deadline - you'll see at the top of the fee schedule. We'll split the difference with you and only charge \$100 so add that to you total.

Let me know if you have any questions.

On Fri, Jun 9, 2017 at 10:30 AM, Jordan Hungenberg <jordan.hungenberg@hungenbergproduce.com> wrote:

Oh my gosh, no, can you ask her how much I need to pay and I'll cut a check today? for some reason I thought a renewal bill would come to us to pay - - so sorry

From: Mack - CDA, Alyssa [mailto:alyssa.mack@state.co.us]
Sent: Friday, June 09, 2017 10:22 AM
To: Jordan Hungenberg
Subject: Re: hungenberg organic audit

Hi Jordan,

I believe the initial review of your Organic System Plan is occurring within the next few days, so the inspection should come shortly after. One thing though - It doesn't look like any certification fees have cleared. Have you been in touch with Barb Rosenbach about this?

Alyssa

On Fri, Jun 9, 2017 at 10:10 AM, Jordan Hungenberg <jordan.hungenberg@hungenbergproduce.com> wrote:

Hi Alyssa, hope all is well.

With our organic crop growing in size this year, and the private label agreement I was able to get on board with Safeway, I wanted to ask when we might be able to schedule the audit visit with the CDA? I know your team is always busy – please let me know at your convenience. If I did not complete the paperwork correctly or need to fix any of my modules please let me know <sup>©</sup>

Thanks

Jordan

Jordan Hungenberg

970 356 6616 - Office

b) (6)

Cell

Jordan@hungenbergproduce.com

Blue Book # 137716

Dun & Bradstreet # 053370573

**Hungenberg Produce** 

976 N. Balsam Ave

Greeley, CO 80631

### **CONFIDENTIALITY NOTICE:**

This message is intended for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by email reply.

Alyssa Mack Organic Certification Specialist



P 303.869.9075 | F 303.466-2860 305 Interlocken Parkway, Broomfield, CO 80021 alyssa.mack@state.co.us | www.colorado.gov/ag

#### Alyssa Mack Organic Certification Specialist



P 303.869.9075 | F 303.466-2860 305 Interlocken Parkway, Broomfield, CO 80021 alyssa.mack@state.co.us | www.colorado.gov/ag

HungenbergApplication Fee Schedule Rev A 5.23.2015.pdf



June 28, 2017

Hungenberg Produce Jordan Hungenberg 976 North Balsam Avenue Greeley, CO 80631

Dear Mr. Hungenberg:

This is to notify you that we received your Organic Systems Plan and your check in the amount of \$2,800.00 on June 9, 2017. We will begin processing your application.

The application process involves an initial review by an organic certification specialist and the gathering of any additional information, if needed, prior to your inspection.

Your file will be assigned to one of our inspectors. The inspector will contact you to arrange a date and time for the inspection based on the information, which you provided to us on your inspection appointment form.

We estimate the inspection time to be approximately 6 hours and travel time to be 2 hours and mileage to be invoiced at .25 per mile (time may vary due to inspector's place of origin). We estimate your total inspection cost to be approximately \$275.00. You will be invoiced after the inspection is performed and actual costs are known.

If you have any questions concerning the inspection process described above, please contact Alyssa Mack at (303) 869-9075.

Sincerely,

Barbara A. Rosenbach Program Assistant Division of Plant Industry

BR:bar





# **RE: hungenberg organic audit**

1 message

Jordan Hungenberg <jordan.hungenberg@hungenbergproduce.com> To: "Mack - CDA, Alyssa" <alyssa.mack@state.co.us> Cc: "Rosenbach - CDA, Barbara" <barbara.rosenbach@state.co.us> Fri, Jun 9, 2017 at 11:24 AM

Will send a check today for \$2800.

\$600 crops and processing

\$100 late fee (thank you for helping me 🙂 )

\$2100 for over 200 acres (we have approx. 275)

\$2800 total

Sorry about that!!

Jordan

From: Mack - CDA, Alyssa [mailto:alyssa.mack@state.co.us]
Sent: Friday, June 09, 2017 10:43 AM
To: Jordan Hungenberg
Cc: Rosenbach - CDA, Barbara
Subject: Re: hungenberg organic audit

Hi Jordan,

I attached your fee schedule with the first page filled out, which reflects that you are applying for both Crops and Processing. On the second page, please just check one box in the Crops Section based on your acreage. There is an additional processing fee for missing the deadline - you'll see at the top of the fee schedule. We'll split the difference with you and only charge \$100 so add that to you total.

Let me know if you have any questions.

On Fri, Jun 9, 2017 at 10:30 AM, Jordan Hungenberg <jordan.hungenberg@hungenbergproduce.com> wrote:

Oh my gosh, no, can you ask her how much I need to pay and I'll cut a check today? for some reason I thought a renewal bill would come to us to pay - - so sorry

From: Mack - CDA, Alyssa [mailto:alyssa.mack@state.co.us]
Sent: Friday, June 09, 2017 10:22 AM
To: Jordan Hungenberg
Subject: Re: hungenberg organic audit

Hi Jordan,

I believe the initial review of your Organic System Plan is occurring within the next few days, so the inspection should come shortly after. One thing though - It doesn't look like any certification fees have cleared. Have you been in touch with Barb Rosenbach about this?

Alyssa

On Fri, Jun 9, 2017 at 10:10 AM, Jordan Hungenberg <jordan.hungenberg@hungenbergproduce.com> wrote:

Hi Alyssa, hope all is well.

With our organic crop growing in size this year, and the private label agreement I was able to get on board with Safeway, I wanted to ask when we might be able to schedule the audit visit with the CDA? I know your team is always busy – please let me know at your convenience. If I did not complete the paperwork correctly or need to fix any of my modules please let me know <sup>©</sup>

Thanks

Jordan

Jordan Hungenberg

970 356 6616 - Office

0) (6)

Cell

Jordan@hungenbergproduce.com

Blue Book # 137716

Dun & Bradstreet # 053370573

**Hungenberg Produce** 

976 N. Balsam Ave

Greeley, CO 80631

#### **CONFIDENTIALITY NOTICE:**

This message is intended for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by email reply.

-

Alyssa Mack Organic Certification Specialist

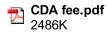


P 303.869.9075 | F 303.466-2860 305 Interlocken Parkway, Broomfield, CO 80021 alyssa.mack@state.co.us | www.colorado.gov/ag

Alyssa Mack Organic Certification Specialist



P 303.869.9075 | F 303.466-2860 305 Interlocken Parkway, Broomfield, CO 80021 alyssa.mack@state.co.us | www.colorado.gov/ag



#### (b) (4)

. .

#### (b) (4)

(b) (4)

£



# COLORADO DEPARTMENT OF AGRICULTURE **Division of Plant Industry**

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

# ORGANIC CERTIFICATION PROGRAM APPLICATION FEE SCHEDULE

This form can be filled out electronically and will automatically calculate your fee. Please complete this form to determine your application fees for the current year. Application fees are annual fees and must be submitted for both initial applications and renewals. All applicants pay a \$400.00 base fee. Additional fees are broken down into 5 scopes (Crop, Process Handler, Livestock, Wild Crop, and Poultry & Livestock Processing). For operations that include multiple scopes, each additional scope is \$200.00.

Certification Renewals: Renewal Forms and Fees must be postmarked by the specified date in your renewal cover letter. The base fee increases \$100 per month if not postmarked by the date specified (1 - 30 days past due = \$100; 31 - 60 days past due = \$200;

up to a maximum of \$300). Initial Applicants: New applicants requesting crop certification must submit the application and Organic System Plan by June 1st to require certification for the upper Theorem to be for for initial certification and Organic System Plan by June 1<sup>st</sup> to receive certification for the year. There are no late fees for initial certifications. Email \$100.00 ×.

GENERAL INFORMATION		Add 1 PUR 4-13 -11	
Applicant/Company Name: Hungenburg Prod	DBA, if applie	icable:	
	Phone Number: 70354 Gallo	Email Address: Jorda Whung enhog	
	Greeley G	te: Zip Code: County:	-0 <i>0</i> / n
	City: State	0005	-

BASE FEES		
What is your Primary scope	?	
CHECK ONE ONLY - The p	part of your operation that produces the most	income)
Crops	Poultry and Livestock Processing	
Livestock	Process Handler	-
Wild Crop		-
	Primary Scope = \$400.00	If entering by hand enter \$400 here: 400.00
Which additional scopes are	Von wishing to govtify?	400.00
(Ruminant Livestock Produce	rs must select crons as an additional second	
(Check an unat apply, addition	al scopes = $\$200 \text{ each}$	If entering by hand anter \$200 G
Crops (must be selected	if ruminant livestock is part of operation)	If entering by hand enter \$200 for each checked box, below
Livestock		.0.00
Wild Crop		0.00
Process Handler		0.00
Poultry and Livestock P	rocessing	200.00
		0.00
b	ase Fee Total (Primary Scope + additional scopes)	600.00

\*Continue to Page two for Scope Fees



6161715456 6/16/2017 Hungenberg Produce, Inc. 95773 \$2,800.00 23S0 4200 BPAA 1602 BCAACL001 6130 6270

Form:DPI-ORG-AFS (rev. 10/2015) Code 6270

Fee Schedule



# COLORADO DEPARTMENT OF AGRICULTURE **Division of Plant Industry** 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

# ORGANIC CERTIFICATION PROGRAM - APPLICATION FEE SCHEDULE CONT'D

SCOPE 1: CROPS			San Provide States	rresponds to the type & size of the operation
Check the box that correspo	nds to the type and i	number of acres you are requesti	ng for certifica	tion. If more than one type of production
Irrigated Acres	produces the most in		ing for certifica	fillion. If more than one type of production
$\Box 1 - 20 \text{ acres}$		Dryland Acres	State State	
$\Box 21 - 200 \text{ acres}$	\$400.00	□ 1 – 1500 acres	\$400.00	
201 or greater acres	\$850.00	1501 - 4000 acres	\$850.00	-
Perennial Fruit	\$2100.00	4001 or greater acres	\$2100.00	-
$\Box 1 - 5 \text{ acres}$		Greenhouse/Specialty Cron	)	
$\Box 6-40 \text{ acres}$	\$400.00	1 - 12000 sq. ft.	\$400.00	1
	\$850.00	□ 12001 – 15000 sq. ft.	\$850.00	2100.
□ 41 or greater acres	\$2100.00	□ 15001 or greater sq. ft.	\$2100.00	24000
SCOPE 2: LIVESTOCK		<u> </u>	\$2100.00	0.
check the box that correspon	do to the tree 1			
oultry	us to the type and m	umber of livestock you are reque	sting for certif	ication.
□ 1 – 1000 head	and the second second second	Dairy		
1000 head	\$400.00	□ 1 – 100 head	\$400.00	1
$\square$ 6001 or greater head	\$850.00	□ 101 – 300 head	\$850.00	1
U 0001 of greater head	\$2100.00	□ 301 or greater head	\$2100.00	1
other (Beef cattle, sheep, pi				
$\Box$ 1 – 250 head				
$\Box 251 - 500 \text{ head}$	\$400.00			
	\$850.00			
□ 500 or greater head	Contact CDA			
COPE 3: PROCESS HANI	DLING			0.0
both Single-Ingredient and I	Multi-Ingredient pro	ducts are being requested, enter	the highest fee	of the two
Be and curcht runsheu I	roducts	Multi-Ingredient Finished P	roducte	or the two.
$\Box$ 1 – 20 products	\$400.00	$\Box 1-5$ products	\$400.00	
$\Box$ 21 – 40 products	\$850.00	$\Box 6 - 15$ products	\$850.00	
☐ 41 or greater products	\$2100.00	16 or greater products	\$2100.00	
		g and products	\$2100.00	
COPE 4: POULTRY AND	LIVESTOCK PRO	CESSINC	1	0.00
vestock Processing		Poultry Processing		
□ 1 – 300 head	\$400.00	$\Box 1 - 3000 \text{ head}$	0400.00	
□ 301 - 500 head	\$850.00	3001 – 9000 head	\$400.00	
501 or greater head	\$2100.00		\$850.00	
	42100.00	9001 or greater head	\$2100.00	
OPE 5: WILD CROP				0.00
Id Crop Harvesting			New Street	0.00
	6400.00			
	\$400.00			
1-2 sites	00000			
$\begin{array}{c} 1 - 2 \text{ sites} \\ \hline 3 - 5 \text{ sites} \end{array}$	\$850.00			
$\begin{array}{c} \hline 1 - 2 \text{ sites} \\ \hline 3 - 5 \text{ sites} \\ \hline 6 \text{ or greater sites} \end{array}$	\$850.00 \$2100.00			

Print this form and mail it along with a check made payable to: Colorado Department of Agriculture Colorado Department of Agriculture Division of Plant Industry 305 Interlocken Parkway Broomfield, CO 80021 Fee Schedule Fee Schedule

1 ofal



# ORGANIC CERTIFICATION PROGRAM APPLICATION FEE SCHEDULE CONT'D

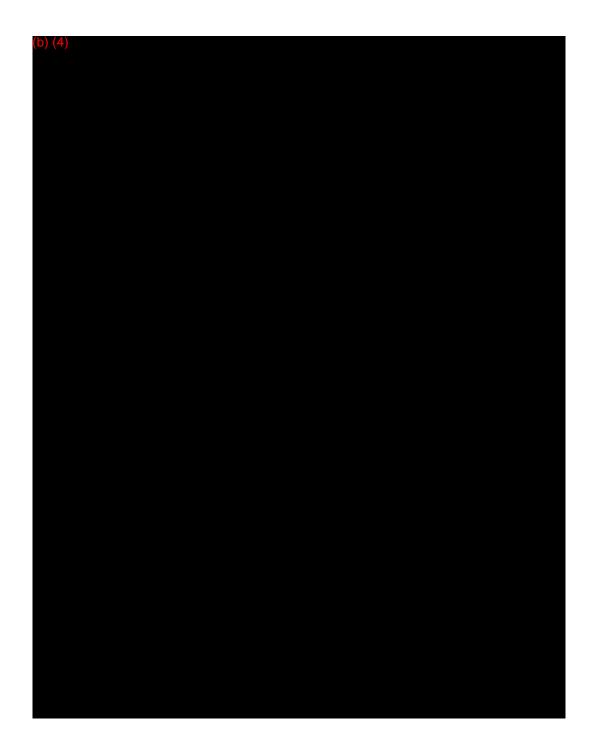
Application Fee Refund Policy: The entire application fee can be refunded if an applicant decides to withdraw from the certification process, prior to the on-site inspection. Once the on-site inspection is conducted, the entire application fee becomes non-refundable. In order to obtain a refund, the applicant must inform the Colorado Department of Agriculture in writing that they no longer wish to proceed with the organic certification process and request a refund of their application fee.

**Inspection Fees**: Inspection fees are calculated separately and are determined by hourly rates. In the event of an Unannounced Inspection, an operation will only be charged if the unannounced inspection replaces the required annual inspection.

# **Inspection Fee Schedule**

Hourly Rates	Construction of the Constr	Mileage	
Inspection Time	\$34/hour	Wincage	Per Diem
Driving Time	\$34/hour	Mileago Potos 60 25/	
Report Write-Up Time	\$34/hour	Mileage Rate: \$0.25/mile	Varies by Location

# THIS PAGE CAN BE KEPT BY THE APPLICANT



Date: May 15, 2017



As the local bound dealer for the Eaton, Colorado area, this letter is provided to confirm that the b) (4) Corn Seed (b) (4) planted by Hungenberg Produce is a non-GMO seed that has not been treated. I have contacted three other local seed dealers in order to obtain certified organic corn seed without success. The following are the other dealers I have contacted.

Scott Vermilyea (Golden Harvest)	970-381-8155
John Larson(Channel Seed)	970-371-1447
Mike Tatro(Ag One, WL Dekalb)	970-301-6612

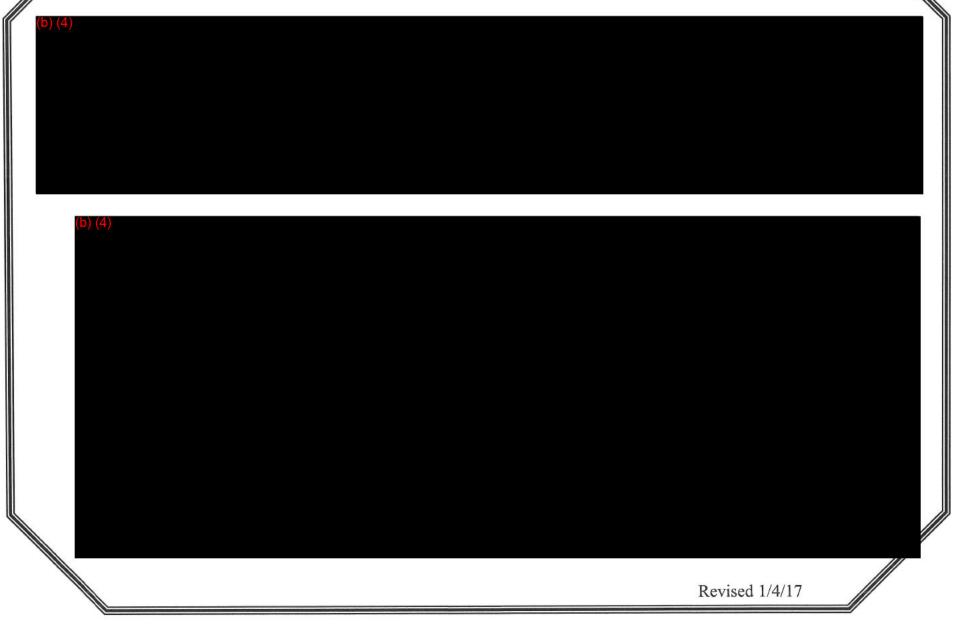
Please feel free to contact me if you have any further questions.

Mike St. Jean

Northern Colorado Seed, Inc.

970-397-5428

# VALIDATION CERTIFICATE





# **INVOICE Spring 2017**

June 19, 2017

Operation : Hungenberg Produce Inc Account Description : Hungenberg Produce Inc Business Partner : Hungenberg Produce Inc Business Partner ID : 17024538

Hungenberg Produce Inc 976 N Balsam Ave Greeley, CO 80631

Product	Segment	Sub-Product Description	Invoice Type	Total # of Units Season To Date	Gross Price Per Unit	Share Gross Invoice Value	Avg Price Per Unit
o) (4)			Regular	100.0	\$260.00	\$26,000.00	\$186.59
			Regular	150.0	\$355.00	\$53,250.00	\$254.77
			Regular	8.0	\$355.00	\$2,840.00	\$254.77
			Regular	8.0	\$355.00	\$2,840.00	\$254.77
		Regular	8.0	\$295.00	\$2,360.00	\$211.71	
			Regular	100.0	\$369.00	\$36,900.00	\$264.82
			Regular	5.0	\$310.00	\$1,550.00	\$222.48
			Regular	50.0	\$376.00	\$18,800.00	\$269.84
			Regular	10.0	\$376.00	\$3,760.00	\$269.84
			Regular	40.0	\$376.00	\$15,040.00	\$269.84
			Regular	36.0	\$310.00	\$11,160.00	\$222.48
			Replant 75%	20.0	\$280.00	\$1,400.00	\$70.00
			Regular	5.0	\$394.00	\$1,970.00	\$282.76
Corn Total				(b) (4)		\$177,870.00	(b) (4)

# **Gross Invoice Value**

Total Value of Products Invoiced	\$177,870.00
Total Value of Products Invoiced as Replant Units	-\$1,400.00
Value of Products Eligible for Discounts (regular invoiced units)	\$176,470.00

# Discounts

		Corn		Total
No. and Value of All Reg Inv Units	520.0	\$176,470.00	520.0	\$176,470.00
Early Pay Savings	10.0 %	\$17,647.00		\$17,647.00
Quantity Savings	10.0 %	\$17,647.00		\$17,647.00
100% Pioneer Customer	4.0 %	\$7,058.80		\$7,058.80
Early Direct Delivery Incentive	-	\$3,000.00		\$3,000.00
TruChoice® Advance Incentive	-	\$2,500.00		\$2,500.00
CPA - Plots \$	-	\$1,970.00		\$1,970.00

 Total Discount Rates and Amounts\*
 28.2 %
 \$49,822.80
 28.2 %
 \$49,822.80

\*Discounts shown are subject to change based on invoice adjustments, payment date(s) and/or payment type. Discount Rates shown

For internal use only : [T: CDA S: 7163252 BPI: 81367005]

\$176,470.00 -\$49,822.80



June 19, 2017

Operation : Hungenberg Produce Inc Account Description : Hungenberg Produce Inc Business Partner : Hungenberg Produce Inc Business Partner ID : 17024538

are rounded to the nearest tenth of a percent while discounts amounts are calculated using the actual discount rates. As a result, the discount amount may not equal the rate shown times the value of regular invoiced units.

Other Credits, Fees, and Charges not Eligible for Discounts Value of Replant Prod Total Other Credits, Fees, and Cha		\$1,400.00
Net Invoice Value		\$128,047.20
Payments Net Posted Payments (Payments less Refunds) Cash Payment (Payment less Refunds) Total Posted Payments	-\$109,222.00	¢100 222 00
Total Payments		-\$109,222.00
Total Duo		\$18,825.20

# **Total Due**

(b) (4)		

For internal use only : [ T: CDA S: 7163252 BPI: 81367005 ]



# **INVOICE Spring 2017**

# June 19, 2017

Operation : Hungenberg Produce Inc Account Description : Hungenberg Produce Inc Business Partner : Hungenberg Produce Inc Business Partner ID : 17024538

(b) (4)

Northern Colorado Seed Inc PO Box 156 Lucerne, CO 80646 (970) 397-2780

For internal use only : [ T: CDA S: 7163252 BPI: 81367005 ]

# CERTIFIED ORGANIC

CERTIFIED TO THE USDA ORGANIC REGULATIONS 7 CFR PART 205

# **HUNGENBERG PRODUCE**

31466 WCR 39.5 Greeley, CO 80631 United States

ANNIVERSARY DATE Crops 6/1/2017 Process Handler 6/1/2017

Crops:

Organic: Carrots, O Organics Baby Carrots (1lb, 2lb), O Organics Cello Carrots (1lb, 2lb.)

Processing: Organic: Peeled Baby Carrots, Whole Carrots, Juice Carrots 976 N Balsam Avenue Greeley, CO 80631 United States

# CERTIFICATION NUMBER

493 Initial Effective Date 7/22/2016





COLORADO DEPARTMENT OF AGRICULTURE 305 Interlocken Parkway Broomfield, CO, 80021 (303) 869-9000 www.colorado.gov/ag

Mitch Yergert Director, Division of Plant Industries

FARRE

Parton

Date Issued

Rev 08-29-2008

Once certified, a production or handing operation's organic certification continues in effect until surrendered or suspended or revoked.

Date of Initial Review: 7.18.2017			Date Review Finalized:		
PAGE	ISSUE OF CONCERN/ INCOMPLETE	REVIEWER or INSPECTOR	COMMUNICATION	REQUESTED INFORMATION AND RESOLUTION	
(OSP)	(Clarification? Incomplete?)	(Issue handled before or at inspection?)	(email, during inspection, date due for items prior to inspection)	(specific notification to operation, and response received, specific request to inspector)	
Module 4 & 5	Field history only includes 2 years. Field history and field eligibility don't match.	R	Email, due 8.1.2017		
All	No year with initials.	Ι	During inspection		
Module 7	Clarify 3 seed suppliers contacted and the dates.	Ι	During inspection		
Module 10	Need labels for all the terra biotics inputs.	R	Email, due 8.1.2017		
Module 16	Module missing	R	Email, due 8.1.2017		



May 19, 2017

Jones Farms Organics Robert Jones 11221 East County Road 110 North Hooper, CO 81136

Dear Mr. Jones:

This is to notify you that we received your Organic Systems Plan and your check in the amount of \$2,500.00, was postmarked on May 1, 2017. We will begin processing your application.

