



1400 Independence Avenue, SW.
Room 2646-S, STOP 0268
Washington, DC 20250-0201

VIA EMAIL

February 24, 2016

Betty Kananen
President/CEO
Global Organic Alliance
3185 Township Road 179
Bellefontaine, OH 43311
goaorg@centurylink.net

Re: NOPC-048-14 and Yurman Farms

Dear Ms. Kananen:

The U.S. Department of Agriculture (USDA), National Organic Program (NOP) is responsible for enforcing the Organic Foods Production Act of 1990, as amended, and its implementing regulations (7 CFR Part 205). All agricultural products sold, labeled, or represented as organic must comply with the USDA organic regulations. The NOP received a complaint regarding a Global Organic Alliance client. Specifically, the complaint alleged that Susan Yurman, Yurman Farms, Chester, Montana, produced certified organic crops using noncompliant weed and land management practices.

In response to our request to investigate, you conducted an unannounced on-site inspection of Yurman Farms. The inspection identified minor issues concerning weed management practices. Two subsequent inspections verified that the operation took sufficient action to address the issues. Further, your most recent annual inspection confirmed that the operation maintains compliance with the USDA organic regulations. This complaint is hereby closed. If you have any questions, please contact Kristin Thornblad at (202) 720-1153 or at Kristin.Thornblad@ams.usda.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Michael", written over a horizontal line.

Matthew Michael
Director, Compliance & Enforcement Division
National Organic Program

From: [Michael, Matthew - AMS](#)
To: [Thornblad, Kristin - AMS](#)
Subject: FW: Yurman Farm Complaint - New Complaint
Date: Monday, December 09, 2013 11:57:18 AM
Attachments: [Valerie Schmale.vcf](#)
[image001.jpg](#)
Importance: High

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

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

From: Schmale, Valerie - AMS
Sent: Thursday, September 26, 2013 11:18 AM
To: Michael, Matthew - AMS
Subject: Yurman Farm Complaint - New Complaint
Importance: High

Hi Matthew,

There will be a gentleman by the name of (b) (6), (b) (7)(C), (b) (7)(D) (b) (6), (b) (7)(C) , email: (b) (6), (b) (7)(C) , sending in a complaint against Susan Yurman, Yurman Farm, 3371 1500 Road East, Chester, Montana 59522, ph: 406-759-5725. I spoke with him on the phone today and apparently he has complained about this operation to their previous certifier, OCIA, with no results. He complained to GOA, their new certifier, on September 24, 2013 and about ten days earlier according to him. I contacted Betty Kananen to get copies of the photos he submitted and she is already taking care of the issue. She has sent Ms. Yurman notification that she must address the weed issue.

I have no problem continuing to handle this case if you like. I can have Kristin give me a case number for the file I am putting together.

Thanks,

Val
Valerie.Schmale@ams.usda.gov



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

NOP Mission: Ensure the integrity of USDA organic products in the U.S. and throughout the world.

Interested in being an organic insider, just [click here](#).

"There is much to be said for failure. It is much more interesting than success" Max Beerbohm

"If you're not making mistakes, then you're not doing anything. I'm positive that a doer makes mistakes." John Wooden

"Flexibility is the key to stability." John Wooden

"Character is more important than intelligence for success." Gilberte Beaux

From: [Thornblad, Kristin - AMS](#)
To: (b) (6), (b) (7)(C)
Subject: Notice of Closure National Organic Program complaint
Date: Thursday, February 25, 2016 7:24:00 AM
Attachments: [NoticeofClosureCompltnOPC-048-14.pdf](#)

Dear Mr. (b) (6), (b) (7)(C) —

Good morning. Please see attached a Notice of Closure letter concerning National Organic Program complaint NOPC-048-14.

Thank you. The National Organic Program appreciates your interest in organic integrity, and for bringing this matter to our attention.

Sincerely,

Kristin Thornblad

Agricultural Marketing Specialist, Compliance and Enforcement
USDA National Organic Program
1400 Independence Ave., S.W.
Room 2957-S
Washington, D.C. 20250
(202) 720-1153
(202) 205-7808 (fax)

Register for the USDA Organic Insider, the National Organic Program's email notification service, by visiting <http://bit.ly/NOPOrganicInsiderRegistration>.



1400 Independence Avenue, S.W.
Room 2646-S, STOP 0268
Washington, D.C. 20250-0268

VIA EMAIL

February 24, 2016

Mr. (b) (6), (b) (7)(C), (b) (7)(D)

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

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

Re: NOPC-048-14 and Yurman Farms

The U.S. Department of Agriculture (USDA), National Organic Program (NOP) has concluded its investigation of the complaint you filed against Yurman Farms on September 25, 2013. Your complaint alleged that Yurman Farms violated the USDA organic regulations through noncompliant weed and land management practices.

Our investigation determined that Yurman Farms is presently in compliance with the USDA organic regulations. Yurman Farms' USDA-Accredited Certifying Agent ("certifying agent") conducted on-site inspections to investigate the allegations. Thereafter, the certifying agent verified that Yurman Farms took sufficient action to demonstrate and maintain compliance with the USDA organic regulations. The complaint is hereby closed.

Thank you for bringing this matter to our attention. We appreciate your support of the NOP and the USDA.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Michael". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Matthew Michael, Director
Compliance and Enforcement Division
National Organic Program

From: [Thornblad, Kristin - AMS](#)
To: ["goaorg@centurylink.net"](mailto:goaorg@centurylink.net)
Subject: Notice of Closure NOPC-048-14 & Yurman Farms
Date: Wednesday, February 24, 2016 4:37:00 PM
Attachments: [ClosureNoticetoGOANOPC-048-14.pdf](#)

Hello Betty—

Please see attached a Notice of Closure letter concerning National Organic Program complaint NOPC-048-14.

Thank you.

Kristin Thornblad

Agricultural Marketing Specialist, Compliance and Enforcement
USDA National Organic Program
1400 Independence Ave., S.W.
Room 2957-S
Washington, D.C. 20250
(202) 720-1153
(202) 205-7808 (fax)

Register for the USDA Organic Insider, the National Organic Program's email notification service, by visiting <http://bit.ly/NOPOrganicInsiderRegistration>.



1400 Independence Avenue, SW.
Room 2646-S, STOP 0268
Washington, DC 20250-0201

VIA EMAIL

February 24, 2016

Betty Kananen
President/CEO
Global Organic Alliance
3185 Township Road 179
Bellefontaine, OH 43311
goaorg@centurylink.net

Re: NOPC-048-14 and Yurman Farms

Dear Ms. Kananen:

The U.S. Department of Agriculture (USDA), National Organic Program (NOP) is responsible for enforcing the Organic Foods Production Act of 1990, as amended, and its implementing regulations (7 CFR Part 205). All agricultural products sold, labeled, or represented as organic must comply with the USDA organic regulations. The NOP received a complaint regarding a Global Organic Alliance client. Specifically, the complaint alleged that Susan Yurman, Yurman Farms, Chester, Montana, produced certified organic crops using noncompliant weed and land management practices.

In response to our request to investigate, you conducted an unannounced on-site inspection of Yurman Farms. The inspection identified minor issues concerning weed management practices. Two subsequent inspections verified that the operation took sufficient action to address the issues. Further, your most recent annual inspection confirmed that the operation maintains compliance with the USDA organic regulations. This complaint is hereby closed. If you have any questions, please contact Kristin Thornblad at (202) 720-1153 or at Kristin.Thornblad@ams.usda.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Michael", written over a horizontal line.

Matthew Michael
Director, Compliance & Enforcement Division
National Organic Program



1400 Independence Avenue, S.W.
Room 2646-S, STOP 0268
Washington, D.C. 20250-0268

VIA EMAIL

February 24, 2016

Mr. [REDACTED]

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

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

Re: NOPC-048-14 and Yurman Farms

The U.S. Department of Agriculture (USDA), National Organic Program (NOP) has concluded its investigation of the complaint you filed against Yurman Farms on September 25, 2013. Your complaint alleged that Yurman Farms violated the USDA organic regulations through noncompliant weed and land management practices.

Our investigation determined that Yurman Farms is presently in compliance with the USDA organic regulations. Yurman Farms' USDA-Accredited Certifying Agent ("certifying agent") conducted on-site inspections to investigate the allegations. Thereafter, the certifying agent verified that Yurman Farms took sufficient action to demonstrate and maintain compliance with the USDA organic regulations. The complaint is hereby closed.

Thank you for bringing this matter to our attention. We appreciate your support of the NOP and the USDA.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Michael". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Matthew Michael, Director
Compliance and Enforcement Division
National Organic Program

weed control that caused seed drift to adjacent land. Initial NOP investigation determined that, since October 2012, Yurman Farms has been certified to the USDA organic standard for hard red spring wheat, peas and pasture by USDA-Accredited Certifying Agent ("certifying agent") Global Organic Alliance ("GOA").

In response to the complaint, GOA representatives stated to NOP staff that it previously received a similar complaint from the owner of land adjacent to Yurman Farms. GOA investigated those allegations in September 2013 through conducting an unannounced on-site inspection of Yurman Farms' production fields. The inspection identified several minor issues concerning weed management practices, including vulnerable weed buffer zones. In November 2013, GOA conducted a follow up on-site inspection, at which time the operation successfully demonstrated its compliance with the USDA organic regulations through revised and strengthened weed management practices.

GOA representatives attested to C&E Division staff that, during calendar year 2014, it would conduct an announced inspection of Yurman Farms to monitor weed management practices. In August 2014, the certifying agent conducted the unannounced inspection, at which time it determined that Yurman Farms was currently compliant with USDA organic weed and land management standards.

In July 2015, GOA verified the operation's continued compliance during its annual on-site certification renewal inspection. In February 2016, GOA representatives affirmed to C&E Division staff that Yurman Farms remains a client in good standing for USDA organic certification and has no outstanding noncompliances or other compliance concerns.

RECOMMENDATION:

This complaint is recommended for closure. In response to the complaint, the operation took action to address minor weed management issues. Notice of Closure letters will be sent to the certifying agent and complainant.

APPROVED FOR CLOSURE BY:

MM
Matthew Michael

2/24/14
Date



Agricultural
Marketing
Service

1400 Independence Avenue, SW.
Room 2646-S, STOP 0268
Washington, DC 20250-0268

Closure Memorandum

February 24, 2016

TO: Matthew Michael
Director
Compliance and Enforcement Division
National Organic Program

FROM: Kristin Thornblad
Compliance and Enforcement Division
National Organic Program

CASE NO: NOPC-048-14

SUBJECTS: Yurman Farms
Susan Yurman
Chester, Montana

CERTIFYING AGENT INVOLVED: Global Organic Alliance

COMPLAINANT:

(b) (6), (b) (7)(C), (b) (7)(D)
FOIA Exemption 7D
(b) (6), (b) (7)(C)

ALLEGED VIOLATION: Operation Yurman Farms, Chester, Montana, is producing certified organic crops using prohibited practices.

RELEVANT LAW:

7 U.S.C 6505(a)(1)(B) of the Organic Food Production Act of 1990 "no person may affix a label to, or provide other market information concerning, an agricultural product if such label or information implies, directly or indirectly, that such product is produced and handled using organic methods, except in accordance with [the NOP]."

7 C.F.R. § 205.206 Crop pest, weed, and disease management practice standard. "(a) The producer must use management practices to prevent crop pests, weed, and diseases...."

SUMMARY:

On September 25, 2013, the NOP Compliance and Enforcement ("C&E") Division received a complaint against Yurman Farms, Chester, Montana, for allegedly producing certified agricultural products using prohibited practices. Specifically, the complaint alleged that Yurman Farms engaged in noncompliant weed and land management practices, including insufficient



Global Organic Alliance, Inc.

P.O. Box 530 3185 Twp Rd 179

Bellefontaine, OH 43311-0530

Phone (937)-593-1232 Fax (937)-593-9507

Email : goaorg@centurylink.net

Web Site : www.goa-online.org

CERTIFICATION ASSESSMENT

1. Operation		Effective/Renewal Date: 9/9/14
Status: <input type="checkbox"/> New <input checked="" type="checkbox"/> Renewal	Review By: 1003	
Inspection Date: 8/2/14	Inspector: (b) (6), (b) (7)(C), (b) (7)(D)	
Name: Susan Yurman		
Business Name: Yurman Farms		
Mailing Address: PO Box 337, Chester, MT 59222		
Physical Address: 3371 1500 Rd East, Chester, MT 59222		
Phone: 406-759-5725	Cell:	Fax:
Email:		

Certified operations and contracted certified operations must apply for certification and undergo an on-site inspection annually. Failure to do so will result in the commencement of adverse actions.

2. Contract	<input type="checkbox"/> Not Applicable
Name:	
Business Name:	
Mailing Address:	
Physical Address:	
Phone:	Cell: Fax:

3. Certification/Compliance Program and Scope	
I affirm the certification decision is based on the evaluation of the documentation obtained during the certification and inspection process for the above named operation and their compliance with the regulations, standards, and requirements of the certification and/or compliance program identified below.	
<input checked="" type="checkbox"/> NOP	Scope: <input checked="" type="checkbox"/> Crops <input type="checkbox"/> Livestock <input type="checkbox"/> Processor <input type="checkbox"/> Handler <input type="checkbox"/> Wild Harvest <input type="checkbox"/> Private Label
<input type="checkbox"/> COR	Scope: <input type="checkbox"/> Crops <input type="checkbox"/> Livestock <input type="checkbox"/> Processor <input type="checkbox"/> Packaging and Labeling <input type="checkbox"/> Wild Harvest <input type="checkbox"/> Attestation <input type="checkbox"/> Transition
<input type="checkbox"/> JAS	Scope: <input type="checkbox"/> Agricultural Product PPM <input type="checkbox"/> Feed PPM <input type="checkbox"/> Livestock Products PPM <input type="checkbox"/> Processed Food PPM <input type="checkbox"/> Processed Feed PPM <input type="checkbox"/> Repacker
Trade/Equivalence Agreement Compliance:	
<input type="checkbox"/> MAFF/USDA Export Arrangement <input type="checkbox"/> US/Canada Equivalence Agreement	

4. Status of Conditions for Continued Certification	<input checked="" type="checkbox"/> None <input type="checkbox"/> Corrected
--	---

5. Minor Issues – Conditions for Continued Certification	Standard/Article/ Technical Criteria
<i>Failure to implement a corrective action to an identified minor noncompliance will result in a delay in the certification process and/or adverse action pursuant to the applicable certification program.</i>	
1.	
2.	
3.	
4.	
5.	

6. Comments or Recommendations
1.
2.

7. Field Profile			<input type="checkbox"/> Not Applicable
Status	Acres	Field(s)	
Organic	(b) (4)	(b) (4)	
T3			Date Eligible:
T2			Date Eligible:
T1			Date Eligible:
NonOrganic			

8. Production and Acreage Certified			<input type="checkbox"/> Not Applicable	
Crop	Total Acres	Projected Yield	Category	
Summer Fallow	(b) (4)	NA	<input checked="" type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic
Pasture		NA	<input checked="" type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic
			<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic
			<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic
			<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic
			<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic
			<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic
			<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic
			<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic
			<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic

9. Livestock Certified						<input checked="" type="checkbox"/> Not Applicable	
Species	Type	Head	Slaughter	Breeding	Dairy	Projected Production	
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

10. Product/Process Certified		<input checked="" type="checkbox"/> Not Applicable			
Product/Process	Projected Production	Product Composition			
		<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	<input type="checkbox"/> Made with	<input type="checkbox"/> None
		<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	<input type="checkbox"/> Made with	<input type="checkbox"/> None
		<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	<input type="checkbox"/> Made with	<input type="checkbox"/> None
		<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	<input type="checkbox"/> Made with	<input type="checkbox"/> None
		<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	<input type="checkbox"/> Made with	<input type="checkbox"/> None
		<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	<input type="checkbox"/> Made with	<input type="checkbox"/> None
		<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	<input type="checkbox"/> Made with	<input type="checkbox"/> None
		<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	<input type="checkbox"/> Made with	<input type="checkbox"/> None



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: Susan Yurman
Yurman Farms
Mailing: PO Box 337, Chester, MT 59222
Physical: 3371 1500 Rd East, Chester, MT 59222
USA

Scope: Crops

Certificate Issue Date: 9/9/14

Certificate Number(s):

100% Organic Category – National Organic Program (NOP)

Commodity Process	Program				Brand Name
	NOP	US/Canada	USDA/MAFF	JAS	
Pasture	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Organic Category

Commodity Process	Program					Brand Name
	NOP	COR	US/Canada	USDA/MAFF	JAS	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



Global Organic Alliance, Inc.

PO Box 530 3185 Township Road 179

Bellefontaine, OH 43311-0530

Phone: 937 593 1232

Fax: 937 593 9507

Email: goaorg@centurylink.net

Website: www.goa-online.org

AUG 4 - 2014

Completion of this form must be TYPED or HAND WRITTEN LEGIBLY with blue or black ink. *Comments and observations MUST be provided.* Incomplete or unsigned Inspection Reports will be returned and payment for inspection services will be held. **Do NOT RE-SUBMIT DOCUMENTS (I.E. SEED TAGS, INGREDIENT INFORMATION, MAPS, ETC.) THAT HAVE BEEN SUBMITTED.** NOTE "REVISED" OR "UPDATE" AND THE DATE ON AMENDED DOCUMENTS (I.E. FIELD HISTORIES, INPUT LOG, MAPS, INVENTORIES, ETC).

CROP INSPECTION REPORT

YEAR: 2014

GENERAL INFORMATION – The physical address must reflect the address where the operation is located and is required to appear on the certificate.

Certification: <input type="checkbox"/> New <input checked="" type="checkbox"/> Renewal	Inspection Date: 8.2.14	Inspector: (b) (6), (b) (7)(C), (b) (7)(D)
Type of Inspection: <input checked="" type="checkbox"/> Initial/Annual <input type="checkbox"/> Additional/Follow-Up <input type="checkbox"/> Unannounced <input type="checkbox"/> Investigation <input type="checkbox"/> Other:		
Certification Program: <input checked="" type="checkbox"/> NOP <input type="checkbox"/> COR <input type="checkbox"/> COR Transition (at least 12 months prior to certification)		
Compliance Program: COR Attestation <input type="checkbox"/> US/Canada Equivalence		
Owner/Authorized Representative: Susan Yurman		
Business Name: Yurman Farms		
Mailing Address: PO Box 337		
City: Chester	State/Province: MT	Zip/Postal Code: 59522
Physical Address: 3371 1500 Rd E,		
City: Chester	State/Province: MT	Zip/Postal Code: 59522
Phone: 406 759 5725	Cell:	Fax:
Email:		
Does the operation have the standard(s) applicable to the certification? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, list missing documents?		

Note: Additional certification and inspection documents are required for the US/Canada Equivalence Arrangement. If you **DID NOT** receive completed Plans CONTACT the GOA office before proceeding.

CONTRACT INFORMATION

☒ Not Applicable

Report the contact information for an operation that produces a crop or edible livestock product or raises livestock for an operation that is certified by GOA.

Contact:		
Business Name:		
Physical Address:		
City:	State/Province:	Zip/Postal Code:
Phone:	Cell:	Fax:
Email:		

1. CERTIFICATION BACKGROUND

☐ Not Applicable

	Yes	No	Comments/Observations/Noncompliance(s)
1.1 Is this a dual inspection or is the operation dual certified?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	If yes, name of other agency, scope of certification and products certified.
1.2 Is the operation transferring from another agency?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Name of agency and operations plan for surrendering certification.
1.3 Is/Was certification denied, suspended, cancelled, or revoked?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Name of agency, year, and adverse action. ATTACH notification.

2. PREVIOUS YEAR NONCOMPLIANCE(S)

☒ Not Applicable

Applicable	
2.1	Identify the condition and describe corrective action taken. ATTACH evidence of compliance documentation.
2.2	Identify the condition that has not been brought into compliance and reason for not fulfilling the requirement.

3. OPERATION PROFILE Acreage reported must equal the acreage reported in the current year field histories. Field histories for transitional fields must include the year of transition and date of the last prohibited input application. When there is a discrepancy in the last prohibited input date and the transition period is shortened, details and documentation must be attached to support the change.

3.1	Production: <input checked="" type="checkbox"/> Organic <input type="checkbox"/> Split Operation with Parallel Production <input type="checkbox"/> Split Operation – NO parallel production
3.2	Total Organic acres: (b) (4)
3.3	T ₃ Acres: 3.3.1 Field ID's: 3.3.2 Last Prohibited Input Date:
3.4	T ₂ Acres: 3.4.1 Field ID's: 3.4.2 Last Prohibited Input Date:
3.5	T ₁ Acres: 3.5.1 Field ID's: 3.5.2 Last Prohibited Input Date:
3.6	Organic Livestock: <input type="checkbox"/> Dairy <input type="checkbox"/> Layers <input type="checkbox"/> Broilers <input type="checkbox"/> Beef <input type="checkbox"/> Other,
3.7	NonOrganic Livestock: <input type="checkbox"/> Dairy <input type="checkbox"/> Layers <input type="checkbox"/> Broilers <input type="checkbox"/> Beef <input type="checkbox"/> Swine <input type="checkbox"/> Other,

4. ORGANIC CROP PROFILE List Specific Crop(s) – Hard Red Winter Wheat not just Wheat or Winter Wheat; Yellow Corn or Corn Silage Not just Corn Include pasture, fallow, outdoor access areas for poultry, green manure, etc. Field id's and estimated yields must be reported on the Inspection Affidavit. Do NOT list transitional or nonorganic crops in this section.

Summer Fallow (hoping to seed sainfoin in spring 2015)	

5. ORGANIC PLAN VERIFICATION and INSPECTION

	Yes	No	Comments/Observations/Noncompliance(s)
6.1 Were you permitted access to all organic production and handling areas and audit trail, including nonorganic?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	If no, what areas were you denied?
5.2 Were all people knowledgeable about the practices and record keeping by the operation present?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Identify the people present and responsibilities.
5.3 Does the Plan accurately describe the practices and activities and input applications?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Identify inaccuracies and discrepancies or inputs and ATTACH Labels.
5.4 Are field histories and field, pasture, and site/facility maps accurate?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Identify changes and attach updated histories and maps. The entire farm, except for (b) (4) ac, was leased to (b) (6)
Are buffer locations and adjoining land use accurate on field maps?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Identify changes and attach updated maps.
5.5 Is land being added? (Attach Prior Land Use Statement with current year and previous 3-year field histories and field map)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Identify the field id, previous land owner/manager, and date the land came under the operation's management?
5.6 Describe how the effectiveness of the Plan is monitored and the frequency it is monitored. The applicant said that she updates the OSP if field crops change			
5.7 Provide the inspection itinerary and identify the fields, facilities, offices, etc. visited (organic and nonorganic)? Arrived at farm- Inspected the (b) (4) ac requested for certification (including the bins that are currently storing peas and kamut)-conducted audit/general paperwork			

6. GENERAL

	Yes	No	Comments/Observations/Noncompliance(s)
6.1 Were crops requested for certification planted?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	List crops not planted. Flax was originally planned but field (b) (4) is now in summer fallow (planned for sainfoin in 2015)
6.2 Was a farm site or field rotated in and out of organic production?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	List the site, field id, acreage and dates.
6.3 Is there evidence of prohibited input applications or use? (i.e. spot-spraying, treated seed, etc.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Identify material, location used and identify affected area(s) on field map.

6. GENERAL			
	Is there evidence of chemical trespass/drift to organic fields/crops?	<input type="checkbox"/>	<input checked="" type="checkbox"/> Identify the field and location of the affected area(s) on the field map. Field(s): Details:
6.4	Were crops requested for certification harvested prior to inspection?	<input type="checkbox"/>	<input checked="" type="checkbox"/> List the crop and measures taken to verify production.
6.5	Are any crops produced hydroponically or aeroponically?	<input type="checkbox"/>	<input checked="" type="checkbox"/> Identify the production method and crop(s).
6.6	Was treated lumber used in a new installation or for replacement purposes in contact with soil?	<input type="checkbox"/>	<input checked="" type="checkbox"/> Identify location/details of use and affected crop.
6.7	Observations/Comments: The applicant has leased out her entire farm to (b) (6)		

7. SEEDS, SEEDLINGS, PERENNIAL PLANTING STOCK				<input type="checkbox"/> Not Applicable
		Yes	No	Comments/Observations/Noncompliance(s)
7.1	Did the operation use its own seed or leftover seed? (This seed does not need to be listed again below.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Identify own seed. Identify leftover seed/year
7.2	Is seed planted to produce an organic crop?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Identify the organic seed. Identify the nonorganic seed/seedling.
7.3	Was a green manure or cover crop planted since the last inspection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	List the seed and status (organic or nonorganic)
7.4	Is seed inoculated or coated?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	List and attach ingredient labels and nonGMO verification.
7.5	Were annual seedling(s) planted to produce an organic crop or in a certified field/bed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	List seedlings grown. List purchased seedling and source.
7.6	Is a crop from perennial planting stock (new or established) being requested for certification?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Identify planting stock and date organic management began.
7.7	Observations/Comments: The applicant leased out her farm and is only keeping 101 ac under her certificate. The applicant harvested peas from field 101 in 2013 and is summer fallowing the field in 2014.			

8. CROP MANAGEMENT PROGRAM				
		Yes	No	Comments/Observations/Noncompliance(s)
8.1	Were micronutrients applied to correct soil deficiencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Identify the deficiency and micronutrient applied and ATTACH test results.
8.2	List soil amendments/fertility inputs applied since the last inspection.			
8.3	Is water used in the production of crops or pasture?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Identify the field id, crop, and use.
	List water source(s) and potential contaminants:			
	List water treatments or materials:			
8.4	Is an inoculant or preservative applied to a forage/silage crop?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Identify the crop and material applied.
8.5	Describe the soil-building program, including crop rotation(s): Wheat → Summer Fallow- Kamut → Peas			
8.6	Describe production practices to maintain or improve the natural resources, including soil and water quality, and prevent contamination from heavy metals, excess phosphorus, and pathogenic bacteria? The applicant leaves grass buffers around the fields in addition to maintaining a short window between plowing and planting.			
8.7	Observations/Comments: The applicant is only farming 101 acres in 2014 (with the balance in perennial grass). She said that she attempts to keep a good amount of litter on top of the ground to help prevent soil wind erosion.			

9. MANURE/COMPOST				<input checked="" type="checkbox"/> Not Applicable
		Yes	No	Comments/Observations/Noncompliance(s)
9.1	Source: <input type="checkbox"/> On-Farm <input type="checkbox"/> Off-Farm	Identify off-farm source(s):		

9. MANURE/COMPOST				<input checked="" type="checkbox"/> Not Applicable
Type: <input type="checkbox"/> Raw Manure <input type="checkbox"/> Compost <input type="checkbox"/> Dried <input type="checkbox"/> Other,				
COR: Describe efforts to ensure manure/compost is not from caged animal operations, animals kept in the dark or fed animal feed containing GMO's or a GMO derivative and documentation maintained.				
9.2	Describe manure management practices and soil conditions to prevent contamination of crops, soil, and water.			
9.3	Do records verify raw manure applications were made at least 90 days prior to harvest of a crop whose edible portion does not come into contact with the soil or 120 days prior to harvest of a crop whose edible portion does come into contact with the soil?	<input type="checkbox"/>	<input type="checkbox"/>	Identify crop, application/harvest dates, and current crop location.
COMPOST				<input checked="" type="checkbox"/> Not Applicable – no composting activities
9.4	Describe composting facilities and composting process.			
	NOP: Do records verify the process (C:N ration, temperature and duration, and when applicable turns) are compliant.			
9.5	List materials and inputs used in the composting process.			
9.6	Describe management practices to prevent contamination of crops, soil, and water.			
9.7	Observations/Comments:			

10. PEST, WEED, and DISEASE CONTROL				<input type="checkbox"/> Not Applicable
		Yes	No	Comments/Observations/Noncompliance(s)
10.1	Are pest, weed, and disease controlled through rotation, sanitation, resistant species and varieties, and natural methods?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Describe Program.
10.2	Do crops suffer from weed, insect, or disease infestation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Identify the crop, field id, type of pressure.
	Are materials applied to prevent/control pest, weed or disease?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Identify the material and reason for use.
10.3	Do records verify applications were in compliance with any annotations or restrictions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Identify the material and reason for use.
10.4	Is mulch used to suppress weeds?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Identify type of mulch, crop, location and removal.
10.5	Observations/Comments: The applicant's field did not appear to be especially weed heavy. It had been tilled once after the peas were harvested and then again twice in the summer of 2014.			

11. ADJOINING LAND USE/BUFFER				<input type="checkbox"/> Not Applicable
		Yes	No	Comments/Observations/Noncompliance(s)
11.1	NOP: Do organic fields have adequate buffers to prevent contamination?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	List field and location needing buffers and adjoining land use.
	COR: Do organic fields have buffers at least 8 meters wide?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	List field and location needing buffers and adjoining land use.
11.2	Describe the buffer management and monitoring practices (i.e. planted, mowed, grazed, etc.) and the harvest, storage, and disposition of the buffer crop. N/A			
11.3	Describe buffer monitoring practices and frequency. Visual observation: all buffers can be viewed from the roads.			
11.4	Observations/Comments: The applicants fields are bordered by organic fields on the East and West sides and roads with 'no spray signs' on the north and south sides.			

12. SPLIT or PARALLEL PRODUCTION				<input checked="" type="checkbox"/> Not Applicable
	Yes	No	Comments/Observations/Noncompliance(s)	

12. SPLIT or PARALLEL PRODUCTION				<input checked="" type="checkbox"/> Not Applicable
12.1	Is the organic operation physically and operationally separate from the nonorganic operation?	<input type="checkbox"/>	<input type="checkbox"/>	Identify locations and describe separation. N/A
COR: Describe the transition plan and timeframe/progress for bringing all land under organic management.				
12.2	Are organic crops visually distinguishable from nonorganic crops?	<input type="checkbox"/>	<input type="checkbox"/>	List the visually indistinguishable crops.
12.3	Describe practices and physical barriers to prevent contamination and commingling of organic crops.			
12.4	Where and how are non-organic inputs stored? (i.e. fertilizers, pest controls, etc.)			
12.5	Do records track organic and nonorganic CROPS from seed through sale and verify segregation?	<input type="checkbox"/>	<input type="checkbox"/>	Describe.
Describe the identification system for distinguishing organic and nonorganic crops.				
12.6	Observations/Comments: N/A no split or parallel production			

13. EQUIPMENT (Production and Post-Harvest Handling)				
		Yes	No	Comments/Observations/Noncompliance(s)
13.1	Is equipment used by the operation used for organic and non-organic crop production or handling?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	List equipment used for both production systems.
13.2	Are custom operators or mobile handling units brought in for production or handling of organic crops?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Identify equipment and name/address of the custom operator.
13.3	Describe clean-out procedures. Identify equipment, materials used in the process, and purge amounts and disposition. N/A all equipment associated with the applicant's 100 acres of current production is owned by the applicant.			
13.4	Observations/Comments:			

14. WILD CROP HARVESTING					<input checked="" type="checkbox"/> Not Applicable
A Wild Harvest Plan must be completed for wild harvested crops requested for certification. If a Plan has not been completed contact the GOA Office. Maps must identify the specific harvesting location(s) for each wild crop.					
		Yes	No	Comments/Observations/Noncompliance(s)	
14.1	Were all harvesting areas inspected?	<input type="checkbox"/>	<input type="checkbox"/>		
14.2	Do harvesting areas have defined, visually identifiable boundaries?	<input type="checkbox"/>	<input type="checkbox"/>	Describe.	
14.3	Do maps accurately identify the specific harvesting location(s), buffers, and adjoining land use?	<input type="checkbox"/>	<input type="checkbox"/>		
14.4	Do harvesting practices promote the growth and production of the wild crop and prevent adverse impact on the biological diversity?	<input type="checkbox"/>	<input type="checkbox"/>	Describe.	
14.5	Observations/Comments:				

15. POST-HARVEST HANDLING					<input checked="" type="checkbox"/> Not Applicable
A Handling Plan must be completed by operations that wash, clean, grade, repackage, etc. organic crops. No Plan – CONTACT office.					
		Yes	No	Comments/Observations/Noncompliance(s)	
15.1	Location where product is handled. <input type="checkbox"/> On-Farm (only) <input type="checkbox"/> Off-Farm (only) <input type="checkbox"/> On-Farm and Off-Farm				
	Ownership of Product: <input type="checkbox"/> Retained <input type="checkbox"/> Transferred/Sold <input type="checkbox"/> Other,				
15.2	Is water in contact with organic product?	<input type="checkbox"/>	<input type="checkbox"/>	Describe use.	
	Identify water source(s).				
15.3	Is a substance (i.e. chlorine, etc.) added to water in contact with organic product?	<input type="checkbox"/>	<input type="checkbox"/>	List materials and attach ingredient information.	

15. POST-HARVEST HANDLING		<input checked="" type="checkbox"/> Not Applicable	
A Handling Plan must be completed by operations that wash, clean, grade, repackage, etc. organic crops. No Plan – CONTACT office.			
	If chlorine is used, describe how water is monitored to ensure residual chlorine levels do not exceed maximum levels in the Safe Drinking Water Act.		
15.4	Describe process and provide flow chart of process. Attach facility map identifying equipment and storage locations.		
	Are materials/processing aids used in the process?	<input type="checkbox"/>	<input type="checkbox"/> List materials and attach ingredient information.
15.5	Describe management practice and physical barriers to protect the organic integrity.		
15.6	Describe sanitation program, list materials used to clean equipment and facility. Attach ingredient labels.		
15.7	Describe pest management program, list materials used. Attach facility map showing locations of traps/baits, etc.		
15.8	Type of Packaging: <input type="checkbox"/> Retail <input type="checkbox"/> Non-Retail <input type="checkbox"/> Bulk <input type="checkbox"/> Other,		
15.9	Observations/Comments:		

16. STORAGE		Attach organic certification documents for off-farm facilities when applicable (i.e. grain banks).		<input type="checkbox"/> Not Applicable
Applicable		Yes	No	Comments/Observations/Noncompliance(s)
16.1	Location of storage facilities: <input checked="" type="checkbox"/> On Farm <input type="checkbox"/> Off Farm: Location and type:			
16.2	Describe monitoring activities and frequency for storage facilities. Applicant cleans the bins immediately before the new crop goes in. The bins are cleaned out immediately after the crop is taken to market.			
16.3	Are storage facilities used for organic and nonorganic products?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Describe segregation practices.
16.4	Are storage facilities numbered and/or labeled "organic" or "O"?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
16.5	Describe cleaning procedures and frequency. The applicant cleans the bins 2x per year depending on how much grain will be stored.			
16.6	Describe the pest control practices and materials used in and around storage facilities. The applicant mows around the bins to decrease habitat for rodents			
16.7	Observations/Comments: Mice were in bin (b) (4) at time of inspection.			