The application process involves an initial review by an organic certification specialist and the gathering of any additional information, if needed, prior to your inspection.

Your file will be assigned to one of our inspectors. The inspector will contact you to arrange a date and time for the inspection based on the information, which you provided to us on your inspection appointment form.

We estimate the inspection time to be approximately 4 hours and travel time to be 2 hours and mileage to be invoiced at .25 per mile (time may vary due to inspector's place of origin). We estimate your total inspection cost to be approximately \$200.00. You will be invoiced after the inspection is performed and actual costs are known.

If you have any questions concerning the process outlined above, please contact Alyssa Mack at 303-869-9075.

Sincerely,

Barbara A. Rosenbach Program Assistant Division of Plant Industry

BR:bar





Tel: 303-869-9050 www.colorado.gov/ag/dpi

# MODULE 10: SOIL AND FERTILITY INPUTS

### SOIL AND FERTILITY INPUTS

# □ No Soil or Fertility Inputs used. Skip to Section 11 – Weed, Pest and Disease Management

List all fertility inputs intended for use on proposed organic fields including compost and manure. Fertility inputs must also be listed on Field History sheets. Please note, many micro-nutrient products (boron, copper, iron, magnesium, manganese, zinc) require a documented deficiency for their use. Please submit soil or plant tissue test results or other documentation for approval. Product labels and/or OMRI/WSDA certificates for all inputs must be on file. If you have previously submitted labels, you do not need to resubmit them. If you have discontinued use of a product and don't intend to use it again, write "no longer in use" and the date in parentheses.

Product	Manufacturer	Number of Applications Annually	Use & How Applied	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)
) (4)		¥		No	Prohibited, Potassium Carbonate	4/17/2017 AGS
				No	Allowed	4/17/2017 AGS
				No	Allowed	5/9/2017 AGS
				No	Approved	7/14/2017 AM
				No	Restricted per 205.602(c)	7/14/2017 AM

Operator Review, Initial and Date:

Inspector Review, Initial and Date:

Company Name:

F-E-209 10/10/2015



Tel: 303-869-9050 www.colorado.gov/ag/dpi

# MODULE 10: SOIL AND FERTILITY INPUTS, Cont'd

Product	Manufacturer	Number of Applications Annually	Use & How Applied	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)
*NOP Rule References (CDA to enter) -						

Operator Review, Initial and Date:

Inspector Review, Initial and Date:

Company Name:

F-E-209 10/10/2015



Tel: 303-869-9050 www.colorado.gov/ag/dpi

## **MODULE 12: WEED, PEST and DISEASE INPUTS**

#### WEED, PEST AND DISEASE INPUTS

#### CONTROL PRODUCTS

□ No Weed, Pest, or Disease Control Products Used. Skip to Module 13 - Irrigation

List all weed, pest and disease products that are intended for use on proposed organic fields/crops. If you have discontinued use of a product and are unlikely to use it again, please cross out the entry. Labels and/or OMRI/WSDA certificates (if applicable) for each product need to be on file with CDA. If you have received approval for a product and have submitted a product label, you do not need to resubmit the label each year. If a product is not listed with OMRI or WSDA, CDA will need a complete ingredients list and processing methods from the manufacturer to determine whether it complies with NOP Subpart G – Allowed and Prohibited Substances.

Control Product	Manufacturer	Weed, Pest, or Disease problem being addressed (specific)	Preventative Mechanical and Physical Control Strategies	OMRI/ WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)
(b) (4)				OMRI	Restricted per 205.206	5/26/2015 AM
				OMRI	Restricted per 205.206	7.18.2017 RCD
*NOP Rule References (CDA to enter) - 205.206 - Requires the use of preventative mechanical, physical and other pest, weed, and disease management practices.						

Operator Review, Initial and Date: RJ 5/1

Inspector Review, Initial and Date:

Company Name: Jones Farm Organics

F-E-211 10/10/2015 Crop OSP Module 12 Weed.Pest.Disease Inputs



Tel: 303-869-9050 www.colorado.gov/ag/dpi

# MODULE 12: WEED, PEST and DISEASE INPUTS, Cont'd

Control Product	Manufacturer	Weed, Pest, or Disease problem being addressed (specific)	Preventative Mechanical and Physical Control Strategies	OMRI/ WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)
*NOP Rule Reference 205.206 - Requires the	s (CDA to enter) - use of preventative mech	anical, physical and other pes	t, weed, and disease manag	ement practices	1 L	

Operator Review, Initial and Date: RJ 5/1

Inspector Review, Initial and Date:

Company Name: Jones Farm Organics

F-E-211 10/10/2015



# COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry

305 Interlocken Parkway, Broomfield, Colorado, 80021 Tel: (303) 869-9050 Fax: (303) 466-2860 www.colorado.gov/ag/dpi INSPECTOR USE ONLY

Appointment Date:

Appointment Time:

DPI-ORG-OIAF (02/15)

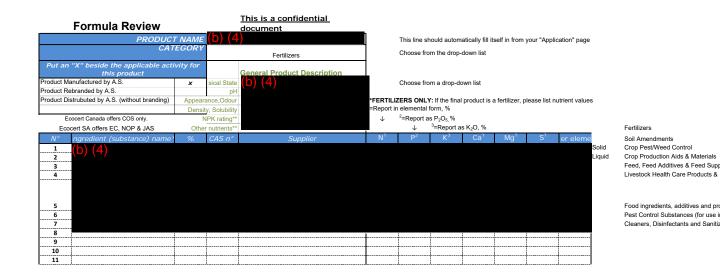
# **Organic Certification Program**

# **Organic Inspection Appointment Form**

(Return form with completed Plan Questionnaire)

Farm/Business Name			Primary Contact's Name:				
Jones Farms Organics			Rob Jones				
Physical Address:							
11221 E.Cnty.Rd. 110	) N.						
City:				State:	Zip Code:	County:	
Hooper				со	81136	Alamosa	
Phone:		Fax:		Email:			
719-588-2299				(b) (6)			
Best hours to call:	Best hours to call: Indicate which day(s) of the week are most conv		vienient for an Organic Inspector to visit your operation:				
any time	Not Sunday						
Draw a clear map and	d provide wri	tten directions to yo	ur farm or busine	SS.			

#### (b) (4)



lements Production Aids

cessing aids n food processing facilities) ers

Formula Review			This is a confidential								
	PRODUCT NAME	(b) (4)			This line sh	nould autom	atically fill its	self in from	your "App	lication" page	
	CATEGORY		Fertilizers		Choose fro	m the drop-	down list				
Put an "X" beside the applicable activ	ity for this product		General Product Descripti	ion							
Product Manufactured by A.S.	x	Physical State	(b) (4)		Choose fro	m a drop-do	wn list				
Product Rebranded by A.S.		pH	() ()								
Product Distrubuted by A.S. (without branding)		Appearance,Odour					product is a	a fertilizer, p	lease list	nutrient values	
		Density, Solubility		=Report in	elemental	form, %					
Ecocert Canada offers COS only.		NPK rating**		$\downarrow$	2=Report a	s P <sub>2</sub> O <sub>5,</sub> %					
Ecocert SA offers EC, NOP & JAS		Other nutrients**			$\downarrow$	°=Report a	s K <sub>2</sub> O, %				Fertilizers
N° Ingredient (substance) name*	%	CAS n°	Supplier	N'	P <sup>2</sup>	K°	Ca'	Mg'	S'	er eleme	Soil Amendments
(b) (4) (-1) (-2) (-3) (-4)											Crop Pest/Weed Control Crop Production Aids & Materials Feed, Feed Additives & Feed Supp Livestock Health Care Products &
5		<b> </b>		<b> </b>		<b> </b>			<u> </u>	-+	Food ingredients, additives and pro
	i	<u>.</u>		<b> </b>		<b> </b>			<u> </u>		Pest Control Substances (for use in Cleaners, Disinfectants and Sanitiz
		<b></b>				<b></b>			<b></b>	-+	Cleaners, Disinfectants and Sanitiz
°		<u> </u>		<u> </u>		<b> </b>			<u> </u>	-+	
I	<b>}</b>	<b>↓</b>		J		<b>↓</b>			<b></b>		

plements Production Aids pcessing aids n food processing facilities) zers

Formula Review			<u>This is a</u>									
	(b) (4)		This line should automatically fill itself in from your "Application" page									
	ATEGORY	Fert	tilizers		Choose fro	om the drop	-down list					
Put an "X" beside the applicable activity for this prod	luct		General Product	Descript	tion							
Product Manufactured by A.S.		Physical State	(b) (4)		Choose fro	om a drop-d	own list					
Product Rebranded by A.S.	x	pH										
Product Distrubuted by A.S. (without branding)		Appearance,Odour			ZERS ONL		al product is	a fertilizer	, please lis	t nutrient va	lues	
		Density, Solubility		=Report in	n elemental	form, %						
Ecocert Canada offers COS only.		NPK rating**		$\downarrow$	<sup>2</sup> =Report a	IS P2O5, %						
Ecocert SA offers EC, NOP & JAS		Other nutrients**			$\downarrow$	3=Report a	s K <sub>2</sub> O, %					Fertilizers
N° Ingredient (substance) name*	%	CAS n°	Supplier	N'	P²	K	Ca'	Mg'	S'	er elem	e	Soil Amendments
1 (b) (4)											Solid	Crop Pest/Weed Conti
2									-		Liquid	Crop Production Aids
3		[	L		<u> </u>	<u> </u>		<u></u>	<u>†</u>	1	]	Feed, Feed Additives

rol & Materials & Feed Supplements



COLORADO DEPARTMENT OF AGRICULTURE

**Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

### ORGANIC CERTIFICATION PROGRAM APPLICATION FEE SCHEDULE

This form can be filled out electronically and will automatically calculate your fee. Please complete this form to determine your application fees for the current year. Application fees are annual fees and must be submitted for both initial applications and renewals. All applicants pay a \$400.00 base fee. Additional fees are broken down into 5 scopes (Crop, Process Handler, Livestock, Wild Crop, and Poultry & Livestock Processing). For operations that include multiple scopes, each additional scope is \$200.00.

Certification Renewals: Renewal Forms and Fees must be postmarked by the specified date in your renewal cover letter. The base fee increases \$100 per month if not postmarked by the date specified (1 - 30 days past due = \$100; 31 - 60 days past due = \$200; up to a maximum of \$300).

Initial Applicants: New applicants requesting crop certification must submit the application and Organic System Plan by June  $1^{st}$  to receive certification for the year. There are no late fees for initial certifications. Due S-1-17 PM

Applicant/Company Name: Jones Farms Organics		DBA, if applicable:					
Primary Contact's Name: Rob Jones	Phone Number: 719-588-2299		Email Address: (b) (6)				
Mailing Address: 11221 E County Rd 110 N	City: Hooper	State: CO	Zip Code: 81136	County: Alamosa			
Physical Address: same	City:	State:	Zip Code:	County:			

BASE FEES			
What is your Primary scope	?		
(CHECK ONE ONLY - The	part of your operation that produces the most	income)	
Crops	Poultry and Livestock Processing		
Livestock	Process Handler		
Wild Crop			
Primary Scope = \$400.00		If entering by hand enter \$400 here:	400.00
Which additional scopes are you wishing to certify? (Ruminant Livectock Producers must calest copy or an auditional scope)			
(Check all that apply, addition	al scopes = \$200 each)	If entering by hand enter \$200 for each checked l	box, below
Crops (must be selected	if ruminant livestock is part of operation)		0.00
Livestock			0.00
Wild Crop		0.	
Process Handler		0	
Poultry and Livestock Processing			0.00
1	Base Fee Total (Primary Scope + additional scopes)		400.00

\*Continue to Page two for Scope Fees

5161714004 5/16/2017 Jones Farms Organics 13898 \$2,500.00 23S0 4200 BPAA 1602 BCAACL001 6130 6270

Fee Schedule



### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry

305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

# **ORGANIC CERTIFICATION PROGRAM - APPLICATION FEE SCHEDULE CONT'D**

SCOPE FEES – Find your P (Select only one box for your SCOPE 1: CROPS	rimary Scope fror Primary Scope)	n the tables below & check the	box that corresp	onds to the type & size of the operation
	s to the type and nu	mber of acres you are requesting	for certification	If more than one type of production
occurs, enter the one which pro	duces the most inc	come.	for certification.	If more than one type of production
Irrigated Acres		Dryland Acres		
$\Box 1 - 20$ acres	\$400.00	□ 1 – 1500 acres	\$400.00	
21-200 acres	\$850.00	1501 - 4000 acres	\$850.00	
201 or greater acres	\$2100.00	4001 or greater acres	\$2100.00	
Perennial Fruit		Greenhouse/Specialty Crop		
$\Box 1-5$ acres	\$400.00	□ 1 – 12000 sq. ft.	\$400.00	
$\Box$ 6 – 40 acres	\$850.00	□ 12001 – 15000 sq. ft.	\$850.00	
41 or greater acres	\$2100.00	15001 or greater sq. ft.	\$2100.00	2,100.0
SCOPE 2: LIVESTOCK				
	to the type and nu	mber of livestock you are request	ing for certification	on.
Poultry		Dairy	ing for contineation	
$\Box$ 1 – 1000 head	\$400.00	$\Box$ 1 – 100 head	\$400.00	
1001 – 6000 head	\$850.00	$\Box$ 101 – 300 head	\$850.00	
6001 or greater head	\$2100.00	□ 301 or greater head	\$2100.00	
	\$2100.00		\$2100.00	
Other (Beef cattle, sheep, pigs	5)			
$\Box$ 1 – 250 head	\$400.00			
251 – 500 head	\$850.00			
500 or greater head	Contact CDA			0.0
SCOPE 3: PROCESS HAND				
If both Single-Ingredient and M	lulti-Ingredient pro	ducts are being requested, enter t	he highest fee of t	the two.
Single Ingredient Finished Pr	oducts	Multi-Ingredient Finished Pr	oducts	
$\Box$ 1 – 20 products	\$400.00	$\Box$ 1 – 5 products	\$400.00	
$\Box$ 21 – 40 products	\$850.00	$\Box 6 - 15$ products	\$850.00	
☐ 41 or greater products	\$2100.00	☐ 16 or greater products	\$2100.00	
				0.00
SCOPE 4: POULTRY AND I	IVESTOCK PRO	DCESSING		
Livestock Processing		Poultry Processing		
1 - 300 head	\$400.00	□ 1 – 3000 head	\$400.00	1
□ 301 – 500 head	\$850.00	□ 3001 – 9000 head	\$850.00	
501 or greater head	\$2100.00	9001 or greater head	\$2100.00	
				0.00
SCOPE 5: WILD CROP			West and the second	
Wild Crop Harvesting				
$\Box 1 - 2$ sites	\$400.00			
$\Box$ 3 – 5 sites	\$850.00			
☐ 6 or greater sites	\$2100.00			
				0.00

Print this form and mail it along with a check made payable to: Colorado Department of Agriculture

**Colorado Department of Agriculture** 

**Division of Plant Industry** 

**305 Interlocken Parkway** 

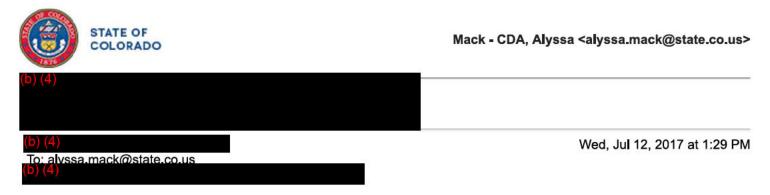
Broomfield, CO 80021



### (b) (4)



### (b) (4)



Hello Alyssa,

I was asked to contact you regarding an issue that

(b) (4)			

Was having in regards to providing information about ingredients of our we manufacture that is private labeled by them as

How can I help?

is currently approved for use by organic organizations such as OCIA, MOSA, OEFFA and currently under review by Washington state. It meets current NOP standards for the approved form of calcium chloride used.

Best regards



This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.



AM

# -

Re: Product Info for Approval. 1 message	
(b) (4) To: "Mack - CDA_Alvssa" <alvssa mack@state.co.us=""> (b) (4)</alvssa>	Tue, Jul 11, 2017 at 9:39
Alyssa, I have contacted (b) (4) the main relabeling/repackaging.	kers of the $\binom{(b)}{(4)}$ product which becomes our $\binom{(b)}{(4)}$ by
They are willing to provide you with the ingra contact is (b) (4) who can be reached at	edient list and ask that you contact them, directly. The person to (b) (4)
I am still waiting for ingredient list from (b) (4	for our <sup>(b) (4)</sup> micro.
Thanks,	
Rhonda	
(b) (4)	
On 2017-07-10 4:02 PM, Mack - CDA, Alyssa wrote:	

Hi (b) (4)

The Colorado Department of Agriculture is not a Material Review Organization and as such, we do not contact input manufacturers. When one of our certified organic clients requests an input for approval for their specific operation, they must submit the documentation that we request in order to make that determination. When applicable, the client can request the manufacturer to contact us to provide additional (often proprietary) information.

For the (b) (4) this is what (b) (4)	ingredient from <sup>(b)</sup> (4) is using and calling (b) (4)	the document you provided is for we need verification of that.	lf
We also still need the	following:	_	
<ul> <li>A product label</li> <li>The exact nam have written it)</li> </ul>	gredients that have not already been or specification sheet for the organic e of the (b) (4) ation regarding the (b) (4)		<i>i</i> ou
On Thu, Jul 6, 2017 at	8:31 AM <mark>(b) (4)</mark>	> wrote:	
Alyssa,			
		or all the manufacturers of the ingredients in the them to obtain the information on the specific	

ingredients as I am not always privy to this proprietary information.

State.co.us Executive Branch Mail - Re: Product Info for Approval.

With that said, I do have some of the info you requested.



Provided I can get that to you in the next day or two, that should take care of your list, unless there is some other objection you can come up with that would keep this organic farmer from using our organic approved products.

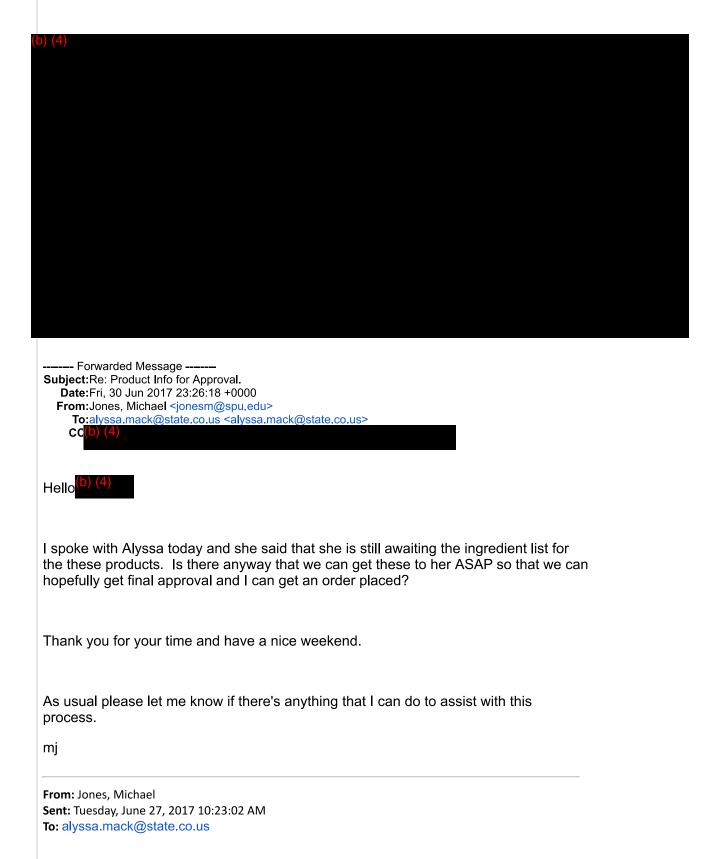
Let me know if there is anything else that I can do for you.

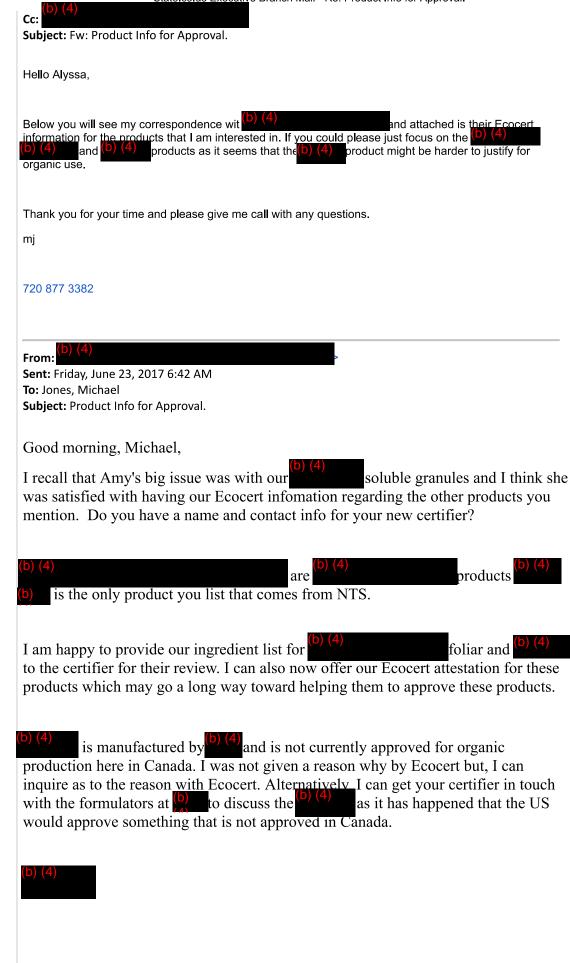
(b) (4)
On 2017-07-03 4:50 PM, Mack - CDA, Alyssa wrote:
(D) (4) • I can approve this product for Jones Farms Organics
(b) (4) - Of the three ingredients only one (b) (4) is listed by OMRI or WSDA. I can
approve that ingredient. The other two (D) (4) I need at least ingredient lists for these. I can't approve these without knowing what they are. What are the sources of calcium and
zinc in the product? Some sources are prohibited.
Similarly for the (b) (4) . I can confirm the following ingredients are allowed:
(b) (4)
On Mon, Jul 3, 2017 at 8:23 AM (0) (4) wrote:
Alyssa,

State.co.us Executive Branch Mail - Re: Product Info for Approval.

Rather than to recreate the wheel, I am forwarding you the documentation that we submit for review of these an many other products with Ecocert. The spreadsheet contains all the information you should need to approve these products for Michael.

Please call me if you have any questions or need additional clarification on anything.





(b) (4)	
On 2017-06-22 8:20 PM, Jones, Michael wrote:	_
Hello (b) (4)	
I hope summer is treating you well.	
I'm going to make one more attempt to get these products approved for my mid-season	
applications and I was hoping that you could help me out. Amy Stafford is no longer with the	
CDA, so I am hoping reach out to our new point person.	
We were able to get some of our other products approved by simply having the vendor	
provide a statement that their process was "inline with NOP/OMRI standards" and that was	
good enough for the CDA. So I am hoping to simply provide these references and verbiage.	
There are really only four products left that I would like to try and get approved:	
(b) (4) (b) (4) product from just the information available on the website. Is there any chance	
you can help me populate the rest of this table?	
Also feel free to comment as to if you think this strategy will work. If you	
don't think this will work I suppose I will have to officially give up on the (0) (4)	
for this year.	
Thanks <sup>(b) (4)</sup>	
Feel free to give me a call with any questions.	
mj	
720 877 3382	

Alyssa Mack Organic Certification Specialist



P 303.869.9075 | F 303.466-2860 305 Interlocken Parkway, Broomfield, CO 80021 alyssa.mack@state.co.us | www.colorado.gov/ag

Alyssa Mack Organic Certification Specialist



COLORADO Department of Agriculture

P 303.869.9075 | F 303.466-2860 305 Interlocken Parkway, Broomfield, CO 80021 alyssa.mack@state.co.us | www.colorado.gov/ag

Fri, Jul 14, 2017 at 1:27 PM



#### b) (4)

To: "Mack - CDA, Alyssa" <alyssa.mack@state.co.us>

#### Alyssa,

That information is correct. I have attached our SDS and latest sheet we received for our liquidow supplier.



This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

From: Mack - CDA, Alyssa [mailto:alyssa.mack@state.co.us] Sent: Friday, July 14, 2017 1:59 PM To:(b) (4) Subject: AgriCal Product



(b) (4) I have been working with (b) (4) Iabel/specification sheet (attached) for (b) (4) your (b) (4) product? Please confirm. Can you provide a specification sheet and/or ingredients listing for your (b) (4) product?

Thanks for any further information you can provide.

Alyssa Mack Organic Certification Specialist



305 Interlocken Parkway, Broomfield, CO 80021 alyssa.mack@state.co.us I www.colorado.gov/ag



Virus-free. www.avg.com



Date of Initial	Review:		Date Review Finalized:			
PAGE	ISSUE OF CONCERN/ INCOMPLETE	REVIEWER or INSPECTOR	COMMUNICATION	REQUESTED INFORMATION AND RESOLUTION		
(OSP)	(Clarification? Incomplete?)	(Issue handled before or at inspection?)	(email, during inspection, date due for items prior to inspection)	(specific notification to operation, and response received, specific request to inspector)		
Inspection Appointment Form	Not in file & not completed for 2016	Reviewer/Inspector	Reviewer	Put info into appointment form based on Module 1		
			Inspector	Verify information in module correct & update missing info – at least any email address and directions to farm.		
Mod 1	States need a copy of organic standards	Reviewer/Inspector	Reviewer – left phone message 6/15/17	Let voicemail to call me if wants mailed or will ask inspector to bring copy to inspection		
			At Inspection	Take printed copy of NOP organic standards to inspection for producer		
Module 1	No email address	Inspector	At Inspection	Update module with email address if there is one		
Mod 2	Module format lists current year as 2016.	Inspector	At Inspection	Verify crops listed are for 2017 certification.		
Mod 4	(b) (4) has only 2017 Field history & not indicated new for 2017 in Mod 3	Inspector	At Inspection	(b) (4) has only 2017 Field history Update OSP for all years for Home Field #5 ( <i>FYI: indicates rented since 1991 in Mod 3</i> <i>and not new for 2017</i> )		
Mod 7 pg 1	Check boxes for if seed grown on contract for buyer not checked	Inspector	At Inspection	Obtain response & update OSP		

		-	-	(b)(4)
Mod 7 Seed	Mix of organic & non-organic seeds	Reviewer/Inspector	Reviewer	Downloaded <sup>(b)</sup> <sup>(4)</sup>
table –	- need verification of sources as			rganic certificates into file.
	listed. Documentation in file for			
	non-GM0 crops ( corn, summer		At Inspection	Mix of organic & non-organic seeds. Review
	squash). Need to verify the			a selection seed packets/invoices etc to
	following non-organic (D) (4)			establish sources are as listed in OSP
	seed is untreated/treated			
	substance: Broccoli Blue Wind,			
	Marathon: Cabbage Tendersweet,			Non- GMO status is on file for GMO crop
	Super Red 80, Storage #4, Carrot			seeds as listed in OSP and some untreated
	Romance, Bolero, Eggplant Orient			seed documentation also. Need to verify the
	Charm; Lettuce Adriana, Flowers			following non-organic <sup>(b) (4)</sup> seed is
	Durango Mix, Jewel Mix: Kale			untreated/treated substance: Broccoli Blue
	Scarlet; Honeydew melon Honey			Wind, Marathon: Cabbage Tendersweet,
	Orange; Kohlrabi Winner: Onion			Super Red 80, Storage #4, Carrot Romance,
	Bridget; Pepper islander; Pumpkin			Bolero, Eggplant Orient Charm; Lettuce
	Cargo; Radish Alpine, Redmeat:			Adriana, Flowers Durango Mix, Jewel Mix:
	Rutabaga Laurentian; Summer			Kale Scarlet; Honeydew melon Honey
	Squash Zephyr: AND the following			Orange; Kohlrabi Winner: Onion Bridget;
	(b) (4) seed; Tomato Black			Pepper islander; Pumpkin Cargo; Radish
	Beauty, Terra Cotta: Watermelon			Alpine, Redmeat: Rutabaga Laurentian;
	Wilson Sweet, Orangeglo			Summer Squash Zephyr: AND the following
				(b) (4) seed; Tomato Black Beauty,
	(b) (4) seed			Terra Cotta: Watermelon Wilson Sweet,
	organic certificates not on file - only			Orangeglo
	invoices, statements etc.			6.6-
	,, _,, _			
	Informational Note – Initial review:			
	Non-GMO verification in file for all			
	Seedway, <sup>(b)</sup> (4)			
	(b) (4) and (b) (4) seed. Organic			
	certs/invoice on file for (b) (4)			
	, ryegrass; (b) (4)			
	peas, cowpeas,			
	radish, rye, sorgum & sweet potato			
	slips: (b) (4) winter rye,			
E_I_017	sups. willer rye,	Initial Daviay		Pausion B

	oats, buckwheat. Affidavits/invoices on file that (b) (4) & rape untreated: (b) (4) Irrigated Pasture Mix is untreated: All (b) (4) is untreated Corn is saved seed (b) (4) ):			
Module 9 Sec 3	States no manure used(& not listed in Module 4) then lists manure source & application dates.	Inspector	At Inspection	Confirm if manure used or not & which feedlot. Update OSP as applicable. Review records of incorporation/harvest dates for NOP compliance as applicable. Also Mod 11 Sec 1 Q3 states livestock grazing use for weed control – ensure applicable grazing to harvest records reviewed.
Module 9 Sec 2 :Seedlings/Pe rennial Stock Table	For non-organic strawberries eligible organic date is more than 12 mths after purchased date – verify management as organic date and harvest date was 12 months after.	Inspector	At Inspection	verify management as organic date and harvest date was 12 months after in 2017
Module 11 Sec 1 Q3	States synthetic mulch used for weed control.	Inspector	At Inspection	Verify on tour that is removed at end of growing season for annual crops & before degradation into soil for perennial crops. Verify is not polyvinyl chloride (PVC).
Mod 11 Sec 2 Q3 and Sec 3 Q3	Does not state approved pesticides used but Mod 4 indicates Entrust may potentially be used.	Inspector	At Inspection	Update OSP as appropriate.
Module 12	Specific pests not listed and "preventative" measure for pests treated by Surround and Suppress not specified. Version of Entrust not specified.	Reviewer/Inspector	Reviewer At Inspection	Updated version of Entrust to SC based on label attached to OSP INSPECTOR: Specific pests not listed and "preventative" measure for pests treated by Surround and Suppress not specified. Update OSP with this information.
F-I-017	96 · · · · · · · · · · · · · · · · · · ·	Initial Review	Form	Revision B

Mod 13 Q4 and Q6	Q4 states contaminants in water source not known and Q6 states will test several times this year.	Inspector	At Inspection	Update OSP if new information available.
Module 16 Sec 3 Q2(c)	States packing materials re-used & "cleaned" but process not described.	Inspector	At Inspection	Update OSP with more info on cleaning process, any cleaners/sanitizers used, rinses. Describe steps taken if containers taken by CSA customers & then returned to farm for reuse.
Module 17	Clorox listed as must be used at labeled rates – verify rates used against label. Dawn soap approved with clean water rinse – verify rinse taking place. No label on file for either – collect. Verify label does not require rinse.	Inspector	At Inspection	Collect Clorox label. Verify Clorox being used at labeled rate and rinse occurring if label requires (note: Mod 16 Sec 1 Q6 states containers air dried after Clorox use and no rinse mentioned) Collect Dawn Soap label – verify clean water rinse occurring
Labels	Labels submitted for the following but not in OSP: (b) (4) pproved in Module 12 but no label in file.	Reviewer/Inspector	Reviewer: left phone message confirming approval on 6/15/17 At Inspection	<ul> <li>Reviewed &amp; approved (b) (4) &amp; &amp;</li> <li>(b) (4) Added OMRI Cert for Suppress</li> <li>EC to file. Added to Modules 10 and 12 as appropriate &amp; notify operator of approvals.</li> <li>1) Module 10: update for number of applications/use &amp; method of application for (b) (4) Ascertain applicator using in a manner that meets sodium nitrate restrictions</li> <li>2) Obtain label for 220grain (b) (4)</li> </ul>



### **Colorado Department of Agriculture**

# **Organic Inspection Report Cover Sheet**

Operation's Name: Monroe Organic Farms LLC	Person Interviewed:		
Physical Address: 25525 Weld County Road 48 Kersey CO 80644	Others Present for Inspection:		
Type of Inspection:          New Applicant          Continuation	Has a Current Copy of NOP Standards?		
Inspector:	Date:	Time In: Time Out:	

### **General Questions**

Does the operation have a complete copy of their current Organic System Plan?

□Yes □ No (if No, please explain)

Did you observe any obvious health and/or safety violations? □Yes □No (if Yes, Please Explain in Exit Interview Section)

Are any sections of the operation not fully under the care and control of the operation requesting organic certification? (Are any fields farmed by someone other than the operation? Are crops/products/ingredients held or stored at a rented facility? Etc.) □Yes □No (If Yes, Please Explain in the Exit Interview Section)

Were any portions of the operation *not* visited during the inspection? **U**Yes **D** No (If Yes, please explain) 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 notes what was collected, or what clarification was provide.

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

Issue	Response
Inspection Appointment Form filled in by initial reviewer based on Module 1 because none in file. Please verify with operator and update at least any email address & directions to farm.	
Module 1: Update module with email address if there is one	
Module 2: format lists current year as 2016. Verify crops listed are for 2017 certification.	
Mod 4: Home Field #5 has only 2017 Field history Update OSP for all years for Home Field #5 ( <i>FYI: indicates rented since 1991 in Mod 3 and not new for 2017</i> )	
Mod 7: Check boxes for if seed grown on contract for buyer not checked. Obtain response & update OSP	
Mod 7 Seed Table: Mix of organic & non-organic seeds. Review a selection seed packets/invoices etc to establish sources are as listed in OSP	
Non- GMO status is on file for GMO crop seeds as listed in OSP and some untreated seed documentation also. Need to verify the <b>following non-organic</b> (b) (4) seed is <b>untreated/treated substance</b> : Broccoli Blue Wind, Marathon: Cabbage Tendersweet, Super Red 80, Storage #4, Carrot Romance, Bolero, Eggplant Orient Charm; Lettuce Adriana, Flowers Durango Mix, Jewel Mix: Kale Scarlet; Honeydew melon Honey Orange; Kohlrabi Winner: Onion Bridget; Pepper islander; Pumpkin Cargo; Radish Alpine, Redmeat: Rutabaga Laurentian; Summer Squash Zephyr: <b>AND the</b> <b>following</b> (b) (4) seed; Tomato Black Beauty, Terra Cotta: Watermelon Wilson Sweet, Orangeglo ( <i>operator asked to have untreated seed verification at</i> <i>inspection</i> )	
Module 9 Sec 3: States no manure used (& not listed in Module 4) then lists manure source & application dates. Confirm if manure used or not & which feedlot if known. Update OSP as applicable. Review records of incorporation/harvest dates for NOP compliance as applicable. Also Mod 11 Sec 1 Q3 states livestock grazing use for weed control – ensure applicable grazing to harvest records reviewed.	
Module 9 Sec 2: For non-organic strawberry seedlings eligible organic date is more than 12 mths after purchased date – verify management as organic date and harvest date was 12 months after in 2017.	
Module 10: Envirokure is 2017 approved product. Update module for number of applications/use & method of	
F-I-021 Inspection	Cover Sheet Revision A

application for Envirokure. Ascertain applicator using in a manner that meets sodium nitrate restrictions.	
Module 11 Sec 1 Q3: Verify on tour that synthetic mulch	
weed barrier is removed at end of growing season for annual crops & before degradation into soil for perennial crops.	
Verify is not polyvinyl chloride (PVC).	
Mod 11 Sec 2 Q3 and Sec 3 Q3: Does not state approved	
pesticides used but Mod 4 indicates Entrust may potentially be	
used. Update OSP as appropriate.	
Mod 12 table : Specific pests not listed and "preventative"	
measure for pests treated by Surround and Suppress not	
specified. Update OSP with this information. LABEL: Mod 12 Table: 220grain Mizbarn America's Vinegar	
approved previously in Module 12 but no label in file. Collect	
label if available.	
Mod 13 Q4 and Q6: Q4 states contaminants in water source	
not known and Q6 states will test several times this year.	
Update OSP if new information available.	
Module 16 Sec 3 Q2(c): Update OSP with more info on	
cleaning process for re-used packing materials: , any cleaners/sanitizers used, rinses. Describe steps taken if	
containers taken by CSA customers & then returned to farm	
for reuse.	
LABELS Module 17 table: Collect Clorox label. Verify	
Clorox being used at labeled rate and rinse occurring if label	
requires (note: Mod 16 Sec 1 Q6 states containers air dried	
after Clorox use and no rinse mentioned) Collect Dawn Soap label if available – verify clean water rinse	
occurring	

### Record Keeping System

### NOP RULE § 205.103

Please use the 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:

Other Comments:

Recommended Sampling NOP §205.402, 205.403
<ul> <li>None Samples Obtained</li> <li>Number of samples taken</li> <li>Sample Type: Crop Vegetation Soil Other</li> <li>Reason for sample(s) obtained:</li> </ul>
What type of receipt was provided?

### **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.

<u>Please remember</u> 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.

Additional documents needed

**Inspection Cover Sheet** 

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

Issues of concern (cite the standard)	NOP §205.403(d)
1	
2	
3	
4	
Comments	

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.

Representative of Operation Signature

Date

Inspector Signature

Date

Inspection Cover Sheet

Attachments:	Farm Questionnaire         Field Maps         Complete Field His         Other (specify)	
Pre- Inspection Time:		Driving Time:
Inspection Time:		
Inspection Narrative Write-up Time	hour(s)	Mileage:



May 4, 2017

Monroe Organic Farms LLC Jerry Monroe 25525 WCR 48 Kersey, CO 80644

Dear Mr. Monroe:

This is to notify you that we received your Organic Systems Plan and your check in the amount of \$1,250.00, was postmarked on April 25, 2017. We will begin processing your application.

The application process involves an initial review by an organic certification specialist and the gathering of any additional information, if needed, prior to your inspection.

Your file will be assigned to one of our inspectors. The inspector will contact you to arrange a date and time for the inspection based on the information, which you provided to us on your inspection appointment form.

We estimate the inspection time to be approximately 5 hours and travel time to be 2 hours and mileage to be invoiced at .25 per mile (time may vary due to inspector's place of origin). We estimate your total inspection cost to be approximately \$250.00. You will be invoiced after the inspection is performed and actual costs are known.

If you have any questions concerning the process outlined above, please contact Alyssa Mack at 303-869-9075.

Sincerely,

Barbara A. Rosenbach Program Assistant Division of Plant Industry

BR:bar





### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry

305 Interlocken Parkway, Broomfield, Colorado, 80021 Tel: (303) 869-9050 Fax: (303) 466-2860 www.colorado.gov/ag/dpi INSPECTOR USE ONLY

Appointment Date:

Appointment Time:

DPI-ORG-OIAF (02/15)

### **Organic Certification Program**

### **Organic Inspection Appointment Form**

(Return form with completed Plan Questionnaire)

Farm/Business Name		Primary Contact's Name:				
Monroe Organic Farm	s LLC			Jerry Monroe		
Physical Address:						
25525 Weld County R	oad 48					
City:				State:	Zip Code:	County:
Kersey				со	80644	Weld
Phone:		Fax:		Email:		
970-284-7941						
Best hours to call:	Indicate whi	ch day(s) of the week are	most convi	enient for	an Organic	Inspector to visit your operation:
Draw a clear map and	l provide wri	tten directions to your farr	n or busine	SS.		

(b) (4)

(b) (4)



# **OMRI Listed**<sup>®</sup>

The following product is OMRI Listed. It may be used in certified organic production or food processing and handling according to the USDA National Organic Program Rule.

Product Company Status Category

Allowed with Restrictions

## NOP: Fertilizers, Blended with sodium nitrate

Issue date 11-May-2016

Product number enk-6628

Class **Crop Fertilizers and Soil Amendments**  **Expiration** date 01-Jun-2017

OMRI.OPD.2.6.7.2

### Restrictions

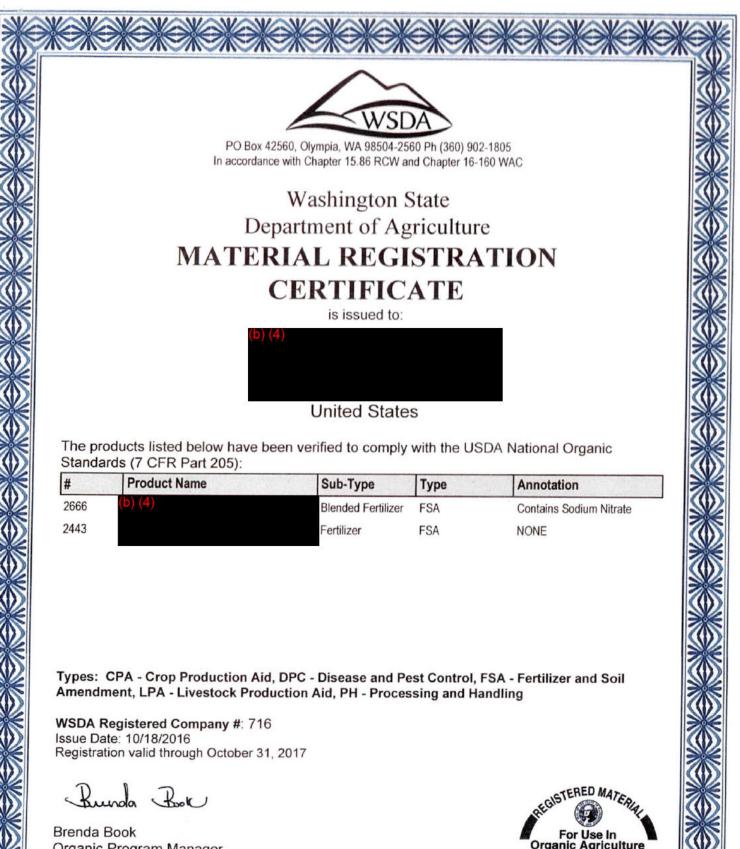
Pending additional rule-making, operators using sodium nitrate shall use it in a manner that maintains or improves the natural resources of the operation, including soil and water quality, and comply with crop nutrient and soil fertility requirements.

Executive Director Of Mians

Product review is conducted according to the policies in the current OMRI Policy Manuals and based on the standards in the current OMRI Standards Manuals. To verify the current status of this or any OMRI Listed product, view the most current version of the OMRI Products List® at OMRI.org. OMRI listing is not equivalent to organic certification and is not a product endorsement. It cannot be construed as such. Final decisions on the acceptability of a product for use in a certified organic system are the responsibility of a USDA accredited certification agent. It is the operator's responsibility to properly use the product, including following any restrictions.



**Organic Materials Review Institute** P.O. Box 11558, Eugene, OR 97440-3758, USA 541.343.7600 · fax 541.343.8971 · info@omri.org · www.omri.org



Organic Program Manager DEPARTMENT OF AGRICULTURE AGR 2291 (R/3/16)





STATE OF CALIFORNIA DEPARTMENT OF FOOD AND AGRICULTURE FEED, FERTILIZER, AND LIVESTOCK DRUGS REGULATORY SERVICES 1220 N STREET SACRAMENTO, CA 95814

#### CERTIFICATE OF REGISTRATION FOR ORGANIC INPUT MATERIALS

NON TRANSFERABLE



FIRM NO.

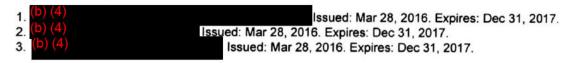
408550

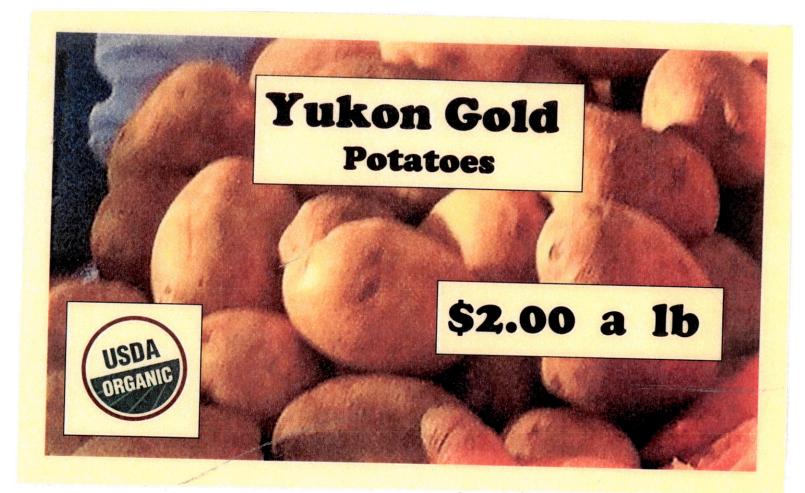
Firm



is authorized to manufacture, deliver or sell in California the products listed below. Registration is not an endorsement by the Department of Food and Agriculture of any product or any claim made for it. No reference may be made to the State of California Department of Food and Agriculture in labeling or advertisements. Registration may be canceled after hearing at any time for just cause. The composition of each product and the label used on it must be the same as those submitted by the registrant.

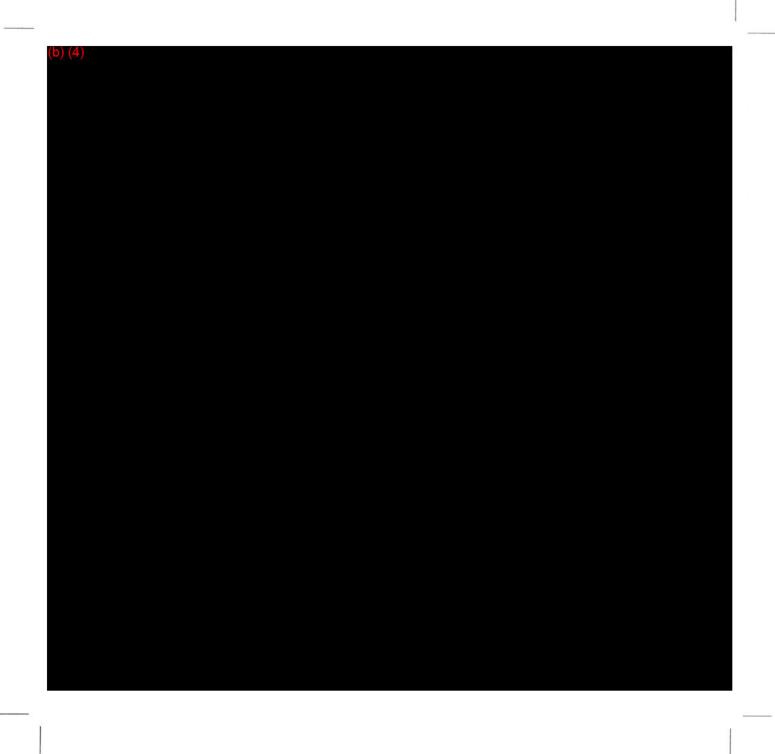
**Organic Input Material** 





4-74-17 This year we have made new signs for Farmers marked, Is this ok ?