17. TRANSPORTATION		<input type="checkbox"/> Not Applicable		
		Yes	No	Comments/Observations/Noncompliance(s)
17.1	Describe transportation arrangements. The applicant has a pre-written form that she signs with the hauler (b) (6)			
17.2	Describe how the crop is physically segregated to protect the organic integrity? The truck used to haul the grain is cleaned before organic and only hauls one product at a time.			
17.3	Describe inspection and cleaning procedures for transportation units for crops. The applicant cleans out the trucks with a broom before hauling each organic load.			
17.4	Observations/Comments: Good, consistent cleanout affidavits from hauler.			

18. AUDIT TRAIL		Yes	No	N/A	Comments/Observations/Noncompliance(s)
18.1	Is audit trail documentation maintained a minimum of 5 years	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
18.2	Field, pasture, outdoor access area production/activity records	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
18.3	Records for sourcing organic seed and/or planting stock	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	AC Lillian was the only purchased seed in 2013- Purchased from (b) (6) -> Non-treated / non gmo statement
18.4	Tags/labels or invoices for purchased seed, seedlings, and planting stock	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
18.5	Certification documents for organic seeds and seedlings	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The applicant saved the seed used in 2013 from 2012 crop (certified by GOA)

18. AUDIT TRAIL				
18.6	Untreated/non-GMO statements for non-organic seed, planting stock and inoculants	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18.7	Ingredient information for inputs	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
18.8	Off-farm manure and/or composting statements	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
18.9	Clean equipment, storage, and transportation/container records	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18.10	Buffer management documentation (harvest, purge, storage, sale/feeding)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18.11	Harvest records for organic and/or nonorganic crop(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18.12	Storage/running inventory records for organic and/or nonorganic crop(s), feed, and/or livestock product(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18.13	Transportation records – operation name/address, product name, organic status, and lot number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18.14	Sales records for organic (with lot numbers/id's) and nonorganic crops and/or products	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18.15	Verification of organic certification or attestation compliance for off-farm handling	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
18.16	Complaint Register	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18.17	Is Audit Trail documentation easily understood and readily accessible?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18.18	Describe the lot numbering system for each crop commodity. Site (b) (4)			
18.19	<p>Details and calculations of the on-site audit(s) of organic crop produced to the amount of crop sold. Applicant planted (b) (4) ac of spring wheat in 2013: (b) (4) bu were sold --> (b) (4) bu/ac The applicant has not sold either the Kamut nor the Peas: (b) (4) bu of peas are currently in storage. (b) (4) bu of Kamut are currently in storage.</p> <p>Audit of product in and out of post-harvest handling facility. <input checked="" type="checkbox"/> Not applicable – facility not used.</p>			
18.20	Observations/Comments: Slightly higher yields from the organic spring wheat harvested in 2013--> Reasonable production.			

19. PACKAGING and LABELING				<input checked="" type="checkbox"/> Not Applicable
	Yes	No	Comments/Observations/Noncompliance(s)	
19.1	Type of Packaging: <input type="checkbox"/> Retail <input type="checkbox"/> Non-retail <input type="checkbox"/> Bulk <input type="checkbox"/> Other, Type of Labeling: <input type="checkbox"/> None <input type="checkbox"/> Retail <input type="checkbox"/> Non-retail/Shipping <input type="checkbox"/> Other,			
19.2	Are all labels displaying the organic seal or making organic claims submitted?	<input type="checkbox"/>	<input type="checkbox"/>	Attach missing labels and identify which labels are retail and non-retail.
19.3	Observations/Comments:			

29. INSPECTION SUMMARY		
NOP/COR Standard	Noncompliance/Recommendation	Inspection Report Section
	No Issues of concern	

The information contained in this report is confidential between the inspector, the inspected party, and Global Organic Alliance (GOA), and its accreditors. This report does not constitute certification or consultation, nor shall it be used for promotional purposes. All observations and compliance assessments made are based on NOP or COR standards and result from observations, review of documents, and the operator interview.

Inspector Signature/Name (b) (6), (b) (7)(C), (b) (7)(D)

Date: 8.2.14

☒ Electronic Signature on File

Attachment(s) – Document id and Name. Visually identify the corresponding document and put in order as listed.

Exit interview

Inspection affirmation

Requests for information document

Storage Bin Map

US/Canada amended agreement



Global Organic Alliance, Inc.

PO Box 530 3185 Township Road 179

Bellefontaine, OH 43311-0530

Phone: 937 593 1232 Fax 937 593 9507

Email: goaorg@centurylink.net Website: www.goa-online.org

EXIT INTERVIEW

Additional documents or issues may be identified during the post inspection certification decision-making process which may require additional submissions or clarification. This form does not imply certification and shall not be used for promotional or marketing purposes. **Please use additional paper when needed.

Authorized Representative: <u>Susan Yurman</u>		Business Name: <u>Yurman Farms</u>	
Scope(s): <input checked="" type="checkbox"/> Crop <input type="checkbox"/> Livestock <input type="checkbox"/> Handler <input type="checkbox"/> Processor <input type="checkbox"/> Wild Crop		Inspector Name:	
Certification Program: <input checked="" type="checkbox"/> NOP <input checked="" type="checkbox"/> COR		Trade Agreement: <input type="checkbox"/> USDA/MAFF <input type="checkbox"/> US/Canada	
Inspection Type: <input checked="" type="checkbox"/> Initial/Annual <input type="checkbox"/> Additional/Follow-Up <input type="checkbox"/> Unannounced <input type="checkbox"/> Investigation <input type="checkbox"/> Other:			
Inspection Date: <u>8.2.14</u>		Arrival Time: <u>8:00 AM</u>	
		Departure Time:	
Individual(s) present during the exit interview: <u>Susan Yurman</u>			

Additional Information To Be Submitted To The GOA Office BY The Operation

1.	<u>None</u>
2.	
3.	
4.	
5.	

Observation/ Issue of Concern	Regulation
1. <u>No issues of concern</u>	
2.	
3.	
4.	
5.	

Applicant/Certified Operation

I affirm that I am the authorized representative of the above named operation and confirm that the observations and information gathered during the on-site inspection and reported above have been discussed with me and are accurate and complete. I agree to additional announced and unannounced inspections and/or sampling/testing to verify compliance with the organic certification program(s) identified above. I have been provided receipts for samples taken by the inspector and confirm that the inspector has not been charged for the samples taken.

(b) (6)

Date: 8-20-14

Signature of applicant or authorized representative (b) (6)

Inspector

I affirm that to the best of my knowledge, the information reported above is based on my observations and documentation gathered, and the information provided to me during the on-site inspection and is accurate and complete. The reported findings above have been discussed with the authorized representative of the operation.

(b) (6)

Date: 8.2.14

Signature of GOA Inspector



Global Organic Alliance, Inc.

PO Box 530

3185 Township Road 179

Bellefontaine, OH 43311-0530

Phone: 937 593 1232

Fax: 937 593 9507

Email: goaorg@centurylink.net

Website: www.goa-online.org

INSPECTION AFFIDAVIT

Certification Year:

Only crops and/or products reported on this form will be considered for certification.

Authorized Representative: <u>Susan Yurman</u>	Business Name: <u>Yurman Farms</u>
Inspector Name: <u>(b) (6), (b) (7)(C), (b) (7)(D)</u>	Inspection Date: <u>August 2, 2014</u>

In my capacity as the authorized representative of the above named operation, I authorize Global Organic Alliance to release certification and inspection documentation required for export.

☒ Yes Initials of authorized representative

(b) (6)

Key: NOP =National Organic Program JAS=Japanese Agricultural Standard COR=Canadian Organic Standard

☐ Not Applicable

Product Inventory

Crop/Product	Year	Quantity	Location	Certification Program			Compliance Program	
				NOP	COR	JAS	US Canada	USDA MAFF
<u>Kamut Khorasan</u>	<u>2013</u>	<u>(b) (4)</u>	<u>(b) (4)</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<u>Peas</u>	<u>2013</u>	<u>(b) (4)</u>	<u>(b) (4)</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Operations previously certified by a USDA accredited certifying agent must provide verification of certification for organic crop/product in storage before it may be recognized by GOA.

☐ Not Applicable

Crop(s) requested for certification. Estimated yields must be reported for crops.

The Unit of Measure (UoM) must be provided with the estimated yield. PIC's will not be generated for crops an estimated yield is not reported.

Crop/Product	Field ID's	Estimated Yield	Certification Program			Compliance Program	
			NOP	COR	JAS	US Canada	USDA MAFF
<u>None</u>	<u>(b) (4)</u>	<u>//</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<u>25ac Summer Fallow</u>	<u>(b) (4)</u>	<u>//</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Additional certification and inspection paperwork is required for COR and JAS certification programs and compliance verification to US/Canada Equivalence, and the USDA/MAFF Agreement. Ensure the field id is included for all parcels of pasture, outdoor access areas, fallow and green manure parcels, etc.

Livestock requested for certification.

Applicable

☒ Not

Species		Certification	Head	Annual Production	Remarks
Dairy	Cows	<input type="checkbox"/> Dairy Only		Lbs milk/year	
	Cows	<input type="checkbox"/> Dairy <input type="checkbox"/> Meat			
	Replacement Heifers	<input type="checkbox"/> Dairy <input type="checkbox"/> Meat			
	Replacement Calves	<input type="checkbox"/> Dairy <input type="checkbox"/> Meat			
	Dairy Feeders	<input type="checkbox"/> Meat			
		<input type="checkbox"/> Dairy <input type="checkbox"/> Meat			
Poultry	Layers	<input type="checkbox"/> Eggs Only		Doz eggs/year	
	Layers	<input type="checkbox"/> Eggs <input type="checkbox"/> Meat			
	Broilers	<input type="checkbox"/> Meat			
	Turkeys	<input type="checkbox"/> Meat			
Beef	Cows	<input type="checkbox"/> Breeding Only			
	Cows	<input type="checkbox"/> Breed <input type="checkbox"/> Meat			
	Heifers	<input type="checkbox"/> Breed <input type="checkbox"/> Meat			
	Calves	<input type="checkbox"/> Breed <input type="checkbox"/> Meat			
		<input type="checkbox"/> Breed <input type="checkbox"/> Meat			
Other, Identify		<input type="checkbox"/> Breed <input type="checkbox"/> Meat			
		<input type="checkbox"/> Breed <input type="checkbox"/> Meat			
		<input type="checkbox"/> Breed <input type="checkbox"/> Meat			
		<input type="checkbox"/> Breed <input type="checkbox"/> Meat			
		<input type="checkbox"/> Breed <input type="checkbox"/> Meat			

Finished Product/Service Provided

Unit of Measure (Units) – bu, tote, gallon, cases, etc.

☒ Not Applicable

Product/Service	Brand Name	Packaging		Production	Certification Program			Compliance Program	
		Retail	Nonretail		NOP	COR	JAS	US CAN	USDA MAFF
		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

I/we Susan Yurman hereby certify that the preceding statements, field histories, and information given are true and accurate to the best of our knowledge. I/we agree to abide by the applicable certification and/or compliance programs requirements and standards. I/we acknowledge that GOA shall be notified immediately, in writing, of any changes in the operation, including but not limited to: adding purchased/leased land, adding production lines, and drift or other contamination issues that may affect compliance and that an additional inspection may be required at the expense of the operation. I/we also understand that I/we shall be responsible for implementing corrective actions to identified compliance issues and the operation may be subject to additional announced or unannounced on-site inspection visits and/or sampling for residue testing. I/we agree to pay royalty fees for organic product(s) sold or service(s) provided that are certified by GOA.

Member Signature 
Inspector Signature

Print Name: F Susan Yurman
Date: 8-2-14

Land Description of Bin Site for Yurman Farms North

(b) (4)





Global Organic Alliance, Inc.

PO Box 530

3185 Township Road 179

Bellefontaine, OH 43311-0530

Phone: 937 593 1232

Fax: 937 593 9507

Email: goaorg@centurylink.net

Website: www.goa-online.org

US - CANADA EQUIVALENCE ARRANGEMENT

This form must be completed and returned to the GOA office to evaluate compliance of raw or processed agricultural product to the US/Canada Equivalency Arrangement. GOA will issue a Certificate of Compliance for product that is compliant with the terms of the arrangement. Products may not be labeled or marketed as '100% Organic'.

NOP Certified Operations Complete Sections 1, 2, 3, 5, 6, and 7 as applicable to the operation.

- Agricultural products to be exported to Canada shall not have been from fields/parcels treated with sodium (Chilean) nitrate.
- Agricultural products produced by hydroponic or aeroponic shall not be sold or marketed in Canada as organic.
- Livestock products must be derived from animals (with the exception of ruminants) produced according to stocking rates set out in CAN/CGSB-32.210-2006.

COR Certified Operations Complete Sections 1, 2, 4, 5, 6, and 7 as applicable to the operation.

- Livestock products that will be sold or marketed as organic in the US may not be derived from animals treated with antibiotics.

Section 1: Operation Data

Equivalence: ☒ Canada ☐ US Date: 4/14/2014

Authorized Representative: Susan Yurman

Business Name: Yurman Farms

Mailing Address: PO Box 337 Chester MT 59222

Physical Address: 3371 1500 Road East Chester MT 59222

Phone: 406-759-5725

Fax:

Cell:

Compliance Verification: ☒ Crop ☐ Livestock ☐ Handler ☐ Processor

Section 2: Agricultural Product(s) (i.e. crop, livestock, processed product) Requested for Equivalence

Pasture

Flax

Summer fallow

(b) (6)

☐ NOT APPLICABLE

Section 3: Completed by NOP Operations

Crops - ☐ Not requested for equivalence.

2.1 Were crops requested for equivalence from fields treated with Chilean (sodium) nitrate? ☐ Yes ☒ No

If yes, list field/parcel id, acreage, and crop in the table below. (Use additional paper when necessary.)

Field/Parcel ID	Acres	Crop
1	(b) (4)	pasture
2	(b) (4)	pasture
3	(b) (4)	flax

2.2 List crops produced by hydroponic or aeroponic methods. ☒ None

☐ NOT

2.3 Livestock Stocking Rates

☒ NOT

APPLICABLE

POULTRY SPACE REQUIREMENTS

APPLICABLE

PASTURE SIZE - PROVIDE THE NUMBER OF ANIMALS/TOTAL AMOUNT OF LAND IN ROTATION.

Layers = birds/m²

Broilers/Turkeys = kg/m²

Layers (number):

Broilers (number):

Max Total Live Weight:



CERTIFICATION FILE ORDER

ORDER OF DOCUMENTS IN FILES TO THE CERTIFICATION REVIEW STAFF

- Number 1: **INSPECTION REPORT**
- Number 2: **EXIT INTERVIEW**
- Number 3: **INSPECTION AFFIDAVIT**
- Number 4: **ADDENDUM AND OR ATTACHMENTS *from Inspector*.**
- COORDINATOR INSPECTOR PICK-UP LETTER AND DOCUMENTS
- Number 5: **PREVIOUS YEAR ASSESSMENT** (when applicable)
- Number 6: **PLAN AND OPERATION PRODUCT PROFILE**
- | | | |
|-------------------------------|----|--|
| 6A: FIELD HISTORIES | OR | PRODUCT/PROCESS FLOW CHART/DESCRIPTION |
| 6B: FIELD/PASTURE MAPS | OR | FACILITY MAP (equipment and storage locations) |
| 6C: SITE/STORAGE FACILITY MAP | OR | PEST MANAGEMENT MAP (locations of traps/lures, etc.) |
- Number 7: **PRIOR LAND USE STATEMENT**
- | | | |
|--------------------------------|----|----------------------|
| 7A: THREE YEAR FIELD HISTORIES | OR | PEST MANAGEMENT PLAN |
| 7B: FIELD/PASTURE MAP | OR | SANITATION PLAN |
| | | HAACP/QUALITY MANUAL |
- Number 8: **SEEDS**
- 8A: SEED REPORTING/SEARCH AND/OR SPECIALTY CROP SUPPLEMENT
 - 8B: SEED TAGS/LABELS or INVOICE PROVIDING TYPE and VARIETY
 - 8C: UNTREATED/NON-GMO VERIFICATION FOR SEED and NON-GMO VERIFICATION FOR INOCULANT
 - 8D: VERIFICATION OF ORGANIC CERTIFICATION FOR ORGANIC SEEDS
- Number 9: **INPUT LOG** (followed by the Input Log – Transition and labels, seed, and manure docs, when applicable)
- 9A: INPUT LABELS – review prior to copying and obtain additional information/clarification when needed.
 - 9B: OFF-FARM MANURE/COMPOST STATEMENT
 - 9C: COMPOST DOCUMENTATION – on-farm records
- Number 10: **ANIMAL INVENTORY AND LIVESTOCK PURCHASES**
- 10A: ANIMAL INVENTORY
 - 10B: INVOICE FOR LIVESTOCK PURCHASES (show date, type and number of livestock purchased)
 - 10C: VERIFICATION OF ORGANIC CERTIFICATION FOR ORGANIC LIVESTOCK
- Number 11: **FEED RATION SHEET**
- 11A: DMD/DMI CALCULATIONS FOR RUMINANT PRODUCTION GROUPS
 - 11B: VERIFICATION OF ORGANIC CERTIFICATION FOR FEED PURCHASES and HANDLERS
 - 11C: FEED SUPPLEMENT/ADDITIVES LABELS WITH INGREDIENT INFORMATION AND VERIFICATION OF ORGANIC CERTIFICATION FOR ORGANIC AG INGREDIENTS
- Number 12: **MULTI-INGREDIENT PRODUCTS** (where applicable)
- 12A: PRODUCT COMPOSITION SHEETS
 - 12B: PRODUCT AND INGREDIENT SUPPLIER LIST
 - 12C: ORGANIC INGREDIENT ORGANIC CERTIFICATION DOCUMENTATION
 - 12D: NONORGANIC INGREDIENT INFORMATION AND COMPLIANCE STATEMENT
- Number 13: **ORGANIC CERTIFICATION/ATTESTATION DOCUMENTS FOR CONTRACTED SERVICES –**
- NOP – SLAUGHTER, CLEANING/BAGGING GRAIN OR SEED, POST-HARVEST HANDLING
 - COR - ATTESTATION OF SLAUGHTER AND HANDLING OPERATIONS IS VOLUNTARY; CERT DOCS FOR PACKAGING AND LABELING OPERATIONS IS REQUIRED
- Number 14: **RETAIL and NON-RETAIL LABELS, EXPORT LABELS**
- Number 15: **AUDIT TRAIL DOCUMENTS and MISC** (noncompliance issues from previous certifier, soil/water test, etc.)
- Number 16: **US/CANADA PLAN AND INSPECTION REPORT**

Date Copied:	5/12
Initials:	(b) (6)
Date Copied:	2/4
Initials:	(b) (6)



Global Organic Alliance, Inc.

P.O. Box 530 3185 Twp Rd 179

Bellefontaine, OH 43311-0530

Phone (937)-593-1232 Fax (937)-593-9507

Email : goaorg@centurylink.net

Web Site : www.goa-online.org

CERTIFICATION ASSESSMENT

1. Operation		Effective/Renewal Date: 9/24/13
Status: <input type="checkbox"/> New <input checked="" type="checkbox"/> Renewal	Review By: 1003	
Inspection Date: 7/8/13	Inspector: (b) (6), (b) (7)(C), (b) (7)(D)	
Name: Susan Yurman		
Business Name: Yurman Farms		
Mailing Address: PO Box 337, Chester, MT 59522		
Physical Address: 3371 1500 Rd East, Chester, MT 59522		
Phone: 406-759-5725	Cell:	Fax:
Email:		

Certified operations and contracted certified operations must apply for certification and undergo an on-site inspection annually. Failure to do so will result in the commencement of adverse actions.

2. Contract		<input type="checkbox"/> Not Applicable
Name:		
Business Name:		
Mailing Address:		
Physical Address:		
Phone:	Cell:	Fax:

3. Certification/Compliance Program and Scope	
I affirm the certification decision is based on the evaluation of the documentation obtained during the certification and inspection process for the above named operation and their compliance with the regulations, standards, and requirements of the certification and/or compliance program identified below.	
<input checked="" type="checkbox"/> NOP	Scope: <input checked="" type="checkbox"/> Crops <input type="checkbox"/> Livestock <input type="checkbox"/> Processor <input type="checkbox"/> Handler <input type="checkbox"/> Wild Harvest <input type="checkbox"/> Private Label
<input type="checkbox"/> COR	Scope: <input type="checkbox"/> Crops <input type="checkbox"/> Livestock <input type="checkbox"/> Processor <input type="checkbox"/> Packaging and Labeling <input type="checkbox"/> Wild Harvest <input type="checkbox"/> Attestation <input type="checkbox"/> Transition
<input type="checkbox"/> JAS	Scope: <input type="checkbox"/> Agricultural Product PPM <input type="checkbox"/> Feed PPM <input type="checkbox"/> Livestock Products PPM <input type="checkbox"/> Processed Food PPM <input type="checkbox"/> Processed Feed PPM <input type="checkbox"/> Repacker
Trade/Equivalence Agreement Compliance:	
<input type="checkbox"/> MAFF/USDA Export Arrangement <input checked="" type="checkbox"/> US/Canada Equivalence Agreement	

4. Status of Conditions for Continued Certification	<input checked="" type="checkbox"/> None <input type="checkbox"/> Corrected
--	---

5. Minor Issues – Conditions for Continued Certification		Standard/Article/ Technical Criteria
Failure to implement a corrective action to an identified minor noncompliance will result in a delay in the certification process and/or adverse action pursuant to the applicable certification program.		
1.	Buffers must be adequately maintained and management practices implemented to prevent weed seeds, disease, and pest habitats. All buffer activities (i.e. mowing, grazing, weeding, etc.) must be documented.	§§205.103, 205.206
2.	6	
3.		
4.		
5.		

6. Comments or Recommendations	
1.	
2.	

7. Field Profile			<input type="checkbox"/> Not Applicable
Status	Acres	Field(s)	
Organic	(b) (4)	(b) (4)	

		(b) (4)	
T3			Date Eligible:
T2			Date Eligible:
T1			Date Eligible:
NonOrganic	(b) (4)	(b) (4)	

8. Production and Acreage Certified				<input type="checkbox"/> Not Applicable	
Crop	Total Acres	Projected Yield	Category		
Hard Red Spring Wheat	(b) (4)	(b) (4) BU	<input checked="" type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	
Peas		(b) (4) BU	<input checked="" type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	
Kamut		(b) (4) BU	<input checked="" type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	
Pasture		NA	<input checked="" type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	
Summer Fallow		NA	<input checked="" type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	
				<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic
			<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	
			<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	
			<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	
			<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	

9. Livestock Certified							<input checked="" type="checkbox"/> Not Applicable	
Species	Type	Head	Slaughter	Breeding	Dairy	Projected Production		
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			

10. Product/Process Certified				<input checked="" type="checkbox"/> Not Applicable			
Product/Process	Projected Production	Product Composition					
		<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	<input type="checkbox"/> Made with	<input type="checkbox"/> None		
		<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	<input type="checkbox"/> Made with	<input type="checkbox"/> None		
		<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	<input type="checkbox"/> Made with	<input type="checkbox"/> None		
		<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	<input type="checkbox"/> Made with	<input type="checkbox"/> None		
		<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	<input type="checkbox"/> Made with	<input type="checkbox"/> None		
		<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	<input type="checkbox"/> Made with	<input type="checkbox"/> None		
		<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	<input type="checkbox"/> Made with	<input type="checkbox"/> None		
		<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	<input type="checkbox"/> Made with	<input type="checkbox"/> None		



Global Organic Alliance, Inc.

PO Box 530 3185 Township Road 179

Bellefontaine, OH 43311-0530

Phone: 937 593 1232 Fax: 937 593 9507

Email: goaorg@centurylink.net

Website: www.goa-online.org

ORGANIC FARM (crop) PLAN

Short Form



EACH SECTION AND QUESTION in this Plan must be completed and this Plan must be signed. Incomplete or unsigned Plans will be returned for completion and held for missing supporting documentation (i.e. ingredient labels, seed tags, untreated/nonGMO verification, seed search, certification documentation for seeds, animals, feedstuffs, field maps and histories, off-farm manure statements, water/soil tests when applicable, etc.). The Plan will be held until all required documentation is received and signed where required. **GOA will not engage an inspector until all required documentation is complete, signed where required, and submitted.**

Certified Operation			Date: 4/14/2014	
Authorized Representative(s): Susan Yurman				
Business Name: Yurman Farms				
Physical Address: 3371 1500 Rd East				
City: Chester	State: MT	Zip/Postal Code: 59222	Country: USA	
Mailing Address: PO Box 337				
City: Chester	State: MT	Zip/Postal Code: 59222	Country: USA	
Phone: 406-759-5725	Fax:	Cell:		
Email:				
Legal Status: <input checked="" type="checkbox"/> Sole Proprietor <input type="checkbox"/> Partnership <input type="checkbox"/> LLC <input type="checkbox"/> Corporation <input type="checkbox"/> Other:				
Type of Operation: <input checked="" type="checkbox"/> 100% Organic <input type="checkbox"/> Split Operation with Parallel Production <input type="checkbox"/> Split Operation – NO Parallel Production				

Contract Operation - Complete for operations that are under contract to provide a certified crop or service specifically for your certified operation. The certified operation will maintain ownership and control of the certificate.				
Authorized Representative(s):				
Business Name:				
Physical Address:				
City:	State:	Zip/Postal Code:	Country:	
Mailing Address:				
City:	State:	Zip/Postal Code:	Country:	
Phone:	Fax:	Cell:		
Email:				

Certification Program – Organic Certification Program to which application is being made must be indicated below. NOP certification is not available to operations in Canada and COR certification is not available to operations in the US. Additional fees apply for compliance verification to the US/Canada Equivalence Agreement. See Schedule of Fees (W004).	
<input checked="" type="checkbox"/> National Organic Program (NOP)	<input type="checkbox"/> Canadian Organic Regime (COR – requires additional Plans)
Compliance Programs - Requires additional Plans and fees. See the Schedule of Fees (W004)	
<input checked="" type="checkbox"/> US/Canada Equivalence	<input type="checkbox"/> EQIP – Organic Transition

Directions to operation: <input type="checkbox"/> Map Attached: Highway 2, East end of Chester, turn south at Mikes Thriftway
Best time to contact you to schedule inspection: <input type="checkbox"/> Morning <input type="checkbox"/> Afternoon <input checked="" type="checkbox"/> Evening <input type="checkbox"/> Mail Only.

1. Condition for Continued Certification – List the noncompliance or condition and provide a description of the corrective action taken to come into compliance. The effectiveness of the action taken will be evaluated during the annual inspection. Failure to correct a previous condition for continued certification will delay the certification process and may result in adverse action. **USE ADDITIONAL PAPER WHEN NEEDED.**

1.1. Was a noncompliance or condition recorded from the previous year? ☐ Yes ☒ No If yes, complete the following table.

Condition for Continued Certification		Corrective Action (Attach supporting documentation when applicable.)
1.	Minor issue-Buffers must be adequately maintained and management practices implemented to prevent weed seeds, disease, and pest habitats. All buffer activities (ie: mowing, grazing, weeding, etc.) must be documented	Cut the buffer, disposed of the crop as non organic. Records are maintained. See attached grain ticket
2.		
3.		

2. Acreage Profile – Report changes to fields or acreage requested for certification.

☐ No Changes to fields, acreage or status of fields.

2.1 Are you adding acreage/fields? ☐ Yes Complete Section 2.2. ☒ No

Are you removing acreage fields? ☒ Yes ☐ No List: Tract 11767: (b) (4) (total approx (b) (4) acres have been removed from this entity)

2.2 List each new field being added to your operation and requested for certification/shortened transition period.

A Prior Land Use Statement (PLUS F014)) must be completed in full and signed by the previous landowner for any land that has not been under your control/management during the transition period. Field histories must be reported on the back of the PLUS for the previous three years and field map submitted for each field.

Field ID's	Acres	Previous Land Owner	Own Field	PLUS
			<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>

2.3. Describe changes to field ids, acreage and or status of fields. Land has been leased out (to be farmed organically) with the exception of tract (b) (4)

2.4. Fill out the Operation/Product Profile – Farm Production (F043) listing the crops, land, and products requested for certification.

3. Seeds/Annual Seedlings/Planting Stock INCLUDES SEED USED FOR COVER CROPS AND GREEN MANURES.

All seed, annual seedlings, and planting stock **MUST BE REPORTED ON THE SEED SEARCH AND REPORTING LOG** and untreated/non-GMO verification must be submitted for all nonorganic seed and planting stock. Verification of current organic certification must be submitted for organic seed and annual seedlings/transplants. **Seed tags/invoice must be attached. If you have not received your seed by the time the application is submitted, note the tags/invoice will be available for the inspector to pick-up.**

☐ Seeds, annual seedlings, and planting stock were not planted.

3.1. Purchased Seed? ☒ Yes ☐ No

3.2. Purchased Annual seedlings/transplants? ☐ Yes ☒ No

List the supplier(s) and attach certification documents: _____

3.3. Purchased Perennial rootstock? ☐ Yes ☒ No If yes, date under organic management.

4. Soil and Crop Nutrient Management

4.1. Describe improvements or changes that have been or will be made to the soil and crop nutrient program. ☒ No Changes

4.2. List all soil/crop fertility inputs in the Input Log (F042).

5. Raw Manure or Compost

☒ Not Applicable

5.1. Describe improvements or changes that have been made or will be made to the manure/compost use/handling. ☐ No Changes

5.2. List all inputs in the Input Log (F042).

6. Environmental Husbandry	
6.1. Describe improvements or changes that have been made or will be made to the environmental husbandry/conservation practices. <input checked="" type="checkbox"/> No Changes Majority of my land has been leased to another organic farmer.	
7. Water <input checked="" type="checkbox"/> Not Applicable	
7.1 Describe improvements or changes that have been made or will be made to the water management and conservation practices. <input type="checkbox"/> No Changes	
8. Crop Management	
8.1. How often are crop management practices rotations monitored? <input type="checkbox"/> Daily <input type="checkbox"/> Weekly <input checked="" type="checkbox"/> As Needed <input type="checkbox"/> Other:	
8.2. Describe improvements or changes that have been made or will be made to the crop management practices, including the crop rotation. <input type="checkbox"/> No Changes Majority of land has been leased. Reduced my acres and workload to semi retire. I plan to plant a perennial crop.	
9. Pest, Weed, Disease Management	
9.1. How often are crop, pest, and disease management practices monitored? <input type="checkbox"/> Daily <input type="checkbox"/> Weekly <input checked="" type="checkbox"/> As Needed <input type="checkbox"/> Other:	
9.2. Describe improvements or changes that have been made or will be made to the pest, weed, and disease program? <input type="checkbox"/> No Changes Majority of land has been leased. Reduced my acres and workload to semi retire.	
10. Treated Lumber and Burning Crop Residues <input checked="" type="checkbox"/> Not Applicable	
10.1. Describe new additions/construction with treated lumber or changes in the practices for burning crop residues. <input type="checkbox"/> No Changes	
11. Buffer Areas/Adjoining Land Use	
11.1. How often are buffer areas and adjoining land use monitored? <input type="checkbox"/> Daily <input type="checkbox"/> Weekly <input checked="" type="checkbox"/> As Needed <input type="checkbox"/> Other:	
11.2. Describe improvements or changes that have been made or will be made to buffer areas or adjoining land use. <input type="checkbox"/> No Changes Majority of land has been leased. Reduced my acres and workload to semi retire. Eliminated the buffers for those lands.	
12. Split or Parallel Production <input checked="" type="checkbox"/> Not Applicable	
12.1. Describe improvements or changes that have been made or will be made to split/parallel production practices and/or physical barriers. <input type="checkbox"/> No Changes	
13. Equipment	
13.1. Describe improvements or changes that have been made or will be made to equipment. <input checked="" type="checkbox"/> No Changes	
14. Post-Harvest Handling <input type="checkbox"/> Not Applicable	
14.1. Location of Post-Harvest Handling: <input checked="" type="checkbox"/> On-Farm <input type="checkbox"/> Off-Farm Name of Operation and Certification Agency:	
14.2. List crops that are handled. seed cleaning only. My own seed for my own use.	
14.3. Describe improvements or changes that have been made or will be made to post-harvest handling arrangements, practices and/or equipment. <input checked="" type="checkbox"/> No Changes	
14.4. Submit organic certification documents for off-farm handling operations.	
15. Storage - Crop/Packaged Product <input type="checkbox"/> Not Applicable – No Storage	
15.1. Describe improvements or changes that have been made or will be made to storage locations, arrangements, and/or facilities. <input type="checkbox"/> No Changes Bins will be leased along with the land. I will maintain control of the bins until the current contents are sold. Preferably before 2014 harvest.	

16. Transportation	<input type="checkbox"/> Not Applicable
16.1. Describe improvements or changes that have been made or will be made to transportation arrangements or practices? <input checked="" type="checkbox"/> No Changes	

17. Labeling – Labels affixed to organic product must be submitted for review and approval annually.	<input checked="" type="checkbox"/> Not Applicable
17.1. Describe improvements or changes that have been made or will be made to labels (retail/nonretail/shipping). <input type="checkbox"/> No Changes	

18. Audit Trail – Records must be maintained for 5 years and be auditable and accessible during the annual inspection, including records for nonorganic/transitional production.
18.1. Describe changes to lot numbering system or audit trail records maintained. <input checked="" type="checkbox"/> No Changes

20. Complaint Ledger					
20.1. Has a complaint regarding the organic commodities grown or handled by your operation been received? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No					
If yes, complete the following matrix or attach a copy of the complaint log you maintain.					
Date	Complainant	Address	Phone	Nature of Complaint	Resolution
2013	(b) (6), (b) (7)(C), (b) (7)(D)			He complains to outside agencies regarding my farming practices. I believe this is a personal grudge against me.	I have leased my lands (that adjoins this person) to someone else.