Can I use this product ?



	FIRST AID
If in Eyes	<ul> <li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
lf on Skin or Clothing	<ul> <li>Remove contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>Wash exposed area with soap and water. If irritation persists, seek medical attention.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
P <sup>an</sup> e h.	HOT LINE NUMBER
Have the pro	duct container or label with you when calling a poison control

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Poison Control Hotline at 1-800-222-1222 for emergency medical treatment information 24 hours a day, 7 days a week.

### NOTE TO PHYSICIAN:

Probable mucosal damage may contraindicate the use of gastric lavage.

### PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**WARNING:** Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Avoid contact with skin and clothing. Wear protective eyewear such as goggles, face shield, or safety glasses. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for Category C on an EPA chemical-resistance selection chart.

Applicators and other handlers must wear:

- Protective eyewear
- · Coveralls worn over short-sleeved shirt and short pants
- Shoes plus socks
- Chemical resistant gloves such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride or viton

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE items separately from other laundry.

### **USER SAFETY RECOMMENDATIONS:**

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing immediately if the product gets inside. Wash thoroughly and put on clean clothing.
- Remove PPE after handling this product.
- Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothes.

### **ENVIRONMENTAL HAZARDS**

For terrestrial uses: Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate.

Do not apply this product or allow it to drift to blooming crops or weeds while honey bees are actively foraging in the treatment area. For maximum honey bee protection, avoid early morning and late afternoon applications.

### **PRODUCT INFORMATION**

is a non-selective, post-emergent, foliar herbicide for use in and around all food crop areas.

broadleaf weeds and grasses. weeds that are less than 6 inches in height.

(b) (4)

is non-systemic and it does not translocate within the

plant.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner that is inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirement specific to your State or Tribe, consult the State/ Tribal agency responsible for the pesticide regulation.

### **AGRICULTURAL USE REQUIREMENTS**

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It also contains specific instructions and exceptions pertaining to statements on this label about personal protective equipment (PPE). The requirements of this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restrictedentry interval (REI) of 24 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and involves contact with anything treated such as plants or soil is:

- long-sleeved shirt and long pants
- protective eyewear
- chemical-resistant gloves
- shoes plus socks

## FOR USE in and AROUND ALL FOOD and NON-FOOD CROPS, INCLUDING, but not LIMITED to:

D						
Berries	Blackberries, Blueberries, Boysenberries, Cranberries, Dew-					
	berries, Loganberries, Raspberries					
Brassicas (Cole)	Broccoli, Brussels Sprouts, Cabbage, Cauliflower, Collards,					
	Kale, Mustard Greens					
<b>Bulb Vegetables</b>	Garlic, Leaks, Onions, Shallots					
Citrus	Grapefruits, Lemons, Oranges, Mandarins, Limes					
Cucurbit	Cantaloupe, Cucumber, Gourd, Muskmelon, Pumpkin,					
Vegetables	Squash, Watermelon					
Field Crops	Alfalfa, Canola, Cereal Grains, Corn, Cotton, Sorghum,					
	Soybeans, Sweet Corn					
<b>Fruiting Vegetables</b>	Peppers (All Varieties), Tomatillos, Tomatoes, Eggplant					
Grapes	Raisin, Table Grapes, Wine Grapes					
Leafy Greens	Arugula, Lettuce, Spinach, Celery					
Legumes	Beans, Garbanzo, Lentils, Peas					
Tree Nuts	Almonds, Cashews, Pecans, Pistachios, Walnuts					
Pome Fruit	Apples, Crabapples, Pears, Quince					
Stone Fruit	Apricot, Cherries, Nectarines, Peaches, Plums, Prunes					
Strawberries	June-bearing, Everbearing, and Day-neutral					
Root & Tuber	Beets, Carrots, Potatoes, Potato Seed, Radishes, Sweet					
Vegetables	Potatoes					
Tropical Fruits	Guavas, Mangos, Kiwi Fruit, Bananas					
Miscellaneous Crops	Avocados, Persimmons, Pomegranates					

### Non-Food Crops:

Turf, Flowers, Bedding and Landscape	Turf Grass (Maintenance, Sod or Seed Production), Bedding Plants, Flowers, and Ornamentals			
Trees and Shrubs	Christmas Trees, Forest and Commercial Trees, Landscape Trees, Nursery Trees or Shrubs			
Greenhouse and Nurseries				

### For use on Sucker Control\*

To burn back unwanted basal sucker growth on woody trees and foliage growth on vines, and excessive cane growth in the brambles. Apply before suckers become woody and only to unwanted vegetative parts. Use the 5% to 7% solution to control sucker growth.

\*Not for use in California.

### MIXING INSTRUCTIONS AND APPLICATION RATES

is a non-selective, post-emergent, foliar herbicide for use in and around all food and non-food crop areas. (b) (4) works best on newly emerged weeds. For more mature weeds, use the higher application rates (6% to 9%) with up to 100 gallons of water per acre. For maximum weed control, apply (b) (4) directly on the targeted weeds. (b) (4) must be sprayed in a manner to avoid drift, such as applying with hooded spray equipment, to prevent drift damage to the crop.

**APPLICATION RATES:** Use the lower use rate range for young, succulent and actively growing weeds and the higher rate for weeds greater than six inches in height. Use the highest rate for perennial weeds when the plants have "hardened."

- Use a 3% solution for control of annual weeds.
- Use a 6% solution for burndown of perennial herbaceous plants, weeds in a later stage of growth and to control sucker growth.
- Use a 9% solution when maximum vegetative burndown, edging, or foliar trimming is desired.

Repeat applications as required to maintain desired level of weed control and to control plants emerging from seed and underground parts.

Desired Volume of	Amount of (b) (4)		per Volume of	
Spray Solution (gallons of water)				
(ganons of water)	3% Solution	6% Solution	9% Solution	
1	4 fl oz	8 fl oz	12 fl oz	
2.5	10 fl oz	20 fl oz	29 fl oz	
25	96 fl oz	1.5 gal	2.25 gal	
50	1.5 gal	3 gal	4.5 gal	
70	2.1 gal	4.2 gal	6.3 gal	
100	3 gal	6 gal	9 gal	

**MIXING INSTRUCTIONS:** Fill tank sprayer with half of the recommended water, then add the appropriate amount of (b) (4) Fill tank with the remaining amount of water. When spraying the solution, **use continuous agitation until all spray solution has been applied**. Apply spray solution in properly maintained and calibrated equipment capable of delivering the desired volumes. Apply spray solution as needed to control newly emerged weeds. Use spray solution within 4 hours of mixing.

**SPRAY EQUIPMENT:** Apply <sup>(D) (4)</sup> using hand-held equipment, boom sprayers, pressure sprayers, and hose-end sprayers. Only protected handlers may be in the application area. Always clean application equipment thoroughly after each use.

Do not apply this product by aerial application. Do not apply when wind conditions favor movement of spray away from the site of application. When applying this product in a broadcast application, utilize a hooded sprayer, shielded or other spray equipment that prevents the movement of spray away from the target weeds. Utilize nozzles that are designed to produce large spray droplets to prevent drift onto crop.

### DO NOT APPLY THIS PRODUCT THROUGH ANY TYPE OF IRRIGATION SYSTEM.

**ADDITIONAL PRECAUTIONS:** Do not apply to weeds when wet from dew, rain or water. Do not water within 2 hours after application. Do not apply if rainfall is expected within 2 hours of spray.

COMPATIBILITY: Conduct a compatibility test when you plan to mix with other products. To determine the physical compatibility of with other products, use a jar test. Using a quart jar, add the proportionate amounts of the products to approximately one quart of water with agitation. Add dry formulations first, then aqueous flowables, and then emulsifiable concentrates last. After thorough mixing, allow this mixture to stand for 5 minutes. If the combination does not form a precipitate and can be readily remixed, it is physically compatible. Once compatibility has been proven, use the same order of addition for adding products to the spray tank. Follow the more restrictive labeling requirements of any tank mix partner. Do not tank mix with products which prohibit tank mixing. Treat a small test plot if new combinations of products are being used for the first time. 9

### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store (D) (4)

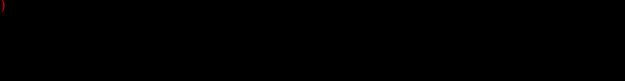
in a cool place out of direct sunlight.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**CONTAINER HANDLING [for containers less than 5 gallons]:** Non-refillable container. Do not reuse or refill this container. Triple rinse (or equivalent) container promptly after emptying, then offer for recycling, if available; or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or, if allowed by state and local authorities, by incineration. If burned, stay out of smoke. Triple rinse as follows: empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling, if available, or puncture or dispose of in a sanitary landfill, or by incineration. Do not burn unless allowed by state and local ordinances.

**CONTAINER HANDLING [for containers greater than 5 gallons]:** Non-refillable container. Do not reuse or refill this container. Triple rinse (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into the application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling, if available, or puncture or dispose of in a sanitary landfill, or by incineration. Do not burn unless allowed by state and local ordinances. Batch Number:

**NOTICE OF WARRANTY** - Westbridge warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with the directions under normal conditions of use. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials or the manner of use or application, all of which are beyond the control of Westbridge. To the extent consistent with applicable law, Westbridge shall not be liable for consequential, special or indirect damages resulting from the use or handling of this product. Westbridge's liability is limited to replacement of product or refund of purchase price. Westbridge makes no warranties of merchantability or fitness for a particular purpose nor any other express or implied warranty except as stated above.



b)

3

् २ - २



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### ORGANIC CERTIFICATION PROGRAM APPLICATION FEE SCHEDULE

This form can be filled out electronically and will automatically calculate your fee. Please complete this form to determine your application fees for the current year. Application fees are annual fees and must be submitted for both initial applications and renewals. All applicants pay a \$400.00 base fee. Additional fees are broken down into 5 scopes (Crop, Process Handler, Livestock, Wild Crop, and Poultry & Livestock Processing). For operations that include multiple scopes, each additional scope is \$200.00.

Certification Renewals: Renewal Forms and Fees must be postmarked by the specified date in your renewal cover letter. The base fee increases \$100 per month if not postmarked by the date specified (1 - 30 days past due = \$100; 31 - 60 days past due = \$200; up to a maximum of \$300).

4-25-17 PM

Initial Applicants: New applicants requesting crop certification must submit the application and Organic System Plan by June 1<sup>st</sup> to receive certification for the year. There are no late fees for initial certifications.

GENERAL INFORMATION				
Applicant/Company Name:		DBA, if applic	able:	
Monroe arganic Farm	544C			
Primary Contact's Name:	Phone Number:		Email Address:	
Jerry Monrue	(970)784-7	941		
Mailing Address:	City:	State	e: Zip Code:	County:
25525 WCR48	Kersen	CO	80644	Weld
Physical Address:	City:	State	e: Zip Code:	County:
Same as applie	5 S	1		2

BASE FEES					
What is your Primary sco	ope?	بديك سيبصلحين يدفينه المتبك ببعد تدرر وا			
(CHECK ONE ONLY - TI	he part of your operation that produces the most	income)			
Crops	Poultry and Livestock Processing				
Livestock	Process Handler				
Wild Crop					
all a second	Primary Scope = \$400.00	If entering by hand enter \$400 here: 400,00	0.00		
Which additional scopes :	are you wishing to certify?	1.0100			
(Ruminant Livestock Prod	ucers must select crops as an additional scope)				
(Check all that apply, addit	tional scopes = \$200 each)	If entering by hand enter \$200 for each checked box, below			
Crops (must be selec	cted if ruminant livestock is part of operation)		0.00		
Livestock			0.00		
Wild Crop	2 E K		0.00		
Process Handler			0.00		
Poultry and Livestoe	ck Processing		0.00		
	Base Fee Total (Primary Scope + additional scopes)		0.00		

\*Continue to Page two for Scope Fees

5031713464 5/3/2017 Monroe Organic Farms, LLC 13014 \$1,250.00 23S0 4200 BPAA 1602 BCAACL001 6130 6270

AFS (rev. 10/2015)

Fee Schedule

Page 1 of 3



### ORGANIC CERTIFICATION PROGRAM - APPLICATION FEE SCHEDULE CONT'D

SCOPE 1: CROPS						
Check the box that correspond occurs, enter the one which pro	s to the type and nu	mber of acres you are requesting	for certification	on. If more than one type	of production	n
Irrigated Acres	bauces the most mo	Dryland Acres		<u></u>		
$\Box 1 - 20$ acres	\$400.00	$\Box 1 - 1500 \text{ acres}$	\$400.00	-		
21 – 200 acres	\$850.00	1501 - 4000 acres	\$850.00	-		
201 or greater acres	\$2100.00	4001 or greater acres	\$2100.00	-		
Perennial Fruit	02100100	Greenhouse/Specialty Crop	\$2100.00			
$\Box$ 1 – 5 acres	\$400.00	□ 1 – 12000 sq. ft.	\$400.00			
6 - 40 acres	\$850.00	□ 12001 – 15000 sq. ft.	\$850.00			
41 or greater acres	\$2100.00	□ 15001 or greater sq. ft.	\$2100.00	3	850,00	0.0
CODE A. LIVESTOCK					~~~~~~	
SCOPE 2: LIVESTOCK Check the box that corresponde	s to the type and nu	mber of livestock you are reques	ting for certifi	cation		1
Poultry	in the type and ha	Dairy	ing for certific			
$\Box$ 1 – 1000 head	\$400.00	$\Box$ 1 – 100 head	\$400.00			
1001 – 6000 head	\$850.00	$\Box$ 101 – 300 head	\$850.00			
6001 or greater head	\$2100.00	301 or greater head	\$2100.00			
	\$2100.00		\$2100.00			
Other (Beef cattle, sheep, pig	s)			) 		
1 - 250 head	\$400.00	· · · · · · · · · · · · · · · · · · ·				
□ 251 – 500 head	\$850.00	14				
□ 500 or greater head	Contact CDA	ν				0.0
SCOPE 3: PROCESS HAND						
f both Single-Ingredient and M	Iulti-Ingredient pro	ducts are being requested, enter t	he highest fee	of the two.		
Single Ingredient Finished Pr	oducts	Multi-Ingredient Finished Pr	oducts			
$\Box$ 1 – 20 products	\$400.00	$\Box$ 1 – 5 products	\$400.00			
$\Box$ 21 – 40 products	\$850.00	$\Box 6 - 15$ products	\$850.00			
☐ 41 or greater products	\$2100.00	☐ 16 or greater products	\$2100.00			
1 I I I I I I I I I I I I I I I I I I I						0.00
SCOPE 4: POULTRY AND I	LIVESTOCK PRO	and the second se				
Livestock Processing		Poultry Processing				
□ 1 – 300 head	\$400.00	1 - 3000 head	\$400.00			
□ 301 – 500 head	\$850.00	3001 – 9000 head	\$850.00			
501 or greater head	\$2100.00	9001 or greater head	\$2100.00			
	~					0.00
SCOPE 5: WILD CROP			Market States			12.2
Wild Crop Harvesting						
1 - 2 sites	\$400.00					
$\Box$ 3 – 5 sites	\$850.00	75				
☐ 6 or greater sites	\$2100.00					

Print this form and mail it along with a check made payable to: Colorado Department of Agriculture

Colorado Department of Agriculture Division of Plant Industry 305 Interlocken Parkway Broomfield, CO 80021 Fee Schedule

	Review: 6.7.2017		Date Review Finalized:		
PAGE	ISSUE OF CONCERN/ INCOMPLETE	REVIEWER or INSPECTOR	COMMUNICATION	REQUESTED INFORMATION AND RESOLUTION	
(OSP)	(Clarification? Incomplete?)	(Issue handled before or at inspection?)	(email, during inspection, date due for items prior to inspection)	(specific notification to operation, and response received, specific request to inspector)	
All modules	No initials or signature(Module 1 says on file)	Ι	During inspection	Have the producer initial and date all pages of the OSP. Also collect a signature on the signature page.	
Module 7	Check certificates and update suppliers on replacement trees.	Ι	During inspection	Check certificates and update suppliers on replacement trees.	
Module 17	Check that measures are taken to ensure wasp spray does not contact organic product. If possible have the producer elaborate on the use of the wasp spray on table of Module 17	Ι	During inspection	Check that measures are taken to ensure wasp spray does not contact organic product. If possible have the producer elaborate on the use of the wasp spray on table of Module 17	
Module 15	The producer has added an off-site storage in Boulder. Email the producer	R	Email 6/21/2017	Completed off-site storage affidavit.	



### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry

305 Interlocken Parkway, Broomfield, Colorado, 80021 Tel: (303) 869-9050 Fax: (303) 466-2860 www.colorado.gov/ag/dpi INSPECTOR USE ONLY

Appointment Date:

Appointment Time:

DPI-ORG-OIAF (02/15)

### **Organic Certification Program**

### **Organic Inspection Appointment Form**

(Return form with completed Plan Questionnaire)

Farm/Business Name		Primary Contact's Name:			
Morton's Orchards A	KA Morton's	Organic Orchards	David A. Morton		
Physical Address:					
3651 E 1/2 Road					
City:			State:	Zip Code:	County:
Palisade			со	81526	Mesa
Phone:		Fax:	Email:	·	
970-464-7854		970-464-5893	(b) (6)		
Best hours to call:	Indicate wh	ich day(s) of the week are	e most convienient fo	or an Organic	Inspector to visit your operation:
9 to 5 weekdays	Monday, Tu	uesday, Thursday, Friday			
Draw a clear map a	nd provide wr	itten directions to your far	m or business.		
Please google my a	ddress				



### Colorado Department of Agriculture

### **Organic Inspection Report Cover Sheet**

Operation's Name: Morton's Orchards AKA Morton's Organic Orchards.	Person Interviewed: David Morton				
Physical Address: 3651 E ½ Road Palisade, Co 81526	Others Present for Inspection: Mary Morton and Don Brooks my supervisor for reviewing the organic inspection.				
Type of Inspection:         □ New Applicant       ⊠ Continuation	Has a Current Copy of NOP Standards? ☑ Yes □ No				
Inspector: David A. Gordon	Date: 07-13-17 Time In: 9:00 am Time Out: 12:00 pm				

#### **General Questions**

Does the operation have a complete copy of their current Organic System Plan?

⊠Yes □ No (if No, please explain)

Did you observe any obvious health and/or safety violations? □Yes ⊠No (if Yes, Please Explain in Exit Interview Section)

Are any sections of the operation not fully under the care and control of the operation requesting organic certification? (Are any fields farmed by someone other than the operation? Are crops/products/ingredients held or stored at a rented facility? Etc.) □Yes ⊠No (If Yes, Please Explain in the Exit Interview Section)

#### 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 notes what was collected, or what clarification was provide.

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

Issue	Response
	OSP review response: Obtained signature for Module # 1 and is included in documents and noted in module.
	OSP review response: For module # 7 requested copies of nursery stock purchased as bare root. Copies of nursery stock are included in documents and noted in module.
	OSP review response: For Module # 17 regarding wasp spray use near organic crops. This product is used by hand by the house/building eves so workers do not get stung, not contact on or near any organic fruit. Also noted in module.
	OSP review response: For module # 15 regarding off site storage. Mr. Morton build the storage unit at his daughters house in Boulder for temporary storage for Boulder farmers market. His daughter and husband are also certified organic and will eventually take over Morton's Orchard. Mr. Morton signed the cover sheet acknowledging this information regarding the storage.

#### Record Keeping System

NOP RULE § 205.103

Please use the 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? $igtimes$ Yes $\higtimes$ No $\higtimes$ N/A
Comments:
Other Comments:
Recommended Sampling NOP §205.402, 205.403
None Samples Obtained
Number of samples taken
<ul> <li>Number of samples taken</li> <li>Sample Type:  Crop  Vegetation Soil Other</li> </ul>
Number of samples taken
<ul> <li>Number of samples taken</li> <li>Sample Type:  Crop  Vegetation Soil Other</li> </ul>

### **Exit Interview Instructions**

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.

<u>Please remember</u> 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.

### Additional documents needed

**Inspection Cover Sheet** 

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:	
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 §20	5.403	(d)
---------	-------	-----

1. \_\_\_\_205.303 (b)(2) For processed products it is not identifying who the name of the certifying agent that certified the finished product. A new product is being developed with a new label called Cherry Rainier which Mr. Morton agreed to submit the label to CDA for review.

2		 2)
		 2
×		 20
	All Apriumes are either dead or dying due to Crown	 2

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.

Signature included in documents. \_\_\_\_\_ Representative of Operation Signature 07-13-17 \_\_\_\_\_ Date

Inspection Cover Sheet

Signature incl	uded in documents Inspector Signature	07-13-17 Date
Attachments:	Farm Questionnaire Field Maps Complete Field His Other (specify)	
Pre- Inspection Time:	1.0	Driving Time:1.50
Inspection Time:3	.0	
Inspection Narrative Write-up Time	1.25 hour(s)	Mileage:75



#### ORGANIC CERTIFICATION PROGRAM - ORGANIC SYSTEM PLAN MODULE 1: GENERAL INFORMATION

SECTION 1 – GENERAL INFORMATIO	DN							
Company/Applicant Name (This will be printed on your certificate):DBA (If applicable):Morton's OrchardsMorton's Organic Orchards								
		WO	ton's organic					
Owner's Name:	Manager's Name:			Primary Contact	's Name:			
David A. Morton	Same			Same				
Physical Address:	City:		State:	Zip Code:	County:			
3651 E. 1/2 Road	Palisade		CO	81526	Mesa			
Mailing Address:	City:		State:	Zip Code:	County:			
Same								
Phone, Business:	Phone, Cell:			Email Address:	4			
	(b) (6)			(b) (6)				
Website URL:	Year first certified:			Do you need a co	py of the organic			
	1999			standards? No				
For which scope(s) is organic certification					(Please note:			
ruminant livestock operations must include t			(2)					
-	enhouse/Specialty		□ Wild Crop		vestock, Poultry			
Livestock, Ruminants	estock, Other		Process/H	andler (including o	of livestock)			
Which category best describes this operation 100% Organic	ion? ] Organic and Convention	al/No	onorganic					
Through what avenues does the operation					-			
Wholesale On-farm re			/subscription		Contract to buyer			
			commodities					
Other (specify): Wholesale only if ext otherwise Farmers M	ra fruit ⊔ 1arkets ➡	Expo	orting (where?)	):				
For producers, are organic products purc	hased from other producer	s to se	ell or otherwi	se distribute? 🛛 🗎	Yes 🛛 No			
If yes, a Process Handler OSP must b	e included.							