21. Declaration	
<p>I hereby attest that all of the information provided in this Plan and attached supporting documentation is complete, true, and accurate to the best of my knowledge. I agree to supply additional documentation and information as required by GOA and to announced and unannounced visits and other verification procedures and measures that are necessary to verify compliance with the organic certification program regulations and requirements, including but not limited to: auditing transactions, residue testing, and access to the production and handling operation, including non-certified production and handling areas, structures, and offices. I further attest that I understand and agree to adhere to the organic certification program standards and requirements to which organic certification is being requested and to the terms in the Licensing Agreement. I understand that acceptance of this plan does not imply or constitute granting or continuance of organic certification.</p>	
Signature: (b) (6)	Date: 4/14/2014
<input checked="" type="checkbox"/> I have made copies of this Plan and supporting documentation for my records.	

22. Attachments **indicates required items. Failure to supply the required documents will delay processing the application for continued certification and engaging an inspector to perform the on-site inspection.	
<input checked="" type="checkbox"/> **Field/Pasture Maps (organic and nonorganic) A copy of ASCS maps, aerial photomaps, and/or hand drawn maps must be attached. Each field must be numbered and adjoining land use must be identified as well as buildings, conventional fields, buffers, etc. In addition, fields and pastures must also be identified as Organic (O), Conventional (C), AND Transitional (T) and include the acreage and field ID on the field maps and field history sheets.	
<input checked="" type="checkbox"/> **Field/Pasture Histories (organic and nonorganic) Previous 3 years plus the current year. The sum of the field/pasture acreages provided in the field/pasture histories must be consistent with the acreages provided on the field/pasture access maps. Field/pasture histories must include all land farmed by you (i.e. owned, rented, and leased land, pastures, and fallow).	
<input checked="" type="checkbox"/> **Site-map providing the locations of Buildings and Storage Facilities	
<input checked="" type="checkbox"/> **Operation/Product Profile – Farm Production listing crops, products and land requested for certification.	
<input checked="" type="checkbox"/> **Input Log	
<input type="checkbox"/> **Non-GMO/Untreated Seed Declaration for nonorganic seed	
<input checked="" type="checkbox"/> **Organic Seed Search	
<input type="checkbox"/> **Seed tags/labels including verification of organic certification for purchased organic seed.	
<input type="checkbox"/> **Ingredient labels for soil amendments, seed inoculant, manure, foliar sprays, pest/disease controls, forage inoculant/preservatives, etc.	

22. Attachments **indicates required items. *Failure to supply the required documents will delay processing the application for continued certification and engaging an inspector to perform the on-site inspection.*

- ☐ **Labels (retail and nonretail) making organic claims and/or using the USDA, COR and/or GOA Seal
- ☐ Prior Land Use Statements for newly rented and/or acquired land with three-year field histories and field map(s).
- ☐ Water test (**required** for irrigation water used to irrigate crops for human consumption and water used to wash/handle organic crops)
- ☒ Soil test (**required** from operations applying or planning to apply synthetic micronutrients)
- ☐ Post-harvest handling product/process flow chart, facility/site map and description of process.
- ☐ **Verification or organic certification for contracted services such as off-farm post-harvest handling facilities.

PLEASE USE THE GOA FIELD HISTORY FORM WHEN SUBMITTING FIELD HISTORIES. If needed, copies may be made of the supporting forms included with this Plan.



FARM/LIVESTOCK

Global Organic Alliance, Inc.

Name: Susan Wenden

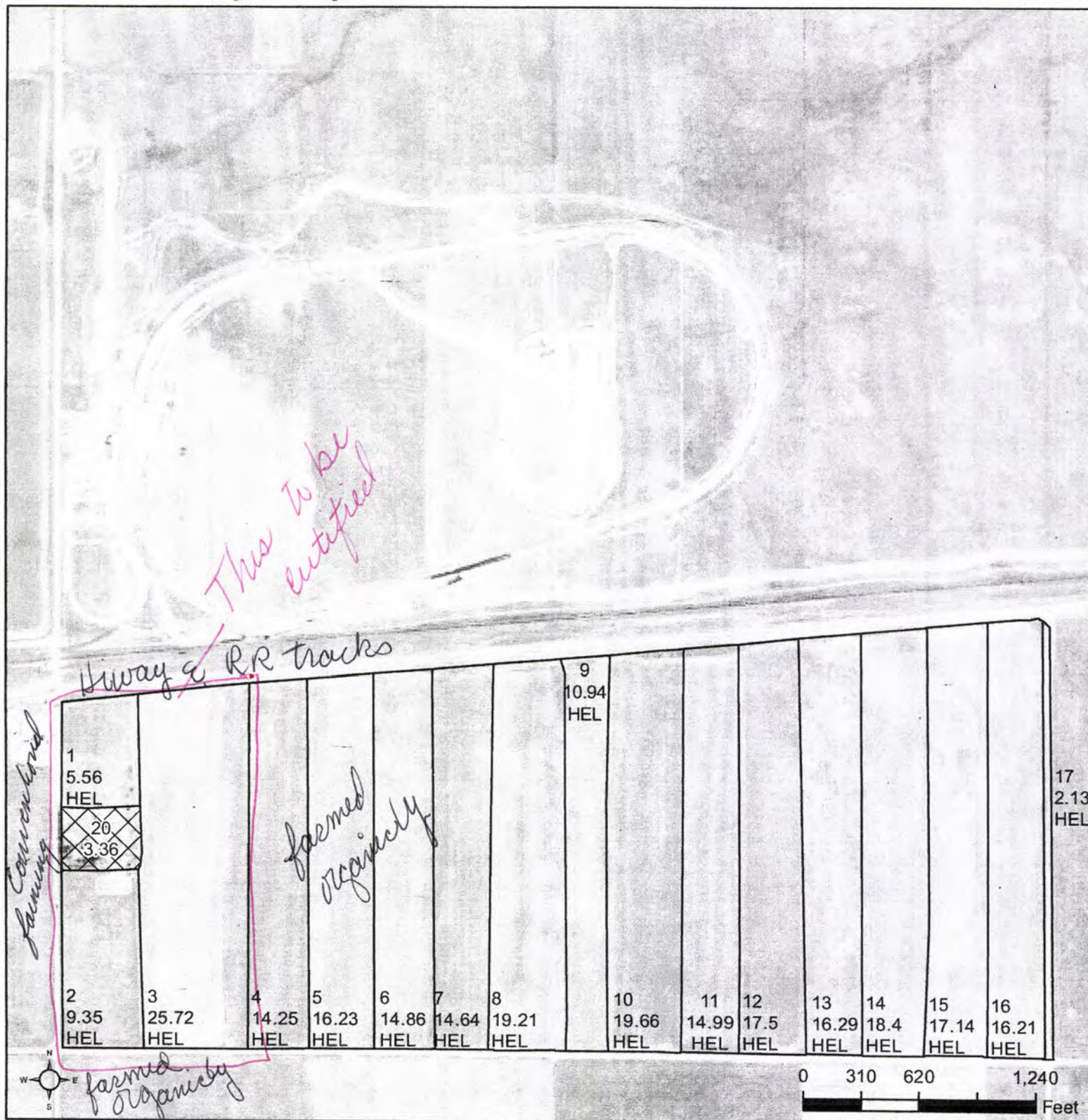
Operation Name: Yar mor

Year: 2014

List crops and acreage, livestock type and production category (i.e. breeding, meat, dairy) and edible livestock products requested for certification. The sum of the total acreage must equal the sum of the total acreage taken from the acreage reported in the Organic Plan and Field History Sheet. Livestock operations requesting certification for meat products must provide verification of organic certification for the slaughter facility. Labels making organic claims must be submitted along with this form for each product and approved before they are used.

Crop	Acreage	Field Number	Livestock Production
Operation Name: <u>YAWMO</u> Year: <u>2014</u>			

[illegible]



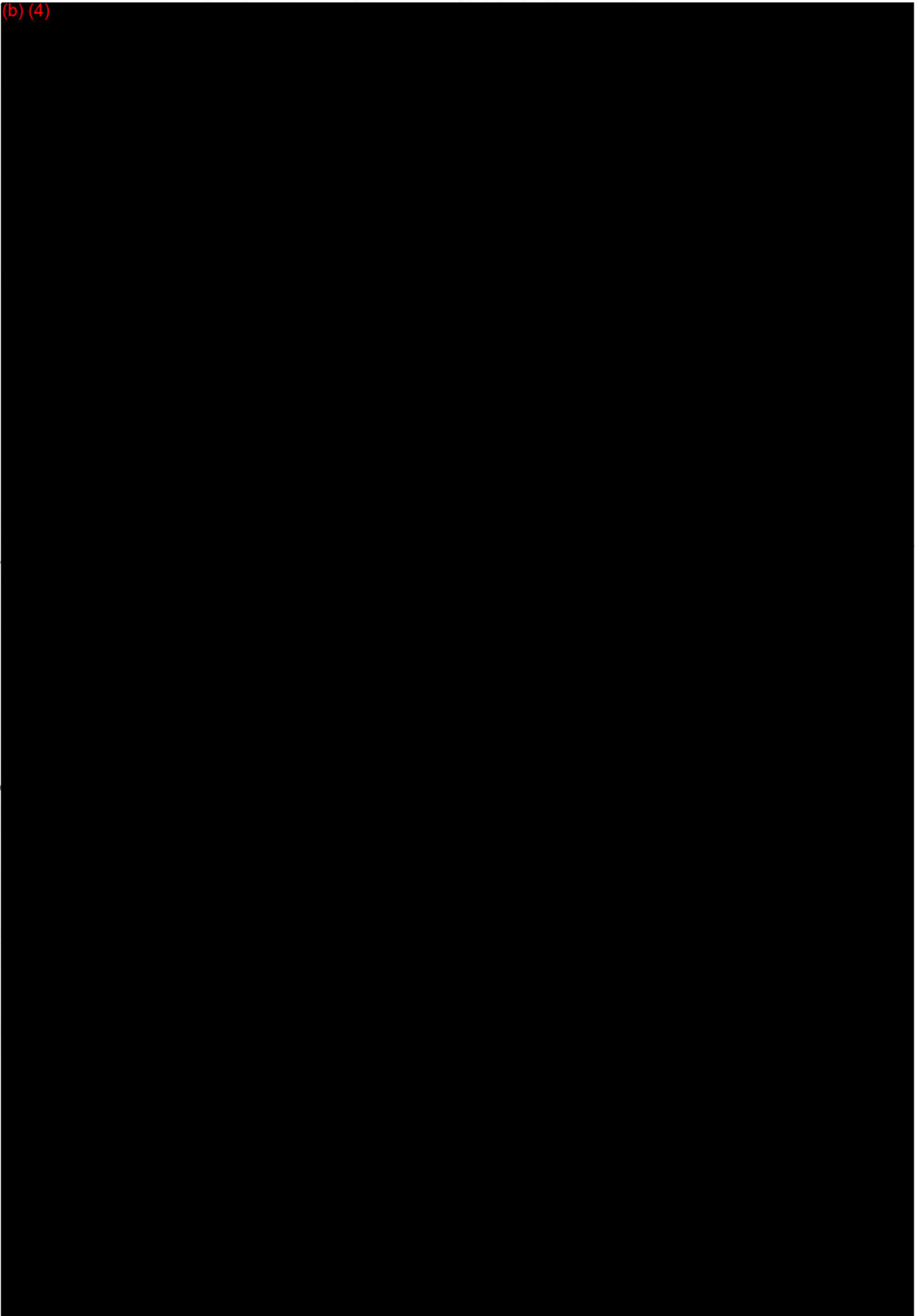
Common Land Unit
☐ Cropland ☐ Rangeland ☐ Other Use
☐ Conservation Reserve Program

Wetland Determination Identifiers
☐ Restricted Use
☐ Limited Restrictions
☐ Exempt from Conservation Compliance Provisions

2014 Program Year

Map Created February 14, 2013

Farm 2513
Tract 11767



Land discription of Bin Site for Yurman Farms

(b) (4)



(b) (4)



Return to:
Lee Law Office PC
P.O. Box 790
Shelby, MT 59474

ABSTRACT OF ORGANIC CROP SHARE LEASE

(b) (6) d/b/a (b) (6) ("Tenants"), hereby give notice that they claim an interest in the following described real property in Liberty County, Montana (the "Premises") pursuant to that certain "**ORGANIC CROP SHARE LEASE AGREEMENT**" dated April 1, 2014 (the "Lease"), wherein F. SUSAN YURMAN, P.O. Box 337, Chester Montana 59522 appears as Landlord and (b) (6) appear as Tenants:

Township 32 North, Range 6 East, MPM

**Section 15: W $\frac{1}{2}$ W $\frac{1}{2}$, W $\frac{1}{2}$ NE $\frac{1}{4}$, SE $\frac{1}{4}$ NE $\frac{1}{4}$, E $\frac{1}{2}$ NW $\frac{1}{4}$,
NE $\frac{1}{4}$ SW $\frac{1}{4}$, N $\frac{1}{2}$ SE $\frac{1}{4}$**

**Section 22: S $\frac{1}{2}$ less 41.74 acres to railroad and highway lying
south of railroad and Highway 2**

Section 27: N $\frac{1}{2}$ NW $\frac{1}{4}$

Township 34 North, Range 6 East, MPM

Section 11: SE $\frac{1}{4}$

Section 13: S $\frac{1}{2}$ SW $\frac{1}{4}$, E $\frac{1}{2}$ E $\frac{1}{2}$, SW $\frac{1}{4}$ SE $\frac{1}{4}$

Section 14: W $\frac{1}{2}$ NW $\frac{1}{4}$, SW $\frac{1}{4}$

Section 22: SW $\frac{1}{4}$

Section 24: N $\frac{1}{2}$

Containing (b) (4) acres, more or less

BUT EXCLUDING approximately 27 acres located in Section 22, Township 32 North, Range 6 East as well as lands described in Paragraph 6 hereafter.

The Lease provides for a lease term which terminates on November 1, 2019.

The Lease also grants to Tenants a right of first refusal to purchase the above described lands in the event Landlord elects to sell such lands during the term of the Lease.

Upon request full and complete copies of the Lease may be obtained from either of the foregoing parties at their respective addresses set forth above.



FIELD HISTORY SHEET

Global Organic Alliance, Inc.

Name: Yurman, Susan

Farm Name: Yurman Farms

Year: 2013

A separate field history sheet must be completed for each year and an individual history established for each field. Do not group two or three years of field histories onto one field history sheet and do not group fields into type of crop being grown. If yearly or individual field histories are grouped they will NOT be accepted and the file will be held until correct field history sheets are submitted.

Key: Status: O = Organic Transition - T3 = Third Year, T2 = Second Year, T1 = First Year C = Conventional

Field ID	Acres	Crop	Status (✓)					Last Prohibited Input Date	Soil Treatment/History Material, Date, Application Rate Cover Crop - Planting Date	Manure/Compost Application Material, Date, Application Rate	Pest/Disease Treatment Material, Date, Application Rate
			O	T3	T2	T1	C				
Tract 1729:											
(b) (4)	(b) (4)	Peas	X					1998	April		
		SF	X					1998	April/May		
		Pasture						1998			
		Pasture	X					1998			
		Pasture	X					1998			
		Peas	X					1998	April		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		Kamut	X					1998	April/May		
		HRS	X					1998	April/May		
		Kamut	X					1998	April/May		
		SF	X					1998	April/May		



FIELD HISTORY SHEET
Global Organic Alliance, Inc.

Name: Yurman, Susan

Field ID	Acres	Crop	Status (✓)					Last Prohibited Input Date	Soil Treatment/History Material, Date, Application Rate Cover Crop – Planting Date	Manure/Compost Application Material, Date, Application Rate	Pest/Disease Treatment Material, Date, Application Rate
			O	T3	T2	T1	C				
(b) (4)	(b) (4)	HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		



FIELD HISTORY SHEET

Global Organic Alliance, Inc.

Name: Yurman, Susan

Farm Name: Yurman Farms

Year: 2013

Field ID	Acres	Crop	Status (✓)					Last Prohibited Input Date	Soil Treatment/History Material, Date, Application Rate Cover Crop - Planting Date	Manure/Compost Application Material, Date, Application Rate	Pest/Disease Treatment Material, Date, Application Rate
			O	T3	T2	T1	C				
(b) (4)	(b) (4)	SF	X					1998	April/May		
		HRS	X					1998	April/May		
		Peas	X					1998	April		
		HRS	X					1998	April/May		
		Kamut	X					1998	April/May		
		Peas	X					1998	April		
		SF	X					1998	April/May		
		HRS	X					1998	April/May		
		Kamut	X					1998	April/May		
		Peas	X					1998	April		
		SF Border					X	1998	April/May		
(b) (4)	(b) (4)	HRS	X					1998	April/May		
		Kamut	X					1998	April/May		
		SF	X					1998	April/May		



Year: 2013

Revision: 8; 4 Jan 12
Effective: 4/1997



FIELD HISTORY SHEET

Global Organic Alliance, Inc.

Name: Yurman, Susan

Farm Name: Yurman Farms

Year: 2013

Field ID	Acres	Crop	Status (✓)					Last Prohibited Input Date	Soil Treatment/History Material, Date, Application Rate Cover Crop - Planting Date	Manure/Compost Application Material, Date, Application Rate	Pest/Disease Treatment Material, Date, Application Rate
			O	T3	T2	T1	C				
(b) (4)	(b) (4)	SF	X					1998	April/May		
(b) (4)	(b) (4)	HRS	X					1998	April/May		
(b) (4)	(b) (4)	SF	X					1998	April/May		
(b) (4)	(b) (4)	Peas	X					1998	April		
(b) (4)	(b) (4)	Peas	X					1998	April		
(b) (4)	(b) (4)	SF	X					1998	April/May		
(b) (4)	(b) (4)	Peas	X					1998	April		
(b) (4)	(b) (4)	SF	X					1998	April/May		
(b) (4)	(b) (4)	HRS	X					1998	April/May		
(b) (4)	(b) (4)	Kamut	X					1998	April/May		
(b) (4)	(b) (4)	Peas	X					1998	April		
(b) (4)	(b) (4)	HRS	X					1998	April/May		
(b) (4)	(b) (4)	Peas	X					1998	April		
(b) (4)	(b) (4)	HRS	X					1998	April/May		
(b) (4)	(b) (4)	Peas	X					1998	April		
(b) (4)	(b) (4)	HRS	X					1998	April/May		



Name: Yurman, Susan

Farm Name: Yurman Farms

Year: 2013

Field ID	Acres	Crop	Status (✓)					Last Prohibited Input Date	Soil Treatment/History Material, Date, Application Rate Cover Crop – Planting Date	Manure/Compost Application Material, Date, Application Rate	Pest/Disease Treatment Material, Date, Application Rate
			O	T3	T2	T1	C				
(b) (4)	(b) (4)	Peas	X					1998	April		
		SF	X					1998	April/May		
		Peas	X					1998	April		
		SF	X					1998	April/May		
		Peas	X					1998	April		
		HRS	X					1998	April/May		
		Peas	X					1998	April		
		Kamut	X					1998	April/May		
		HRS	X					1998	April/May		
(b) (4)	(b) (4)	Peas	X					1998	April		
		HRS	X					1998	April/May		
		Kamut	X					1998	April/May		
		HRS	X					1998	April/May		
(b) (4)	(b) (4)	Kamut	X					1998	April/May		
		HRS	X					1998	April/May		



FIELD HISTORY SHEET

Global Organic Alliance, Inc.

Name: Yurman, Susan

Farm Name: Yurman Farms

Year: 2013

Field ID	Acres	Crop	Status (✓)					Last Prohibited Input Date	Soil Treatment/History Material, Date, Application Rate Cover Crop - Planting Date	Manure/Compost Application Material, Date, Application Rate	Pest/Disease Treatment Material, Date, Application Rate
			O	T3	T2	T1	C				
(b) (4)	(b) (4)	Kamut	X					1998	April/May		
		HRS	X					1998	April/May		
		Peas	X					1998	April		
		Hrs	X					1998	April/May		
		HRS	X					1998	April/May		
		Peas	X					1998	April		
		SF	X					1998	April/May		
		Kamut	X					1998	April/May		
		Peas	X					1998	April		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		Kamut	X					1998	April/May		
		HRS	X					1998	April/May		
		SF	X					1998	April/May		
		Kamut	X					1998	April/May		
		Peas	X					1998	April		



SEED and PLANTING STOCK REPORTING and SEARCH LOG

Global Organic Alliance, Inc.

You must document the three (3) seed suppliers/sources who were contacted to obtain organic seed for each type of nonorganic, untreated/nonGMO seed purchased.

This form must be completed **ANNUALLY** and **RETURNED TO GOA** with the **Organic Plan to report the use of ORGANIC AND NON-ORGANIC** nongMO/unreated seed, including your own, leftover, or contracted seed. This **INCLUDES** seed used for cover crops, green manures, etc. **SEED AND PLANTING STOCK MUST BE organic** when commercially available. **COST IS NOT AN EXEMPTION FOR USING NON-ORGANIC SEED. NON-ORGANIC SEED MUST NOT BE TREATED WITH PROHIBITED SUBSTANCES.** Review seed treatment ingredients with the materials list for the applicable certification program. Annual seedlings/transplants must be from an organic source. Additional paper may be used, if necessary.

Name: Yurman Farms

Year: 2014

KEY: CO = Contracted (supporting documents required)

Cert = Certificate/addendum

UT=Untreated NGMO=NonGMO

[illegible]

Ensure seed tags/labels and untreated/nonGMO statements or verification of organic certification (as applicable to the seed) is maintained and a copy submitted with this form.



INPUT LOG
Global Organic Alliance, Inc.

Name: Susan Yurman

Business Name: Yurman Farms

Year:

2014

Inputs used by your operation must be reported on this form. ALL SECTIONS MUST BE COMPLETED AND THE INGREDIENT INFORMATION FOR THE INPUT MUST BE SUBMITTED. This includes ingredient information must be submitted for inputs applied to fields or fed/administered to dairy animals during the transition period. Nonsynthetic inputs must be documented to be from a natural or mined source and without chemical treatments. Ingredient labels/statements that cannot be removed from the packaging/container may be reported on the Ingredient Reporting Form (F-056), provided, the packaging/container is maintained and available for ingredient verification during the annual inspection. The following documentation for providing ingredient information will not be accepted: the guaranteed analysis, MSDS sheets, and point-of-purchase materials that do not supply full ingredient information. INCOMPLETE FORMS WILL BE RETURNED.

For example: Fertility, pest – field and storage, disease, weed, structural pest management, mineral, vitamins, silage inoculant, vaccines, medications, teat dips, cleanser, sanitizers

[illegible]

(b) (4)

(b) (4)

A natural biostimulant and
soil fertility booster.

Organic Certified
STORE BELOW 120 DEGREES F

Information regarding the contents
and levels of metals in this product is
available on the internet at

(b) (4)

Manufactured by:

(b) (4)



Minimum Guaranteed Analysis
0-0-1

Soluble Potash (K_2O) 1.00 %
Derived from *Ascophyllum Nodosum*

CONDITIONS OF SALE AND LIMITATIONS OF
WARRANTY AND LIABILITY

Limitation of Liability: In no event shall seller or manufacturer be liable for special, incidental or consequential damages, or for damages in the nature of penalties. Seller or manufacturer shall not be liable to buyer, by way of indemnification to customer or buyer, if any, for any damages, sums of money, claims or demands whatsoever, resulting from or by reason of, or rising out of the misuse or the failure to follow label warnings or instructions for use of the goods sold by the seller or manufacturer to buyer. Buyer's or user's exclusive remedy and seller's or manufacturer's total liability shall be for damages not exceeding the cost of the product.

Warranty disclaimer: Ineffectiveness or other unintended consequences may result because of such factors as presence of other materials or the manner of use or application, all of which are beyond the control of the seller or manufacturer. In no case shall seller or manufacturer be liable for consequential, special or indirect damages resulting from the use or handling of this product. The buyer or its customers shall assume all such risks. Tests have not been carried out under all possible conditions and seller or manufacturer cannot and does not warrant that the product is compatible with all other chemicals. Seller or manufacturer warrants that product is adequately contained, packaged and labeled and conforms to the affirmation of fact made on the container and label. Seller or manufacturer makes no other warranties, guarantees, or representations of any kind, either expressed or implied, or by usage of trade, statutory or otherwise, with regard to the product sold, including, but not limited to merchantability, fitness for a particular purpose, use or eligibility of the product for any particular trade usage.

(b) (4) Marketing Inc. and seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by a duly authorized representative of (b) (4) Marketing Inc.

**Global Organic Alliance, Inc.**

P.O. Box 530

3185 Twp Rd 179

Bellefontaine, OH 43311-0530

Phone (937)-593-1232

Fax (937)-593-9507

Email : goaorg@centurylink.netWeb Site : www.goa-online.org**CERTIFICATION ASSESSMENT**

1. Operation		Effective/Renewal Date: 10/9/15	Revision Date:
Status: <input type="checkbox"/> New <input checked="" type="checkbox"/> Renewal	Inspection Date: 7/14/15	Inspector: (b) (6), (b) (7)(C), (b) (7)(D)	Review By: 1007
Name: Susan Yurman			
Business Name: Yurman Farms			
Mailing Address: PO Box 337, Chester, MT 59222			
Physical Address: 3371 1500 Rd East, Chester, MT 59222			
Phone: 406-759-5725	Cell:	Fax:	
Email:			

Certified operations and contracted certified operations must apply for certification and undergo an on-site inspection annually. Failure to do so will result in the commencement of adverse actions.

2. Contract	<input checked="" type="checkbox"/> Not Applicable
Name:	
Business Name:	
Mailing Address:	
Physical Address:	
Phone:	Cell: Fax:

3. Certification/Compliance Program and Scope	
I affirm the certification decision is based on the evaluation of the documentation obtained during the certification and inspection process for the above named operation and their compliance with the regulations, standards, and requirements of the certification and/or compliance program identified below.	
<input checked="" type="checkbox"/> NOP	Scope: <input checked="" type="checkbox"/> Crops <input type="checkbox"/> Livestock <input type="checkbox"/> Processor <input type="checkbox"/> Handler <input type="checkbox"/> Wild Crop
<input type="checkbox"/> COR	Scope: <input type="checkbox"/> Crops <input type="checkbox"/> Livestock <input type="checkbox"/> Processor <input type="checkbox"/> Packaging and Labeling <input type="checkbox"/> Wild Crop <input type="checkbox"/> Transition
Compliance:	<input checked="" type="checkbox"/> US/Canada Equivalence Agreement <input type="checkbox"/> COR Attestation

4. Previous Conditions for Continued Certification	<input checked="" type="checkbox"/> None <input type="checkbox"/> Corrected
---	---

5. Minor Issues – Conditions for Continued Certification		Standard/Article
<i>Failure to implement a corrective action to an identified minor noncompliance will result in a delay in the certification process and/or adverse action pursuant to the applicable certification program.</i>		
1.	Ensure buffer management records are maintained, including the harvest, storage, and sale disposition of the buffer crop.	205.103
2.		
3.		
4.		
5.		

6. Comments or Recommendations	
1.	
2.	

7. Field Profile			<input type="checkbox"/> Not Applicable
Status	Acres	Field(s)	
Organic	(b) (4)	(b) (4)	
T3			Date Eligible:
T2			Date Eligible:
T1			Date Eligible:
NonOrganic	(b) (4)	(b) (4)	

8. Production and Acreage Certified				<input type="checkbox"/> Not Applicable	
Crop	Total Acres	Projected Yield	Category		
Hard Red Spring Wheat	(b) (4)	(b) (4) BU	<input checked="" type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	
Peas	(b) (4)	(b) (4) BU	<input checked="" type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	
Fallow		NA	<input checked="" type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	
Clover		NA	<input checked="" type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	
Pasture		NA	<input checked="" type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	
			<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	
			<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	
			<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	
			<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	
			<input type="checkbox"/> 100% Organic	<input type="checkbox"/> Organic	

9. Livestock Certified							<input checked="" type="checkbox"/> Not Applicable	
Species	Type	Head	Slaughter	Breeding	Dairy	Projected Production		
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			

10. Product/Process Certified – See Certification Profile	<input checked="" type="checkbox"/> Not Applicable
---	--



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: Susan Yurman
Yurman Farms
Mailing: PO Box 337, Chester, MT 59222
Physical: 3371 1500 Rd. East, Chester, MT 59222
USA

Scope: Crops

Issue/Revision Date: 10/9/15

Certificate Number(s):

Certified Product or Service

Commodity or Process	Category			Compliance			Brand Name
	100% Organic	Organic	Made With	NOP	COR	US/CA	
Hard Red Spring Wheat	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Peas	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Pasture	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



Global Organic Alliance, Inc.

PO Box 530 3185 Township Road 179

Bellefontaine, OH 43311-0530

Phone: 937 593 1232

Fax: 937 593 9507

Email: goaorg@centurylink.net

Website: www.goa-online.org

AUG - 3 2015

Completion of this form must be TYPED or HAND WRITTEN LEGIBLY with blue or black ink. *Comments and observations MUST be provided.* Incomplete or unsigned Inspection Reports will be returned and payment for inspection services will be held. Do NOT RE-SUBMIT DOCUMENTS (I.E. SEED TAGS, INGREDIENT INFORMATION, MAPS, ETC.) THAT HAVE BEEN SUBMITTED. NOTE "REVISED" OR "UPDATE" AND THE DATE ON AMENDED DOCUMENTS (I.E. FIELD HISTORIES, INPUT LOG, MAPS, INVENTORIES, ETC).

CROP INSPECTION REPORT

YEAR: 2015

GENERAL INFORMATION – The physical address must reflect the address where the operation is located and is required to appear on the certificate.

Certification: <input type="checkbox"/> New <input checked="" type="checkbox"/> Renewal	Inspection Date: 7/14/15	Inspector: (b) (6), (b) (7)(C), (b) (7)(D)
Type of Inspection: <input checked="" type="checkbox"/> Initial/Annual <input type="checkbox"/> Additional/Follow-Up <input type="checkbox"/> Unannounced <input type="checkbox"/> Investigation <input type="checkbox"/> Other:		
Certification Program: <input checked="" type="checkbox"/> NOP <input type="checkbox"/> COR <input type="checkbox"/> COR Transition		
Compliance Program: <input checked="" type="checkbox"/> US/Canada Equivalence		
Owner/Authorized Representative: Susan Yurman		
Business Name: Yurman Farms		
Mailing Address: PO Box 337		
City: Chester	State/Province: MT	Zip/Postal Code: 59522
Physical Address: 3371 1500 Rd East		
City: Chester	State/Province: MT	Zip/Postal Code: 59522
Phone: 406.759.5725	Cell:	Fax:
Email:		
Does the operation have the standard(s) applicable to the certification? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, list missing documents?		

Note: Additional certification and inspection documents are required for the US/Canada Equivalence Arrangement. If you **DID NOT** receive completed Plans CONTACT the GOA office before proceeding.

CONTRACT INFORMATION

☒ Not Applicable

Report the contact information for an operation that produces a crop or edible livestock product or raises livestock for an operation that is certified by GOA.

Contact:		
Business Name:		
Physical Address:		
City:	State/Province:	Zip/Postal Code:
Phone:	Cell:	Fax:
Email:		

1. CERTIFICATION BACKGROUND

☒ Not Applicable

	Yes	No	Comments/Observations/Noncompliance(s)
1.1 Is this a dual inspection or is the operation dual certified?	<input type="checkbox"/>	<input type="checkbox"/>	If yes, name of other agency, scope of certification and products certified.
1.2 Is the operation transferring from another agency?	<input type="checkbox"/>	<input type="checkbox"/>	Name of agency and operations plan for surrendering certification.
1.3 Is/Was certification denied, suspended, cancelled, or revoked?	<input type="checkbox"/>	<input type="checkbox"/>	Name of agency, year, and adverse action. ATTACH notification.

2. PREVIOUS YEAR NONCOMPLIANCE(S)

☒ Not Applicable

2.1	Identify the condition and describe corrective action taken. ATTACH evidence of compliance documentation.
2.2	Identify the condition that has not been brought into compliance and reason for not fulfilling the requirement.

3. OPERATION PROFILE Acreage reported must equal the acreage reported in the current year field histories. Field histories for transitional fields must include the year of transition and date of the last prohibited input application. When there is a discrepancy in the last prohibited input date and the transition period is shortened, details and documentation must be attached to support the change.

3.1	Production: <input checked="" type="checkbox"/> Organic <input type="checkbox"/> Split Operation with Parallel Production <input type="checkbox"/> Split Operation – NO parallel production
3.2	Total Organic acres: (b) (4) 3.2.1 Conventional Acres: 0
3.3	T ₃ Acres: 0 3.3.1 Field ID's: 3.3.2 Last Prohibited Input Date:
3.4	T ₂ Acres: 0 3.4.1 Field ID's: 3.4.2 Last Prohibited Input Date:
3.5	T ₁ Acres: 0 3.5.1 Field ID's: 3.5.2 Last Prohibited Input Date:
3.6	Organic Livestock: <input type="checkbox"/> Dairy <input type="checkbox"/> Layers <input type="checkbox"/> Broilers <input type="checkbox"/> Beef <input type="checkbox"/> Other, None
3.7	NonOrganic Livestock: <input type="checkbox"/> Dairy <input type="checkbox"/> Layers <input type="checkbox"/> Broilers <input type="checkbox"/> Beef <input type="checkbox"/> Swine <input type="checkbox"/> Other, None

4. ORGANIC CROP PROFILE List Specific Crop(s) – Hard Red Winter Wheat not just Wheat or Winter Wheat; Yellow Corn or Corn Silage Not just Corn Include pasture, fallow, outdoor access areas for poultry, green manure, etc. Field id's and estimated yields must be reported on the Inspection Affidavit. Do NOT list transitional or nonorganic crops in this section.

Hard red spring wheat	Borders
Peas, winter	
Clover, plowdown	
Fallow	
Pasture	

5. ORGANIC PLAN VERIFICATION and INSPECTION

	Yes	No	Comments/Observations/Noncompliance(s)
5.1 Were you permitted access to all production and handling areas and audit trail, including nonorganic?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	If no, what areas were you denied? none
5.2 Were all people knowledgeable about the practices and record keeping present?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Identify the people present and responsibilities. Susan Yurman
5.3 Plan accurately reflects management practices and input applications?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Identify inaccuracies and discrepancies or inputs and ATTACH Labels. Attachment 1 Seed Search updated to remove Kamut, planted HRSW instead. Pick Up letter P/U Letter items; 1a, b, c Farm Plan 2.1, 8.2, USCA updated pages; 2 a, b Op Profile updated 4 is n/a, Kamut was not planted
5.4 Are field histories and field/pasture and site/facility maps accurate?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Identify changes and attach updated histories and maps. Attachments; 2 Field histories updated for crops planted, 3 Maps updated (all); 4 Maps where weeds will be sprayed; and P/U Letter item 3 a, b Maps Tracts 12120 and 1679
5.5 Is land being added? (<u>Attach Prior Land Use Statement with current year and previous 3-year field histories and field map</u>)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Identify the field id, previous land owner/manager, and date the land came under the operation's management? Submitted with application, getting certified organic land back from lessee.
5.6 Describe how the effectiveness of the Plan is monitored and the frequency it is monitored.			Annual review
5.7 Provide the inspection itinerary and identify the fields, facilities, offices, etc. visited (organic and nonorganic)?			All fields, farm yard, bin storage areas, opening and closing meetings in home office.

6. GENERAL

	Yes	No	Comments/Observations/Noncompliance(s)
6.1 Were crops requested for certification planted?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	List crops not planted. none
6.2 Were crops requested for certification harvested prior to inspection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	List the crop and measures taken to verify production. none

6. GENERAL				
6.3	Is there evidence of prohibited input applications or use? (i.e. spot-spraying, treated seed, etc.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Identify material, location used and identify affected area(s) on field map. None observed at inspection.
	Is there evidence of chemical trespass/drift to organic fields/crops?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Identify the field and location of the affected area(s) on the field map. Field(s): none Details:
6.4	Is a crop produced hydroponically or aeroponically?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Identify the production method and crop(s). none, field crops
6.5	Was treated lumber used in a new installation or for replacement purposes in contact with soil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Identify location/details of use and affected crop. none
6.6	Observations/Comments: None			

7. SEEDS, SEEDLINGS, PLANTING STOCK <input type="checkbox"/> Not Applicable				
Update the Seed Search or Specialty Crop Supplement as applicable AND attach copies of the seed tag showing organic certification or corresponding organic certificate/addendum or nonGMO/untreated seed verification.				
		Yes	No	Comments/Observations/Noncompliance(s)
7.1	Are all seeds, seedlings, planting stock planted since the last inspection (3-years for new operations) listed on the Seed Search or Specialty Crop Supplement?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Identify unreported seed. None
7.2	Is documentation present for each seed used (seed tag/invoice and organic certification and addendum or nonGMO/untreated seed verification)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Identify missing or attached organic documentation. none
				Identify missing or attached nonorganic documentation. none
7.3	Are seed treatments reported on the Seed Search or Input Log?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Identify and attach missing documentation. None missing.
7.4	Did the quantity of seed purchased support planting needs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comments.
7.5	Were ALL annual seedling(s) planted to produce an organic crop grown on-farm?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Comments.
	Were purchased annual seedlings certified organic?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	List purchased seedling and source. none planted
	Do invoices support the purchase and quantities of seedlings planted/reported?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Comments. none planted
7.6	Is a crop from perennial planting stock (new or established) being requested for certification?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Identify planting stock and date organic management began. none planted
7.7	Observations/Comments: none			

8. CROP MANAGEMENT PROGRAM				
		Yes	No	Comments/Observations/Noncompliance(s)
8.1	List soil amendments/fertility inputs applied since the last inspection. None			
8.2	Were synthetic micronutrients applied to correct soil deficiencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Identify the micronutrient and ATTACH test results. none
	Do test documents support the application?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Comments. n/a
8.3	Is water used in the production of crops or pasture?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Identify the field id, crop, and use. dryland
	List water source(s), treatments, and potential contaminants: Dryland farm, rely on precipitation.			
8.4	Is an inoculant or preservative applied to a forage/silage crop?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Identify the crop and material applied. no forage or silage crops.
8.5	Describe the soil-building program, including crop rotation(s): fallow to wheat/kamut to peas to wheat. Clover was introduced by lessee.			
8.6	Describe practices implemented to maintain or improve the natural resources and biodiversity, including soil and water quality. Strip farming and crop residue to minimize wind erosion, incorporate crop residues for organic matter.			

8. CROP MANAGEMENT PROGRAM	
8.7	Describe conservation and biodiversity projects that are planned. None, maintain what there is until farm is back to applicant's satisfaction.
8.8	Observations/Comments: None

9. MANURE/COMPOST				<input checked="" type="checkbox"/> Not Applicable
		Yes	No	Comments/Observations/Noncompliance(s)
9.1	Source: <input type="checkbox"/> On-Farm <input type="checkbox"/> Off-Farm	Identify off-farm manure and compost source(s):		
	Are off-farm manure statements and/or compost documents received from all suppliers?	<input type="checkbox"/>	<input type="checkbox"/>	Identify.
	COR: Describe efforts to ensure manure/compost is not from caged animal operations, animals kept in the dark or fed animal feed containing GMO's or a GMO derivative and documentation maintained.			
9.2	Describe manure management practices to prevent contamination of crops, soil, and water.			
9.3	Do records verify raw manure applications were made at least 90 days prior to harvest of a crop whose edible portion does not come into contact with the soil or 120 days prior to harvest of a crop whose edible portion does come into contact with the soil?	<input type="checkbox"/>	<input type="checkbox"/>	Identify crop, application/harvest dates, and current crop location.

COMPOST		<input checked="" type="checkbox"/> Not Applicable – no composting activities
9.4	Describe composting facilities and composting process.	
	NOP: Do records verify the process (C:N ration, temperature and duration, and when applicable turns) are compliant.	
9.5	List materials and inputs used in the composting process.	
9.6	Describe management practices to prevent contamination of crops, soil, and water.	
9.7	Observations/Comments:	

10. PEST, WEED, and DISEASE CONTROL				<input type="checkbox"/> Not Applicable
		Yes	No	Comments/Observations/Noncompliance(s)
10.1	Are pest, weed, and disease controlled through preventive practices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Describe management practices. Timing of planting, cultivation, varieties selected for planting.
10.2	Do crops suffer from weed, insect, or disease infestation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Identify the crop, field id, type of pressure. Edges of fields are starting to get canadian thistle patches, along reservoir edge where there is a lot of off-road vehicle traffic. Attachment 4 shows on maps where weeds are getting thicker. Client stated that she intends to have those weeds sprayed this fall. Acreage affected will not be known until the actual spraying is done. Not done at time of inspection.
10.3	Are materials applied to prevent/control pest, weed or disease?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Identify the material and reason for use. Not at time of inspection.
	Do records verify compliance with annotations or restrictions?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Identify the material and reason for use. n/a
10.4	Is mulch used to suppress weeds?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Identify type of mulch, crop, location and removal. None
10.5	Observations/Comments: none			

11. ADJOINING LAND USE/BUFFER				<input type="checkbox"/> Not Applicable
		Yes	No	Comments/Observations/Noncompliance(s)
11.1	NOP: Do organic fields have adequate buffers to prevent contamination?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	List field and location needing buffers and adjoining land use. Shown on maps.
	COR: Do organic fields have buffers at least 8 meters wide?	<input type="checkbox"/>	<input type="checkbox"/>	List field and location needing buffers and adjoining land use. n/a

11. ADJOINING LAND USE/BUFFER		<input type="checkbox"/> Not Applicable
11.2	Describe the buffer management (i.e. planted, mowed, grazed, etc.) practices including the harvest, storage, disposition of the buffer crop. Some are planted in grass, some are planted in crops. Buffers planted in crops are harvested and sold as conventional.	
11.3	Describe buffer monitoring and frequency. As needed during growing season.	
11.4	Observations/Comments: None	

12. SPLIT or PARALLEL PRODUCTION		<input checked="" type="checkbox"/> Not Applicable	
	Yes	No	Comments/Observations/Noncompliance(s)
12.1	<input type="checkbox"/>	<input type="checkbox"/>	Is the organic operation physically and operationally separate from the nonorganic portion of the operation? <i>Identify locations and describe separation.</i> COR: Describe the transition plan and timeframe/progress for bringing all land under organic management.
12.2	<input type="checkbox"/>	<input type="checkbox"/>	Are organic crops visually distinguishable from nonorganic crops? <i>List the visually indistinguishable crops.</i>
12.3	Describe practices and physical barriers to prevent contamination and commingling of organic crops.		
12.4	Where and how are non-organic inputs stored? (i.e. fertilizers, pest controls, etc.)		
12.5	<input type="checkbox"/>	<input type="checkbox"/>	Are records maintained that track nonorganic CROPS/PRODUCTS from seed through sale and support segregation? <i>Describe.</i> Describe the identification system for distinguishing organic and nonorganic crops.
12.6	Observations/Comments:		

13. EQUIPMENT (Production and Post-Harvest Handling)				
	Yes	No	Comments/Observations/Noncompliance(s)	
13.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Is equipment used by the operation dedicated to organic crop production and handling? <i>List equipment used for both production systems.</i> None	
13.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Are custom operators or mobile handling units brought in for production or handling of organic crops? <i>Identify equipment and name/address of the custom operator.</i> Seed cleaner for own peas planted, document supplied with file. Used (b) (4)	
13.3	Describe clean-out procedures. <i>Identify equipment, materials used in the process, and purge amounts and disposition.</i> Compressed air as needed.			
13.4	Observations/Comments: None.			

14. WILD CROP HARVESTING		<input checked="" type="checkbox"/> Not Applicable	
A Wild Harvest Plan must be completed for wild harvested crops requested for certification. If a Plan has not been completed contact the GOA Office. Maps must identify the specific harvesting location(s) for each wild crop.			
	Yes	No	Comments/Observations/Noncompliance(s)
14.1	<input type="checkbox"/>	<input type="checkbox"/>	Were all harvesting areas inspected?
14.2	<input type="checkbox"/>	<input type="checkbox"/>	Do harvesting areas have defined, visually identifiable boundaries? <i>Describe.</i>
14.3	<input type="checkbox"/>	<input type="checkbox"/>	Do maps accurately identify the specific harvesting location(s), buffers, and adjoining land use?
14.4	Describe harvesting practices that promote the growth and production of the wild crop and prevent adverse impact on the biological diversity?		
14.5	Observations/Comments:		

15. POST-HARVEST HANDLING		<input checked="" type="checkbox"/> Not Applicable
A Handling Plan must be completed by operations that wash, clean, grade, repackage, etc. organic crops. No Plan – CONTACT office. If only off-farm handling is performed, complete 15.1, attach organic certification documents and move to the next section.		

15. POST-HARVEST HANDLING				<input checked="" type="checkbox"/> Not Applicable
A Handling Plan must be completed by operations that wash, clean, grade, repackage, etc. organic crops. No Plan – CONTACT office. If only off-farm handling is performed, complete 15.1, attach organic certification documents and move to the next section.				
	Yes	No	Comments/Observations/Noncompliance(s)	
15.1	Location where product is handled. <input type="checkbox"/> On-Farm (only) <input type="checkbox"/> Off-Farm (only) <input type="checkbox"/> On-Farm and Off-Farm			
	Identify Off-Farm Handling (activity and operation):			
	Ownership of Product: <input type="checkbox"/> Retained <input type="checkbox"/> Transferred/Sold <input type="checkbox"/> Other,			
15.2	Is water in contact with organic product?		<input type="checkbox"/>	<input type="checkbox"/> Describe use.
	Identify water source(s), treatments, and potential contaminants.			
	Is water tested for potability?		<input type="checkbox"/>	<input type="checkbox"/> Testing practices/frequency. Attach most recent test.
15.3	Are materials (i.e. chlorine, etc.) added to water in contact with organic product?		<input type="checkbox"/>	<input type="checkbox"/> List materials and attach ingredient information.
	If chlorine is used, describe monitoring of residual chlorine levels (not to exceed maximum levels in the Safe Drinking Water Act).			
15.4	Describe process and attach facility map with equipment and storage locations and a flow chart of process.			
	Are materials/processing aids used in the process?		<input type="checkbox"/>	<input type="checkbox"/> List materials and attach ingredient information.
15.5	Describe management practice and physical barriers to protect the organic integrity.			
15.6	Describe sanitation program, list materials used to clean equipment and facility. Attach ingredient labels.			
15.7	Describe pest management program, list materials used. Attach facility map showing locations of traps/baits, etc.			
15.8	Observations/Comments:			

16. STORAGE				<input type="checkbox"/> Not Applicable
Attach organic certification documents for off-farm facilities when applicable (i.e. grain banks).				
	Yes	No	Comments/Observations/Noncompliance(s)	
16.1	Location of storage facilities: <input checked="" type="checkbox"/> On Farm <input type="checkbox"/> Off Farm: Location and type:			
16.2	Describe monitoring activities and frequency for storage facilities. As needed when crops in storage, frequency based on weather or temperatures.			
16.3	Are storage facilities used for organic and nonorganic products?		<input type="checkbox"/>	<input checked="" type="checkbox"/> Describe segregation practices. Dedicated to organic crops. Buffer crops are taken from field to elevator.
16.4	Are storage facilities numbered and/or labeled "organic" or "O"?		<input checked="" type="checkbox"/>	<input type="checkbox"/>
16.5	Describe cleaning procedures and frequency. Brooms, shovels as needed before new crops put in bins.			
16.6	Describe the pest control practices and materials used in and around storage facilities. Keep area mowed to reduce harborage for pests. Native wildlife do rodent patrol.			
16.7	Observations/Comments: None.			

17. TRANSPORTATION				<input type="checkbox"/> Not Applicable
17.1	Describe transportation arrangements. Contracted trucks used, no crop harvested in 2014, none shipped.			
17.2	Describe how the crop/product is physically segregated and organic integrity protected? <i>Single commodity shipped, tarped to keep grain in and road debris out during transport.</i>			
17.3	Describe inspection and cleaning procedures for transportation units for crops. Visual inspection, swept, compressed air as needed.			
17.4	Observations/Comments: Documented with clean truck affidavits (from previous years).			

18. AUDIT TRAIL				
	Yes	No	N/A	Comments/Observations/Noncompliance(s)
18.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

18. AUDIT TRAIL					
18.2	Field, pasture, outdoor access area production/activity records	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Attachments 2, and 3
18.3	Records for sourcing organic seed and/or planting stock	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Attachment 1 Seed Search updated
18.4	Ingredient information for inputs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	On file
18.5	Clean equipment, storage, and transportation/container records	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Seed cleaner. No harvest or crops planted for 2014, farm was leased out.
18.6	Buffer management documentation (harvest, purge, storage, sale/feeding)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No harvest or crops planted for 2014, farm was leased out.
18.7	Harvest records for organic crop(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	None harvested in 2014
18.8	Storage/running inventory records for organic crop(s) and/or product(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Bin records reviewed.
18.9	Transportation records – operation name/address, product name, organic status, and lot number?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No harvest or crops planted for 2014, farm was leased out.
18.10	Sales records for organic (with lot numbers/id's) crops and/or products	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	None harvested in 2014, none sold.
18.11	Verification of organic certification or attestation compliance for off-farm handling	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	n/a
18.12	Complaint Register	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No entries since last inspection.
18.13	Is documentation easily understood and readily accessible?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
18.14	Describe the lot numbering system for each crop commodity. farm, year, bin, crop, load				
18.15	Details and calculations of the on-site audit(s) of organic crop produced to the amount of crop sold. N/A, no crops planted for 2014, farm was leased out. None sold.				
	Audit of product in and out of post-harvest handling facility. <input checked="" type="checkbox"/> Not applicable – facility not used.				
18.16	Observations/Comments: None				

19. PACKAGING and LABELING				<input checked="" type="checkbox"/> Not Applicable
	Yes	No	Comments/Observations/Noncompliance(s)	
19.1	Type of Packaging: <input type="checkbox"/> Bulk Other, Type of Labeling: <input type="checkbox"/> None <input type="checkbox"/> Packaged Product (§205.303) <input type="checkbox"/> Only Shipping and Storage Containers (§205.307)			
19.2	<input type="checkbox"/>	<input type="checkbox"/>	Were all labels displaying the organic seal or making organic claims submitted? Attach missing labels and identify labeling category.	
19.3	Do lot numbers appear on labels for shipping/storage containers?			
19.4	Observations/Comments: ship in semi-truck loads			

29. INSPECTION SUMMARY		
NOP/COR Standard	Noncompliance/Observation	Inspection Report Section
	None	

The information contained in this report is confidential between the inspector, the inspected party, and Global Organic Alliance (GOA), and its accreditors. This report does not constitute certification or consultation, nor shall it be used for promotional purposes. All observations and compliance assessments made are based on NOP or COR standards and result from observations, review of documents, and the operator interview.

Inspector Signature/Name: (b) (5), (b) (7)(C), (b) (7)(D)

Date: 7/14/15

☒ Electronic Signature on File

Attachment(s) – Document id and Name. Visually identify the corresponding document and attach in the order as listed.
Attachment 1 Seed Search updated

Attachment 2 Field histories updated
Attachment 3 Maps updated (all)
Attachment 4 Maps where weeds will be sprayed
Pick Up Letter
Pick Up Letter # 1a, b, c Farm Plan 2.1, 8.2, USCA updated pages
Pick Up Letter # 2 a, b Op Profile updated
Pick Up Letter # 3 a, b Maps
US Canada Equivalence Report
Exit Interview
Inspection Affidavit



Global Organic Alliance, Inc.
PO Box 530 3185 Township Road 179
Bellefontaine, OH 43311-0530
Phone: 937 593 1232 Fax 937 593 9507
Email: goaorg@centurylink.net Website: www.goa-online.org

EXIT INTERVIEW

Additional documents or issues may be identified during the post-inspection certification decision-making process which may require additional submissions or clarification. This form does not imply certification and shall not be used for promotional or marketing purposes.

Authorized Representative: Susan Yurman		Business Name: Yurman Farms	
Inspector Name: (b) (6), (b) (7)(C), (b) (7)(D)	Inspection Date: 7/14/15	Arrival Time: 8:30 AM	Departure Time: 1:30 PM
Certification Program: <input checked="" type="checkbox"/> NOP <input type="checkbox"/> COR		Trade Agreement: <input checked="" type="checkbox"/> US/Canada	
Scope(s): <input checked="" type="checkbox"/> Crop <input type="checkbox"/> Livestock <input type="checkbox"/> Handler <input type="checkbox"/> Processor <input type="checkbox"/> Wild Crop <input type="checkbox"/> Attestation (COR only)			
Inspection Type: <input checked="" type="checkbox"/> Initial/Annual <input type="checkbox"/> Additional/Follow-Up <input type="checkbox"/> Unannounced <input type="checkbox"/> Investigation <input type="checkbox"/> Other:			
Individual(s) present during the exit interview: Susan Yurman			

Additional Information To Be <u>SUBMITTED</u> To The GOA Office BY The Operation <u>WITHOUT DELAY</u> .	
1.	
2.	None
3.	
4.	
5.	
6.	

Observation/Issue of Concern	Regulation Number
1.	
2.	None
3.	
4.	
5.	
6.	

Applicant/Certified Operation

I affirm that I am an authorized representative and confirm that the information and documentation reported accurately reflects the production and handling practices used and records maintained by this operation. The additional documentation to be submitted to GOA and/or observation/issue recorded has been discussed with me. I agree to additional announced and unannounced inspections and/or residue sampling and testing as required by GOA or authorized representative of the certification program.

☐ I have received a receipt for the residue sample taken by the inspector and confirm the inspector was not charged for the sample taken.

(b) (6) _____ Date: 7/14/15
Authorized Representative Signature (b) (6)

Inspector

I affirm that to the best of my knowledge, the information recorded is based on the observation, information and documentation gathered during the inspection is accurate and complete. The additional information to be submitted to the GOA office and/or observation/issue has been discussed with the authorized representative of the operation.

(b) (6) _____ Date: 7/14/15
Inspector Signature (b) (6)



Global Organic Alliance, Inc.

PO Box 530 3185 Township Road 179

Bellefontaine, OH 43311-0530

Phone: 937 593 1232

Fax: 937 593 9507

Email: goaorg@centurylink.net

Website: www.goa-online.org

INSPECTION AFFIDAVIT

Certification Year: 2015

Only crops and/or products reported for the current year on this form will be considered for certification.

Authorized Representative: Susan Yurman	Business Name: Yurman Farms
Inspector Name: (b) (6), (b) (7)(C), (b) (7)(D)	Inspection Date: 7/14/15

As an authorized representative of the above named operation, I authorize Global Organic Alliance to release certification and inspection documentation required for exporting organic product.

☒ Yes Initials of authorized representative: FSY

Key: UOM=Unit of Measure NOP =National Organic Program COR=Canadian Organic Standard USCA=US/Canada Equivalency Product

Inventory

☐ Not Applicable

Crop/Product	Year	Amount	UOM (bu, lb, bale)	Location	Program		
					NOP	COR	USCA
Kamut	2013	(b) (4)	bu	(b) (4)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

***Operations transferring from a USDA or CFIA accredited certifying agent must provide certification documents listing the organic crop/product in storage before it may be recognized by GOA.*

Crop(s) requested for certification and program. *Estimated yields must be reported for crops.*

☐ Not Applicable

The UOM must be provided with the estimated yield. *PIC's will not be generated for crops/products when an estimated yield is not reported.*

Crop/Product	Field ID	Yield	UOM	Program		
				NOP	COR	USCA
Hard red spring wheat	(b) (4)	(b) (4)	bu	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Peas	(b) (4)	(b) (4)	bu	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fallow	(b) (4)	none		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Clover, plowdown	(b) (4)	none		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Pasture	(b) (4)	none	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Borders	(b) (4)	none	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Additional paperwork is required for compliance verification to the US/Canada Equivalence Agreement. Ensure the field id is included for all certified parcels of pasture, outdoor access areas, fallow and green manure, etc.

Livestock requested for certification.

☒ Not Applicable

Species		Certification	Head	Annual Production	Program		
					NOP	COR	USCA
Dairy	Cows	<input type="checkbox"/> Dairy Only		Lbs milk	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Cows	<input type="checkbox"/> Dairy <input type="checkbox"/> Meat			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Heifers	<input type="checkbox"/> Dairy <input type="checkbox"/> Meat			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Calves	<input type="checkbox"/> Dairy <input type="checkbox"/> Meat			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Steers (feeders)	<input type="checkbox"/> Meat			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/> Dairy <input type="checkbox"/> Meat			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poultry	Layers	<input type="checkbox"/> Eggs <input type="checkbox"/> Meat		Doz eggs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Pullets	<input type="checkbox"/> Eggs <input type="checkbox"/> Meat			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Broilers	<input type="checkbox"/> Meat			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Turkeys	<input type="checkbox"/> Meat			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Beef	Cows	<input type="checkbox"/> Breeding Only			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Cows	<input type="checkbox"/> Breed <input type="checkbox"/> Meat			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Heifers	<input type="checkbox"/> Breed <input type="checkbox"/> Meat			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Calves	<input type="checkbox"/> Breed <input type="checkbox"/> Meat			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Steers (feeders)	<input type="checkbox"/> Meat			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/> Breed <input type="checkbox"/> Meat			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other,		<input type="checkbox"/> Breed <input type="checkbox"/> Meat			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/> Breed <input type="checkbox"/> Meat			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/> Breed <input type="checkbox"/> Meat			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/> Breed <input type="checkbox"/> Meat			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Finished Product/Service Provided

☒ Not Applicable

US/Canada Equivalency compliance documents must be submitted for organic agricultural ingredients in products requested for compliance verification.

Product/Service	Brand Name	Program			Packaging		
		NOP	COR	USCA	Bulk	Retail	Nonretail
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

I verify that the production and handling practices used, field histories and land use, and production and handling projected yields/production and crop, livestock, and product inventories and other information given is true and accurate to the best of my knowledge. I agree to abide by the applicable certification and compliance program requirements and standards. I acknowledge that GOA shall be notified immediately, in writing, of any changes in the operation, including but not limited to: adding new land, adding a new type of livestock production, adding equipment/production lines, and drift or other contamination, and issues that may affect continued compliance. I understand that an additional inspection may be required at the expense of the operation. I also understand that I shall be responsible for implementing corrective actions to identified compliance issues and the operation may be subject to additional announced or unannounced on-site inspection visits and/or sampling for residue testing. I agree to pay the royalty fees for organic product(s) sold or certified organic service(s) provided that are certified by GOA.

Member Signature: (b) (6)

Print Name: F Susan Yurman

Inspector Signature: (b) (6)

Date: 7/14/15

Global Organic Alliance, Inc.

You must document the three (3) seed suppliers/sources who were contacted to obtain organic seed for each type of nonorganic, untreated/nonGMO seed purchased.

This form must be completed **ANNUALLY** and **RETURNED TO GOA** with the Organic Plan ***to report the use of ORGANIC AND NON-ORGANIC nonGMO/untreated seed, including your own, leftover, or contracted seed. This INCLUDES seed used for cover crops, green manures, etc. SEED AND PLANTING STOCK MUST BE organic when commercially available. COST IS NOT AN EXEMPTION FOR USING NON-ORGANIC SEED. NON-ORGANIC SEED MUST NOT BE TREATED WITH PROHIBITED SUBSTANCES. Review seed treatment ingredients with the materials list for the applicable certification program. Annual seedlings/transplants must be from an organic source. Additional paper may be used if necessary.***

Name: Susan Yurman Yurman Farms

Name: Susan Yuman Yuman Farms Year: 2015
 KEY: CO = Contracted (supporting documents required) O = Organic NO = NonOrganic Cert = Certificate/addendum
 UT=Untreated NGMO=NonGMO

[illegible]

****Ensure seed tags/labels and untreated/nonGMO statements or verification of organic certification (as applicable to the seed) is maintained and a copy submitted with this form.**



FIELD HISTORY SHEET 1

Global Organic Alliance, Inc.

Name: Susan Yarnan

Farm Name: Yarnan Farms

Year: 2015

A separate field history sheet must be completed for each year and an individual history established for each field. Do not group two or three years of field histories onto one field history and do not group fields into type of crop being grown. If yearly or individual field histories are grouped they will NOT be accepted and the file will be held until correct field history she submitted.

Key: Status: O = Organic Transition - T3 = Third Year, T2 = Second Year, T1 = First Year C = Conventional

Field ID	Acres	Crop	Status (✓)					Last Prohibited Input Date	Soil Treatment/History		Manure/Compost Application	Pest/Disease/Treat
			O	T3	T2	T1	C		Material, Date, Application Rate	Cover Crop - Planting Date		
(b) (4)	(b) (4)	Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)	inoculant		
(b) (4)	(b) (4)	HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
(b) (4)	(b) (4)	pasture	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
(b) (4)	(b) (4)	pasture	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
(b) (4)	(b) (4)	Fallow	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
(b) (4)	(b) (4)	HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	" "			
(b) (4)	(b) (4)	Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	" "	inoculant		
(b) (4)	(b) (4)	Clover	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	" "			
(b) (4)	(b) (4)	HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	" "			
(b) (4)	(b) (4)	HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	" "			
(b) (4)	(b) (4)	Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	" "	inoculant		
(b) (4)	(b) (4)	HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	" "			



FIELD HISTORY SHEET 2

Global Organic Alliance, Inc.

Name: Susan Yerman

Farm Name: Yerman Farms

Year: 2015

A separate field history sheet must be completed for each year and an individual history established for each field. Do not group two or three years of field histories onto one field history and do not group fields into type of crop being grown. If yearly or individual field histories are grouped they will NOT be accepted and the file will be held until correct field history sheet is submitted.

Key: Status: O = Organic Transition - T3 = Third Year, T2 = Second Year, T1 = First Year C = Conventional

Field ID	Acres	Crop	Status (✓)					Last Prohibited Input Date	Soil Treatment/History		Manure/Compost Application	Pest/Disease Treat
			O	T3	T2	T1	C		Material, Date, Application Rate	Cover Crop - Planting Date		
(b) (4)	(b) (4)	Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)	inoculant		
		SF clover	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998				
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		Peanut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	inoculant		



FIELD HISTORY SHEET 3

Global Organic Alliance, Inc.

Name: Susan Yurman

Farm Name: Yurman Farms

Year: 2015

A separate field history sheet must be completed for each year and an individual history established for each field. Do not group two or three years of field histories onto one field history and do not group fields into type of crop being grown. If yearly or individual field histories are grouped they will NOT be accepted and the file will be held until correct field history sheet submitted.

Key: Status: O = Organic Transition - T3 = Third Year, T2 = Second Year, T1 = First Year C = Conventional

Field ID	Acres	Crop	Status (✓)					Last Prohibited Input Date	Soil Treatment/History		Manure/Compost Application	Pest/Disease Treat
			O	T3	T2	T1	C		Material, Date, Application Rate	Planting Date		
(b) (4) (b) (4)		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		SF	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		Pears	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		SF Clover	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		SF Clover	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		Pears	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		SF Clover	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		Pears	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		SF Clover	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		Pears	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
(b) (4) (b) (4)		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		SF	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		Pears	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		SF Clover	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		SF Clover	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		Pears	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		SF Clover	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		Pears	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		SF Clover	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
		Pears	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)			
HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)					

FIELD HISTORY SHEET 4
Global Organic Alliance, Inc.Name: Susan YurmanFarm Name: Yurman FarmsYear: 2015

A separate field history sheet must be completed for each year and an individual history established for each field. Do not group two or three years of field histories onto one field history and do not group fields into type of crop being grown. If yearly or individual field histories are grouped they will NOT be accepted and the file will be held until correct field history sheet is submitted.

Key: Status: O = Organic Transition - T3 = Third Year, T2 = Second Year, T1 = First Year C = Conventional

Field ID	Acres	Crop	Status (✓)					Last Prohibited Input Date	Soil Treatment/History Material, Date, Application Rate Cover Crop, Seeding Date	Manure/Compost Application Material, Date, Application Rate	Pest/Disease Treat Material, Date, Appl Rate
			O	T3	T2	T1	C				
(b) (4)	(b) (4)	HRS Kernut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HRS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998			
		SF	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998			
		Pean	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)	inoculant	
		SF	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998			
		HRS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)	inoculant	
		SF	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998			
		Pean	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)	inoculant	
		HRS Kernut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998			
		SF cloud	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998			
		HRS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HRS Kernut	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998			



FIELD HISTORY SHEET 5

Global Organic Alliance, Inc.

Attachment 2
5 of 8

Name: Susan Yurman

Farm Name: Yurman Farms

Year: 2015

A separate field history sheet must be completed for each year and an individual history established for each field. Do not group two or three years of field histories onto one field history and do not group fields into type of crop being grown. If yearly or individual field histories are grouped they will NOT be accepted and the file will be held until correct field history site submitted.

Key: Status: O = Organic Transition - T3 = Third Year, T2 = Second Year, T1 = First Year C = Conventional

Field ID	Acres	Crop	Status (✓)					Last Prohibited Input Date	Soil Treatment/History		Manure/Compost Application		Pest/Disease Tree
			O	T3	T2	T1	C		Material, Date, Application Rate	Cover Crop - Planting Date	Material, Date, Application Rate	Material, Date, Application Rate	
(b) (4) (b) (4)	(b) (4) (b) (4)	Pear	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)	Miscellaneous			
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	" "	Miscellaneous			
		Pear	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	" "	Miscellaneous			
		SF clover	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998					
		Pear	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)	Miscellaneous			
		Pear	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	" "	" "			
		HR5/Pear	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)	Miscellaneous			
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998					
		Pear SF	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998		Miscellaneous			
		SF clover	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998					
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)				
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998					
		SF clover	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998					



FIELD HISTORY SHEET & Global Organic Alliance, Inc.

Name: Susan Yurman

Farm Name: Yurman Farms

Year: 2015

A separate field history sheet must be completed for each year and an individual history established for each field. Do not group two or three years of field histories onto one field history and do not group fields into type of crop being grown. If yearly or individual field histories are grouped they will NOT be accepted and the file will be held until correct field history sheet is submitted.

Key: Status: O = Organic Transition - T3 = Third Year, T2 = Second Year, T1 = First Year C = Conventional

Field ID	Acres	Crop	Status (✓)					Last Prohibited Input Date	Soil Treatment/History Material, Date, Application Rate Cover Crop - Planting Date	Manure/Compost Application Material, Date, Application Rate	Pest/Disease Treat Material, Date, Appl. Rate
			O	T3	T2	T1	C				
(b) (4)	(b) (4)	HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		Pean	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	Miscelant	
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	"	Miscelant	
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					



FIELD HISTORY SHEET 7

Global Organic Alliance, Inc.

Attachment 2
7 of 8

Name: Susan Yarmen

Farm Name: Yarmen Farms

Year: 2015

A separate field history sheet must be completed for each year and an individual history established for each field. Do not group two or three years of field histories onto one field history and do not group fields into type of crop being grown. If yearly or individual field histories are grouped they will NOT be accepted and the file will be held until correct field history sheet submitted.

Key: Status: 0 = Organic Transition - T3 = Third Year, T2 = Second Year, T1 = First Year C = Conventional

Field ID	Acres	Crop	Status (✓)					Last Prohibited Input Date	Soil Treatment/History Material, Date, Application Rate Cover Crop - Planting Date	Manure/Compost Application Material, Date, Application Rate	Pest/Disease Treat Material, Date, Appl Rate
			0	T3	T2	T1	C				
(b) (4)	(b) (4)	HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		Peas	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	insectant		
		60 SF 60 Peas	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	insectant	60 Fallow 60 Peas	(b) (4) ac
		Peas SF	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4) insectant		
		SF	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998			
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
		HR5 Peas	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998			
		Peas SF	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	" insectant		
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	" "		
		Peas	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	" insectant		
		SF	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998			
		HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		



FIELD HISTORY SHEET 8

Global Organic Alliance, Inc.

Attachment 2
8 of 8

Name: Susan Yurman

Farm Name: Yurman Farms

Year: 2015

A separate field history sheet must be completed for each year and an individual history established for each field. Do not group two or three years of field histories onto one field history and do not group fields into type of crop being grown. If yearly or individual field histories are grouped they will NOT be accepted and the file will be held until correct field history sheet submitted.