Operator Review, Initial and Date:

Inspector Review, Initial and Date: DAG-07-13-17



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### MODULE 1: GENERAL INFORMATION Cont'd

SECTION 1 - GENERAL INFO	ORMATION, CONT'D			
The business is operating as a:	🔳 Sole Proprietorship	🗆 Partnership	Corporation	Limited Liability Co.
□ Other, describe:			Date Incorporat	ed:
List the person(s) authorized to the state of Colorado.	receive and accept service	of summons and	legal notices of all l	kinds for the applicant in
Name(s):		Title:		3
Complete Address (if different fr	rom operation's address):			

SECTION 2 - PREVIOUS CERTIFICATION
This section must be filled out each year.
For re-certification, were conditions placed on the previous year's certification? If yes, what were the conditions?
Were all the conditions addressed?  Yes No If yes, how?
Has certification ever been denied for this operation (by any USDA-accredited organic certification agent)? Yes No If yes, describe the circumstances:
Are there any outstanding non-compliances for the operation (from any USD-accredited organic certification agent)? Yes No If yes, what is the non-compliance?



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### MODULE 1: GENERAL INFORMATION Cont'd

#### SECTION 3 – ATTACHEMENTS

#### This section must be filled out each year.

Detailed field and facility maps are required to be on file with the CDA. Attachments for the following may be required as supporting documentation. If you have already submitted a particular piece of information, it does not need to be included again unless a change or update has occurred. Please select all documents that have been attached to the OSP for the current year.

#### **Crop/Plant Production**

- Field maps (with Field ID, buffers/dimensions, adjoining land use, notable structures)
- □ Soil/plant tissue tests
- □ Seed documentation
- □ Non GMO, Nonorganic verification
- Compost documentation
- □ Input (Fertilizers, pesticides, etc.) product labels
- □ Input product OMRI or WSDA certificates
- □ Labels for product sold by the operation as organic
- □ Prior land use affidavits
- E Fees
- Inspection Appointment Form
- □ Other, Please list:

#### **Livestock Production**

Field maps (with pasture/outdoor areas, housing and handling structures, adjoining land use, etc.)

- □ Water tests
- □ Organic certificates for purchased animals
- □ Organic certificates for purchased feed
- Labels/ingredient statements for supplements and additives
- □ Labels for all vaccines and medications/health care products
- □ Input product OMRI or WSDA certificates
- □ Labels for product sold by the operation as organic
- Prior land use affidavits
- □ Fees
- Inspection Appointment Form
- Other, Please list:

#### **Process Handling**

- Process flow chart/narrative
- □ Facility map/diagram
- Organic ingredients supplier certificates
- Nonorganic ingredients verification
- Natural Flavor Affidavits
- □ Processing aid labels/MSDS/spec. sheets
- □ Water test results
- □ Boiler additive labels/MSDS
- Cleanser/sanitizer labels/MSDS
- Pest control product labels/MSDS
- □ Inspection Appointment Form
- Inspection Appointment Form
- □ Other, Please list:



#### MODULE 1: GENERAL INFORMATION Cont'd

#### SECTION 4 - AFFIRMATION & SIGNATURE

The following must be signed by the Applicant. By signing this document, the Applicant acknowledges and agrees to:

1. Fully comply with all applicable organic product and handling regulations in accordance with Title 7 CFR Part 205 National Organic Program Rule issued by the United States Department of Agriculture (USDA), Agricultural Marketing Service.

2. Establish, implement, and update annually, an organic production and handling system plan (OSP) that will be submitted to the Colorado Department of Agriculture (CDA) Organic Program.

3. Supply the CDA Organic Program with all information required to verify compliance with the National Organic Program Rule.

4. Permit on-site inspections with complete and unrestricted access to the production and handling operation, including noncertified production and handling areas, structures, and offices by the CDA Organic Program. This inspection may occur with or without an authorized representative of the operation present. These inspections may be announced or unannounced at the discretion of the CDA Organic Program or as required by the Administrator of the National Organic Program.

5. Understand that the CDA Organic Program may use subcontractors for inspecting, testing, and other technical services, as necessary.

6. Maintain all records applicable to the organic operation for not less than five (5) years beyond their creation.

7. Allow authorized representatives of the CDA Organic Program, of the Secretary of Agriculture (USDA) access to these records under normal business hours for review and copying to determine compliance with the National Organic Program Rule.

8. Submit to the CDA Organic Program the applicable fees as described on the most current fee schedule.

9. Immediately notify the CDA Organic Program about any application, including drift, of a prohibited substance to any field, production unit, site, facility, livestock or part of an operation.

10. Understand that the use of the CDA name and seal must be in accordance with the Colorado Department of Agriculture's guidelines

11. Immediately notify the CDA Organic Program of any change in the certified operation or portion of it that may affect its compliance with the National Organic Program Rule.

I, the owner or legally authorized representative, acknowledge the above General Requirements for CDA Organic Certification and understand that failure to meet the above requirements may be cause for denial of an application and sanctioning of certification.

I affirm that all statements made in this application are true and correct. No prohibited products have been applied to any of my organically managed fields during the three-year period prior to projected harvest. I understand that the operation may be subject to unannounced inspection and/or sampling for residues at any time as deemed appropriate to ensure compliance with the NOP Rules. I understand that acceptance of this form in no way implies granting of certification by the Colorado Department of Agriculture. I agree to follow all the applicable organic standards set forth in the National Organic Program regulations, 7 CFR Part 205.

on file 3/30/2017
Signature of Operator:\_\_\_\_\_ Date:\_\_\_\_



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

### MODULE 2: CROP/PRODUCTS REQUESTED FOR CERTIFICATION

#### **CROPS/PRODUCTS REQUESTED FOR CERTIFICATION**

The crops and/or products being requested for certification must be listed each year. This is what will be on the operation's certificate. List all products and check the box if you are continuing to grow this crop for the current year, strike through any crops that were listed last year that you will not be growing this year, add any new crops to the bottom of the list. It is not necessary to list individual crop varieties (carrots vs. yaya carrots, purple haze carrots, bolero carrots, etc.) unless it is important for you to have them listed on the certificate this way. Please list all forms that you wish to market the crop (example: Oats and Oat Straw). If crops are grown for harvest as well as to market as transplants or seed, please list all of these forms separately and specify the use.

<u>Crop/Product</u>	2016	Last yr. certified	<u>Crop/Product,</u> <u>Cont'd</u>	2016	Last yr. certified	<u>Crop/Product,</u> <u>Cont'd</u>	2016	Last yr. certified
Apricots		2015	Peach Pepper Jam		2015			
Apriums		2015	Peach Pie Preserves		2015			
Asian Pears		2015	Lavender Peach Jam		2016			
Cherries		2015	Rainier cherry jam		82			
English Walnuts		2015						
Nectarines		2015						
Peaches		2015						
Plums		2015						
Pluerry		2015						
Pluots		2015						
Apricot Jam		2015						
Apricot Pepper Jam		2015						
Bing Cherry Jam		2015						
Ginger Peach Jam		2015						
Peach Jam		2015						

Operator Review, Initial and Date:

CDA Inspector Initial and Date: DAG-07-13-17

Company Name: Morton's Orchards



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

### **MODULE 3: FIELDS AND ELIGIBILITY**

### FIELDS AND ELIGIBILITY

Please complete or review the following information about this operation. Include all land including conventional, transitional, and organic fields. The NOP Rule requires that to be eligible for certification, a site producing crops intended to be sold, labeled or represented as organic must have had no prohibited substances applied for at least 36 months preceding harvest of the crop. Transitional means that a field is being managed in accordance with the organic standards, but has not yet met the standard for 36 months without use of a prohibited product. If a field being used for organic production has not been managed by the operator for 3 or more years, a Previous Land Use Affidavit from the previous land manager must be attached. The Field Identifications and acreages must be the same as what is listed on maps and the Crop and Input Information section. For new fields, please be sure to complete the column "New to operation...?"

Field ID/name/ number	Address/legal description (if different from main operation address)	whe T	acreag ther Or ransitio onventio T	ganic, nal,	Rent or Own	Date management began	Last date prohibited substance applied & material	Date eligible for organic (CDA to enter)	New to Operation since last OSP update? (Yes or No)	*Operator - note change, addition or deletion. Date and initial in parenthesis.
b) (4)	same	1			Own	1980	1992		No	
	same	1			Own	1980	1992		No	
	same + 2 close by	14			Own/ rent	1980/2005/ 2015 +	1992		No/Yes	Planting 380 new trees to new location in 2016.
	same + 1 close by	2.3			Own/ rent	1993/2005	1993		No	
					own/r ent	3.37 Ac	2015	2017	No/yes	Planted approx. 380 trees and 03 of Ac was transitional
Total this page		18.3	0	0						·

Operator Review, Initial and Date:

Inspector Review, Initial and Date: DAG-07-13-17

Company Name: Morton's Orchards

F-E-202 10/10/2015



**Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

## MODULE 3: FIELDS AND ELIGIBILITY, Cont'd

Field ID/name/ number	Address/legal description (if different from main operation address)	wheth Tra	acreag ier Or ansitio iventic T	ganic, nal,	Rent or Own	Date management began	Last date prohibited substance applied & material	Date eligible for organic (CDA to enter)	New to Operation since last OSP update? (Yes or No)	*Operator - note change, addition or deletion. Date and initial in parenthesis.
		2				~			2	
		3					2		0	
		-1								
								-	1	
Total this page		0	0	0		•				2
Total Prev.		18.3	0	0	1					
Total all pages		18.3	0	0	1					

Operator Review, Initial and Date:

Inspector Review, Initial and Date: DAG-07-13-17



#### **MODULE 5: BUFFERS AND ADJOINING LAND USE**

#### BUFFERS AND ADJOINING LAND USE

ADJOINING LAND USE: The NOP Rule requires organic production areas to have distinct boundaries and buffer zones to prevent the unintended application of a prohibited substance or contact with a prohibited substance (including cross pollination from GMO crops) applied to adjoining land not under organic management. Adjoining land includes cropland, pasture, residential property, fallow land, etc. Though the NOP does not specify a minimum buffer size requirement, it is required that the buffer must be sufficient in size or other features to prevent unintended contact by prohibited substances. If the buffer consists of crops, these crops must be left unharvested or if harvested, must be harvested and sold (represented) as NON-organic. Field maps must indicate buffer zones (widths and make-up: road, field road, trees, etc.) and show all adjoining land uses (organic cropland, conventional cropland, un-sprayed fallow or pasture, residential, etc.).

List Specific buffers for all organic and transitional fields. Multiple fields/field IDs can be listed in one row, if those fields are contiguous within a block. If individual fields are all organic and contiguous, list the Field ID as "entire farm" and enter buffer information.

ld ID(s)		Type of Buffer	Width of Buffer	Adjoining Land Use (include whether conventional, organic or untreated)
4) N	orth	Roadway (E 1/2 Road)	40 feet	Conventional Orchard (Dave Cox)
S	outh	Orchard (Ours)	N/A	Us (Organic)
E	ast	House (Brother in law)	N/A	Part of my orchard (Organic)
W	Vest	House (Ours)	N/A	Us (Organic)
N	orth	Apricots (Ours)	N/A	Us (Organic)
S	outh	Peaches (Ours)	N/A	Us (Organic)
E	ast	House (Brother in law)	N/A	Part of my orchard (Organic)
W	Vest	House (Ours)	N/A	Us (Organic)
N	orth	Cherries (Ours)	N/A	Us (Organic)
S	outh	Road (to our barn)	N/A	Cooper Lease - (Organic)
E	ast	Main Road (36 5/8 Road)	61 feet	Vineyard
W	Vest	Cox Orchard (Conventional)	45 feet	Conventional Peaches
N	orth	Peaches (Ours)	N/A	Us (Organic
S	outh	Empty unused field (non Ag)	N/A	Non Ag empty field
E	ast	Roadway and vineyard	41 feet	Conventional Vineyard-Talbott
W	Vest	Pond (irrigation water)	N/A	Us (Organic)
N	orth			
S	outh			
E	ast			
W	Vest			

Operator Review, Initial and Date:

Inspector Review, Initial and Date: DAG-07-13-17



**Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

BUFFERS AND ADJOINING LAND USE Cont'd	Module 5 Cont'd									
<ol> <li>What safeguards are used to prevent accidental contamination of organic crops/cropland?</li> <li>a. Written notification to:</li> </ol>										
■ Highway Departments □ Electric Companies □ Oil and Gas Comp	panies									
<ul> <li>Aerial Spray Companies</li> <li>Farm Service Offices</li> <li>Adjoining Landowners/Neighbors</li> <li>Other, please specify: Good neighbor policy (I spray along here)</li> </ul>	is fonce row									
with Entrust. He uses Spintor in his o	prchard +									
<ul> <li>b. Other safeguards:</li> <li>Posting signs regarding organic status</li> <li>Registration with DriftWatch (<u>https://dr</u></li> </ul>	iftwatch org/)									
□ Delayed Planting (GMO contamination) □ Ongoing monitoring of neighboring man										
□ Other, please specify:										
2. How do you monitor for crop contamination?										
■ Visual Observation □ Residue Analysis □ GMO Testing										
PhotographsWind Speed/DirectionOther (Specify):										
3. How often do you monitor for crop contamination?										
□ Weekly □ Monthly □ Annually										
As needed Other (Specify):										
4. Are crops harvested from buffer zones?										
If yes, how are these crops managed to prevent commingling or contamination during harve	est and post-harvest?									
I have the inspectors take a sample from west of my peaches each year and nothings come back negat	ive CDA Samples									
taken have never shown residue										
NOP Rule 205.206(f) states that lumber treated with arsenate or other prohibited substances ma installations or replacement purposes where it comes in contact with soil or crops.	y not be used for <i>new</i>									
instantations of replacement purposes where it coulds in contact with son of crops.										
5. Has any lumber been used that has been treated with arsenate or other prohibited substance	.c?									
□ Yes ■ No	5.									
If yes, please describe what type of structure(s) (greenhouses, fence posts, other building or const installation is on the farm, how far between the installation and where organic crops are grown,										
have been taken to prevent direct or indirect contact of the treated wood with the soil:	SURV.									
Operator Review, Initial and Date: Inspector Review, Initial and Date: D	AG-07-13-17									



# COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### MODULE 6: GREENHOUSES AND HOOP HOUSES/HIGH TUNNELS

#### GREENHOUSES AND HOOP HOUSES/HIGH TUNNELS

For the purposes of this application, the terms hoop house and high tunnel are considered to have equal meanings and describe structures at least 6 feet high that are generally unheated and have no electrical climate controls. Typically, crops are grown in the ground in hoop houses. Conversely, the term greenhouse normally describes a heated structure where crops are grown on benches or tables. However, it is recognized that these terms exist on a continuum. Please note, lumber treated with arsenate or other prohibited substances may not be used for *new installations or replacement purposes* where it comes in contact with soil or crops.

	No greenhouses or hoop houses used for this operation. Skip to Module 7 – Seeds, Seedlings, and Planting Stock									
1.	Are seedlings grown on-farm?	🗆 No								
2.	Are seedlings used only on-farm, sold, or both?	On farm use only	☐ For sale only	□ Seedlings are grown for both on-farm use and sale						
3.	Are any crops produced in the ground in hoop houses	/greenhouses?	□ Yes	□ No						
Ple	ase complete the following information for each str	ucture:								

ID/Name	Organic, Conventional, Both	Dimension & size (sf)	Heated?	Crops grown in ground?	Seedlings grown?	Treated wood?	Description of structure - location of treated wood, venting, roll up sides, structural materials, doors, etc. heating source, etc.	Operator indicate changes and date	
	Dotti			giounu.	1		materials, 60015, etc. nearing source, etc.		
				_					
*Please include	greenhouses/hoo	p houses on any fie	eld maps th	at have been	n submitted :	and identif	y them with the same name or number listed or	1 the table above. If	
houses do not fa	houses do not fall within any of these maps, provide separate maps locating the houses on the farm property.								
*List all fertility	inputs used in g	reenhouses and ho	op houses,	including so	oil/seed starti	ng/potting	mixes, on the "Soil and Fertility Materials and	Inputs" Section. Also	
list all pest, wee	d or disease prod	lucts in that section	and note t	hey are use	d in houses.				

Operator Review, Initial and Date:

Inspector Review, Initial and Date: DAG-07-13-17

Company Name: Morton's Orchards

F-E-203 10/10/2015



CI		NHOUSES AND HOOP HOUSES Cont'd Module 6 cont'd
		NHOUSES AND HOOP HOUSES Cont'dModule 6 cont'de any inputs applied through greenhouse or hoop house watering systems?YesImage: No
		f yes, please list all inputs in Module 10 (Fertility Inputs) or Module 12 – Weed, Pest, and Disease Inputs:
	-	
5.		hlorine used to clean the watering system?
	1	i yes, please multate rates used.
6.		e non-organic (conventional) plants grown in or near any of the greenhouses/hoop houses?
		Yes 🗆 No
	If	yes, please answer the following questions:
	a.	How are organic and non-organic growing areas identified?
	b.	How is commingling of organic and non-organic soil mixes prevented during:
		Mixing -
		Planting -
		Flanting -
		Storage -
	c.	How are organic and non-organic plants identified or differentiated?
	d	How are seedling containers and equipment cleaned?
	u.	now are second containers and equipment cleaned.
	e.	How is drift or contamination from prohibited materials prevented: Within the house –
		while house -
		Through ventilation systems -
		Through watering systems -
0		
Ope	erator	Review, Initial and Date: Inspector Review, Initial and Date: DAG-07-13-17



10/10/2015

## **MODULE 8: SPLIT and PARALLEL PRODUCTION**

#### CONVENTIONAL, PARALLEL AND SPLIT PRODUCTION

If the operation produces both organic and NON-organic crops, then the operation is considered a "split" operation. If the same exact crops are grown as organic and NON-organic such that the crops are not visually distinguishable, then the operation is considered to have "parallel" production.

This operation is 100% organic. No non-organic production occurs (other than harvesting of buffers on an otherwise 100% organic operation). Skip to Module 9 – Fertility Management

1.	Does the operation produce both organic and conventional crops?	🗆 No	
2.	Does the operation produce the same crop in organic and conventional form?	□ Yes	🗆 No
3.	What crops are produced non-organically?		
4.	What crops are produced in both non-organic and organic form?		
5.	Are any GMO varieties produced for the non-organic part of the operation? If yes, please list:	□ Yes	🗆 No
6.	How are crops in parallel production distinguished during harvest and post-ha	rvest?	
7.	List inputs (fertilizers, pesticides, fungicides, herbicides) used in non-organic p	roduction:	
8.	Where are non-organic inputs stored and how are they kept separate from org	anic-approved in	puts?
9.	Are employees made aware of the difference between organic-approved and no Yes INO Please explain:	on-organic inputs	?
Op	erator Review, Initial and Date:	Inspector Re DAG-07-13-	view, Initial and Date: 17
Con	mpany Name: Morton's Orchards	2.10 0. 10	
F-F	-206 Crop OSP Module 8 NonOrganic Production		Revision A



Tel: 303-869-9050 www.colorado.gov/ag/dpi

## **MODULE 9: FERTILITY MANAGEMENT**

#### FERTILITY MANAGEMENT

The NOP Rule requires active management to build soil fertility, manage plant nutrients, protect natural resources, and prevent soil erosion through; rotation of crops, cover cropping, and applications of plant and animal materials. These applications must be managed in such a way that they do not contribute to contamination of crops, soil or water from pathogens, heavy metals, nutrients, or prohibited substances. The operator must conduct cultivation and tillage practices in a way that minimizes soil erosion and maintains or improves the condition of the soil including physical, chemical and biological properties. The application of sewage sludge is prohibited in organic agriculture.

1.	What are the soil types	s of this operation?									
	Clay										
2.	2. What are the nutrient deficiencies?										
<b>.</b>	High PH, needs Nitrogen Annually										
	night hi, hoodo hia ogon										
3.	What are the major co	omponents of the so	oil and/or crop fe	rtility plan?							
	Crop rotation	□ Soil amendme	ents	□Foliar fer	tilizers	Compost					
	□ Manure	Cover crops		Undersov	ving	□ Soil inoculants					
	□ Fallowing	Conservation	tillage	Biodynam	nic inputs						
	Incorporation of crop	residue		Other (sp	ecify):						
4.	Describe any crop rota	ation practices. If	cover crops are u	sed, describ	e type and free	quency. If production is					
						orchard understory plantings					
etc	·	41-1- XA/ XA/I-14-1									
	almost every year.	tion. we use white i	Dutch Clover and o	niy cut with cr	lopper after gon	e to seed so as to replant					
	annoot overy your.										
5.	Are crop residues burn	and a second s									
	If yes, please describe										
	We burn the prunings fr	rom each year in orde	er to minimize cytos	spera canker s	spread.						
-	A										
	Are liquid fertilizers w	0	centration greate	r than 3% u	sea:	Yes No					
	ves, please submit docum		stilizar with Nitron	n orantar than	a 20/ unloss it is	approved by OMRI or WSDA.)					
(13	of 2013, the CDA will not	approve any liquia je	ruuger wan Ivaroge	n greuter indi	1 5 % unless il 15	approved by OMAI OF WSDA.)					
7.	How is the effectivenes	ss of the fertility m	anagement progi	am monitor	ed?						
	Soil testing		Microbiologia			□ Tissue testing					
	Observation of crop h	health	Comparison o	-		Crop quality testing					
	□ Observation of soil he					t the farmers markets we					
					that is our best						
8.	How often is fertility n	nonitoring conduct	ted?			an ang an					
		Monthly	□ Annually		As needed	Other (Specify):					
	8000 M		5000 K			We rotate from 13-0-0 to					
						8-5-1 every other year					
9.	Rate the effectiveness	of the fertility man	agement program	n							
	Excellent	□ Satisfactory		□ Needs imp							
Op	erator Review, Initial and D	ate: 4/26/2017		Inspector R	eview, Initial an	d Date: DAG-07-13-17					
		the sheet of the									



305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

COMPOST – SECTION 2 Module 9, Cont'd
Compost not used this year – Skip to Section 3, Manure
*This section must be completed each year if compost is purchased or produced on-farm. NOP Rule 205.203(c)(2) requires that when compost contains animal materials, composting processes must include an initial C:N ratio of between 25:1 and 40:1 and maintain temperatures between 131 and 170 degrees, depending on the method. If you produce compost on-farm, production records must be kept to verify compliance with the above. If compost is purchased, this information must be obtained from the supplier. If records are not kept or do not document compliance, it will be considered raw manure and must meet the pre-harvest interval when used on products for human consumption according to 205.203(c)(1).
1. Was compost purchased?   Image: Yes   Image: No
If compost was purchased, attach documentation from the supplier stating the requirements of NOP Rule 205.203(c)(2) have been met and include it on the Soil and Fertility Materials and Inputs list (Section 9).
2. Was/Is compost produced on farm?  Yes
If yes, what are the raw ingredients used and what is the source of each?
3. What is the composting method?
☐ Windrows or aerated pile. Must reach 131-170 degrees for at least 15 days and be turned at least 5 times.
☐ In-vessel or static system. Must be aerated and reach 131–170 degrees for at least 3 days.
Information on the following will be verified at inspection:
The initial C:N Ratio
The final temperature reached
How long this temperature is maintained
<ul> <li>If compost is windrowed, how many times the materials are turned</li> </ul>
PELLETED/PROCESSED MANURE
Pelleted or processed manure not used this year
Processed or pelleted manure may be used as a fertility input without a specific interval between application and harvest as
long as it is treated so that all portions of the product, without causing combustion, reach a minimum temperature of either 150° F (66° C) for at least one hour or 165° F (74° C), and are dried to a maximum moisture level of 12%; or an equivalent
heating and drying process could be used. In determining the acceptability of an equivalent process, processed manure
products should not contain more than 1x103 (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.
If you are applying pelleted or processed manure this year:
1. How do you confirm that the product meets the heat processing requirements described above?
OMRI listed
*Any pelleted or processed manure products must be listed in the Soil and Fertility Materials and Inputs List (Module 10).
Operator Review, Initial and Date: 4/26/2017 Inspector Review, Initial and Date: DAG-07-13-17

Company Name: Morton's Orchards

**Revision A** 



Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### **MANURE – SECTION 3**

#### Module 9, Cont'd

#### MANURE

Animal manures must be composted unless: they are applied to land used for a crop not intended for human consumption; OR 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 surface particles; OR 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.

No raw or unprocessed manures used this year – Skip to Module 10, Soil & Fertility Input List

1. What is the source of manure applied this year?

2. How do you ensure that manure does not contaminate wells, rivers, streams, lakes, or ponds?

#### 3. What types of crops are grown on fields to which manure is applied?

- Crops not used for human consumption
- Crops for human consumption whose edible portion HAS direct contact with the soil or soil particles.

Crops for human consumption whose edible portion DOES NOT have contact with the soil or soil particles

If you grow crops for human consumption and use un-composted manure, complete the following table. Include manure deposited by grazing livestock.

Field Number/ID	Crop(s)	Date manure is incorporated	Expected Harvest Date

Operator Review, Initial and Date: 4/26/2017

Inspector Review, Initial and Date: DAG-07-13-17



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

## MODULE 10: SOIL AND FERTILITY INPUTS

#### SOIL AND FERTILITY INPUTS

## □ No Soil or Fertility Inputs used. Skip to Section 11 – Weed, Pest and Disease Management

List all fertility inputs intended for use on proposed organic fields including compost and manure. Fertility inputs must also be listed on Field History sheets. Please note, many micro-nutrient products (boron, copper, iron, magnesium, manganese, zinc) require a documented deficiency for their use. Please submit soil or plant tissue test results or other documentation for approval. Product labels and/or OMRI/WSDA certificates for all inputs must be on file. If you have previously submitted labels, you do not need to resubmit them. If you have discontinued use of a product and don't intend to use it again, write "no longer in use" and the date in parentheses.

Product	Manufacturer	Number of Applications Annually	Use & How Applied	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)
o) (4)		Once	Spreader & hand Shovels	No	Approved	7/24/2014 CA
		every other year	Spreader	OMRI	Allowed	7/24/2014 CA
		every other year	Spreader	OMRI	Allowed	9/7/2016 AM
				WSDA	Allowed	7/24/2014 CA
NOP Rule Refer	ences (CDA to enter) -			·		·

Operator Review, Initial and Date: 4/26/2017

Inspector Review, Initial and Date: DAG-07-13-17

Company Name: Morton's Orchards

F-E-209 10/10/2015



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

## MODULE 10: SOIL AND FERTILITY INPUTS, Cont'd

Product	Manufacturer	Number of Applications Annually	Use & How Applied	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)	
NOP Rule References (CDA to enter) -							

Operator Review, Initial and Date: 4/26/2017

Inspector Review, Initial and Date: DAG-07-13-17

Company Name: Morton's Orchards

F-E-209 10/10/2015



## **MODULE 11: WEED, PEST and DISEASE MANAGEMENT**

#### WEED, PEST AND DISEASE MANAGEMENT

The NOP requires crop rotation plans that maximize soil organic matter and prevent weed, pest and disease problems. Producers must utilize sanitation measures to remove disease vectors, weed seeds and habitat for pests. Cultural practices must be used to enhance crop health. Approved synthetic materials listed on the National List 205.601 may only be used when management practices are insufficient to prevent or control problems. All weed, pest and disease inputs must be approved. A "restricted" input has specific annotations for its use. If a restricted input is used, evidence of how the annotation is addressed must be provided. Please include all weed, pest and disease products in Module 12 - "Weed, Pest, and Disease Control Inputs" list.

# SECTION 1 - WEEDS

1	What are the wood pushleme (types) for this encyclica?				
1.	What are the weed problems (types) for this operation?				
	Russian Knapweed, Iron weed				
2	How often is weed monitoring c	conducted?			
4.	□ Weekly □ Monthly		As needed	□ Other (Specify):	
			EAS liceded	la other (speerly).	
3.	What weed control methods are	used? Check all that apply:			
	Mechanical cultivation	Hand weeding	□Flame weeding		
	Crop rotation	Smother/cover crops	Sanitation/cleaning	of tools & agginment	
	□ Soil solarization				
		Approved herbicides	Stale seedbed prepa		
	Mulching, specify type:	☐ Timing of planting	Prevention of weed	seed set	
	□ Weed seed screens on irrigation	inlets	Other (specify):		
4.	Please describe in further detail				
	We around trees and install compo	ost, we cut weeds before they see	d with mower, bare spaces	get cover crop with Dutch	
	White Clover				
5.	Are records kept of how often t	hese weed control methods are	utilized?	s 🗆 No	
5.	Are records kept of now often t	nese weed control methods are			
6.	. How is the effectiveness of the weed management program monitored?				
0.	Observation of weed types	Observations of crop health		ison of crop yields	
	Records of weed counts				
	- The cover crop has carminated reasoning the bind				
7	Ano plastia an synthetia mulaha	weed.	□ Yes	No.	
	Are plastic or synthetic mulches es, please note: per NOP Rule 205.20		a second and a second and a second and a second as	and a second	
	wmers, or other nonrecycled or nonbid				
	ps, in which case the mulch must be r			cuson unicss applica to perchinar	
1	1.0	, - <u>-</u>	Γ		
8.	Rate the effectiveness of the wee	ed management program: 🛛	Excellent 📃 Satisfac	tory I Needs improvement	
Ope	erator Review, Initial and Date: 4/26/2	2017 II	spector Review, Initial and	Date: DAG-07-13-17	
	na ann an ann an Ann an Ann an Ann an Ann an Ann ann a	K 19			

Company Name: Morton's Orchards

**Revision A** 



**Division of Plant Industry** 305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

1.	What are the pest problems for this operation?				
	Aphids, peach crown borer, peach twig borer, ground squirrels, birds on ripe fruit.				
2.	How often is pest monitoring conducted?				
	□ Weekly □ Monthly □ Annually ■As needed □ Other (Specify):				
3.	What strategies are utilized to prevent and control pest damage to field crops?				
	□ Crop rotation □ Timing of planting □ Selection of resistant crop varieties ■ Physical removal				
	□ Physical barriers ■ Traps □ Repellents □ Natural enemy habitat				
	□ Trap crops □ Companion planting □ Lures ■ Approved pesticides				
	Release of beneficial organisms     Other (specify): Mating Disrupters				
4.	Please describe in further detail the selections made above:				
	We put enough mating disrupterson the trees to confuse males so they can't locate females, we use traps to catch ground squirrels, we have a natural habitat for praying mantis that renew itself yearly. Entrust is used sparingly as needed. We use multicolored foil streamers in the trees when crops begin to ripen to scare birds away				
5.	Is a record kept of how often these pest control methods are utilized?				
6.	How is the effectiveness of the pest management program monitored?				
	□ Insect monitoring with traps □ Observation of crop health or quality □ Comparison of crop yield				
	□ Crop quality testing □ Monitoring records kept ■ Other (Specify):				
	If our pest management is working the number of #2's to				
7.	Rate the effectiveness of the pest management program: Excellent Satisfactory Needs improvement				
8.	Is a pest control advisor used? If yes, provide name:				
	Larry Traubel of Cropworx in Cedaredge, CO sends out e-mails each week.				
-					

Operator Review, Initial and Date: 4/26/2017

Inspector Review, Initial and Date: DAG-07-13-17



Tel: 303-869-9050 www.colorado.gov/ag/dpi

SE	CTION 3 - DISEASES			Module 11, Cont'd
1.	What are the disease problems of th	is operation?		
	Cytospera Canker, coryneum blight			
2.	How often is disease monitoring con			
	U Weekly Monthly	□ Annually	As needed	Other (Specify): When pruning
3.	What disease prevention strategies a	and control methods are	used?	inter praining
	Selection of resistant varieties	Crop and soil health	Soil solarization	□ Seed treatments
	Plant spacing/Promotion of airflow	Compost teas	□ Irrigation management	□ Crop rotation
	□ Selection of resistant varieties	□ Timing of planting	Sanitation practices	
	Use of organic-approved inputs	Other (Specify): cuttin disea	g branches back to good woo sed branches and spraying N	od and burning the JuCopWP at the end of
4.	Please describe in further detail the	selections made above:		
	CSU extension has been working on cyto from infecting new trees, we spray NuCo trees.			
5.	How is the effectiveness of the diseas			
	Card a second and a second	omparison of crop yields ssue Testing	<ul> <li>Observation of soil</li> <li>Observation of crop qual</li> </ul>	Soil testing
	☐ Monitoring records kept			
	Other (specify): Our effectiveness is a a new grad student d	adequate on coryneum blig loing some different testing	nt but the Cytospera Canker i in the meantime we will just k	s being studied further by keep on cutting and
6.	Rate the effectiveness of the disease	management program:		
	Excellent Satisfactory	Needs improvement		

Operator Review, Initial and Date: 4/26/2017

Inspector Review, Initial and Date: DAG-07-13-17



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

## **MODULE 12: WEED, PEST and DISEASE INPUTS**

#### WEED, PEST AND DISEASE INPUTS

#### CONTROL PRODUCTS

□ No Weed, Pest, or Disease Control Products Used. Skip to Module 13 - Irrigation

List all weed, pest and disease products that are intended for use on proposed organic fields/crops. If you have discontinued use of a product and are unlikely to use it again, please cross out the entry. Labels and/or OMRI/WSDA certificates (if applicable) for each product need to be on file with CDA. If you have received approval for a product and have submitted a product label, you do not need to resubmit the label each year. If a product is not listed with OMRI or WSDA, CDA will need a complete ingredients list and processing methods from the manufacturer to determine whether it complies with NOP Subpart G – Allowed and Prohibited Substances.

Control Product	Manufacturer	Weed, Pest, or Disease problem being addressed (specific)	Preventative Mechanical and Physical Control Strategies	OMRI/ WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)
o) (4)		Peach Twig Borer, Oriental Fruit Moth, some Aphhids 🖬		OMRI	Restricted per 205.206	7/24/2014 CA
		Peach twig borer			Restricted per 205.206	7/24/2014 CA
		Acts as sticker / spreader		WSDA	Restricted per 205.206	7/24/2014 CA
		Peach Crown Borer		WSDA	Restricted per 205.206	7/24/2014 CA
		Codling moth control		OMRI	Restricted per 205.206	7/24/2014 CA
		Aphid control + control of other overwintering pests		WSDA	Restricted per 205.206	7/24/2014 CA
		Codling moth control		OMRI	Restricted per 205.206	7/24/2014 CA
		Corynium Blight		OMRI	Restricted per 205.206	5/8/2015 AM

\*NOP Rule References (CDA to enter) -

205.206 - Requires the use of preventative mechanical, physical and other pest, weed, and disease management practices.

Operator Review, Initial and Date: 4/26/2017

Inspector Review, Initial and Date: DAG-07-13-17

Company Name: Morton's Orchards

F-E-211 10/10/2015 Crop OSP Module 12 Weed.Pest.Disease Inputs



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

## MODULE 12: WEED, PEST and DISEASE INPUTS, Cont'd

Control Product	Manufacturer	Weed, Pest, or Disease problem being addressed (specific)	Preventative Mechanical and Physical Control Strategies	OMRI/ WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)
) (4)		Black Cherry Aphids		OMRI	Restricted per 205.206	5/8/2015 AM
				1		
NOP Rule Reference		hanical, physical and other pes	t, weed, and disease mana	gement practices	ц 3.	

Operator Review, Initial and Date: 4/26/2017

Inspector Review, Initial and Date: DAG-07-13-17

Company Name: Morton's Orchards

Crop OSP Module 12 Weed.Pest.Disease Inputs



#### **MODULE 13: IRRIGATION**

IR	IRRIGATION					
	□ Water not used for irrigation. Skip to Module 14 – Natural Resources and Biodiversity					
1.	List the types of irrigation systems (flood, drip, overhead, center pivot, etc.) employed on this operation:					
	MicroJet hang down sprinklers					
2.	What is the source(s) of water used on this operation for irrigation?					
	Colorado River Water					
3.	What is the name of the municipal and/or irrigation district, if applicable?					
	Orchard Mesa Irrigation Company					
4.	List known contaminants in water supplies in your area:					
194	Muddy during spring runoff season					
5	How are the water contamination problems listed above minimized?					
5.	A city nearby (Clifton, CO) takes municipal water from this same source and we have a holding pond for silt to settle and					
	we only pump from the top of the pond.					
6.	Please describe how and how often water quality is monitored?					
	Probably hourly in the city of Clifton, CO					
-						
7.	Are any input products applied through irrigation systems?					
	ii yes, piease provide details.					
1						
0						
8.	What, if any, products are used to clean irrigation systems? Please list the product and provide rates of use:					
	None					
0	Are any irrigation systems shared with other users?					
2.						
a. If irrigation systems are shared with another user or if your operation also consists of conventional crop						
production, how do you ensure there is no contamination of organic crops in terms of the irrigation system?						
On	rator Review, Initial and Date: 4/26/2017 Inspector Review, Initial and Date: DAG-07-13-17					



Tel: 303-869-9050 www.colorado.gov/ag/dpi

## **MODULE 14: NATURAL RESOURCES and BIODIVERSITY**

NATURAL RESOURCES AND BIODIVERSITY						
The conservation of natural resources and biodiversity is a primary tenet of organic production. NOP Rules 205.200 and 205.203(a) require that production practices maintain or improve the natural resources of the operation, including soil, water, wetlands, woodlands, grasslands and wildlife. Practices must minimize erosion. Irrigation water should not contaminate organic crops or soils with prohibited materials. Methods to conserve water should be part of the irrigation plan.						
<ul> <li>What features does this operation contain? Check all that apply.</li> <li>□ Forest or Woodland □ Grassland □ Shrub Land □ Riparian or Wetland Areas</li> <li>■ Other, please specify:</li> </ul>						
<ul> <li>2. What features does this operation border (not owned or managed by this operation)?</li> <li>              Forest or Woodland             Grassland             Grassland             Shrub Land             Riparian or Wetland Areas             Other, please specify:      </li> </ul>						
3. In general, what conservation practices are in use? Check all that apply. <ul> <li>Terracing</li> <li>Maintaining or improving field borders with natural vegetation</li> <li>Contour farming</li> <li>Grassed waterways</li> <li>Under sowing/inter planting</li> <li>Crop selection for site specific/regional conditions</li> <li>Winter cover crops</li> <li>Conservation Easements or CRP</li> <li>Conservation tillage</li> <li>Maintaining or improving wildlife habitat</li> <li>No till</li> <li>Windbreaks</li> <li>Other (specify):</li> </ul>						
4. Please describe, in further detail, any boxes checked from above: Utilizing MicroJet Sprinklers keeps cover crops growing, cutting clover/grasses and utilizing that for green manure, that also controls invasive species.						
5. Describe any practices in place to maintain native plant and pollinator populations: Since going totally organic our continuing populations of lady beetles and praying mantis doesn't have to be reintroduced						
Operator Review, Initial and Date: 4/26/2017 Inspector Review, Initial and Date: DAG-07-13-17						



305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

NATURAL RESOURCES AND BIODIVERSITY	Module 14 Cont'd					
	<ul> <li>6. Does the operation participate in any NRCS (Natural Resources Conservation Service) or EQUIP (Environmental Quality Incentives Program) activities or work with an NRCS advisor?</li> <li>Yes No</li> </ul>					
If yes, please describe: NRCS helped us install the sprinkling system and now only uses ab used.	out 1/3 the amount of irrigation water we previously					
7. Are there any areas of the operation that have evidence of so If yes, please describe:	il erosion? 🛛 Yes 🔳 No					
8. What practices are being used to minimize the soil erosion p	roblems listed above?					
9. What practices are used to protect <i>water quality</i> ? Buried pipes instead of open ditches helps protect water quality						
10. What water conservation practices are used on this operation See #6 above	n?					
11. Describe how manure and compost are managed to protect nutrients, heavy metals or pathogenic organisms: we use a manure spreader for our compost and also (b) (4)	crops, soil, and water from contamination by excess					
Operator Review, Initial and Date: 4/26/2017	Inspector Review, Initial and Date: DAG-07-13-17					



## MODULE 15: EQUIPMENT, TRANSPORTATION AND STORAGE

#### SECTION 1 - EQUIPMENT AND TOOLS

To prevent commingling and contamination, all equipment used in organic crop production must be free of non-organic crop material (including residues of) and prohibited materials. Contamination includes that from oil, fuel and hydraulic fluids. Equipment used for both organic and non-organic farming must be cleaned prior to use on organic fields and crops. Records of equipment cleaning, including cleaning by an outside business, must be available during your inspection.

2	
1.	Is any equipment owned by the operation loaned out or otherwise used on land not controlled by the operation?
	If yes to the above, please explain:
2.	Is any equipment used by the operation used on both organic and non-organic fields? If yes, please list all equipment used on both organic and non-organic fields:
	Describe the use of any custom operators/custom equipment that occurs on this operation. Include what type of uipment, which crops, for what purpose (input application, harvest, soil preparation, etc.):
4.	List names of any custom operators used by this operation:
5.	How is equipment cleaned before use on organic fields (if different for different pieces of equipment, please list all)?
6.	Are any products used to clean or sanitize equipment or tools?  Yes  No If yes, please list the product and the rate used:
7.	Is cleaning documentation maintained? If yes, please describe:
8.	Is equipment maintained so that fuel, oil, and hydraulic fluid do not leak?
9.	Could any of the equipment used on the operation be contaminated by previous uses? If yes, please describe:
Op	erator Review, Initial and Date: 2/26/2017 Inspector Review, Initial and Date: DAG-07-13-17

Company Name: Morton's Orchards F-E-213 10/10/2015

Crop OSP Module 15 Equipment.Transportation.Storage



**Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

SE	SECTION 2 - STORAGE AND TRANSPORTATION Module 15, Cont'd						
		nination of organic produ st be maintained if applic:		ring storage and transpor	t. Storage records and		
		for transporting the final					
	Self/Operation	Buyer	Third Party	□ Other (specify):	□Not applicable		
2.	Who is responsible t	for <i>arranging</i> the final tr	ansportation of organic	products?			
	Self/Operation	Buyer	Third Party	Other (specify):	□ Not applicable		
3.	When do organic cr	ops leave the operation's	s custody?				
	At the point of sale			r delivery to the buyer, tran	sported by this operation		
		he buyer, transported by thi		er (Specify): We sell our fru			
4.	What practices are	used to protect the integ	rity of organic crops du				
	Use of clean truck/tr		edicated organic transport	27.2	sport units prior to loading		
	☐Inspecting transport	and a super state of the second state of the s		port agency stating organic			
		n and transport our own fru					
			415.				
5.		are stored at this operat	ion (where, length of tin	ne, climate control, etc.):			
	(b) (4)						
6	Are the same storag	e areas used for organic	and non organic crops'	? 🗆 Yes 🔳 No			
0.	-	s segregated and identifi					
	II yes, now are crop	s segregated and identifi	cu.				
7.	Are any inputs used	to control rodents, insec	ct pests, and or diseases	in storage areas?	🖬 Yes 🛛 No		
	Please list any materials in Module 17 - Post-Harvest Materials						
8.		to clean and/or sanitize		Yes No			
	Please list any input	s/materials in Module 17	7 – Post Harvest Materi	als			
0	Is off site stange of	ilizad?		Yes	No		
9.	Is off-site storage ut	inzed? rage controlled exclusive	by by this operation?	Yes No	INU		
	II yes, is off-site stol	rage controlled exclusive	ry by this operation?				
	If yes, is the off-site	storage facility certified	organic?	🗆 Yes 🔳 No			
	in jes, is the on-site	storage mening certificu	or Bunter				
In	In the table below, describe storage locations or structures including off-site storage:						
_							
	Storage Name/ID	Туре	Capacity	On Site or address for Off-Site	Dedicated Organic?		
	athen Marten Durtness	40 × 40 cooler	Omellate	Contrast terror to a state of the second second			
He	eather Morton Burtness	10 x 18 cooler	9 pallets	2390 95th St, Boulder, CC	Yes		
-				-			
5		с — — — — — — — — — — — — — — — — — — —	0				

Operator Review, Initial and Date: 4/26/2017

Inspector Review, Initial and Date: DAG-07-13-17



## MODULE 16: HARVEST, POST-HARVEST HANDLING AND PACKAGING

#### **SECTION 1 - HARVESTING**

□ No harvesting occurs – *all* land is fallow or maintained solely for grazing. Skip to Module 17

NOP Rule 205.272(b)(1)(2) requires that containers, bins and packaging materials must not contain synthetic fungicides, preservatives, or fumigants. All reusable containers must be thoroughly cleaned and pose no risk of contamination to organic crops prior to use. If crops are harvested through custom harvesters, clean equipment verification should be submitted.

1.	Are any crops custom harvested? If yes, which crops and by whom?	Yes	■ No
2.	Are any crops harvested with rented or borrowed equipment? If yes, please describe:	Yes	No
3.	Is harvest equipment used for both organic and conventional crops? If yes, describe how the operation ensures there is no risk of contami left on equipment (cleaning methods, etc.):		■No crop from any residue
4.	Are containers used to harvest crops? If yes, list the types of containers and whether they are new or used: Used picking baskets that are "Hotsy" cleaned and used over and over again cardboard boxes	Yes . Crops are then so	☐No rted and placed in our
5.	Are containers used for both organic and conventional crops? If yes, describe how the operation ensures that there is no risk of con Container:	Yes ntamination from	■No residues left in the
6.	Are containers cleaned prior to harvest? If yes, describe methods: See #4 above.	∎ Yes	No
Ope	erator Review, Initial and Date: 4/26/2017	Inspector Review, Ini	itial and Date: DAG-07-13-17



**Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

SE	CTION 2 - POST HARVEST			Module 16, Cont'd		
	□ No post-harvest activities occur (No cooling, rinsing, washing, packing or application of any materials, occurs to					
1	crops post-harvest.). Skip to Module 17 . Indicate what methods are used to prepare post-harvest areas/facilities:					
1.	Check all that apply and <u>list any cleansers or sanitizers in the Module 17 - Post-Harvest Materials</u> .					
	Manual Washing	□ Soap and Water	Sanitizing	□ Scraping		
	Sweeping	□ Vacuuming	Compressed Air	Steam Cleaning		
	□ Purging of Equipment	□ Other (specify):		0		
2.	Are quaternary ammonia products u	ised for cleaning or s	anitation? 🗆 Yes 🔳	No		
ens	ease note, Quaternary Ammonia produc ure that no residues remain on any food nethyl ammonium chloride)			A STATE OF A		
3.	How does the operation ensure that	organic products are	not contaminated by a cleanser of	or sanitizer?		
	Hotsy" makes steam only					
4.	<b>Does the operation document/record</b> Yes No If yes, please describe:	cleaning, sanitation	and/or purging practices and pro	ocedures?		
5.	Are products containing chlorine, ca direct contact with any crops (wash If yes, please answer the following:	20.55	T-0.77.1	<b>hlorite used in</b> □Yes ■No		
	a) What is the rate used?					
	<ul> <li>b) <i>Residual</i> chlorine levels in water that has direct contact with crops, may not exceed the maximum residual limit of 4ppm as specified by the Safe Drinking Water Act. Please describe how this restriction is met:</li> </ul>					
6.	What is the source of water used in d Municipal		ops?			
7.	Is water treated on site? If yes, how?	Yes	No			
8.	Is water quality monitored? Please describe:	Yes Yes	No			
Ope	erator Review, Initial and Date: 4/26/2017		Inspector Review, Initial and Date:	DAG-07-13-17		



**Division of Plant Industry** 

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

SECTION 2 - POST HA	ARVEST CONT'D			Module 16, Cont'd		
<ul> <li>9. Are any materials applied to any crops post-harvest (sprout inhibitors, silage inoculants, etc.)?</li> <li>Yes INO</li> <li>If yes, please list the material in the "Post-Harvest Materials" section.</li> </ul>						
Yes No	<ul> <li>Are any pest control methods used in areas/structures where cooling, washing, bagging occurs?</li> <li>Yes No</li> <li>If yes, please list the materials in the "Post-Harvest Materials" section.</li> </ul>					
11. Are any harvested operation?	crops processed (grind ☐Yes ■No	, cut, mix, preserve, ext	ract, dehydrate, can, ja	r, cook, etc.) by this		
<ul> <li>12. Is a different certiany of this operation</li> <li>■No, not applicable</li> </ul>	If yes, please also fill out a Process Handler OSP.  12. Is a different certified organic facility used to process (cut, mix, preserve, extract, dehydrate, can, jar, cook, etc.) any of this operation's crops post-harvest? No, not applicable Yes and ownership is transferred at delivery Yes and the operation retains ownership of the final product If a certified organic facility is used to process any crops post-harvest and this operation retains ownership of the					
Product	Label Claim (100% Organic, Organic,	Label or Brand Name	Name of Processor	Organic Certifier of Processor		
Jams - you have labels	Made with Organic)					

Operator Review, Initial and Date: 4/26/2017

Inspector Review, Initial and Date: DAG-07-13-17



305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

## SECTION 3 - PACKAGING

## Module 16, Cont'd

The NOP rule defines "packaging" as a sealed container or material that encloses a product. Non-retail containers used only to ship or store organic products must clearly identify the organic status of the product. If lot numbers are used, non-retail containers must display the production lot number of the product. For packaged (sealed), retail products, the label must state "Certified Organic by the Colorado Department of Agriculture" or similar, directly below the name and contact information for the operation. Please see Subpart D – Lables, Labeling, and Market Information - of the NOP Rule for more specific requirements.