Key: Status: O = Organic

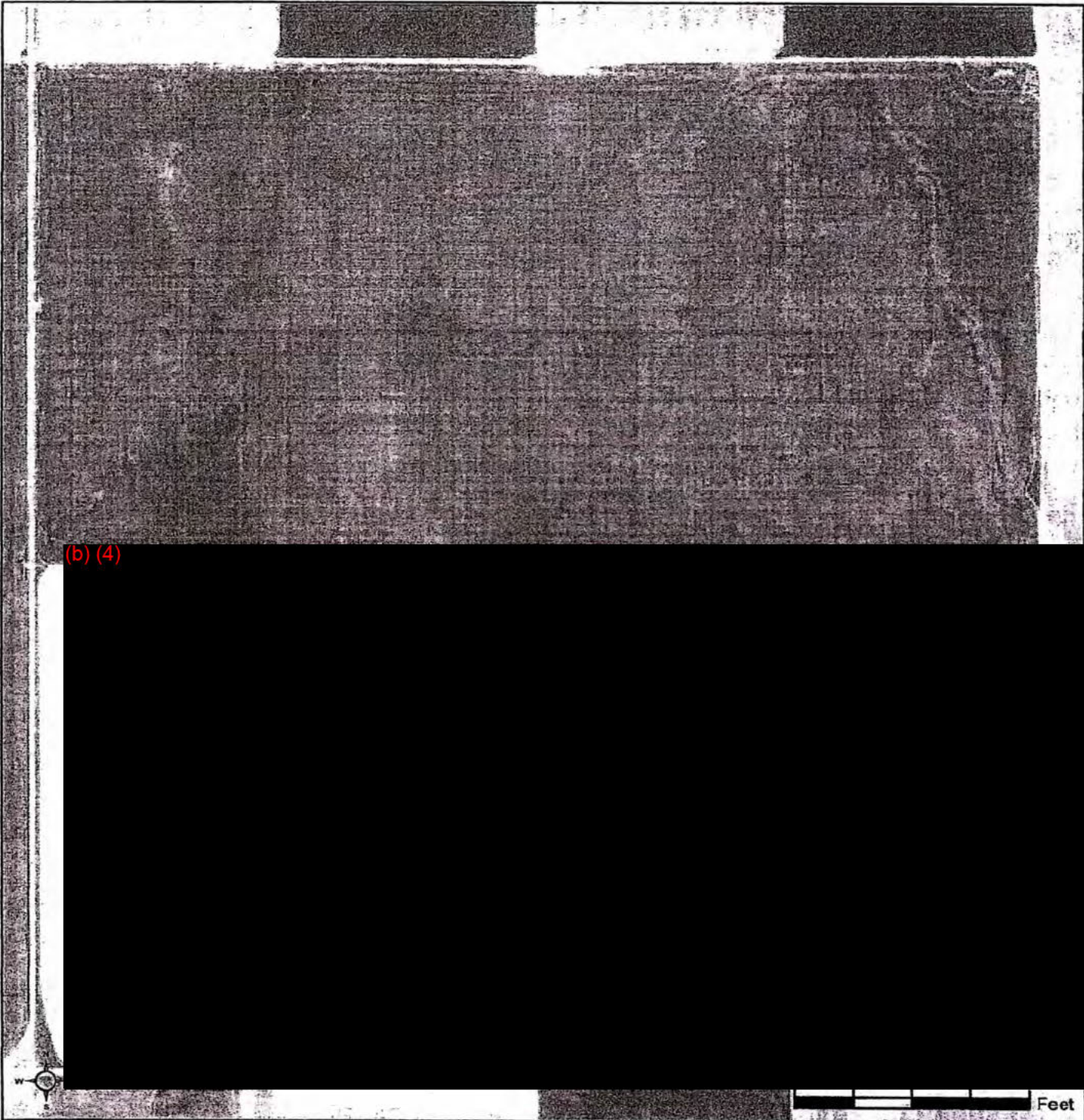
Transition - T3 = Third Year, T2 = Second Year, T1 = First Year C = Conventional

Field ID	Acres	Crop	Status (Y)					Last Prohibited Input Date	Soil Treatment/History Material, Date, Application Rate Cover Crop - Planting Date	Manure/Compost Application Material, Date, Application Rate	Pest/Disease Treat Material, Date, Application Rate
			O	T3	T2	T1	C				
(b) (4)	(b) (4)	SF	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
(b) (4)	(b) (4)	HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
(b) (4)	(b) (4)	Pine	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	inoculant		
(b) (4)	(b) (4)	SF Clover	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
(b) (4)	(b) (4)	HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
(b) (4)	(b) (4)	HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
(b) (4)	(b) (4)	Kanuck	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
(b) (4)	(b) (4)	Pine	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
(b) (4)	(b) (4)	HR5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
(b) (4)	(b) (4)	Pine	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		
(b) (4)	(b) (4)	border	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1998	(b) (4)		



United States
Department of
Agriculture

Liberty County, Montana



(b) (4)

Common Land Unit
 Cropland Rangeland X Other Use
☒ Conservation Reserve Program
Wetland Determination Identifiers
☒ Restricted Use
☒ Limited Restrictions
☒ Exempt from Conservation
 Compliance Provisions

SHARES OF 100% OW OW
 HRW HRS (b) (4) BRLY
 FALL CRP
 PEAS (b) (4) OTHER CROP (b) (4) NAG
 OTH GRASS TOTAL CROPLAND (b) (4)

2015 Program Year

Map Created July 17, 2014

Farm 2795

Tract 1126

11-34N-6E

United States Department of Agriculture (USDA) Farm Service Agency (FSA) maps are for FSA Program administration only. This map does not represent a legal survey or reflect actual ownership; rather it depicts the information provided directly from the producer and/or National Agricultural Imagery Program (NAIP) imagery. The producer accepts the data 'as is' and assumes all risks associated with its use. USDA-FSA assumes no responsibility for actual or consequential damage incurred as a result of any user's reliance on this data outside FSA Programs. Wetland identifiers do not represent the size, shape, or specific determination of the area. Refer to your original determination (CPA-026 and attached maps) for exact boundaries and determinations or contact USDA Natural Resources Conservation Service (NRCS).



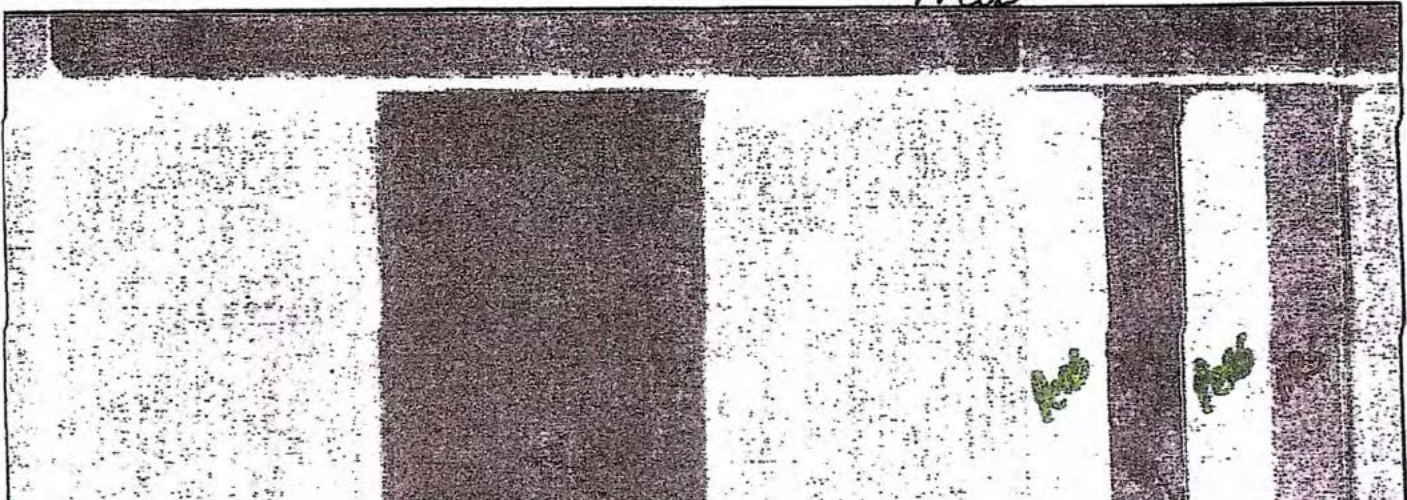
United States
Department of
Agriculture

Liberty County, Montana

Attachment 3

2 of 8

Me



(b) (4)

Common Land Unit

☐ Cropland ☐ Rangeland ☒ Other Use

☒ Conservation Reserve Program

Wetland Determination Identifiers

- ☒ Restricted Use
- ☒ Limited Restrictions
- ☒ Exempt from Conservation Compliance Provisions

SHARES OF 100% ON
HRW HRS BRLY
FALLOW CRP
OTHER CROPS pcas nag
TOTAL CROPLAND

2015 Program Year

Map Created July 17, 2014

Farm 2795

Tract 1129

13-34N-6E

United States Department of Agriculture (USDA) Farm Service Agency (FSA) maps are for FSA Program administration only. This map does not represent a legal survey or reflect actual ownership; rather it depicts the information provided directly from the producer and/or National Agricultural Imagery Program (NAIP) imagery. The producer accepts the data 'as is' and assumes all risks associated with its use. USDA-FSA assumes no responsibility for actual or consequential damage incurred as a result of any user's reliance on this data outside FSA Programs. Wetland Identifiers do not represent the size, shape, or specific determination of the area. Refer to your original determination (CPA-026 and attached maps) for exact boundaries and determinations or contact USDA Natural Resources Conservation Service (NRCS).

updated 7/14/15



United States
Department of
Agriculture

Liberty County, Montana



Common Land Unit
 Cropland Rangeland Other Use
☒ Conservation Reserve Program
Wetland Determination Identifiers
☒ Restricted Use
☒ Limited Restrictions
☒ Exempt from Conservation Compliance Provisions

SHARES OF 100% DW BRLY
 HRS
 FALLON CRP
 PEAS OTHER CROPS NAE
 OTH GRASS TOTAL CROPLAND

2015 Program Year
 Map Created July 17, 2014

Farm 2795
Tract 1132
14-34N-6E

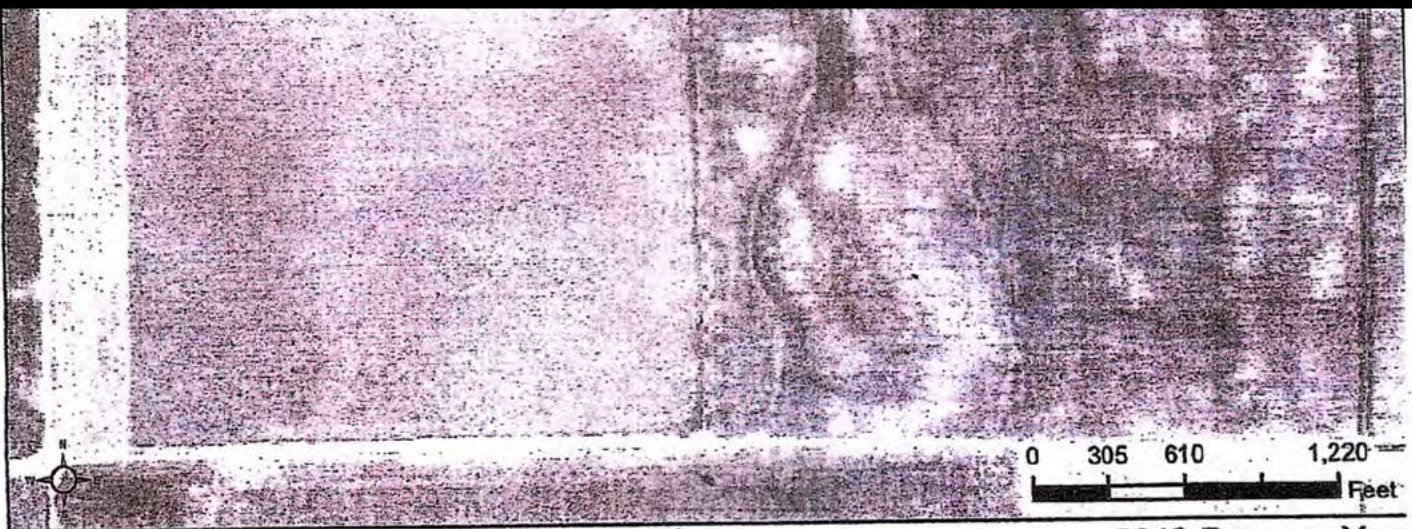
United States Department of Agriculture (USDA) Farm Service Agency (FSA) maps are for FSA Program administration only. This map does not represent a legal survey or reflect actual ownership; rather it depicts the information provided directly from the producer and/or National Agricultural Imagery Program (NAIP) imagery. The producer accepts the data 'as is' and assumes all risks associated with its use. USDA-FSA assumes no responsibility for actual or consequential damage incurred as a result of any user's reliance on this data outside FSA Programs. Wetland identifiers do not represent the size, shape, or specific determination of the area. Refer to your original determination (CPA-026 and attached maps) for exact boundaries and determinations or contact USDA Natural Resources Conservation Service (NRCS).



United States
Department of
Agriculture

Liberty County, Montana

(b) (4)



Common Land Unit
 Cropland Rangeland Other Use
☒ Conservation Reserve Program
Wetland Determination Identifiers
☒ Restricted Use
☒ Limited Restrictions
☒ Exempt from Conservation Compliance Provisions

SHARES OF	100%	OW	OW
HRW		WRS	BRLY
FALLOW		CRP	
OTHER CROPS	peas		clover
TOTAL CROPLAND			

2015 Program Year
 Map Created July 17, 2014
Farm 2795
Tract 1148
24-34N-6E

United States Department of Agriculture (USDA) Farm Service Agency (FSA) maps are for FSA Program administration only. This map does not represent a legal survey or reflect actual ownership; rather it depicts the information provided directly from the producer and/or National Agricultural Imagery Program (NAIP) imagery. The producer accepts the data "as is" and assumes all risks associated with its use. USDA-FSA assumes no responsibility for actual or consequential damage incurred as a result of any user's reliance on this data outside FSA Programs. Wetland identifiers do not represent the size, shape, or specific determination of the area. Refer to your original determination (CPA-026 and attached maps) for exact boundaries and determinations or contact USDA Natural Resources Conservation Service (NRCS).

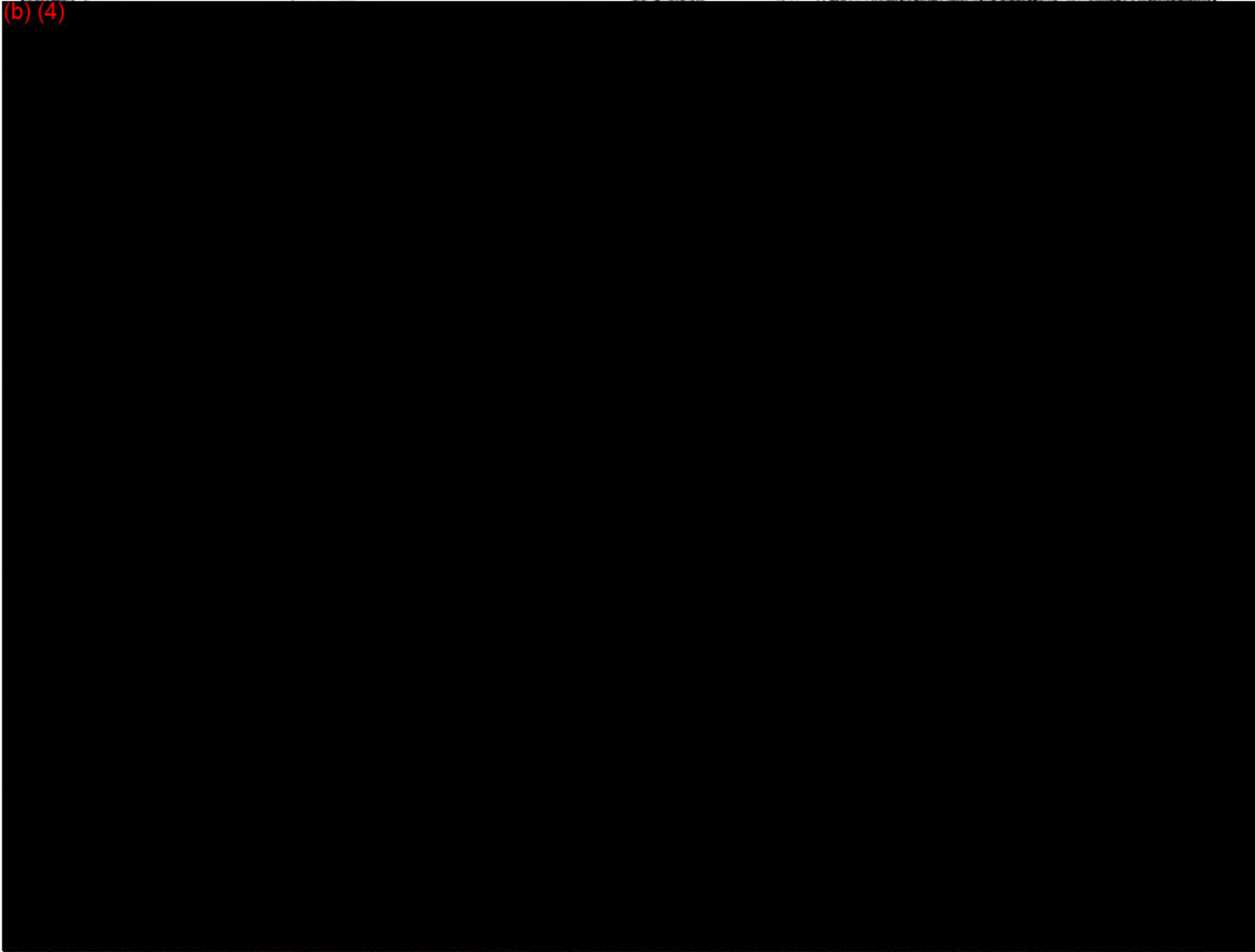
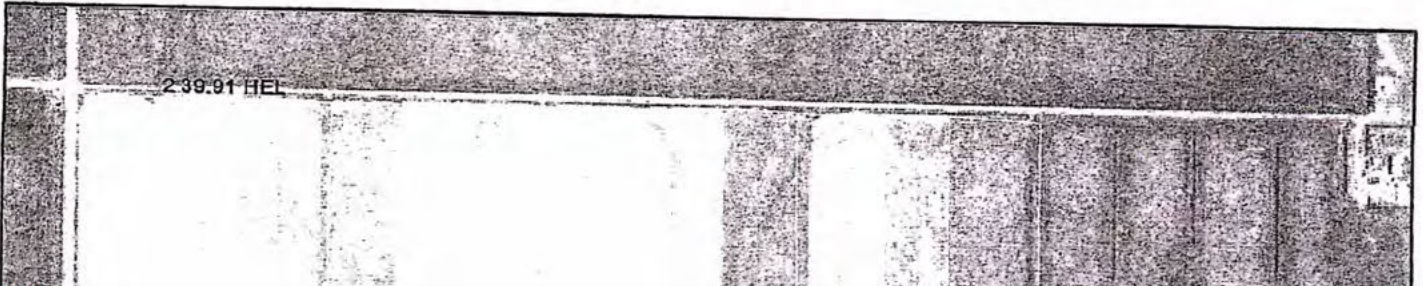


United States
Department of
Agriculture

Liberty County, Montana

Attachment 3

5 of 8



- Common Land Unit**
- Cropland
 - Rangeland
 - Other Use
- Conservation Reserve Program**
- Wetland Determination Identifiers**
- Restricted Use
 - Limited Restrictions
 - Exempt from Conservation
 - Compliance Provisions

SHARES DP 100%
HRU [redacted] HRS [redacted] ON [redacted]
FALLOW [redacted] [redacted] [redacted] [redacted]
PEAS [redacted] OTHER CROPS [redacted] [redacted]
OTH GRASS [redacted] TOTAL CROPLAND [redacted]
border [redacted]

2015 Program Year

Map Created July 17, 2014

Farm 2795

Tract 1697

15-32N-6E

United States Department of Agriculture (USDA) Farm Service Agency (FSA) maps are for FSA Program administration only. This map does not represent a legal survey or reflect actual ownership; rather it depicts the information provided directly from the producer and/or National Agricultural Imagery Program (NAIP) imagery. The producer accepts the data 'as is' and assumes all risks associated with its use. USDA-FSA assumes no responsibility for actual or consequential damage incurred as a result of any user's reliance on this data outside FSA Programs. Wetland identifiers do not represent the size, shape, or specific determination of the area. Refer to your original determination (CPA-026 and attached maps) for exact boundaries and determinations or contact USDA Natural Resources Conservation Service (NRCS).

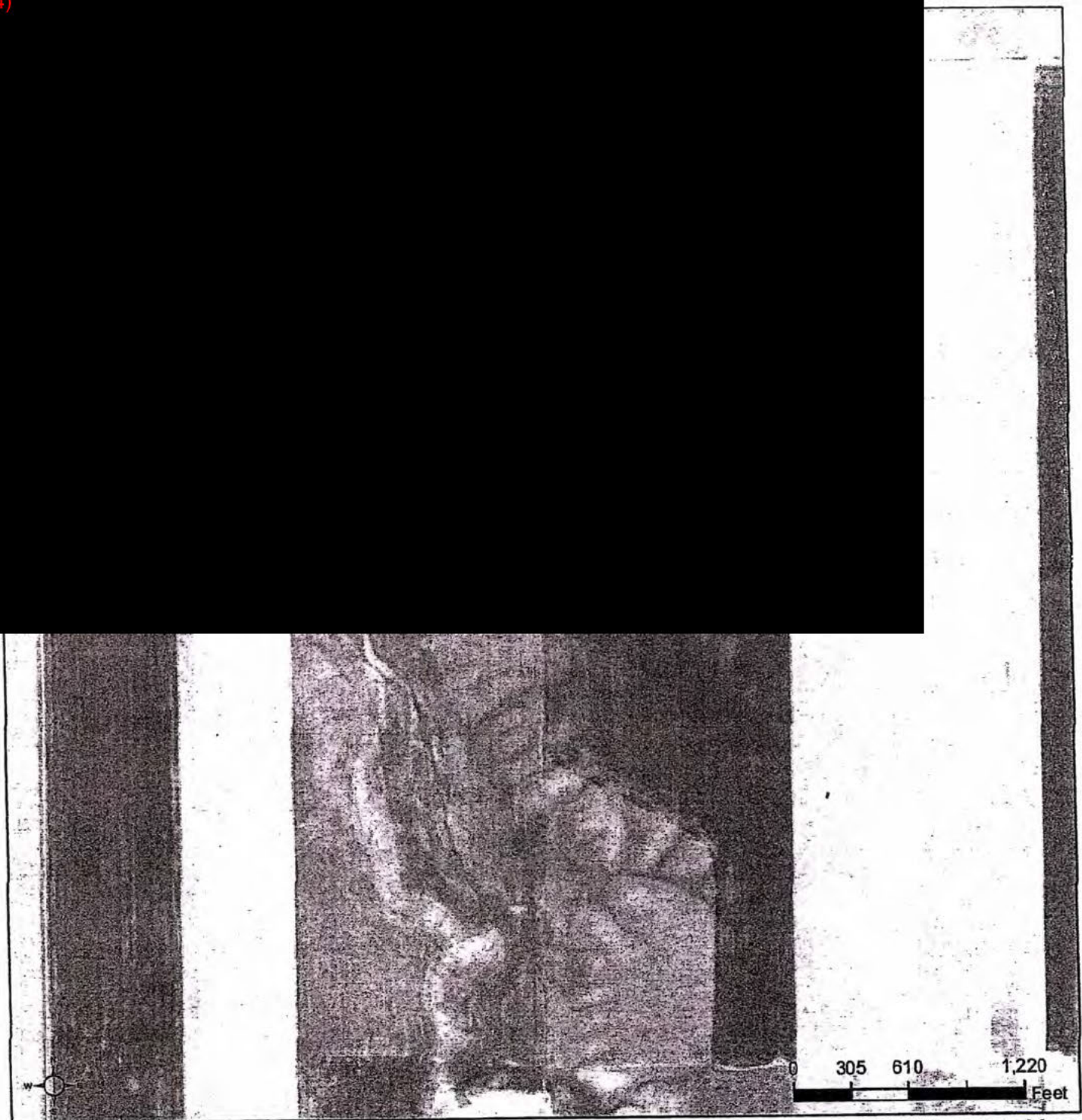
updated 7/14/15

USDA

United States
Department of
Agriculture

Liberty County, Montana

(b) (4)

**Common Land Unit**

Cropland Rangeland Other Use

Conservation Reserve Program

Wetland Determination Identifiers

- Restricted Use
- ▽ Limited Restrictions
- Exempt from Conservation Compliance Provisions

SHARES DP 100% OW OW
 HRW HRS [redacted] DRLY
 FALLOW CRP
 PEAS [redacted] OTHER CROPS HAG
 OTH GRASS TOTAL CROPLAND [redacted]

2015 Program Year

Map Created July 17, 2014

Farm 2795**Tract 1729****27-32N-6E**

United States Department of Agriculture (USDA) Farm Service Agency (FSA) maps are for FSA Program administration only. This map does not represent a legal survey or reflect actual ownership; rather it depicts the information provided directly from the producer and/or National Agricultural Imagery Program (NAIP) imagery. The producer accepts the data 'as is' and assumes all risks associated with its use. USDA-FSA assumes no responsibility for actual or consequential damage incurred as a result of any user's reliance on this data outside FSA Programs. Wetland identifiers do not represent the size, shape, or specific determination of the area. Refer to your original determination (CPA-026 and attached maps) for exact boundaries and determinations or contact USDA Natural Resources Conservation Service (NRCS).

updated 7/14/15

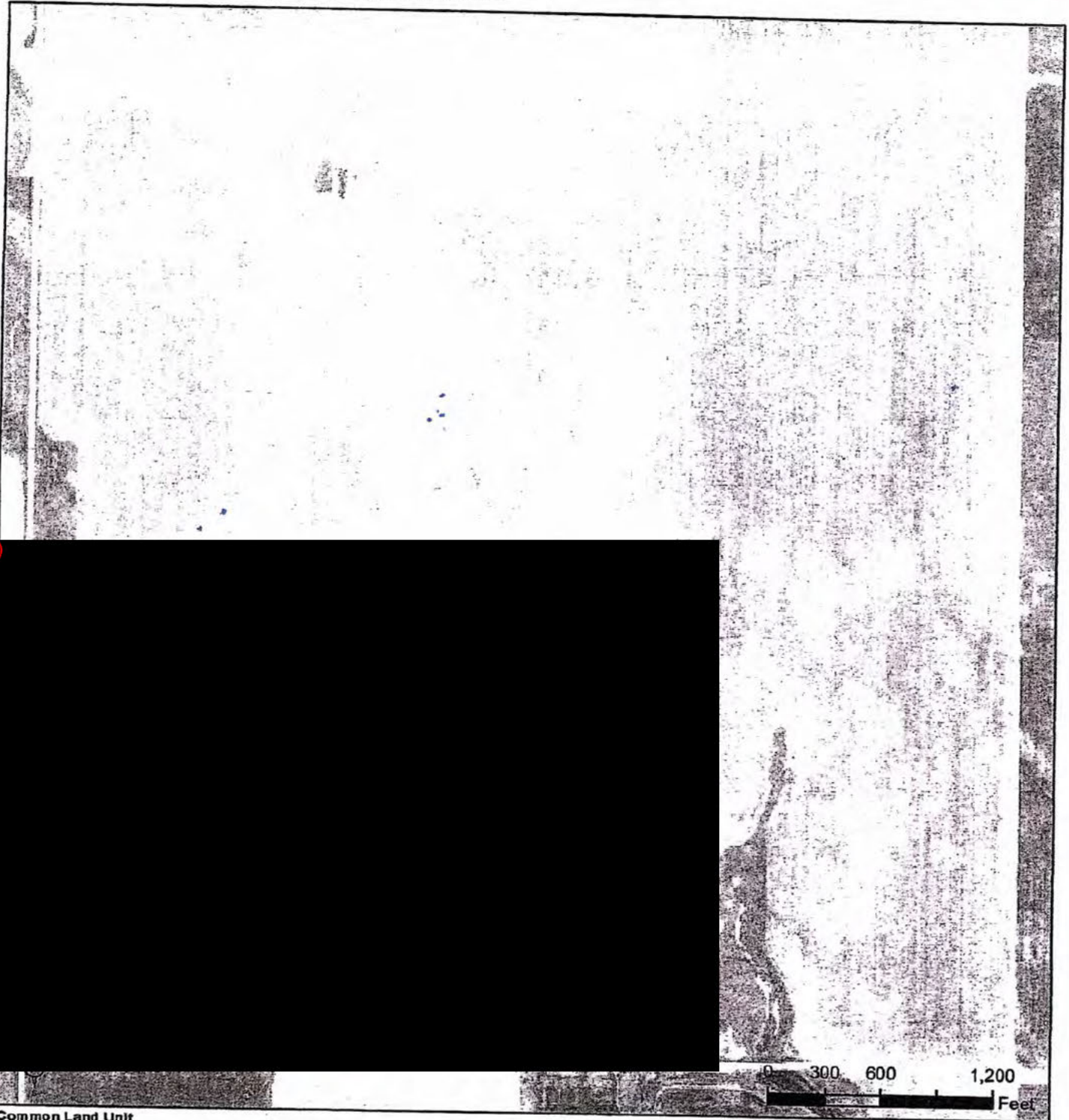


United States
Department of
Agriculture

Liberty County, Montana

Attachment 3

7 of 8



Common Land Unit
Cropland Rangeland Other Use
☒ Conservation Reserve Program
Wetland Determination Identifiers
☒ Restricted Use
☒ Limited Restrictions
☒ Exempt from Conservation Compliance Provisions

SHARES OF 100%
IRV [REDACTED] [REDACTED] [REDACTED]
FALLOW [REDACTED] [REDACTED] [REDACTED]
PEA [REDACTED] [REDACTED] [REDACTED]
OTH GRASS [REDACTED] [REDACTED] [REDACTED]
TOTAL CROPLAND [REDACTED]
range land

2015 Program Year

Map Created July 17, 2014

Farm 2795

Tract 11765

22-34N-6E

United States Department of Agriculture (USDA) Farm Service Agency (FSA) maps are for FSA Program administration only. This map does not represent a legal survey or reflect actual ownership; rather it depicts the information provided directly from the producer and/or National Agricultural Imagery Program (NAIP) imagery. The producer accepts the data 'as is' and assumes all risks associated with its use. USDA-FSA assumes no responsibility for actual or consequential damage incurred as a result of any user's reliance on this data outside FSA Programs. Wetland Identifiers do not represent the size, shape, or specific determination of the area. Refer to your original determination (CPA-026 and attached maps) for exact boundaries and determinations or contact USDA Natural Resources Conservation Service (NRCS).

updated 7/14/15

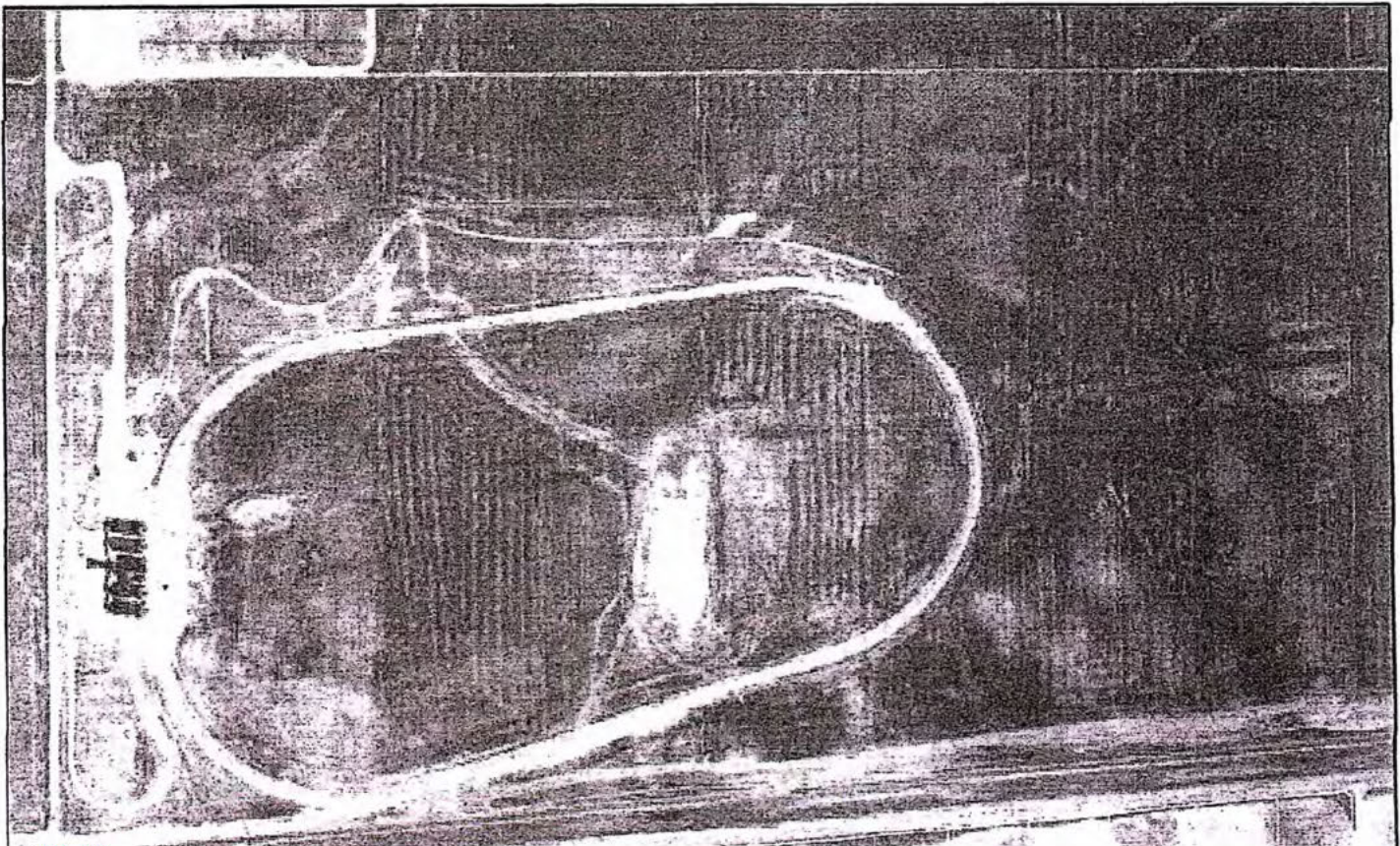


United States
Department of
Agriculture

Liberty County, Montana

Attachment 3

8 of 8



(b) (4)

Common Land Unit
Cropland Rangeland Other Use
☒ Conservation Reserve Program
Wetland Determination Identifiers
☒ Restricted Use
☒ Limited Restrictions
☒ Exempt from Conservation Compliance Provisions

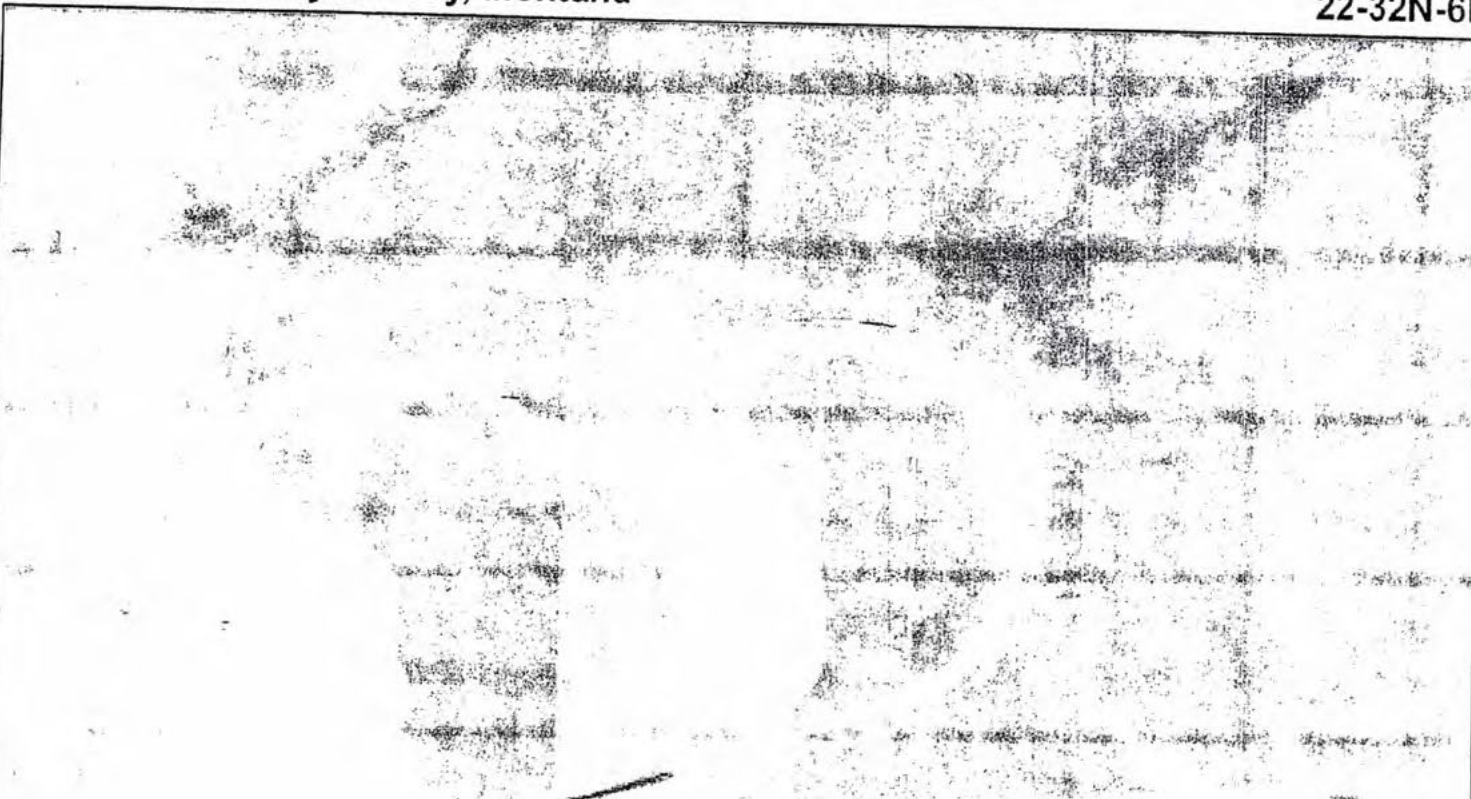
SHARES CP 100% ON
HRS [REDACTED] BRLY
FALLOW [REDACTED] CRP
PEAS [REDACTED] OTHER CROPS [REDACTED] HAY [REDACTED]
OTH GRASS [REDACTED] TOTAL CROPLAND [REDACTED]

2015 Program Year
Map Created July 17, 2014

Farm 2795
Tract 12120
22-32N-6E

United States Department of Agriculture (USDA) Farm Service Agency (FSA) maps are for FSA Program administration only. This map does not represent a legal survey or reflect actual ownership; rather it depicts the information provided directly from the producer and/or National Agricultural Imagery Program (NAIP) imagery. The producer accepts the data 'as is' and assumes all risks associated with its use. USDA-FSA assumes no responsibility for actual or consequential damage incurred as a result of any user's reliance on this data outside FSA Programs. Wetland identifiers do not represent the size, shape, or specific determination of the area. Refer to your original determination (CPA-026 and attached maps) for exact boundaries and determinations or contact USDA Natural Resources Conservation Service (NRCS).

updated 7/14/15



(b) (4)

Common Land Unit
☐ Cropland ☐ Rangeland ☒ Other Use
Conservation Reserve Program

Wetland Determination Identifiers

- ☐ Restricted Use
- ☐ Limited Restrictions
- ☐ Exempt from Conservation Compliance Provisions

2014 Program Year

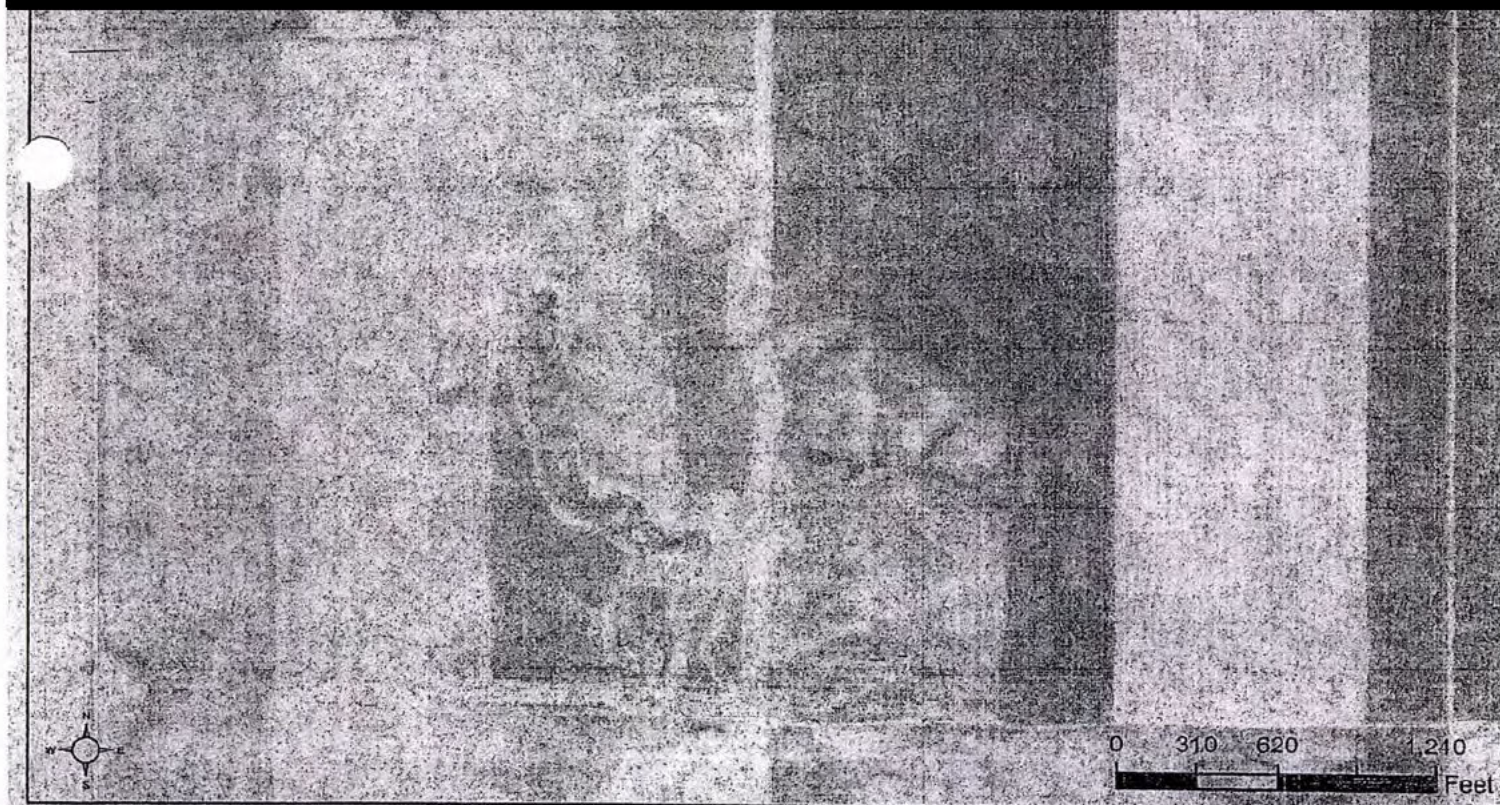
Map Created February 14, 2013

Farm 2513
Tract 11767

updated 7/14/15

USDA FSA maps are for FSA Program administration only. This map does not represent a legal survey or reflect actual ownership; rather it depicts the information provided directly from the producer and/or the NAIP imagery. The producer accepts the data 'as is' and assumes all risks associated with its use. The USDA Farm Service Agency assumes no responsibility for actual or consequential damage incurred as a result of any user's reliance on this data outside FSA Programs. Wetland identifiers do not represent the size, shape, or specific determination of the area. Refer to your original determination (CPA-026 and attached maps) for exact boundaries and determinations or contact NRCS.

(b) (4)



Common Land Unit
☐ Cropland ☐ Rangeland ☒ Other Use

☐ Conservation Reserve Program

Wetland Determination Identifiers

☐ Restricted Use

☐ Limited Restrictions

☐ Exempt from Conservation
 Compliance Provisions

FARM 2513
 TRACT 1729
 PEAS OTHER CROPS
 OTI GRASS TOTAL CROPLAND

2014 Program Year

Map Created February 14, 2013

Farm 2513

Tract 1729

updated 7/14/15

USDA FSA maps are for FSA Program administration only. This map does not represent a legal survey or reflect actual ownership; rather it depicts the information provided directly from the producer and/or the NAIP imagery. The producer accepts the data 'as is' and assumes all risks associated with its use. The USDA Farm Service Agency assumes no responsibility for actual or consequential damage incurred as a result of any user's reliance on this data outside FSA Programs. Wetland identifiers do not represent the size, shape, or specific determination of the area. Refer to your original determination (CPA-026 and attached maps) for exact boundaries and determinations or contact NRCS.

(b) (4)

Common Land Unit

☐ Cropland ☐ Rangeland ☒ Other Use
Conservation Reserve Program

Wetland Determination Identifiers

☐ Restricted Use
☐ Limited Restrictions
☐ Exempt from Conservation
Compliance Provisions

2014 Program Year

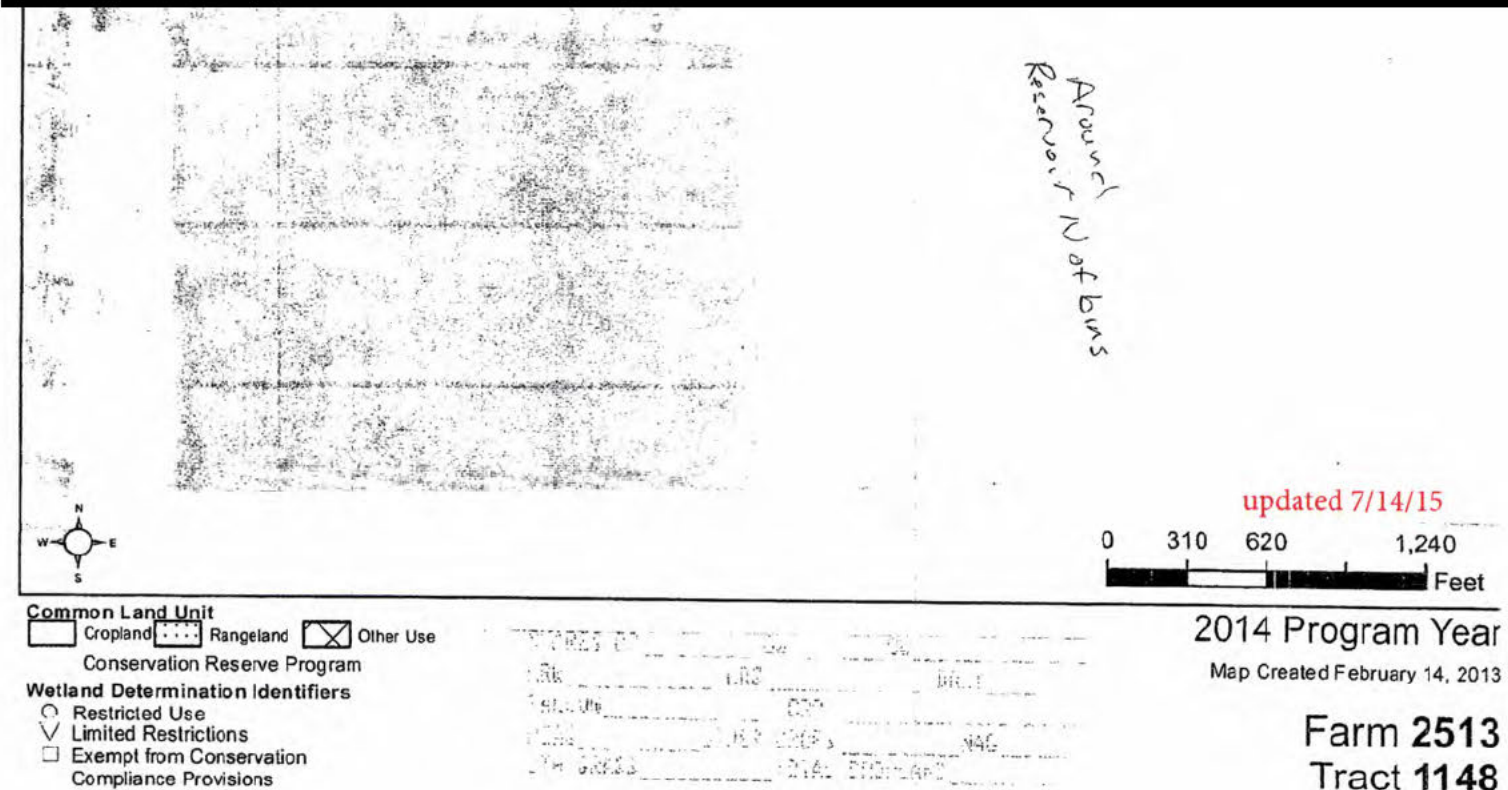
Map Created February 14, 2013

Farm 2513
Tract 1129

updated 7/14/15

SDA FSA maps are for FSA Program administration only. This map does not represent a legal survey or reflect actual ownership; rather it depicts the information provided directly from the producer and/or the NAIP imagery. The producer accepts the data 'as is' and assumes all risks associated with its use. The USDA Farm Service Agency assumes no responsibility for actual or consequential damage incurred as a result of any user's reliance on this data outside FSA Programs. Wetland identifiers do not represent the size, shape, or specific determination of the area. Refer to your original determination (CPA-026 and attached maps) for exact boundaries and determinations or contact NRCS.

(b) (4)



(b) (4)



0 310 620 1,240
Feet

Common Land Unit

☐ Cropland ☐ Rangeland ☒ Other Use
Conservation Reserve Program

Wetland Determination Identifiers

☒ Restricted Use
☐ Limited Restrictions
☐ Exempt from Conservation
Compliance Provisions

2014 Program Year

Map Created February 14, 2013

Farm 2513
Tract 1697

USDA FSA maps are for FSA Program administration only. This map does not represent a legal survey or reflect actual ownership; rather it depicts the information provided directly from the producer and/or the NAIP imagery. The producer accepts the data "as is" and assumes all risks associated with its use. The USDA Farm Service Agency assumes no responsibility for actual or consequential damage incurred as a result of any user's reliance on this data outside FSA Programs. Wetland identifiers do not represent the size, shape, or specific determination of the area. Refer to your original determination (CPA-026 and attached maps) for exact boundaries and determinations or contact NRCS.

updated 7/14/15



Global Organic Alliance, Inc.

PO Box 530 3185 Township Road 179

Bellefontaine, OH 43311-0530

Phone: 937 593 1232 Fax: 937 593 9507

Email: goainfo@centurylink.net Website: www.goa-online.org

IN ORDER TO EXPEDITE THE CERTIFICATION PROCESS, WE ARE REQUESTING YOU TO PICK UP THE DOCUMENTS or ITEMS LISTED BELOW FROM THE APPLICANT AND INCLUDE THEM WITH YOUR REPORT WHEN SUBMITTED. PLEASE NOTE: AUDITORS DO NOT ACCEPT "OBSERVED BY THE INSPECTOR. IF NOT AVAILABLE, PLEASE NOTE THE REASON. THANK YOU FOR YOUR VALUABLE ASSISTANCE WITH THE CERTIFICATION PROCESS.

Inspector Name	(b) (6), (b) (7)(C), (b) (7)(D)		
Operation Name	Yurman Farms -- Susan Yurman		
Review By	1022	Date Sent	5/26/15

Items Required -- PLEASE HOLD FOR THE INSPECTOR:

- Please complete the following questions on the Organic Farm Plan:
 - Please revise answer to 2.1. Last year you were certified for (b) (4) acres (b) (4) and this year you are requesting certification on the Operation Product Profile of (b) (4) acres. ✓
 - Answer 8.2. ✓
 - Please answer Section 3 of US/Canada Equivalency Agreement Plan. ✓

Available ☒ Not Available ☐

- Operation Product Profile: *updated*
 - List units of measure for "Projected Yield or Production" column. ✓
 - Please be certain to list all fields for which you are requesting certification, including summer Fallow and Pastures. ✓

Available ☒ Not Available ☐

- Please mark the following Field Maps accordingly:
 - 12120 needs Fields (b) (4) labeled with field numbers and acreage.
 - 1679 needs Fields (b) (4) labeled with field numbers and acreage.

Available ☒ Not Available ☐

- Seed tag OR invoice and organic certificate/product addendum for the Kamut seed from Montana Flour & Grain. *n/a no seed purchased, not planted*

Items requested: 4 items received 4

1. Condition for Continued Certification – List the noncompliance or condition and provide a description of the corrective action taken to come into compliance. The effectiveness of the action taken will be evaluated during the annual inspection. Failure to correct a previous condition for continued certification will delay the certification process and may result in adverse action. **USE ADDITIONAL PAPER WHEN NEEDED.**

1.1. Was a noncompliance or condition recorded from the previous year? ☐ Yes ☒ No If yes, complete the following table.

Condition for Continued Certification	Corrective Action (Attach supporting documentation when applicable.)
1.	
2.	
3.	

2. Acreage Profile – Report changes to fields or acreage requested for certification.

☐ No Changes to fields, acreage or status of fields.

2.1 Are you adding acreage/fields? ☒ Yes Complete Section 2.2. ☒ No

Are you removing acreage fields? ☐ Yes ☒ No List:

2.2 List each new field being added to your operation and requested for certification/shortened transition period.

A Prior Land Use Statement (PLUS F014) must be completed in full and signed by the previous landowner for any land that has not been under your control/management during the transition period. Field histories must be reported on the back of the PLUS for the previous three years and field map submitted for each field.

Field ID's	Acres	Previous Land Owner	Own Field	PLUS
See prior land use			<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>

2.3. Describe changes to field ids, acreage and or status of fields.

2.4. Fill out the Operation/Product Profile – Farm Production (F043) listing the crops, land, and products requested for certification.

3. Seeds/Annual Seedlings/Planting Stock INCLUDES SEED USED FOR COVER CROPS AND GREEN MANURES.

All seed, annual seedlings, and planting stock **MUST BE REPORTED ON THE SEED SEARCH AND REPORTING LOG** and untreated/non-GMO verification must be submitted for all nonorganic seed and planting stock. Verification of current organic certification must be submitted for organic seed and annual seedlings/transplants. **Seed tags/invoice must be attached. If you have not received your seed by the time the application is submitted, note the tags/invoice will be available for the inspector to pick-up.**

☐ Seeds, annual seedlings, and planting stock were not planted.

3.1. Purchased Seed? ☒ Yes ☐ No

3.2. Purchased Annual seedlings/transplants? ☐ Yes ☒ No

List the supplier(s) and attach certification documents:

3.3. Purchased Perennial rootstock? ☐ Yes ☒ No If yes, date under organic management.

4. Soil and Crop Nutrient Management

4.1. Describe improvements or changes that have been or will be made to the soil and crop nutrient program. ☒ No Changes

4.2. List all soil/crop fertility inputs in the Input Log (F042).

5. Raw Manure or Compost

☒ Not Applicable

5.1. Describe improvements or changes that have been made or will be made to the manure/compost use/handling. ☐ No Changes

5.2. List all inputs in the Input Log (F042).

6. Environmental Husbandry

6.1. Describe improvements or changes that have been made or will be made to the environmental husbandry/conservation practices.

☒ No Changes

7. Water ☒ Not Applicable

7.1 Describe improvements or changes that have been made or will be made to the water management and conservation practices.

☐ No Changes**8. Crop Management**8.1. How often are crop management practices rotations monitored? ☐ Daily ☐ Weekly ☒ As Needed ☐ Other:

8.2. Describe improvements or changes that have been made or will be made to the crop management practices, including the crop rotation.

☒ No Changes**9. Pest, Weed, Disease Management**9.1. How often are crop, pest, and disease management practices monitored? ☐ Daily ☐ Weekly ☒ As Needed ☐ Other:

9.2. Describe improvements or changes that have been made or will be made to the pest, weed, and disease program?

☐ No Changes*Patches of Canada Thistle were sprayed out last fall these small will be out of production for 3 years and will be noted on maps.***10. Treated Lumber and Burning Crop Residues** ☒ Not Applicable10.1. Describe new additions/construction with treated lumber or changes in the practices for burning crop residues. ☐ No Changes**11. Buffer Areas/Adjoining Land Use**11.1. How often are buffer areas and adjoining land use monitored? ☐ Daily ☐ Weekly ☒ As Needed ☐ Other:11.2. Describe improvements or changes that have been made or will be made to buffer areas or adjoining land use. ☐ No Changes*As we did in 2013 we will be seeding the border areas and selling it for conventional product.***12. Split or Parallel Production** ☒ Not Applicable

12.1. Describe improvements or changes that have been made or will be made to split/parallel production practices and/or physical barriers.

☐ No Changes**13. Equipment**13.1. Describe improvements or changes that have been made or will be made to equipment. ☒ No Changes**14. Post-Harvest Handling** ☐ Not Applicable14.1. Location of Post-Harvest Handling: ☒ On-Farm ☐ Off-Farm Name of Operation and Certification Agency:14.2. List crops that are handled. *Clean seed for my own use*14.3. Describe improvements or changes that have been made or will be made to post-harvest handling arrangements, practices and/or equipment. ☒ No Changes

14.4. Submit organic certification documents for off-farm handling operations.

15. Storage - Crop/Packaged Product ☐ Not Applicable - No Storage

15.1. Describe improvements or changes that have been made or will be made to storage locations, arrangements, and/or facilities.

☒ No Changes**16. Transportation** ☐ Not Applicable16.1. Describe improvements or changes that have been made or will be made to transportation arrangements or practices? ☒ No Changes

Global Organic Alliance, Inc.

PO Box 530 3185 Township Road 179

Bellefontaine, OH 43311-0530

Phone: 937 593 1232

Fax: 937 593 9507

Email: goaorg@centurylink.net

Website: www.goa-online.org

MAY - 5 2015

US - CANADA EQUIVALENCE ARRANGEMENT

This form must be completed and returned to the GOA office to evaluate compliance of raw or processed agricultural product to the US/Canada Equivalency Arrangement. GOA will issue a Certificate of Compliance for product that is compliant with the terms of the arrangement. Products may not be labeled or marketed as '100% Organic'.

NOP Certified Operations Complete Sections 1, 2, 3, 5, 6, and 7 as applicable to the operation.

- Agricultural products to be exported to Canada shall not have been from fields/parcels treated with sodium (Chilean) nitrate.
- Agricultural products produced by hydroponic or aeroponic shall not be sold or marketed in Canada as organic.
- Livestock products must be derived from animals (with the exception of ruminants) produced according to stocking rates set out in CAN/CGSB-32.210-2006.

COR Certified Operations Complete Sections 1, 2, 4, 5, 6, and 7 as applicable to the operation.

- Livestock products that will be sold or marketed as organic in the US may not be derived from animals treated with antibiotics.

Section 1: Operation Data		
Equivalence: <input checked="" type="checkbox"/> Canada <input type="checkbox"/> US	Date: 4-28-2015	
Authorized Representative: Susan Yurman		
Business Name: Yurman Farms		
Mailing Address: PO Box 337 Chester MT 59522		
Physical Address: 3371 1500 Rd East Chester MT 59522		
Phone:	Fax:	Cell:
Compliance Verification: <input checked="" type="checkbox"/> Crop <input type="checkbox"/> Livestock <input type="checkbox"/> Handler <input type="checkbox"/> Processor		

Section 2: Agricultural Product(s) (i.e. crop, livestock, processed product) Requested for Equivalence	
Spring wheat	
Kamut	
Peas	

Section 3: Completed by NOP Operations <input checked="" type="checkbox"/> NOT APPLICABLE			
Crops - <input type="checkbox"/> Not requested for equivalence.			
2.1 Were crops requested for equivalence from fields treated with Chilean (sodium) nitrate? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
If yes, list field/parcel id, acreage, and crop in the table below. (Use additional paper when necessary.)			
Field/Parcel ID	Acreage	Crop	
2.2 List crops produced by hydroponic or aeroponic methods. <input checked="" type="checkbox"/> None			
2.3 Livestock Stocking Rates <input checked="" type="checkbox"/> NOT APPLICABLE			
POULTRY SPACE REQUIREMENTS <input checked="" type="checkbox"/> NOT APPLICABLE			
PASTURE SIZE - PROVIDE THE NUMBER OF ANIMALS/TOTAL AMOUNT OF LAND IN ROTATION.			
Layers = birds/m ²	Indoor Stocking Density	Outdoor Stocking Density	Mobile/ Pasture Based Birds/Hectare
Broilers/Turkeys = kg/m ²			
Layers (number):			
Broilers (number):			
Max Total Live Weight:			
Turkeys/Geese (number):			
Max Total Live Weight:			

updated 7/14/15



OPERATION PRODUCT PROFILE
FARM/LIVESTOCK
Global Organic Alliance, Inc.

P/U Letter # 2 a, b

Name: Susan Yurman

Operation Name: Yurman Farms

Year: 2015

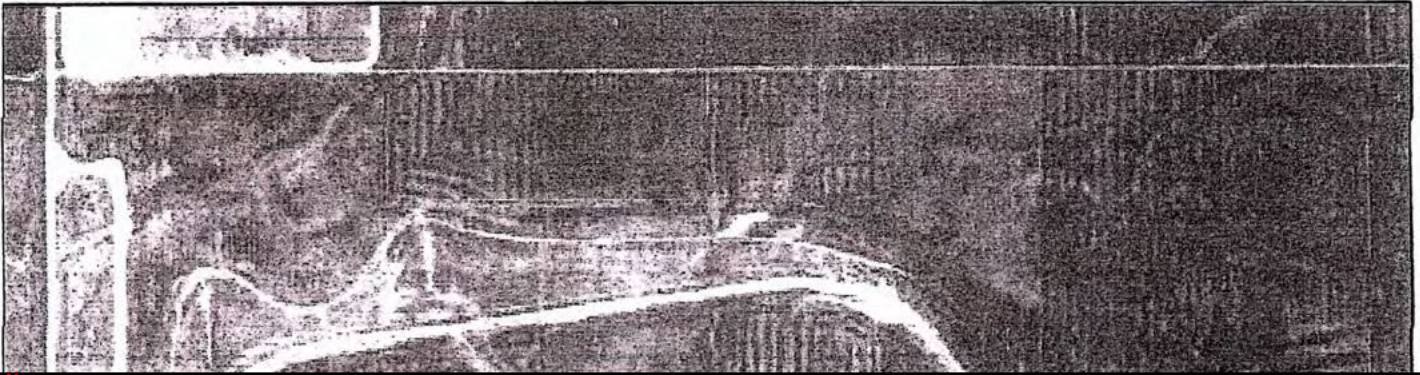
List crops and acreage, livestock type and production category (i.e. breeding, meat, dairy) and edible livestock products requested for certification. The sum of the total acreage must equal the sum of the total acreage taken from the acreage reported in the Organic Plan and Field History Sheet. Livestock operations requesting certification for meat products must provide verification of organic certification for the slaughter facility. Labels making organic claims must be submitted along with this form for each product and approved before they used.

Crop Livestock	Acreage Number of Head	Field Numbers Edible Livestock Product	Livestock Production			Packaging			Label Type		Projected Yield or Production
			Dairy	Meat	Breed	Bulk	Retail	Non Retail	Retail	Non- Retail	
Blue Corn	(b) (4)	(b) (4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	(b) (4) bu
Fallow			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA
Dairy Cows		Milk	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	(b) (4) lbs
Dairy Heifers			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Replacement
Layers		Eggs	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	(b) (4) doz
Broilers		Meat	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	(b) (4) head
Hard red spring wheat	(b) (4)	(b) (4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	(b) (4) bu
Peas	(b) (4)	(b) (4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	(b) (4) bu
Fallow	(b) (4)	(b) (4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	n/a
Clover, plowdown	(b) (4)	(b) (4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	n/a
Pasture	(b) (4)	(b) (4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	n/a
Borders	(b) (4)	(b) (4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	n/a

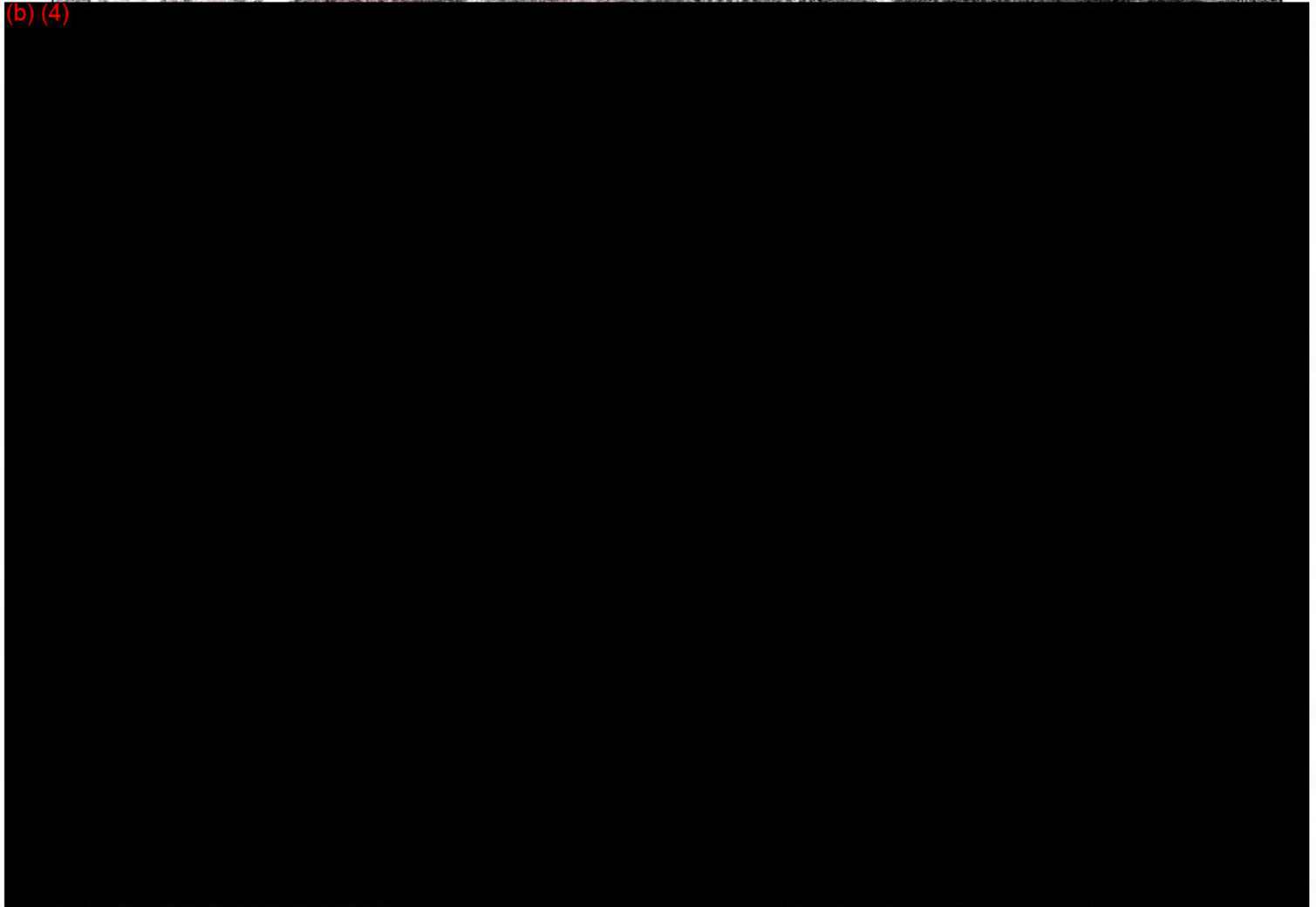


United States
Department of
Agriculture

Liberty County, Montana



(b) (4)



Common Land Unit
 Cropland Rangeland Other Use
☒ Conservation Reserve Program
Wetland Determination Identifiers
☒ Restricted Use
☒ Limited Restrictions
☒ Exempt from Conservation Compliance Provisions

SHARES CP 100% DW DW
 HRW HRS BRLY
 FALLOW (b) (4) CRP
 PEAS (b) (4) OTHER CROP (b) (4) HAY
 OTH GRASS TOTAL CROPLAND (b) (4)

2015 Program Year

Map Created July 17, 2014

Farm 2795

Tract 12120

22-32N-6E

United States Department of Agriculture (USDA) Farm Service Agency (FSA) maps are for FSA Program administration only. This map does not represent a legal survey or reflect actual ownership; rather it depicts the information provided directly from the producer and/or National Agricultural Imagery Program (NAIP) imagery. The producer accepts the data 'as is' and assumes all risks associated with its use. USDA-FSA assumes no responsibility for actual or consequential damage incurred as a result of any user's reliance on this data outside FSA Programs. Wetland identifiers do not represent the size, shape, or specific determination of the area. Refer to your original determination (CPA-026 and attached maps) for exact boundaries and determinations or contact USDA Natural Resources Conservation Service (NRCS).