1. How are products identified as organic during sale or at the point of sale? Check all that apply.					
	Retail labels Invortea labels Inv	voices 🛛 Scale tickets			
	□ Bin tags □ Bills of lading □ Ot	her(Specify):			
2.	2. Are organic products packaged (see definition above) in any way?	Yes 🗆 No			
	a. If yes, what types of packaging or containers are used? Mark	x all that apply.			
	Cardboard Daper Dwood	Glass			
	□ Plastic bags □ Solid plastic □ Metal	□ Foil			
	□ Other (Specify):				
	□ Other (specify).				
	h Ana packaging materials on containous food guade?	Vac Na			
	b. Are packaging materials or containers food grade?	Yes No			
	If no, please explain:	2 NORE BRY			
	Well you can't eat the cardboard box, we use foam between each	layer of fruit.			
	a Ana nachaging matanials an containans na usad?				
	c. Are packaging materials or containers re-used?	Yes No			
	If yes, explain how organic products are protected from po	otential contamination:			
See previous answer - new foam between each layer of fruit.					
	d. Are retail labels applied to packaging?	Yes No			
	u. Are retain labers applied to packaging:	i es i No			
	a Ave non-veteil labels applied to peakeging?	Yes No			
	e. Are non-retail labels applied to packaging?				
	f. Is the USDA seal applied to packaging or marketing informa	tion? Yes No			
	1. Is the USDA sear applied to packaging of marketing informa-				
	- Is the Colombia Operation of Length of the production of the state				
	g. Is the Colorado Organic seal applied to packaging or market	ting information? 🔳 Yes 🔲 No			
**Please submit color copies of all labels used by the operation (photographs and printing proofs are acceptable)					
r icase submit color copies of an labers used by the operation (photographs and printing proofs are acceptable)					
0	On any territical and Data and an and a	Devices Initial and Dates			

Operator Review, Initial and Date: 4/26/2017

Inspector Review, Initial and Date:



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021

Tel: 303-869-9050 www.colorado.gov/ag/dpi

## MODULE 17: CLEANING, SANITIZING & POST HARVEST INPUTS

#### **Cleaning, Sanitizing & Post-Harvest Inputs**

List all products used after products have been harvested including tool and equipment cleaners and sanitizers, pest control products used in handling and storage areas, and materials applied to products. If you have discontinued use of a product and are unlikely to use it again, please strike through or cross out the entry. Labels for each product need to be on file with CDA. If you have received approval for a product and have submitted a product label, you do not need to resubmit the label each year.

Product	Manufacturer	Use & How Applied	OMRI/WSDA? (CDA to enter)	Status (CDA to enter)	Review Date (CDA to enter)
Steam	Ute Water District	Hotsy - steam only			
Mouse Traps	??	kill mice			
Small rodent trap	Hardware Store	trap rodents, relocate			
Wasp Spray	??	kill wasps - outside barn			
*NOP Rule References (C	DA to enter) -				

Operator Review, Initial and Date: 4/26/2017

Inspector Review, Initial and Date: DAG-07-13-17

Company Name: Morton's Orchards F-E-215 10/10/2015

All OSP Module 17 Post Harvest Handling Inputs



#### COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry

305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

## **MODULE 18: RECORD KEEPING**

#### **Record Keeping**

The NOP Rule requires that records disclose all activities and transactions of the operation, be maintained for 5 years, and demonstrate compliance with the Rule. Organic products must be able to be traced back to the field/location where they were produced/harvested. All records must be available to view and/or copy.

1.	1. What records are kept for organic production?					
	Field maps					
	Field activity logs					
	Machine use logs					
	□ Planting records					
	Documentation of previous land use					
	■ Input records for soil amendments, fertilizers, pest, w	and and discours controls				
	Documentation of attempts to source organic seeds at					
	□ Documentation of attempts to source organic seeds at □ Documentation of seed and planting stock sources	nd of planting stock				
	Compost production records					
	<ul> <li>Monitoring records (soil, tissue, and water tests, etc.)</li> </ul>					
	□ Equipment cleaning records					
	Harvest records					
	Labor records					
	Storage records					
	Clean transport records					
	Sales records (invoices, purchase orders, receipts)					
	□ Shipping records (scale tickets, bill of lading, etc.)					
	□ Transaction certificates					
	Audit control summary					
	□ Other (Specify):					
2.	How long are records kept? If less than 5 years, e	explain why:				
	7 years					
3.	What records are kept for non-organic production	n?				
Control	Not applicable (no non-organic production)	□ Input records	☐ Field history sheets			
	□ Harvest records	□ Sales records	□ Storage records			
	□ Shipping records	□ Complaints to operators	☐ Field maps			
	□ Labor records	Other:				
Op	erator Review, Initial and Date: 4/26/2017	Inspector Review, Initial	and Date: DAG-07-13-17			



# Company Morton's Orchard

Date 07-13-17

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:	Apricot for 2017- Each box has Julian date, variety, blocked picked.
Crop.	ripricot for 2017 Euch box hus bunun dute, vuriety, biocheu pieneu.

Question	Document Name	Link	Additional Information
1. Does the producer have organic seed /seedlings or non- organic seed documentation and organic certificates?	Field History and nursery stock purchase for trees replanted with in block which include Apriums/pluots.		This same block of apricots has 78 trees of Apriums/pluots planted in 2005.
2. Does the producer have input (fertility, pest control, etc) records?	Fertilizer/pesticide document.		Sample included in documents.
3. Are there planting and cultivating records available?	Field history of apricots planted in 1981.		Four rows of apricots with 39 trees/row totaling 156 trees.
4. Does the producer have harvest records?	Shed Form records all fruit picked.	Sample of form included in documents.	<ul> <li># 1 fruit picked = 3,672 lbs.</li> <li>&amp; # 2 fruit picked = 490 lbs.</li> <li>totaling 4,162 lbs./156 trees</li> <li>= 26.7 lbs./tree.</li> </ul>
5. Do storage records show field numbers, date of harvest, and amount harvested?	Shed forms		
6. Does the producer have shipping records?	Farmers market sales records.		
7. Does the producer have sales records?	Farmers market sales records.		Sample included in documents.

Do you have copies of all records?

1. Is the system functional, current and accessible? Yes.

# Types of records that could be used:

#### - Seed packets

- name of buyer

- lot #

B. What they-shotivity log of planting dates

- date of sale Seedling information, invoices

- Map of land/ acreage, planting area

- product soldDocumentation of commercial non-availability

1. Sales Records:

- A. Includes:
- Invoices or receipts  $\rightarrow$
- Sales logs of summaries  $\rightarrow$
- Transaction Certificates  $\rightarrow$
- Bills of Lading
- Farmer's Market Worksheets
- Weigh/scale tickets

## 2. Shipping Records

A. Includes:

- Settlement Sheet
- Clean Truck Affidavits

## 3. Storage Records

A. Includes: (What a storage record SHOULD show; specifically bin storage)

- Storage unit #
- Capacity of storage unit
- Type of crop or products stored
- Date of stored crop
- Field # where harvested
- Date and quantity in (often an estimate)
- Date and quantity out
- (Clean out logs, map/ input of pest control)

## 4. Harvest Records

- A. Must show:
- Type of crop/product
- Field #
- Date harvested
- Yield amounts

## Optional:

- equipment clean-out documentation
- Harvest records sometimes combined with storage
- Activity logs, crop storage
- Pocket notebooks

# 5. Input Records (Activity Log)

A. Must show:

- crops and/or variety planted and dates
- Inputs used, dates and rates of application
- Compost and manure management and paperwork
- Purchase records (receipts and labels of products)

## 6. Planting/ Seed Records

A. Includes:

- Seed Certificates showing Certified Organic seed

## How the inspector uses Sale Records:

- Determine if the products can be tracked back to the field(s) of production.
- Determine that <u>quantities</u> sold as organic are consistent with the previous year's organic crop yields.
- Verify that lot numbers are used appropriately
- Verify that products are properly designated "certified organic"

## How the inspector uses Storage Records:

- Determine if the products can be tracked back to the field(s) of production.

- Verify pest management

- Verify that storage units are physically numbered and that the numbers correspond to the storage records

- Verify proper clean out and that no commingling occurs for split operations.

## How the inspector uses Harvest Records:

- Determine if the organic products can be tracked back to the field(s) of operation

- Determine if yields are realistic for the operation
- Verify that crops harvested are consistent with crop plan.
- Verify no commingling has occurred.
- These records often show equipment cleaning procedures and dates cleaned or the use of custom harvesting.

## How the inspector uses Input Records:

- Confirm inputs and production practices. (Look for receipts)

- Report any use of prohibited or questionable substances

- Assess if input records and other audit trail documents are well organized and accessible.

How the inspector uses Planting/Seed Records: - Verify that seed, seedling information is organic or commercially unavailable in organic form

- Verify when crops were planted (planting dates)



# Company Morton's Orchards.

Date 07-13-17

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 Apricots 2017

Question	Answer
1. Define period being reviewed. (Today to when the product was purchased, or Sept to Dec.)	06-19-17 to 07-13-17
2. Define unit(s) of measure.	Pounds # 1 Box = 18 lbs. and a # 2 box = 10 lbs.
3. Obtain Beginning Inventory Obtain Ending (current) Inventory	O beginning inventory and ending inventory was 1 last apricot which Mr. Morton let Don Brooks eat ending in 0 inventory.
4. Add in purchases of product if necessary.	N/A
5. How much of the ingredient has been sold?	4,162 lbs.
6. What is the expected yield? (Look at recipe or batch sheet).	The yield was about 35 % less than desired due to a partial frost affecting the apricots.
<ul><li>7. Does the expected yield and amount sold correlate? (Yes or no, explain reason for variation).</li></ul>	The actual averaged 26.7 lbs./tree a little over a third less than desired. The yield does correlate for the age of trees and seasonal conditions.

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.

# HINTS and EXAMPLE

## 1. Define period:

- a. Example: At time of inspection, the operation may have 50 lbs of flour on hand from the original 100 that was purchased; audit the 50 that has been used.
- b. Example: You can choose to audit the flour from the date of purchase to current date.
- c. Example: Choose to audit all flour from a specified time period before the inspection. Inspection date June 1<sup>st</sup>, you audit all flour in April and May that was used.

\* The idea is to find a place to start from, preferably from "0". Maybe ask for the most recent incoming product invoice for the flour that way there is a specified amount.

#### 2. Define unit of measure:

d. Cups, ounces, gallons, etc...

#### 2. Obtain beginning and ending inventories:

- a. Example: look at most recent invoice to see what was ordered for the beginning inventory and then view current inventory for ending.
- b. Example: Find where the ending or beginning inventory is at "0". This will give a frame of reference.
- c. Example: If looking at months or time period view inventory records for those months.

#### 3. Add in purchases of product:

a. Make sure no more product were ordered than was specified. This is just a cautionary step.

#### 4. How much of the ingredient has been sold?

**a.** Obtain sales records to show how much of the finished products have been sold with the ingredient in them, for the amount listed in #1.

#### 5. What is the expected yield?

**a.** When looking at Batch or Recipe Sheets, calculate the amount of flour that should be used for that time period or amount listed in #1. If the 50lbs of flour can yield 40 loaves of bread according to the batch/recipe sheet, that is the expected yield.

Summary Statement : This is a word explanation of what is going on.

For example: "In the month of September, the sales of finished products with flour compared to production was 250 lbs more than was sold. Thus information is lacking in regards to inventory records for the month.

"In the month of September, the sales of finished products containing flour compared to production were equal at 250lbs. The audit information is complete and is representative of the operation."



May 18, 2017

Morton's Orchards AKA Morton's Organic Orchards David A. Morton 3651 E. ½ Road Palisade, CO 81526

Dear Mr. Morton:

This is to notify you that we received your Organic Systems Plan and your check in the amount of \$1,250.00, was postmarked on April 29, 2017. We will begin processing your application.

The application process involves an initial review by an organic certification specialist and the gathering of any additional information, if needed, prior to your inspection.

Your file will be assigned to one of our inspectors. The inspector will contact you to arrange a date and time for the inspection based on the information, which you provided to us on your inspection appointment form.

We estimate the inspection time to be approximately 6 hours and travel time to be 2 hours and mileage to be invoiced at .25 per mile (time may vary due to inspector's place of origin). We estimate your total inspection cost to be approximately \$275.00. You will be invoiced after the inspection is performed and actual costs are known.

If you have any questions concerning the process outlined above, please contact Alyssa Mack at 303-869-9075.

Sincerely,

Barbara A. Rosenbach Program Assistant Division of Plant Industry

BR:bar







Donald - CDA, Rob <rob.donald@state.co.us>

# **Organic Certification - Initial Review - \*\*Time Sensitive\*\***

1 message

Donald - CDA, Rob <rob.donald@state.co.us> To: (b) (6) Wed, Jun 7, 2017 at 10:49 AM

"Dear	David,

We have completed the initial review of the Organic System Plan for *Morton's Orchard*. This review is conducted to ensure the plan is complete and to determine if it appears to comply with the NOP Rule. Based on the review, the following needs to be addressed:

• Your OSP indicates you have added an off-site storage here on the front range. Could you please complete the storage affidavit I have attached to this email.

Please respond to the above no later than *June 21st*. We can schedule your inspection as soon as we receive the information.

Please let me know if you have any questions.

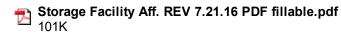
Thank you for your time,

## **Robert Donald**



**COLORADO** Department of Agriculture

P 303.869.9050 | C (b) (6) 305 Interlocken Parkway, CO 80021 rob.donald@state.co.us | www.colorado.gov/ag





Donald - CDA, Rob <rob.donald@state.co.us>

# Emailing - StorageFacilityAff.REV7.21.16PDFfillable.pdf

1 message

_	_
	(6)
· · ·	

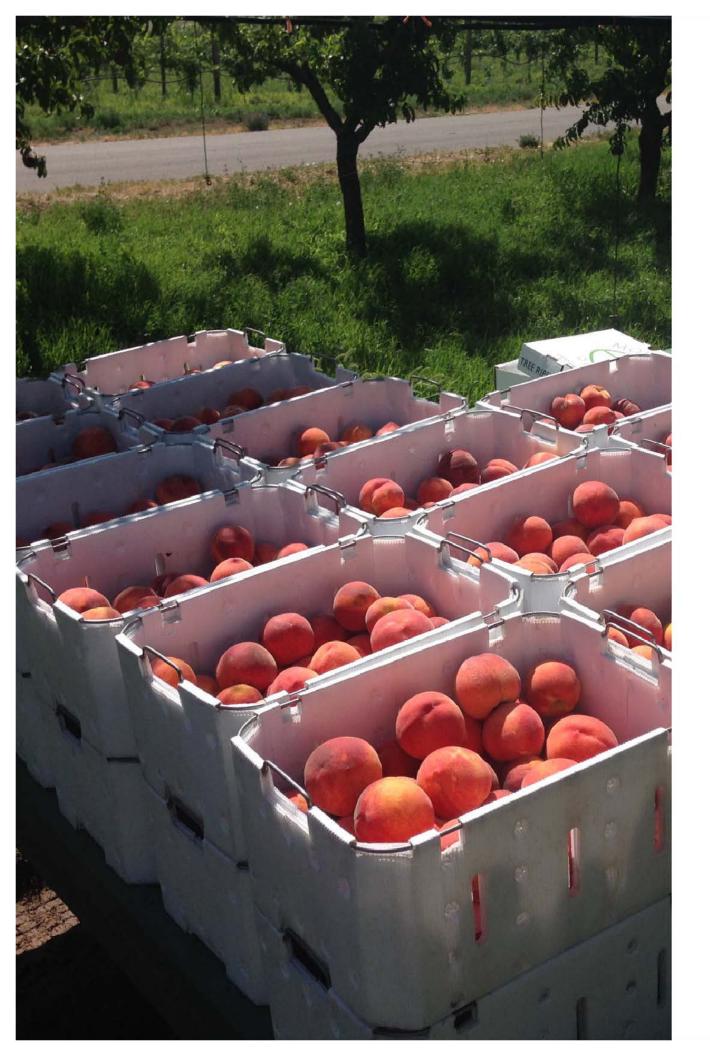
To: rob.donald@state.co.us

Wed, Jun 7, 2017 at 2:19 PM

see attached for daughters storage facility in Louisville. CO

David A. Morton Morton's Organic Orchards 3651 E 1/2 Palisade, CO 81526 970-464-7854 cell (b) (6)

StorageFacilityAff.REV7.21.16PDFfillable.pdf





DATE	ORCHARD	VARIETY	#1	#2	OTHER
6-19-17	water	Bing	9		
5-19-12	John	Vivaia	4	-	
6-20-17	Maiton	au fector	5		
5-20-12	John	Gold Sick	2		
-20-17	John	bing			
1-21-17	Moston	PF # JB	60	4	
-28-17	John	Ryland	8	4	
-22-17	Moston	Ryland	14	4	
- 22-17	John	Rivel	6		
5-22-17	Moston	Goldrick	85		
-22-17	John	6 old rick	3	79	
5-22-17	Morton	perfection	5		
6-22-17		getfection.	4		
6-23.17		PF HI	- fine		
6-23-17		REH 1	7	2	
6-26-17		Gold sick		- de .	
6-26-17		Gold ricks	4		
6-26-17		Rival	- 4		
6-26-17	John	Rival	2	10	

Palisade Farm MKt. Sunday 7/9/17 1. Peaches (ERH) Apricots (Perfection) 2. Total Sales \$ 1169.00 3 Paid & to market 4 Workers - Brittany, Dava 8#1 3#2 Morton's Parch Raturnel 2 medium Bys 7#1 3#2 Heathers Porch of # 2's Took 5. 1. 2#1 > Rustars Returned & 5#2 Apricot Returned & 1.

Sues of concern (cite the standard) For processed proberts + (b)(z)03 idonitity the Costifla OTA the Cost rying agent 2. prod - nisle) lleur Prod ends Ramer Char Jan 3. Arway MI how dand or Myu From Crown buso 4. Comments The information contained in this report is confidential between the inspector, the inspected party and the certification agen does not constitute certification or consultation, nor should it be used for promotional purposes. All compliance assessments does not constitute certification of consolition not should be used for promotional purposes. An compliance assessments reference to the standards and policies of the above-mentioned certification agent, and are based on the inspector's observat documents and operator interview. 3/2017 eration Signatu Representative of 07-13-12 Date Inspector Signature Farm Questionnaire Field Maps Attachments: Complete Field Histories Other (specify) \_ Driving Time: 1.5 Pre- Inspection Time: Inspection Time: Mileage: Inspection Narrative 1.25 hour(s) Write-up Time Inspection Cover Sheet Page 4 of 4 F-I-021 11/16/2015

Mortons Orchard	Description
Module # 1 Signature Page.	OSP reviewer requested signature on Module # 1.
Inputs for 2017	Sample of approved inputs used for 2017 as part of traceability audit.
Nursery Stock Purchase Bare Root.	1 of 2 Pages for Sierra Gold Nursery.
Nursery Stock Purchase Bare Root.	2 Of 2 Pages for Sierra Gold Nursery.
Nursery Stock Purchase Bare Root.	Boyer Nursery.
Crop Worx Purchase in fall of 16 for 2017	Sample of approved inputs used for 2017 as part of traceability audit.
Peaches.	Photo during inpection of food grade boxes peaches are harvested into.
Peach Box	Box with Julian date, variety and number linking blocked picked from
Shed Form	Shed form list amount picked from each block, variety, grade, and date picked.
Farmers Market sales note book.	Sample of farmers market sales note book. Mortons direct sales all their fruit to markets.
Signatue/billing page.	Last page of cover sheet with signatures agreeing to inspeciton, billing, issues of consern.



COLORADO DEPARTMENT OF AGRICULTURE Division of Plant Industry 305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### ORGANIC CERTIFICATION PROGRAM APPLICATION FEE SCHEDULE

This form can be filled out electronically and will automatically calculate your fee. Please complete this form to determine your application fees for the current year. Application fees are annual fees and must be submitted for both initial applications and renewals. All applicants pay a \$400.00 base fee. Additional fees are broken down into 5 scopes (Crop, Process Handler, Livestock, Wild Crop, and Poultry & Livestock Processing). For operations that include multiple scopes, each additional scope is \$200.00.

Certification Renewals: Renewal Forms and Fees must be postmarked by the specified date in your renewal cover letter. The base fee increases \$100 per month if not postmarked by the date specified (1 - 30 days past due = \$100; 31 - 60 days past due = \$200; up to a maximum of \$300).

Initial Applicants: New applicants requesting crop certification must submit the application and Organic System Plan by June  $1^{st}$  to receive certification for the year. There are no late fees for initial certifications.