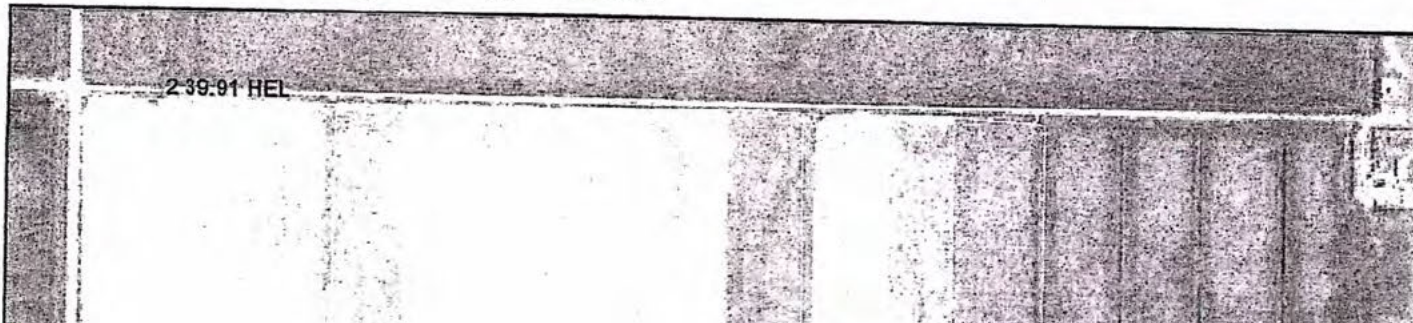
updated 7/14/15



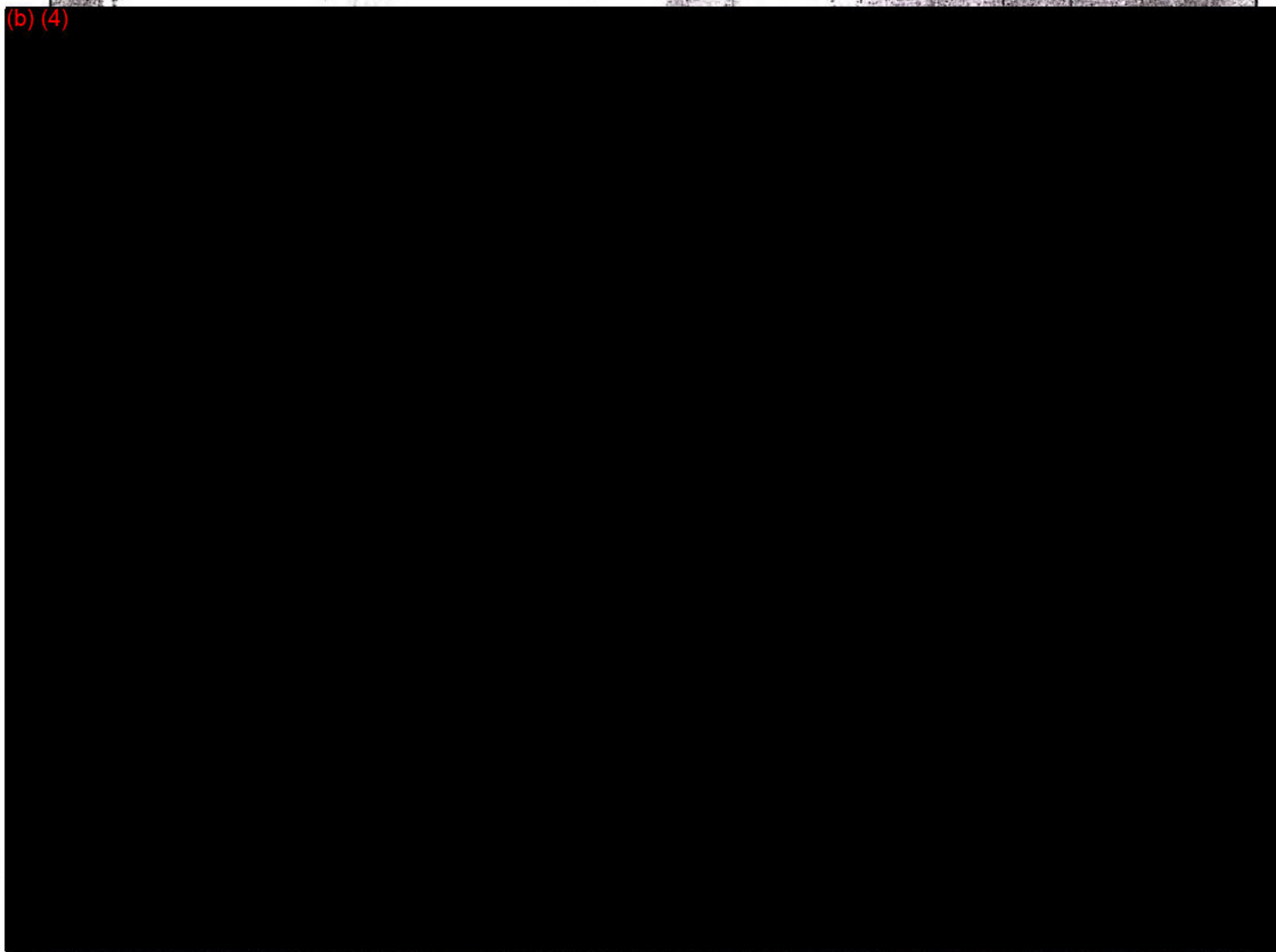
United States
Department of
Agriculture

Liberty County, Montana

P/U Letter 3 b



(b) (4)



Common Land Unit

Cropland Rangeland X Other Use

Conservation Reserve Program

Wetland Determination Identifiers

- Restricted Use
- ▼ Limited Restrictions
- Exempt from Conservation Compliance Provisions

SHARED BY 100%
HRW HRG
FALLOW
PEAT
OTH GRASS
#17 border
OTHER CROPS
TOTAL CROPLAND

2015 Program Year

Map Created July 17, 2014

Farm 2795

Tract 1697

15-32N-6E

United States Department of Agriculture (USDA) Farm Service Agency (FSA) maps are for FSA Program administration only. This map does not represent a legal survey or reflect actual ownership; rather it depicts the information provided directly from the producer and/or National Agricultural Imagery Program (NAIP) imagery. The producer accepts the data 'as is' and assumes all risks associated with its use. USDA-FSA assumes no responsibility for actual or consequential damage incurred as a result of any user's reliance on this data outside FSA Programs. Wetland identifiers do not represent the size, shape, or specific determination of the area. Refer to your original determination (CPA-026 and attached maps) for exact boundaries and determinations or contact USDA Natural Resources Conservation Service (NRCS).

updated 7/14/15



Global Organic Alliance, Inc.

PO Box 530 3185 Township Road 179

Bellefontaine, OH 43311-0530

Phone: 937 593 1232

Fax: 937 593 9507

Email: goaorg@centurylink.net

Website: www.goa-online.org

US – CANADA EQUIVALENCY COMPLIANCE REPORT

US for Canada Equivalence – Complete Sections 1, 2, and 5

Canada for US Equivalence – Complete Sections 1, 3, and 5

Handlers/Processors (US and Canada) – Complete Sections 1, 4, and 5

Operation

Equivalence: <input checked="" type="checkbox"/> Canada <input type="checkbox"/> US	Inspection Date: 7/14/15	Inspector: (b) (6), (b) (7)(C), (b) (7)(D)
Authorized Representative: Susan Yurman		
Business Name: Yurman Farms		
Address: 3371 1500 Rd East, Chester, MT 59222		
Type of Operation: <input checked="" type="checkbox"/> Crops <input type="checkbox"/> Livestock/Livestock Products <input type="checkbox"/> Handler		

Section 1: Product(s) Requested for Compliance

Hard red spring wheat	
Peas, winter	

Section 2: US Operation for Canada Equivalence

☐ NOT APPLICABLE

Crops	Yes	No	Comments/Observations
2.1 Was sodium (Chilean) nitrate applied to crops requested for equivalence?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	If yes, LIST crop(s): none
2.2 Crops requested for Canadian equivalency grown using hydroponic or aeroponic methods?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	If yes, LIST crops(s): none
2.3 Livestock Stock Rates – <input checked="" type="checkbox"/> No livestock seeking equivalence. Not applicable to ruminants.			

Poultry Space Requirements

☒ NOT APPLICABLE

Pasture size – provide the number of animals/total amount of land in rotation.

Layers = birds/m ²	Indoor Stocking Density	Outdoor Stocking Density	Mobile/ Pasture Based Birds/Hectare
Broilers/Turkeys = kg/m ²			
Layers (number):			
Broilers (number):			
Turkeys/Large Birds (number):			
2.4 Comments:			

Section 3: Canada Operation for US Equivalence

☒ NOT APPLICABLE

	Yes	No	Comments/Observations
3.1 Were antibiotics used to treat livestock?	<input type="checkbox"/>	<input type="checkbox"/>	If yes, identify animal type and id:
3.2 Comments:			

Section 4: Handler/Processor (US and Canada)

☒ NOT APPLICABLE

	Yes	No	Comments/Observations
4.1 Attestation(s) of Compliance for Agricultural Products/ingredients.	<input type="checkbox"/>	<input type="checkbox"/>	If no, list product/ingredient.
4.2 Comments:			

Section 5: Labels

☒ NOT APPLICABLE

	Comments/Observations
5.1 Attach labels that will be applied to exported product. <input type="checkbox"/> Retail <input type="checkbox"/> NonRetail	
5.2 Comments:	

Section 6: Declaration

The information contained in this report is confidential between the inspector, the inspected party, and Global Organic Alliance (GOA), and its accreditors. This report does not constitute certification or consultation, nor shall it be used for promotional purposes. All observations and compliance assessments made are based upon the terms of the US/Canada Equivalency Arrangement and observations, review of documents, and the operator interview.

Signature: _____

Date: 7/14/15Print Name: (b) (6), (b) (7)(C), (b) (7)(D) _____☒ Electronic Signature on File



Global Organic Alliance, Inc.

P.O. Box 530

3185 Twp Rd 179

Bellefontaine, OH 43311-0530

Phone (937)-593-1232 Fax (937)-593-9507

Email goacoordinator2@centurylink.net Website : www.goa-online.org

20 May 2015

Susan Yurman
P O Box 337
Chester, MT 59222
USA

Re: Request for Additional Information

Dear Susan:

Global Organic Alliance (GOA) has reviewed your certification file and is in need of additional information to verify compliance to the National Organic Program (NOP). Please submit the following:

1. § 205.406: Please answer the following questions on the Organic Farm/Livestock Plan:
 - a. Please revise answer to 2.1. Last year you were certified for (b) (4) acres (b) (4) and this year you are requesting certification for (b) (4) acres.
 - b. Answer 8.2.
 - c. Please answer Section 3 of US/Canada Equivalency Agreement Plan.
2. § 205.406: Operation Product Profile: Please list unit of measure for "Projected Yield or Production" column. Please make certain to list all fields for which you are requesting certification, including Summer/Fallow and Pastures.
3. § 205.202: Prior Land Use statement with all applicable columns and tables completed by Mr. (b) (6) for land he leased and farmed in 2014.
4. § 205.204: Seed tag OR invoice and organic certificate/product addendum for the Kamut seed from Montana Flour & Grain.
5. § 205.204: Seed tag AND Untreated/NonGMO Verification signed by seed supplier for the AC Lillian purchased from (b) (6)

Global Organic Alliance looks forward to receiving your written response and/or requested documentation to the issues listed above by the close of business on **3 June 2015**, so that we may proceed with the certification process without further delay. Failure to respond to this request for additional information will result in adverse action pursuant to §205.662 of the National Organic Program.

Sincerely,

Rebecca Y. Turner
Certification Coordinator

cc: Master File

enc.: Pages 2 and 3 Organic Farm Plan (copies)
US/Canada Equivalency Agreement (copy)
Operation Product Profile (copy)
Prior Land Use Statement (blank)
Seed and Planting Stock Reporting and Search Log (copy)



Global Organic Alliance, Inc.
PO Box 530 3185 Township Road 179
Bellefontaine, OH 43311-0530
Phone: 937 593 1232 Fax: 937 593 9507
Email: goaorg@centurylink.net Website: www.goa-online.org

PRIOR LAND USE STATEMENT

This document must be submitted for new land being brought into certification or a shortened transition period that has not been under your management for the three years immediately preceding the first harvest of an organic crop. This includes your own ground that was NOT previously reported to be in transition to GOA and land that was rented/leased to another operation and being returned to your operation. Field histories for the previous three years or time period within the previous three years the land was not under your management, and field maps must be submitted to be considered for organic certification to the National Organic Program. (REPORT FIELD HISTORIES ON THE BACK.)

GOA Applicant or Certified Operation (Please print legibly.)

Name:		
Business Name:		
Address:		
City:	State/Province:	Zip/Postal:
Phone:	Fax:	Cell:
Email:		

Previous Land Owner/Manager Information (Please print legibly.)

Name:	(b) (6)		Check one: <input checked="" type="checkbox"/> Owner <input checked="" type="checkbox"/> Manager
Address:	(b) (6)		
City:	(b) (6)	State/Province:	(b) (6)
Phone:	(b) (6)	Fax:	(b) (6)
Email:	(b) (6) <i>corns.com</i>		

(b) (6)

(b) (6) affirm the field(s) presented for organic certification listed below have been

(b) (6) under my management from 4-1-2014 (date) to 12-31-2014 (date) and there has been no use of Genetically Modified Seed, seed treated with a prohibited substance, or application of a prohibited material (i.e. herbicide, pesticide, fungicide, soil amendment or other prohibited material), including inputs used in the production of nonorganic annual transplants/seedlings, by the requirements for organic certification since 4-1-2014 (date).

Field ID	Acres	Product Name	Manufacturer Name	Last Application Date

Proprietors of rented/leased land agree to:

- Allow inspectors for Global Organic Alliance (GOA) access to the land at any time without prior notice for the purpose of inspecting the land for compliance with organic certification requirements.

(b) (6)
I affirm (b) (6) and the field histories reported on page two (2) are correct and true to the best of my knowledge.

Signature (b) (6) (SIGNATURE OF PREVIOUS LAND OWNER/MANAGER)

Date: 4-28-2015

Field Histories

attached

Report the histories for the fields listed on page 1. Provide current year activity on the Field History Sheet (F016A) with the Organic System Plan. Field Maps must be submitted for each new field.

20 14

Field ID	Acreage	Crop/Activity	Seed and Input Application(s)
<i>All</i>			(b) (4) (b) (4)
			<i>inoculate on soil cocktail mix checkin water levels pers in (CV) CM 1 see maps</i>

20 _____

Field ID	Acreage	Crop/Activity	Seed and Input Application(s)

20 _____

Field ID	Acreage	Crop/Activity	Seed and Input Application(s)



Montana Department of Agriculture
Organic Certification Program
302 N Roberts
Helena, MT 59620-0201
(406) 444-7804
agr.mt.gov



This confirms that the following Producer is certified to the USDA organic regulations, 7 CFR 205:

(b) (6)

☒ Crops

☐ Wild Crops

☐ Livestock

Please see attached list of certified Organic products.

- ☒ Certified in compliance with the terms of the US-Canada Organic Equivalency Arrangement.
- ☒ Certified in compliance with the terms of the US-European Union Organic Equivalency Arrangement.
- ☐ Certified in compliance with the terms of the US-Japan Organic Equivalency Arrangement.

Effective Date of Certification: September 25, 2009
Anniversary Date of Certification: March 15, 2015

Once certified a production or handling operation's organic certification continues in effect until surrendered, suspended or revoked.

Authorized Representative, Montana Department of Agriculture

Issued Date

[Signature]

9/20/14

RECEIVED
MAY 22 2015

United States Postal Service®

Sorry We Missed You! We Re Deliver for You

Item is at:

Post Office™ (See back)

Today's Date

Sender's Name

Available for Pick-up After

Date:

For Redelivery
Go to usps.com/redelivery
or see reverse

Time:

☒ Letter
For Delivery: (Enter total number of items delivered by service type.)

☐ Large envelope, magazine, catalog, etc.
For Notice Left: (Check applicable item)

☐ Priority Mail

☐ Express™

☒ Certified Mail™

(Must claim within 15 days or article will be returned)

☐ Restricted Delivery

☐ Registered Mail™

Article Requiring Payment

☐ Postage Due

☐ COD

☐ Customs

Amount Due \$

☐ Final Notice: Article will be returned to sender on

☐ If checked, you or your agent must be present at time of delivery to sign for item.

USPS Tracking # or Article Number(s)

7008 1140 0004 3033 5722

Notice Left Section

Customer Name and Address

Susan Yurman

Box 337

Delivered By and Date

PS Form 3849, July 2013

usps.com

Delivery Notice/Reminder/Receipt



CERTIFIED MAIL™



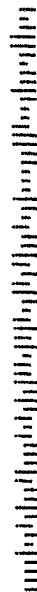
7008 1140 0004 3033 5722

6249

Susan Yurman
PO Box 337
Chester MT 59522

5/15/15
A

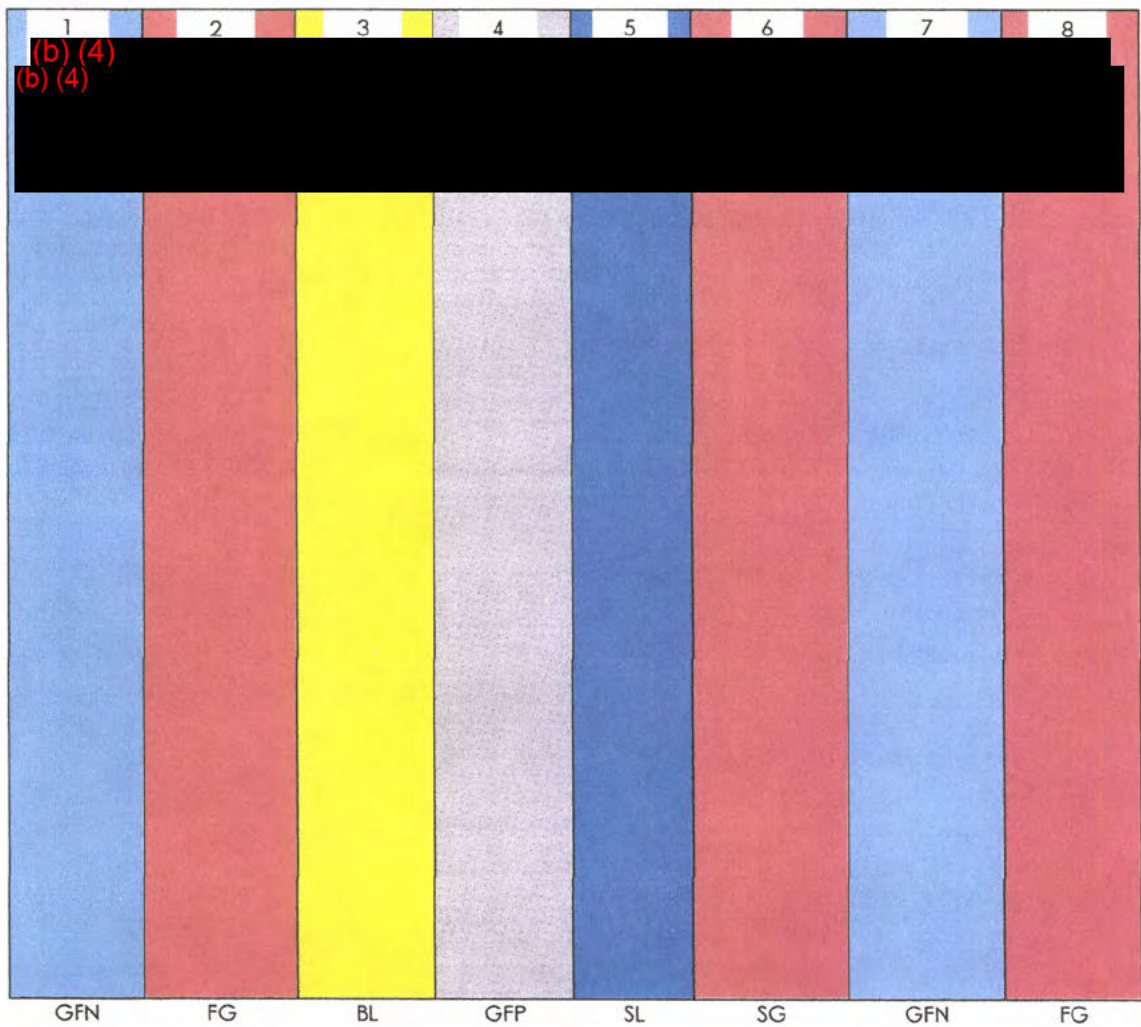
59522\$0337



(b) (6)

2014 CROP PLAN
(b) (4)

(b) (6)

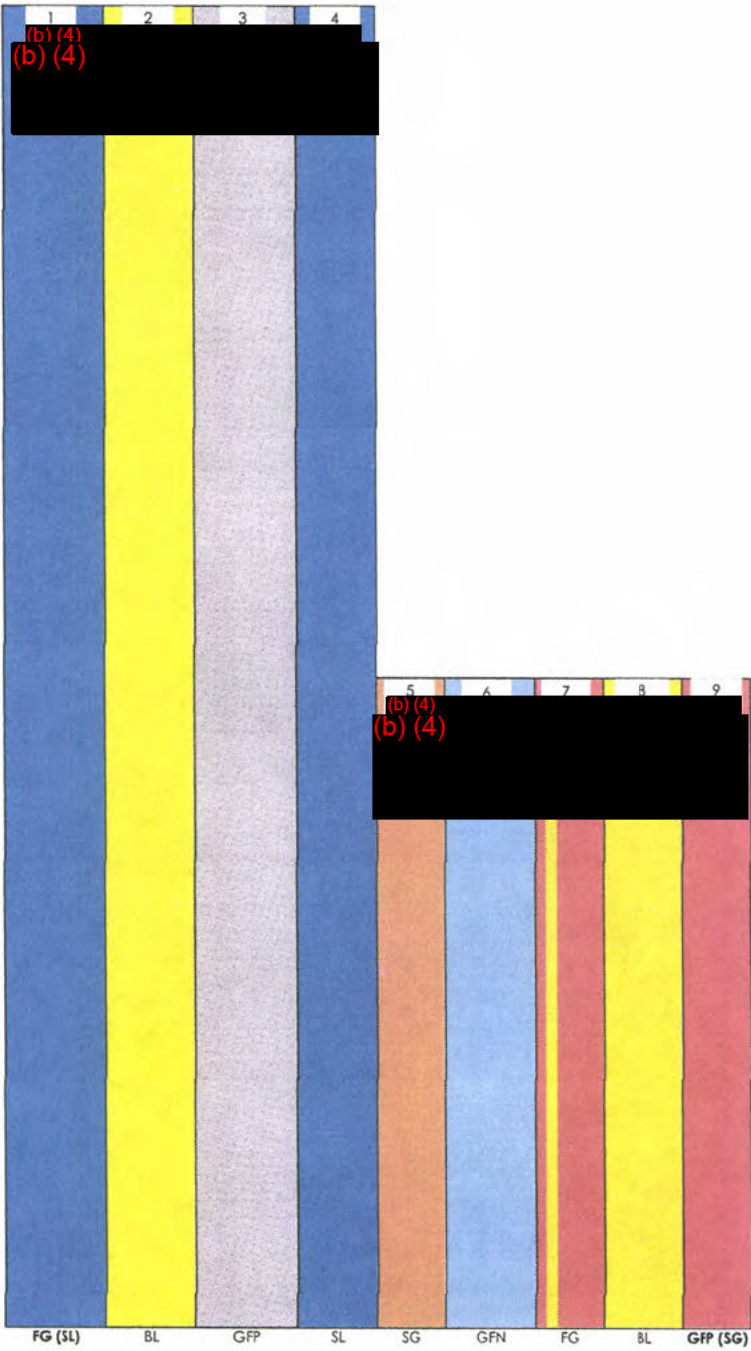


CROP	STRIP(S)	ACRES	DATE	NOTES
Spring Pea Green Manure (SPf)	(b) (4)	(b) (4)	29-Jun	Incorporated as green manure
Khorasan Wheat (KW)			7-Jun	
Safflower (SAF)			9-Jun	Underseeded with Sweet Clover
Buckwheat Green Manure (BWf)			29-Jun	Incorporated as green manure
Spring Peas (SP)			5-May	
TOTAL CROP ACRES:		(b) (4)		
Border Strip:		-		
TOTAL FIELD ACRES:		(b) (4)		

(b) (6)

2014 CROP PLAN
(b) (4)

(b) (6)



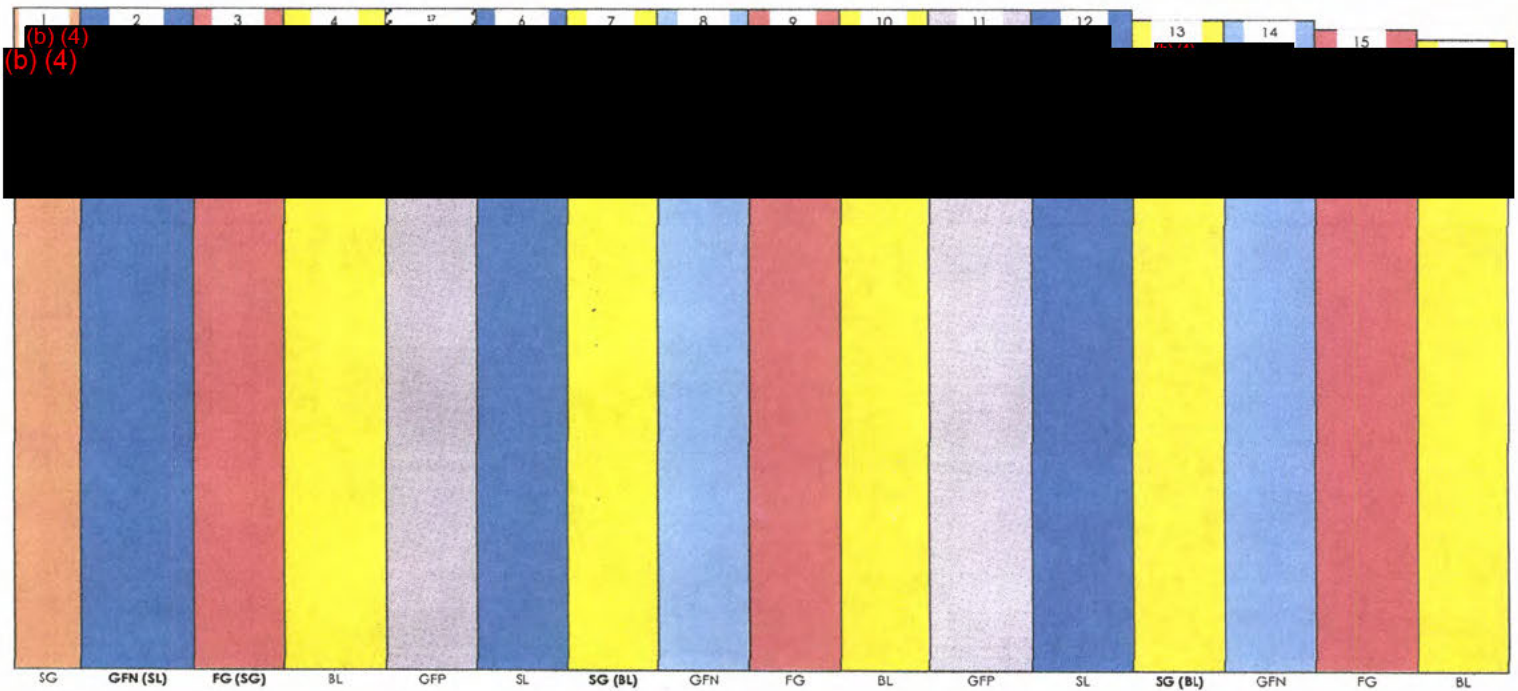
CROP	STRIP(S)	ACRES	DATE	NOTES
Spring Peas (SP)	(b) (4)	(b) (4)	15-May	
Safflower (SAF)			9-Jun	Underseed with Sweet Clover
Buckwheat Green Manure (Bwf)			29-Jun	Incorporate as green manure
Durum Wheat (DW)			6-Jun	
Spring Pea Green Manure (SPf)			28-Jun	Incorporate as green manure
Khorasan Wheat (KW)			7-Jun	
TOTAL CROP ACRES:		(b) (4)		
Border Strip:		-		
TOTAL FIELD ACRES:		(b) (4)		

(b) (6)

2014 CROP PLAN

(b) (4)

(b) (6)



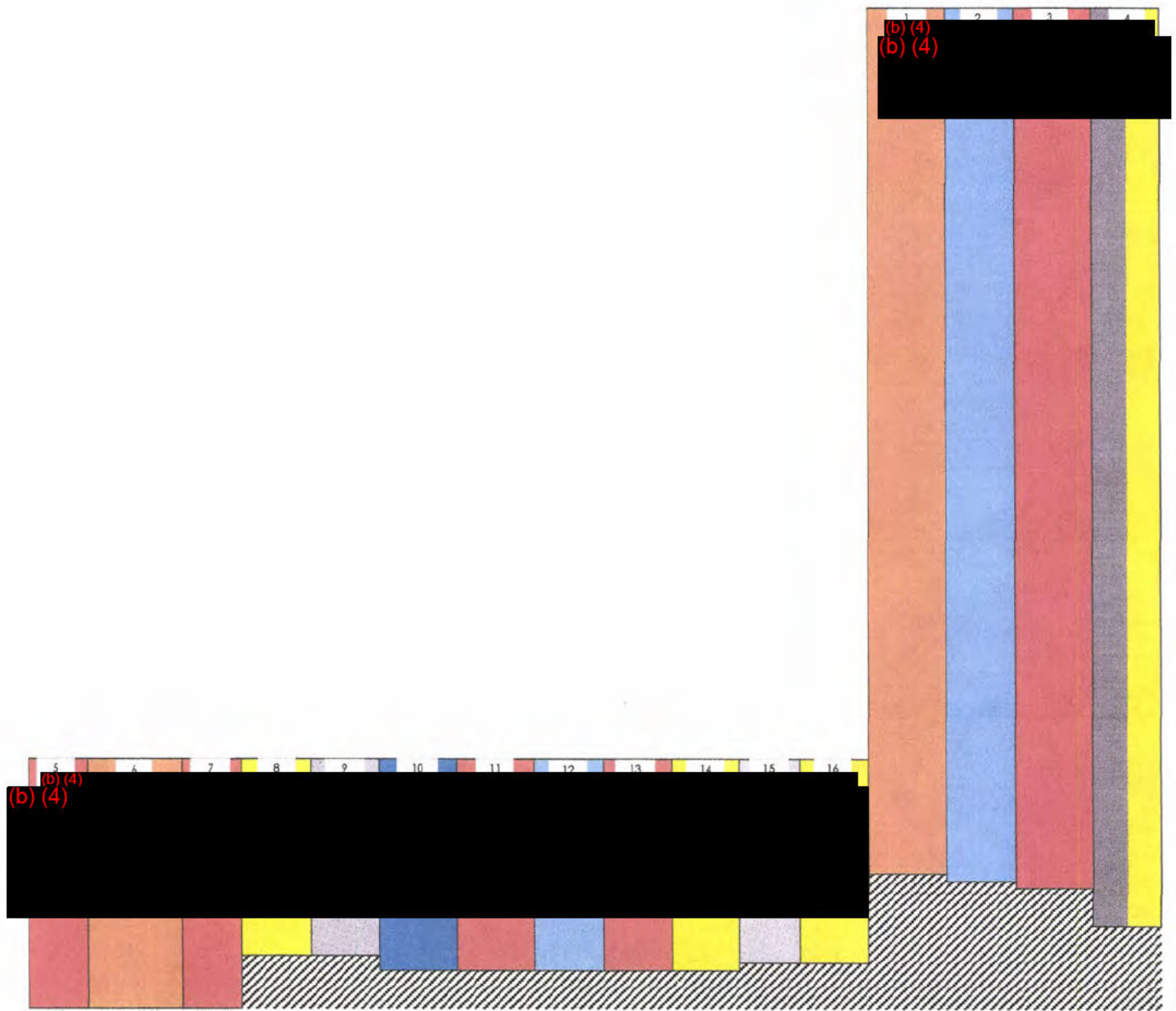
CROP	STRIP(S)	ACRES	DATE	NOTES
Durum Wheat (DW)	(b) (4)	(b) (4)	4-Jun	
Lentils (LTL)			25-May	
Khorasan Wheat (KW)			25-May	
Safflower (SAF)			9-Jun	Underseeded with Sweet Clover
Buckwheat Green Manure (BWf)			28-Jun	Incorporate as green manure
Spring Peas (SP)			15-May	
Spring Pea Green Manure (SPf)			8-Jun	Incorporate as green manure
TOTAL CROP ACRES:			(b) (4)	
Rangeland		(b) (4)		
TOTAL FIELD ACRES:		(b) (4)		

(b) (6)

2014 CROP PLAN

(b) (4)

(b) (6)