GENERAL INFORMATION				
Applicant/Company Name: Morton's Orchards AKA Morton's	Organic Orchards	DBA, if applicab	le:	
Primary Contact's Name: David A. Morton	<b>Phone Number:</b> 970-464-7854		Email Address: (b) (6)	3
Mailing Address: 3651 E 1/2 Road	City: Palisade	State: CO	Zip Code: 81526	County: Mesa
Physical Address: Same as Mailing	City:	State:	Zip Code:	County:

BASE FEES			
What is your Primary scop	e?		
(CHECK ONE ONLY - The	part of your operation that produces the most	income)	
Crops	Poultry and Livestock Processing		
Livestock	Process Handler		
Wild Crop			
	Primary Scope = \$400.00	If entering by hand enter \$400 here:	400.00
Which additional scopes ar	e you wishing to certify?		400.00
(Ruminant Livestock Produc	ers must select crops as an additional scope)		
(Check all that apply, additio	nal scopes = $200$ each)	If entering by hand enter \$200 for each checke	d hav halow
Crops (must be selected if ruminant livestock is part of operation)		g g y name the essey of each checke	
Livestock	• • •		0.00
Wild Crop			0.00
			0.00
			0.00
Poultry and Livestock Processing			0.00
	Base Fee Total (Primary Scope + additional scopes)		400.00
			400.00

\*Continue to Page two for Scope Fees

5091713680 5/9/2017 Morton's Organic Orchards 10890 \$1,250.00 23S0 4200 BPAA 1602 BCAACL001 6130 6270

Form:DPI-ORG-AFS (rev. 10/2015) Code 6270 Fee Schedule



# ORGANIC CERTIFICATION PROGRAM - APPLICATION FEE SCHEDULE CONT'D

SCOPE 1: CROPS					
Check the box that correspon	ids to the type and n	umber of acres you are requesting	g for certification	tion. If more than one ty	pe of production
occurs, enter the one which p Irrigated Acres	broduces the most inc	Joine.			production
$\Box 1 - 20$ acres	\$400.00	Dryland Acres			
$\square 21 - 200 \text{ acres}$	\$400.00	□ 1 – 1500 acres	\$400.00		
201 or greater acres	\$850.00	1501 - 4000 acres	\$850.00		
Perennial Fruit	\$2100.00	4001 or greater acres	\$2100.00		
$\Box 1 - 5 \text{ acres}$	¢ 400.00	Greenhouse/Specialty Crop			
$\blacksquare 6 - 40 \text{ acres}$	\$400.00	□ 1 – 12000 sq. ft.	\$400.00		
	\$850.00	□ 12001 – 15000 sq. ft.	\$850.00		
☐ 41 or greater acres	\$2100.00	□ 15001 or greater sq. ft.	\$2100.00		850.0
SCOPE 2: LIVESTOCK					000.0
Check the box that correspond	ds to the type and nu	mber of livestock you are reques			
Poultry	as to the type and hu	Inder of investock you are reques	ting for certif	ication.	
$\Box$ 1 – 1000 head	\$400.00	Dairy			
$\Box$ 1001 – 6000 head	\$850.00	1 - 100 head	\$400.00		
6001 or greater head		101 - 300 head	\$850.00		
	\$2100.00	□ 301 or greater head	\$2100.00		
Other (Beef cattle, sheep, pig	re)				
$\Box$ 1 – 250 head	\$400.00			-	
251 – 500 head	\$850.00			-	
500 or greater head					
	Contact CDA				0.0
COPE 3: PROCESS HAND	DLING				
Single Ingredient Finished P	viulti-Ingredient prod	ducts are being requested, enter t	he highest fee	of the two.	
$\Box$ 1 – 20 products	and the second se	Multi-Ingredient Finished Pr	oducts		
$\square$ 21 – 40 products	\$400.00	$\Box 1 - 5$ products	\$400.00		
	\$850.00	$\Box 6 - 15$ products	\$850.00		
			\$2100.00		
☐ 41 or greater products	\$2100.00	□ 16 or greater products	\$2100.00		
			\$2100.00		0.00
COPE 4: POULTRY AND			\$2100.00		0.00
COPE 4: POULTRY AND )		CESSING	\$2100.00		0.00
COPE 4: POULTRY AND ivestock Processing					0.00
COPE 4: POULTRY AND ivestock Processing 1 - 300 head 301 - 500 head	LIVESTOCK PRO	CESSING Poultry Processing	\$400.00		0.00
COPE 4: POULTRY AND ivestock Processing	LIVESTOCK PRO \$400.00	CESSING           Poultry Processing           1 - 3000 head           3001 - 9000 head	\$400.00 \$850.00		0.00
COPE 4: POULTRY AND ivestock Processing 1 - 300 head 301 - 500 head	LIVESTOCK PRO \$400.00 \$850.00	CESSING Poultry Processing 1 – 3000 head	\$400.00		
COPE 4: POULTRY AND ivestock Processing 1 – 300 head 301 – 500 head 501 or greater head COPE 5: WILD CROP	LIVESTOCK PRO \$400.00 \$850.00	CESSING           Poultry Processing           1 - 3000 head           3001 - 9000 head	\$400.00 \$850.00		0.00
COPE 4: POULTRY AND ivestock Processing 1 – 300 head 301 – 500 head 501 or greater head COPE 5: WILD CROP Vild Crop Harvesting	LIVESTOCK PRO \$400.00 \$850.00	CESSING           Poultry Processing           1 - 3000 head           3001 - 9000 head	\$400.00 \$850.00		
COPE 4: POULTRY AND ivestock Processing 1 - 300 head 301 - 500 head 501 or greater head	LIVESTOCK PRO \$400.00 \$850.00 \$2100.00	CESSING           Poultry Processing           1 - 3000 head           3001 - 9000 head	\$400.00 \$850.00		
COPE 4: POULTRY AND ivestock Processing 1 – 300 head 301 – 500 head 501 or greater head COPE 5: WILD CROP Vild Crop Harvesting	LIVESTOCK PRO \$400.00 \$850.00 \$2100.00 \$400.00	CESSING           Poultry Processing           1 - 3000 head           3001 - 9000 head	\$400.00 \$850.00		
COPE 4: POULTRY AND ivestock Processing 1 – 300 head 301 – 500 head 501 or greater head COPE 5: WILD CROP /ild Crop Harvesting 1 – 2 sites	LIVESTOCK PRO \$400.00 \$850.00 \$2100.00 \$400.00 \$400.00 \$850.00	CESSING           Poultry Processing           1 - 3000 head           3001 - 9000 head	\$400.00 \$850.00		
COPE 4: POULTRY AND ivestock Processing 1 – 300 head 301 – 500 head 501 or greater head COPE 5: WILD CROP /ild Crop Harvesting 1 – 2 sites 3 – 5 sites	LIVESTOCK PRO \$400.00 \$850.00 \$2100.00 \$400.00	CESSING           Poultry Processing           1 - 3000 head           3001 - 9000 head	\$400.00 \$850.00		
COPE 4: POULTRY AND         .ivestock Processing $\Box$ 1 – 300 head $\Box$ 301 – 500 head $\Box$ 501 or greater head         COPE 5: WILD CROP         Vild Crop Harvesting $\Box$ 1 – 2 sites $\Box$ 3 – 5 sites	LIVESTOCK PRO \$400.00 \$850.00 \$2100.00 \$400.00 \$400.00 \$850.00 \$2100.00	CESSING Poultry Processing 1 – 3000 head 3001 – 9000 head 9001 or greater head	\$400.00 \$850.00		

Print this form and mail it along with a check made payable to: Colorado Department of Agriculture

Colorado Department of Agriculture Division of Plant Industry 305 Interlocken Parkway Broomfield, CO 80021



### **Organic Certification – Organic System Plan Storage Facility Affidavit**

Per NOP Rule 205.101(b)(1) certified organic operations may store their products at non-certified facilities as long as the products are packaged or otherwise enclosed in a container prior to being received or acquired by the operation and may not be repacked or relabeled while in control of the storage operation. CDA can waive the requirement for an annual inspection of storage facilities if the storage facility complies with the requirements to safeguard the product from contacting prohibited substances.

CDA Certified Operation Name: Morton's Orchards aka Morton's Organic Orchards				
Name of Storage Facility: Heather Burtness Orchards Manager/Owner: David A. Morton/ Heather Morton Burtness				
Physical Address: 28271 Road L	Email: Same address	Phone: 720-371-1727		

- The manager of the storage facility must answer the questions below.
- Copies of the Storage Facility Affidavit must be kept by both the CDA certified operation and the storage facility.
- The Storage Facility Affidavit must be submitted to CDA annually by the certified operation

Which types of storage occur at this facility?

Dry

Cold

Freezer

**Other, Specify:** Usually we store overnight

Please complete the table below to describe the storage facilities					
	YES	NO	NA		
1. Does the storage facility implement necessary measures to protect the organic product from contacting prohibited substances such as pesticides?					
2. Does the CDA certified operation retain ownership of the product during storage?					
3. Is the organic product packaged or enclosed in a container prior to being received and does it remain in that enclosed container during storage?					
4. Do the appropriate records indicate that the product is "organic"?					
5. Are the records detailed enough to disclose description and amounts of organic products transferred, and to link any lot numbers assigned by the CDA-certified operation with tracking numbers or lot numbers assigned at the storage facility?					
6. If pesticide fogging is performed or pesticide sprays are applied to areas where packaged or otherwise enclosed organic products are stored, are the organic products removed prior to application or covered with impermeable coverings, or otherwise protected from contacting pesticides and is this documented with written records?					
7. Does the storage facility further process the organic product, including sorting, culling, cleaning, icing, hydro cooling or hydro vacuuming?					
8. Does the storage facility label or re-label the organic product?					
9. Does the storage facility apply any substance to the organic product or its packaging or container, including water, ethylene or controlled atmosphere treatment?					
David A. Morton	6-1	2-17			
Name: Signature:	Date:				

Name:

Signature:

CDA reserves the right to inspect any facility storing organic product owned by a CDA certified operation as specified in NOP 205.400. If it is determined

that the storage operation has misrepresented policies or procedures as stated on this waiver, or acts in a manner that might jeopardize organic integrity or tracking of the organic product, the CDA client using the facility will be notified. The CDA client will be held responsible for correcting any noncompliance issues according to the timeline set by CDA.

Date of Initial	Review: 7.19.2017			Date Review Finalized:
PAGE	ISSUE OF CONCERN/ INCOMPLETE	REVIEWER or INSPECTOR	COMMUNICATION	REQUESTED INFORMATION AND RESOLUTION
(OSP)	(Clarification? Incomplete?)	(Issue handled before or at inspection?)	(email, during inspection, date due for items prior to inspection)	(specific notification to operation, and response received, specific request to inspector)
Module 2	Check crops for certification with crops being produced. Update OSP where necessary.	Ι	During inspection	Please check crops for certification with crops being produced. Update OSP where necessary.

ate of Initial Review: 7.19.2017PAGEISSUE OF CONCERN/REVIEWER or			Date Review Finalized:		
ISSUE OF CONCERN/ INCOMPLETE	REVIEWER or INSPECTOR	COMMUNICATION	REQUESTED INFORMATION AND RESOLUTION		
(Clarification? Incomplete?)	(Issue handled before or at inspection?)	(email, during inspection, date due for items prior to inspection)	(specific notification to operation, and response received, specific request to inspector)		
No issues noted					
	ISSUE OF CONCERN/ INCOMPLETE (Clarification? Incomplete?)	ISSUE OF CONCERN/ INCOMPLETEREVIEWER or INSPECTOR(Clarification? Incomplete?)(Issue handled before or at inspection?)	ISSUE OF CONCERN/ INCOMPLETE       REVIEWER or INSPECTOR       COMMUNICATION         (Clarification? Incomplete?)       (Issue handled before or at inspection?)       (email, during inspection, date due for items prior to inspection)		



## **Division of Plant Industry**

305 Interlocken Parkway, Broomfield, Colorado, 80021 Tel: (303) 869-9050 Fax: (303) 466-2860 www.colorado.gov/ag/dpi Appointment Date:

Appointment Time:

DPI-ORG-OIAF (02/15)

## **Organic Certification Program**

## **Organic Inspection Appointment Form**

(Return form with completed Plan Questionnaire)

Farm/Business Name	Primary C	ontact's Nar	ne:	
Twisted Root Organic Farm, LLC		Kristin Gross		
Physical Address:				
15388 Hopper Lane				
City:	State:	Zip Code:	County:	
Paonia	со	81428	Delta	
Phone: Fax:	Email:		l l	
(970)275-2838	kristin@tv	vistedrootor	ganicfarm.com	
Best hours to call: Indicate which day(s) of the week are most convi	enient for	an Organic I	Inspector to visit your operation:	
9am-5pm Tuesdays and Wednesdays				
From Highway 133, turn onto Panorama Road (one road east of Cono e are the second house on the righthand side. Enter through the gate. oad, Paonia, CO 81428. To Darbord ale. Highway 13		6, use our ol		
Phyloraus Road Twisted Root Favru 15388 Hopper Lane	13 nor Road	ethilefrent Road	Conoco Stortion	



## **Colorado Department of Agriculture**

# **Organic Inspection Report Cover Sheet**

Operation's Name: Twisted Root Organic Farm, LLC	Person Interviewed:		
Physical Address: 15388 Hopper Lane. Paonia, CO 81428	Others Present for Inspection:		
Type of Inspection:          New Applicant          Continuation	Has a Current Copy of NOP Standards?		
Inspector:	Date:	Time In: Time Out:	

#### **General Questions**

Does the operation have a complete copy of their current Organic System Plan?

□Yes □ No (if No, please explain)

Did you observe any obvious health and/or safety violations? □Yes □No (if Yes, Please Explain in Exit Interview Section)

Are any sections of the operation not fully under the care and control of the operation requesting organic certification? (Are any fields farmed by someone other than the operation? Are crops/products/ingredients held or stored at a rented facility? Etc.) □Yes □No (If Yes, Please Explain in the Exit Interview Section)

Were any portions of the operation *not* visited during the inspection? **UYes D** No (If Yes, please explain)

#### 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 notes what was collected, or what clarification was provide.

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

Issue	Response
	1

#### Record Keeping System

#### NOP RULE § 205.103

Please use the 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:

Other Comments:

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?			

#### **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.

<u>Please remember</u> 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.

#### Additional documents needed

	ents that the operation was unable to supply at the inspection that may be needed to
	ation on their organic certification:
1	
2	20 
3.	
4.	
5.	
Comments:	
Director Construction and Construction Providence Solition -	
Please do not ask for	these documents to be sent to you or into the office; the final reviewer may do tha
I RUSE GO HOT USK IOI	these documents to be sent to you of into the office, the infar reviewer may do that

Issues of concern (cite the standard)

NOP §205.403(d)

1			
2		 	_
2			
3	 	 	-
4			_
			_
Comments			
	 		-

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.

Representati	ive of Operation Signature	Da	ate
	Inspector Signature	Da	ate
Attachments:	Farm Questionnaire Field Maps Complete Field Histo Other (specify)		
Pre- Inspection Time:	I	Driving Time:	·
Inspection Time:			
Inspection Narrative Write-up Time	hour(s)	Mileage:	

Page 4 of 4



May 18, 2017

Twisted Root Organic Farm, LLC Kristin Gross 15388 Hopper Lane Paonia, CO 81428

Dear Ms. Gross:

This is to notify you that we received your Crops Organic Systems Plan and your check in the amount of \$1,000.00, was postmarked on May 1, 2017. You noted at that time that the Poultry Organic Systems Plan will be submitted at a later date. We will begin processing your application.

The application process involves an initial review by an organic certification specialist and the gathering of any additional information, if needed, prior to your inspection.

Your file will be assigned to one of our inspectors. The inspector will contact you to arrange a date and time for the inspection based on the information, which you provided to us on your inspection appointment form.

We estimate the inspection time to be approximately 4 hours and travel time to be 2 hours and mileage to be invoiced at .25 per mile (time may vary due to inspector's place of origin). We estimate your total inspection cost to be approximately \$200.00. You will be invoiced after the inspection is performed and actual costs are known.

If you have any questions concerning the process outlined above, please contact Alyssa Mack at 303-869-9075.

Sincerely,

Barbara A. Rosenbach Program Assistant Division of Plant Industry



BR:bar



May 19, 2017

Twisted Root Organic Farm, LLC Kristin Gross 15388 Hopper Lane Paonia, CO 81428

Dear Ms. Gross:

This is to notify you that we received your Livestock (Poultry) Organic Systems Plan on May 18, 2017. We had already received your Crops Organic System Plan and your check in the amount of \$1,000.00, which was postmarked on May 1, 2017. We will begin processing both of your applications.

The application process involves an initial review by an organic certification specialist and the gathering of any additional information, if needed, prior to your inspection.

Your file will be assigned to one of our inspectors. The inspector will contact you to arrange a date and time for the inspection based on the information, which you provided to us on your inspection appointment form.

We estimate the inspection time to be approximately 4 hours and travel time to be 2 hours and mileage to be invoiced at .25 per mile (time may vary due to inspector's place of origin). We estimate your total inspection cost to be approximately \$200.00. You will be invoiced after the inspection is performed and actual costs are known.

If you have any questions concerning the process outlined above, please contact Alyssa Mack at 303-869-9075.

Sincerely,

Barbara A. Rosenbach Program Assistant Division of Plant Industry



BR:bar

5/13/2015

40007 Panorama Rd - Google Maps



#### (b) (4)

alene visk blockmentik spisorati costavlandi 600 Mi polikan obnoslati wany - Abati posta olimiti



305 Interlocken Parkway, Broomfield, CO 80021 Tel: 303-869-9050 www.colorado.gov/ag/dpi

#### ORGANIC CERTIFICATION PROGRAM APPLICATION FEE SCHEDULE

This form can be filled out electronically and will automatically calculate your fee. Please complete this form to determine your application fees for the current year. Application fees are annual fees and must be submitted for both initial applications and renewals. All applicants pay a \$400.00 base fee. Additional fees are broken down into 5 scopes (Crop, Process Handler, Livestock, Wild Crop, and Poultry & Livestock Processing). For operations that include multiple scopes, each additional scope is \$200.00.

Certification Renewals: Renewal Forms and Fees must be postmarked by the specified date in your renewal cover letter. The base fee increases \$100 per month if not postmarked by the date specified (1 - 30 days past due = \$100; 31 - 60 days past due = \$200; up to a maximum of \$300).

up to a maximum of \$300). Initial Applicants: New applicants requesting crop certification must submit the application and Organic System Plan by June  $I^{st}$  to receive certification for the year. There are no late fees for initial certifications. D ue 7

Applicant/Company Name: Twisted Root Organic Farm, LLC	a <b>3850.00</b> bead <b>5</b> 220.00	DBA, if applicabl Twisted Root Or	e: rganic Farm	- 1000 mma 001 - 6000 m ad 001 or greater head
Primary Contact's Name:	Phone Number:		Email Address:	
Kristin Gross	(970)275-2838		kristin@twistedrootorganicfarm.c	
Mailing Address:	City:	State:	Zip Code:	County:
15388 Hopper Lane	Paonia	CO	81428	Delta
Physical Address: Same as above	City:	State:	Zip Code:	County:

BASE FEES			
What is your Primary sco	pe?	incoma)	100 100 100 100 100 100 100 100 100 100
(CHECK ONE ONLY - Th Crops	e part of your operation that produces the most		bias tot T
	Process Handler	P.D. Com	
Wild Crop	Primary Scope = \$400.00	If entering by hand enter \$400 here:	400
(Ruminant Livestock Prod	are you wishing to certify? ucers must select crops as an additional scope)	If entering by hand enter \$200 for each	ch checked box, below
(Check all that apply addit	ional scopes = \$200 each)	If emering by hand emer eres se	0.00
Crops (must be selec	cted if ruminant livestock is part of operation)		200
Livestock			0.00
Wild Crop			0
Process Handler	a section of the sect	· Total of Babe rate - here -	0.00
Poultry and Livesto	ck Processing		600
ARRIGUEN	Base Fee Total (Primary Scope + additional scopes)	with the second state state of the second second	

\*Continue to Page two for Scope Fees

5091713680 5/9/2017 Twisted Root Organic Farm 1127 \$1,000.00 23S0 4200 BPAA 1602 BCAACL001 6130 6270



# **ORGANIC CERTIFICATION PROGRAM - APPLICATION FEE SCHEDULE CONT'D**

					oonds to the type & size of the operation
COPE 1: CROPS			c requesting	for certification	. If more than one type of production
heck the box that corresponds t	to the type and nur	nber o	f acres you are requesting	or continue	1231
ccurs, enter the one which prou	uces the most inco	ALL .	and Acres		
rrigated Acres	and the second s	Dry	1 - 1500  acres		
■ 1 – 20 acres	\$400.00		1501 - 4000 acres	10000	
□ 21 – 200 acres	\$850.00		4001 or greater acres		
□ 201 or greater acres	\$2100.00	L	enhouse/Specialty Crop	42100	
erennial Fruit	a sussessment of the State	Gre	1 – 12000 sq. ft.	\$400.00	
$\Box$ 1 – 5 acres	\$400.00		1 = 12000 sq. ft. 12001 = 15000 sq. ft.	\$850.00	and seen in descent way were the set
□ 6 – 40 acres	\$850.00			\$2100.00	400
41 or greater acres	\$2100.00		15001 or greater sq. ft.	\$2100.00	
SCOPE 2: LIVESTOCK				100 9010 900	and the start of the second
Check the box that corresponds	to the type and nu	mber	of livestock you are reques	ting for certific	ation. The set of set of the set
Poultry		Dai	ry	Alter Andre States	
□ 1 – 1000 head	\$400.00		1 – 100 head	\$400.00	
□ 1001 – 6000 head	\$850.00		101 – 300 head	\$850.00	
6001 or greater head	\$2100.00		301 or greater head	\$2100.00	and a source of several gradients in the second second
	Constant of the second			Chone North	rimney Conta-1's Name:
Other (Beef cattle, sheep, pigs			000	s-cos(une)	Cristin Groas
□ 1 – 250 head	\$400.00				
□ 251 – 500 head	\$850.00	100	22	Cibr	delling Address
□ 500 or greater head	Contact CDA	-	UVI Market State	ALL SIDDA'L	The second s
SCOPE 3: PROCESS HAND If both Single-Ingredient and M	LING	oducts	are being requested, enter	the highest fee	of the two.
		IM	ulti-Ingredient Finished I	roducts	
Single Ingredient Finished P		IVA	1 - 5 products	\$400.00	
$\Box$ 1 – 20 products	\$400.00	-	$\Box 6 - 15$ products	\$850.00	
$\Box$ 21 – 40 products	\$850.00	+	☐ 16 or greater products	\$2100.00	Address .
41 or greater products	\$2100.00	11	10 of greater products	<b>\$2100.00</b>	0.0
SCOPE 4: POULTRY AND	LIVESTOCK PH	ROCE	SSING		
	LIVESTOCKT	T Pe	oultry Processing		
Livestock Processing	\$400.00		□ 1 – 3000 head	\$400.00	CHECK ONE ONLY The part of your
	\$850.00		□ 3001 – 9000 head	\$850.00	LEICrops L. Penne
301 - 500 head	\$2100.00		9001 or greater head	\$2100.00	and the second s
□ 501 or greater head	\$2100.00	6.8.6.0	v.Seame = \$.108.00   J en	Proba and	
SCOPE 5: WILD CROP		1942 (M. 1)			
Wild Crop Harvesting					and the second of the second of the second of the
$\Box 1-2$ sites	\$400.00	1.36 1.29		Close not	request insettible when and lie los (a)
$\Box 3 - 5$ sites	\$850.00		(buintsontern	a statement	Shown ii bataka si taani taani
$\bigcirc 6 \text{ or greater sites}$	\$2100.00			and the second second second	- Velocit
0 or greater sites	φ2100.00				0.
		and the second second		and the second second	100

Print this form and mail it along with a check made payable to: Colorado Department of Agriculture

Colorado Department of Agriculture Division of Plant Industry 305 Interlocken Parkway Broomfield, CO 80021

Fee Schedule

-----

----