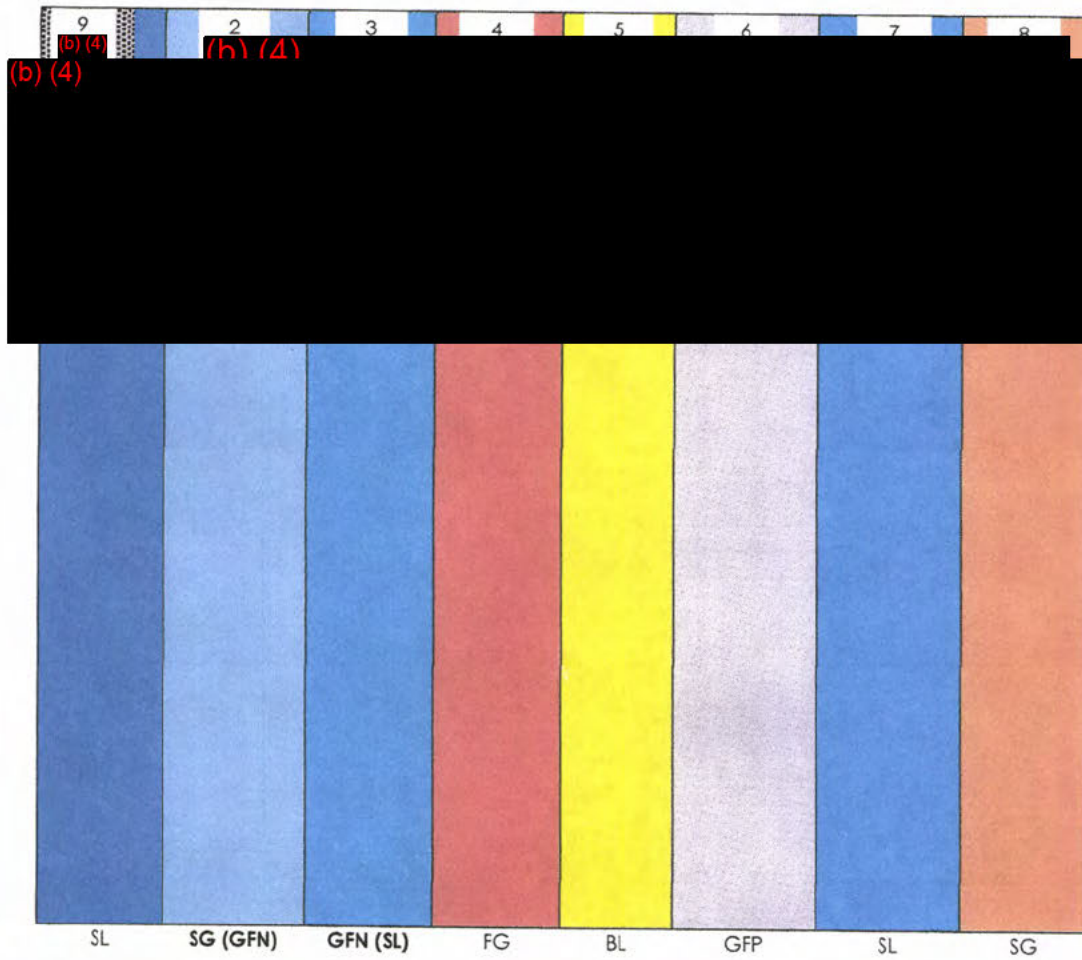
CROP	STRIP(S)	ACRES	DATE	NOTES
Durum Wheat (DW)	(b) (4)	(b) (4)	5-Jun	
Buckwheat (BW)			29-Jun	West side; For seed
Safflower (SAF)			10-Jun	(b) (4)
Khorasan Wheat (KW)			6-Jun	
Buckwheat Green Manure (BWf)			29-Jun	Incorporate as green manure
Spring Peas (SP)			15-May	
Spring Pea Green Manure (SPf)			8-Jun	Incorporate as green manure
TOTAL CROP ACRES:		(b) (4)		
Border Strip:		-		
TOTAL FIELD ACRES:		(b) (4)		

(b) (6)

2014 CROP PLAN

(b) (4)

(b) (6)



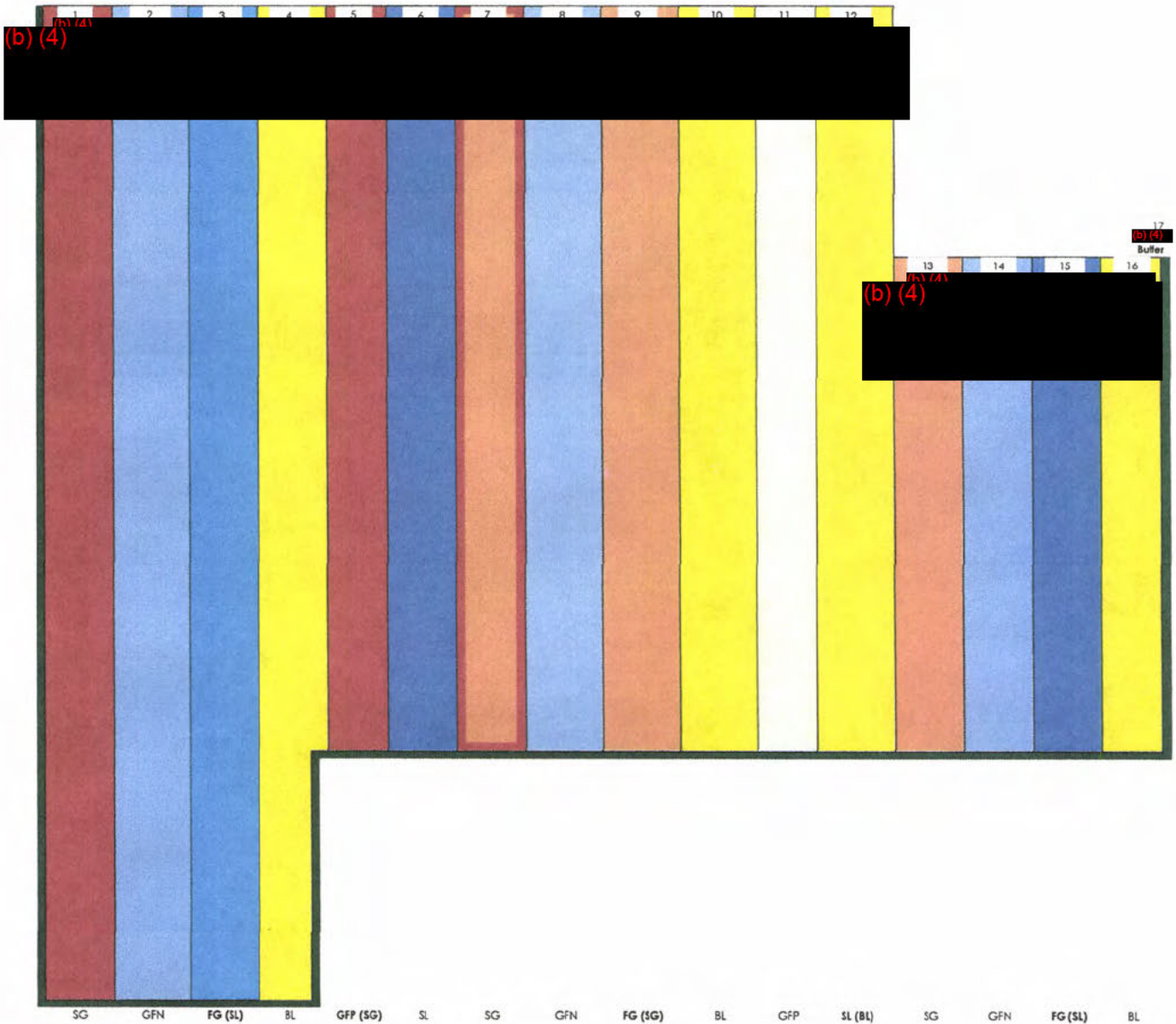
CROP	STRIP(S)	ACRES	DATE	NOTES
Spring Peas (SP)	(b) (4)	(b) (4)	14-May	
Spring Pea Green Manure (SPf)			29-Jun	
Lentils (LTL)			27-May	
Safflower (SAF)			9-Jun	
Buckwheat Green Manure (BWf)			29-Jun	
Khorasan Wheat (KW)			8-Jun	
Durum Wheat (DW)			4-Jun	
TOTAL CROP ACRES:		(b) (4)		
Rangeland				
Border Strip:				
TOTAL FIELD ACRES:				

(b) (6)

2014 CROP PLAN

(b) (4)

(b) (6)

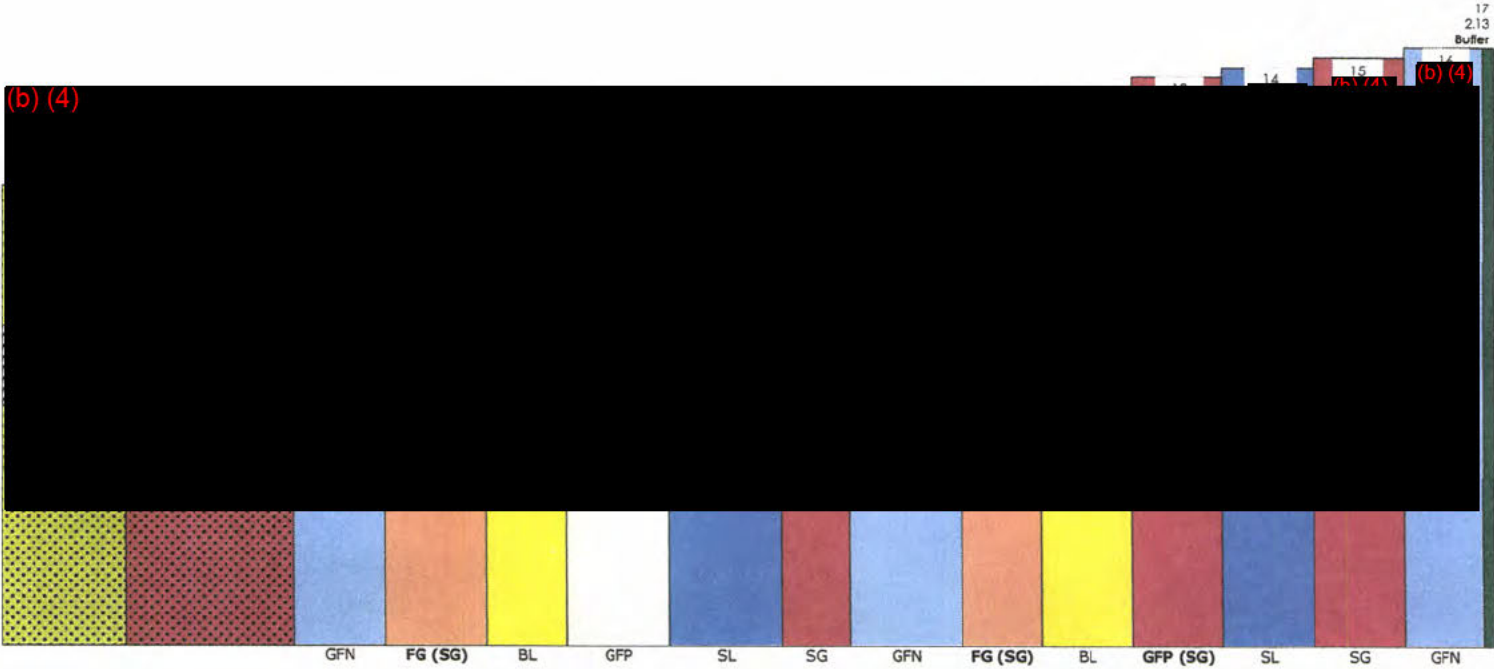


CROP	STRIP(S)	ACRES	DATE	NOTES
Red Spring Wheat (RSW)	(b) (4)	(b) (4)	3-Jun	
Spring Pea Green Manure (SPf)	(b) (4)	(b) (4)	30-May	Incorporate as green manure
Chickling Vetch (CV)	(b) (4)	(b) (4)	26-May	For seed
Spring Peas (SP)	(b) (4)	(b) (4)	14-May	
Safflower (SAF)	(b) (4)	(b) (4)	10-Jun	4, 10, 16 Underseeded with Sweet Clover
Durum Wheat (DW)	(b) (4)	(b) (4)	3-Jun	
Cocktail Mix- Phosphorus (CMP)	(b) (4)	(b) (4)	29-Jun	Incorporate as green manure
TOTAL CROP ACRES:		(b) (4)		
Border Strip:				
TOTAL FIELD ACRES:				

(b) (6)

2014 CROP PLAN
(b) (4)

(b) (6)



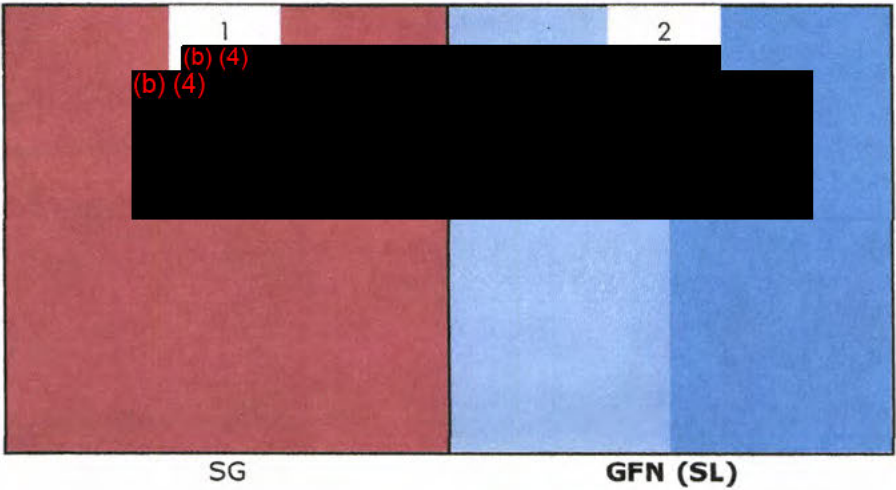
CROP	STRIP(S)	ACRES	DATE	NOTES
Red Spring Wheat (RSW)	(b) (4)	(b) (4)	2-Jun	
Spring Pea Green Manure (SPF)			29-May	Incorporate as green manure
Durum Wheat (DW)			4-Jun	
Safflower (SAF)			10-Jun	Underseeded with Sweet Clover
Cocktail Mix- Phosphorus (CMP)			29-Jun	Incorporate as green manure
Spring Peas (SP)			1-May	
TOTAL CROP ACRES:			(b) (4)	
Strip 3 (Not included in Lease):			(b) (4)	Summer Fallow in 2014
Pasture:				
Home Site:				
Border Strip:				
TOTAL FIELD ACRES:			(b) (4)	

(b) (6)

2014 CROP PLAN

(b) (4)

(b) (6)



CROP	STRIP(S)	ACRES	DATE	NOTES
Red Spring Wheat (RSW)	(b) (4)	(b) (4)	2-Jun	
Lentils (LTL)			26-May	
Spring Pea Green Manure (SPf)			26-May	
TOTAL CROP ACRES:		(b) (4)		
Border Strips:		-		
TOTAL FIELD ACRES:		(b) (4)		

North Tract: 34N-6E

(b) (4)



South Tract: 32N-6E

YURMAN FARM / (b) (6)

2014 CROP PLAN

FIELD	STRIP	ACRES	Rotation	2014 Crop	2013 Crop	Seed Date	FIELD	STRIP	ACRES	Rotation	2014 Crop	2013 Crop	Seed Date
(b) (4)	(b) (4)	(b) (4)	FG	Chickling Vetch (CV)	RSW	26-May	(b) (4)	(b) (4)	(b) (4)	SG	Red Spring Wheat (RSW)	SP	2-Jun
1. CHICKLING VETCH (FOR SEED)						(b) (4) ACRES	(b) (4)	(b) (4)	(b) (4)	SG	Red Spring Wheat (RSW)	SF	2-Jun
(b) (4)	(b) (4)	(b) (4)	GFN	Lentils (LTL)	SF	26-May	(b) (4)	(b) (4)	(b) (4)	GFP	Red Spring Wheat (RSW)	SF	2-Jun
(b) (4)	(b) (4)	(b) (4)	GFN	Lentils (LTL)	SF	27-May	(b) (4)	(b) (4)	(b) (4)	SG	Red Spring Wheat (RSW)	SF	2-Jun
(b) (4)	(b) (4)	(b) (4)	SL	Lentils (LTL)	SF	27-May	(b) (4)	(b) (4)	(b) (4)	SG	Red Spring Wheat (RSW)	SF	3-Jun
(b) (4)	(b) (4)	(b) (4)	GFN	Lentils (LTL)	SF	25-May	(b) (4)	(b) (4)	(b) (4)	GFP	Red Spring Wheat (RSW)	SF	3-Jun
2. LENTILS						(b) (4) ACRES	10. RED SPRING WHEAT						(b) (4) ACRES
(b) (4)	(b) (4)	(b) (4)	SL	Spring Peas (SP)	KW	1-May	(b) (4)	(b) (4)	(b) (4)	FG	Durum Wheat (DW)	SF	4-Jun
(b) (4)	(b) (4)	(b) (4)	SL	Spring Peas (SP)	RSW	1-May	(b) (4)	(b) (4)	(b) (4)	FG	Durum Wheat (DW)	SF	4-Jun
(b) (4)	(b) (4)	(b) (4)	SL	Spring Peas (SP)	RSW	14-May	(b) (4)	(b) (4)	(b) (4)	SG	Durum Wheat (DW)	SF	3-Jun
(b) (4)	(b) (4)	(b) (4)	FG	Spring Peas (SP)	KW	14-May	(b) (4)	(b) (4)	(b) (4)	FG	Durum Wheat (DW)	SP	3-Jun
(b) (4)	(b) (4)	(b) (4)	SL	Spring Peas (SP)	RSW	14-May	(b) (4)	(b) (4)	(b) (4)	SG	Durum Wheat (DW)	SF	3-Jun
(b) (4)	(b) (4)	(b) (4)	SL	Spring Peas (SP)	RSW	14-May	(b) (4)	(b) (4)	(b) (4)	SG	Durum Wheat (DW)	SP	4-Jun
(b) (4)	(b) (4)	(b) (4)	FG	Spring Peas (SP)	RSW	5-May	(b) (4)	(b) (4)	(b) (4)	SG	Durum Wheat (DW)	SP	6-Jun
(b) (4)	(b) (4)	(b) (4)	SL	Spring Peas (SP)	RSW	15-May	(b) (4)	(b) (4)	(b) (4)	SG	Durum Wheat (DW)	SF	5-Jun
(b) (4)	(b) (4)	(b) (4)	SL	Spring Peas (SP)	KW	15-May	(b) (4)	(b) (4)	(b) (4)	GFN	Durum Wheat (DW)	SF	5-Jun
(b) (4)	(b) (4)	(b) (4)	SL	Spring Peas (SP)	KW	15-May	(b) (4)	(b) (4)	(b) (4)	SG	Durum Wheat (DW)	SP	4-Jun
(b) (4)	(b) (4)	(b) (4)	SL	Spring Peas (SP)	RSW	15-May	11. DURUM						(b) (4) ACRES
3. SPRING PEAS						(b) (4) ACRES	(b) (4)	(b) (4)	(b) (4)	FG	Khorasan Wheat (KW)	SP	8-Jun
(b) (4)	(b) (4)	(b) (4)	GFN	Spring Peas (SP)	RSW	27-May	(b) (4)	(b) (4)	(b) (4)	FG	Khorasan Wheat (KW)	SP	7-Jun
(b) (4)	(b) (4)	(b) (4)	GFN	Spring Peas (SP)	RSW	29-May	(b) (4)	(b) (4)	(b) (4)	SG	Khorasan Wheat (KW)	SF	8-Jun
(b) (4)	(b) (4)	(b) (4)	GFN	Spring Peas (SP)	RSW	29-May	(b) (4)	(b) (4)	(b) (4)	FG	Khorasan Wheat (KW)	SP	7-Jun
(b) (4)	(b) (4)	(b) (4)	GFN	Spring Peas (SP)	RSW	29-May	(b) (4)	(b) (4)	(b) (4)	FG	Khorasan Wheat (KW)	SF	7-Jun
(b) (4)	(b) (4)	(b) (4)	GFN	Spring Peas (SP)	KW	30-May	(b) (4)	(b) (4)	(b) (4)	GFP	Khorasan Wheat (KW)	SF	7-Jun
(b) (4)	(b) (4)	(b) (4)	GFN	Spring Peas (SP)	RSW	30-May	(b) (4)	(b) (4)	(b) (4)	FG	Khorasan Wheat (KW)	SF	7-Jun
(b) (4)	(b) (4)	(b) (4)	GFN	Spring Peas (SP)	RSW	30-May	(b) (4)	(b) (4)	(b) (4)	SG	Khorasan Wheat (KW)	SP	7-Jun
(b) (4)	(b) (4)	(b) (4)	SG	Spring Peas (SP)	KW	29-Jun	(b) (4)	(b) (4)	(b) (4)	FG	Khorasan Wheat (KW)	SP	7-Jun
(b) (4)	(b) (4)	(b) (4)	GFN	Spring Peas (SP)	RSW	29-Jun	(b) (4)	(b) (4)	(b) (4)	SG	Khorasan Wheat (KW)	SP	7-Jun
(b) (4)	(b) (4)	(b) (4)	GFN	Spring Peas (SP)	KW	29-Jun	(b) (4)	(b) (4)	(b) (4)	FG	Khorasan Wheat (KW)	SP	7-Jun
(b) (4)	(b) (4)	(b) (4)	GFN	Spring Peas (SP)	RSW	28-Jun	(b) (4)	(b) (4)	(b) (4)	FG	Khorasan Wheat (KW)	SP	25-May
(b) (4)	(b) (4)	(b) (4)	GFN	Spring Peas (SP)	RSW	8-Jun	(b) (4)	(b) (4)	(b) (4)	FG	Khorasan Wheat (KW)	SP	25-May
(b) (4)	(b) (4)	(b) (4)	GFN	Spring Peas (SP)	RSW	8-Jun	12. KHORASAN WHEAT						(b) (4) ACRES
(b) (4)	(b) (4)	(b) (4)	GFN	Spring Peas (SP)	RSW	8-Jun	(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	KW	10-Jun
3b. SPRING PEA (GREEN MANURE)						(b) (4) ACRES	(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	RSW	10-Jun
(b) (4)	(b) (4)	(b) (4)	GFP	Cocktail Mix* (CM)	RSW	29-Jun	(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	SP	10-Jun
(b) (4)	(b) (4)	(b) (4)	GFP	Cocktail Mix* (CM)	KW	29-Jun	(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	RSW	10-Jun
4 - 8. COCKTAIL MIX* (Green Manure)						(b) (4) ACRES	(b) (4)	(b) (4)	(b) (4)	SL	Safflower (SAF)	SP	10-Jun
*Buckwheat, Sorghum-Sudan, Mustard, Radish and Phacelia							(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	SP	10-Jun
(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	KW	10-Jun	(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	RSW	9-Jun
(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	RSW	10-Jun	(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	SF	9-Jun
(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	SP	10-Jun	(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	SP	9-Jun
(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	RSW	10-Jun	(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	SP	9-Jun
(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	SP	10-Jun	(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	RSW	9-Jun
(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	SF	9-Jun	(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	SF	10-Jun
(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	SP	9-Jun	(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	RSW	9-Jun
(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	RSW	9-Jun	(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	SF	9-Jun
(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	RSW	9-Jun	(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	RSW	9-Jun
(b) (4)	(b) (4)	(b) (4)	SG	Safflower (SAF)	KW	9-Jun	(b) (4)	(b) (4)	(b) (4)	SG	Safflower (SAF)	KW	9-Jun
(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	RSW	9-Jun	(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	RSW	9-Jun
(b) (4)	(b) (4)	(b) (4)	SG	Safflower (SAF)	KW	9-Jun	13. SAFFLOWER						(b) (4) ACRES
(b) (4)	(b) (4)	(b) (4)	BL	Safflower (SAF)	RSW	9-Jun	(b) (4)	(b) (4)	(b) (4)	GFP	Buckwheat (BW)	KW	29-Jun
9. SWEET CLOVER (UNDERSEED FOR 2015 GREEN MANURE)						(b) (4) ACRES	(b) (4)	(b) (4)	(b) (4)	GFP	Buckwheat (BW)	KW	29-Jun
(b) (4)	(b) (4)	(b) (4)		Border Strips			(b) (4)	(b) (4)	(b) (4)	GFP	Buckwheat (BW)	RSW	29-Jun
(b) (4)	(b) (4)	(b) (4)		Border Strips			(b) (4)	(b) (4)	(b) (4)	GFP	Buckwheat (BW)	RSW	29-Jun
BORDER STRIPS						(b) (4) ACRES	(b) (4)	(b) (4)	(b) (4)	GFP	Buckwheat (BW)	SP	29-Jun
(b) (4)	3	(b) (4)		Flax (FLX)	SP		(b) (4)	(b) (4)	(b) (4)	GFP	Buckwheat (BW)	SP	29-Jun
This strip not included in lease and used for perennial flax trial by owner.							(b) (4)	(b) (4)	(b) (4)	GFP	Buckwheat (BW)	SP	28-Jun
Harvested (b) (4) acres						73%	(b) (4)	(b) (4)	(b) (4)	GFP	Buckwheat (BW)	KW	28-Jun
Green Manure (b) (4) acres						27%	14. BUCKWHEAT (Green Manure)						(b) (4) ACRES
TOTAL CROP ACRES						(b) (4)	(b) (4)	(b) (4)	(b) (4)	BL	Buckwheat (BW)	SP	29-Jun
Non-Leased Acres:							14b. BUCKWHEAT (FOR SEED)						(b) (4) ACRES
Rangeland 21.26 acres							(b) (4)	1	(b) (4)		Pasture	RGL	
Border Strips 12.67 acres							(b) (4)	20	(b) (4)		Farmstead	RGL	
TOTAL NON-CROP ACRES						(b) (4)	(b) (4)	3	(b) (4)		Pasture	RGL	
TOTAL FARM ACRES						(b) (4)	(b) (4)	17	(b) (4)		Rangeland	RGL	
							(b) (4)	9	(b) (4)		Rangeland	RGL	
							RANGELAND						(b) (4) ACRES



Montana Department of Agriculture
Organic Certification Program
302 N Roberts
Helena, MT 59620-0201
(406) 444-7804
agr.mt.gov

Certified Product(s):

- Barley
- Black Oil Sunflower
- Bronze Barley
- Brown Flax (NOP, COR, EU)
- Buckwheat (grain/green manure/cover crop)
- Camelina
- Canola
- Chickling Vetch (seed/green manure/cover crop)
- Durum Wheat (NOP, COR, EU)
- Emmer
- Golden Flax (NOP, COR, EU)
- Grass/forb sod
- Grass Hay
- Kamut Khorasan Wheat (NOP, COR, EU)
- Lentils (NOP, COR, EU)
- Millet
- Mustard
- Native Grass Pasture (rangeland)
- Oats (grain/green manure/cover crop)
- Phacelia (green manure/cover crop)
- Radish (green manure/cover crop)
- Red Spring Wheat (NOP, COR, EU)
- Red Winter Wheat (NOP, COR, EU)
- Safflower
- Sonora Wheat (NOP, COR, EU)
- Sorghum-Sudan Grass
- Spring Peas (peas/green manure/cover crop)
- Sweet Clover (green manure/cover crop)
- Turnip (green manure/cover crop)
- White Spring Wheat (NOP, COR, EU)

EU – Denotes European Union Equivalency; COR – Denotes Canadian Equivalency; JAS – Denotes Japan Equivalency



Montana State Seed Lab

PO Box 173145

Bozeman, MT 59717-3145

Laboratory Report Of Analysis

(b) (6)

Account No.	Date Received	Date Completed	Lab Number
8559	03/20/15	03/25/15	15-3724

Information Provided by Sender

Product ~~Wheat~~ *Spring Wheat, high protein*
Kind Wheat, hard red spring
Genus/Species Triticum aestivum
Lot Number ~~Wheat~~
Class Service

Purity Analysis			Viability Analysis				
Component	in 131.0696 grams	Purity	Germ Date	Germ	Dormant	Hard	Viable
Wheat, hard red spring	Triticum aestivum	99.57%	03/25/15	97	-N-	-N-	97
	Weed seed	0.00%					
	Crop Seed	0.00%					
	Inert Matter	0.43%					

Other Crop Seeds	None Found	Noxious Weed Seeds in 500 grams	None Found
		For: MT	
		(P)Prohibited Noxious (R)Restricted Noxious	

Weed Seeds	None Found	Other Determinations	
		Seed count	15231 Seeds/lb
		Pure live seed	96.58 %

Status: None.

Tests Requested: Dormant seed, Germination, Purity, Seed count. No other tests requested.
Services Requested: Rush

WARRANTY: We warrant that the purity and germination test results reported on this form have been carried out in accordance with AOSA rules unless otherwise specified. Test results reflect the condition of the submitted sample and may not reflect the condition of the seed lot from which the sample was taken.

DISCLAIMER OF WARRANTIES: WE MAKE NO OTHER WARRANTIES OF ANY KIND, EXPRESSED OR IMPLIED, INCLUDING BUT NOT LIMITED TO THE IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE.

Signature: (b) (6)

Bridget Westfall, KS

Seal #139



**Agricultural
Marketing
Service**

**1400 Independence Avenue, S.W.
Room 2648-S, STOP 0268
Washington, D.C. 20250-0268**

OCT 14 2014

VIA EMAIL

Craig Morr
Quality Assurance International (QAI)
9191 Town Center Drive, Suite 200
San Diego, CA 92122
cmorr@nsf.org

Re: Sunrise Organic Dairy, LLC (NOPC-087-14)

Dear Mr. Morr:

The U.S. Department of Agriculture, National Organic Program (NOP) received a complaint alleging that Sunrise Organic Dairy, LLC, Paul, Idaho (SOD), which is certified by QAI, is violating the USDA organic regulations at 7 CFR 205.

The complaint alleges violations of NOP outdoor access and pasture requirements (§205.239). Specifically, the complaint alleges that:

- "throughout 2013 the dairy, which previously was milking twice a day and putting cows out between each milking, had been shifted to milking three times a day and confining cattle between two of the three milkings."
- "fresh, high producing cows were being milked four times a day and entirely confined until their production dropped off."
- SOD does not provide sufficient pasture and adequate drinking water for its herd.
- SOD claimed that they could "average" the herd (to meet DMI requirements) to "intentionally" undermine the intent of the outdoor access requirements.

The NOP requests that you investigate these allegations within 30 days of receiving this letter. Within 45 days of receiving this letter, please notify the NOP of your findings and of any notices of noncompliance or proposed adverse actions that you issued as a result of the investigation. At that time, assuming no additional action is needed, the NOP will inform the complainant of your investigation's outcome. Also, if your investigation will take more than 30 days from the receipt of this letter, please inform the NOP.

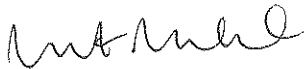
Note that you are authorized to investigate complaints of noncompliance under the regulations at §205.661(a). Further, you are required to have procedures for investigating certified operation noncompliance under the regulations at §205.504(b)(2). However, we realize that there may be some investigations with which you need assistance and you may refer the investigation back to the NOP for one or more of the following reasons:

Mr. Craig Morr
Re: Sunrise Organic Dairy (NOPC-087-14)
Page 2

- You lack the resources or the specialized expertise needed to adequately investigate the complaint;
- You believe a civil penalty may be warranted for the knowing sale or labeling of agricultural products in violation of the USDA organic regulations;
- You believe the complaint warrants a criminal investigation;
- For some other reason, you cannot carry out or complete the investigation.

Should you have any questions regarding this matter, you may contact Andrew Regalado, Compliance & Enforcement, at (202) 205-5605 or andrew.regalado@ams.usda.gov.

Sincerely,




Matthew Michael
Director, Compliance & Enforcement Division
National Organic Program

cc:
Theresa Hughes, thughes@nsf.org
Director, Accreditation and International Activities Division

Investigation Summary/Closure Memorandum

March 18, 2015

TO: Matthew Michael
Director
Compliance and Enforcement Division
National Organic Program

FROM: Andrew Regalado 
Compliance and Enforcement Division
National Organic Program

CASE NO: NOPC-087-14

SUBJECTS: Sunrise Organic Dairy, LLC (Previously Horizon Organic Dairy)
303 South 2800 East
Paul, ID 83347

CERTIFYING AGENT INVOLVED:
Quality Assurance International (QAI)
9191 Towne Centre Drive, Suite 200
San Diego, CA 92122
www.qai-inc.com

COMPLAINANT:

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

ALLEGED VIOLATION: Sunrise Organic Dairy, LLC, previously Horizon Organic Dairy, is violating USDA organic animal welfare provisions by failing to provide adequate pasture to its cows.

RELEVANT REGULATIONS:

§205.239 Livestock living conditions

(c) The producer of an organic livestock operation may, in addition to the times permitted under §205.239(b), temporarily deny a ruminant animal pasture or outdoor access under the following conditions:

- (1) One week at the end of a lactation for dry off (for denial of access to pasture only), three weeks to parturition (birthing), parturition, and up to one week after parturition;
- (4) In the case of dairy animals, for short periods daily for milking. Milking must be scheduled in a manner to ensure sufficient grazing time to provide each animal with an average of at least 30

percent DMI from grazing throughout the grazing season. Milking frequencies or duration practices cannot be used to deny dairy animals pasture.

BACKGROUND:

The dairy identified in the complaint (Horizon Organic Dairy (HOD)) changed ownership in December, 2013. The dairy is now owned and operated by Sunrise Organic Dairy, LLC (SOD). Quality Assurance International (QAI) is/was the certifying for both HOD and SOD. In addition to the above allegations, the complainant resubmitted a previous complaint dated 2006 against the former owner/operator, Horizon Organic Dairy.

SUMMARY:

February, 2014

The NOP Compliance and Enforcement Division received a complaint from (b) (7)(D) (b) (7)(D) alleging that Sunrise Organic Dairy, LLC (SOD), formerly known as Horizon Organic Dairy (HOD), is illegally confining its dairy cows and preventing access to pasture, in violation of USDA organic regulations. Specifically, the complaint alleged that: (Exhibit 1A-1B)

- 1) "throughout 2013 the dairy, which previously was milking twice a day and putting cows out between each milking, had been shifted to milking three times a day and confining cattle between two of the three milkings." (Exhibit 1A)
- 2) "fresh, high producing cows were being milked four times a day and entirely confined until their production dropped off." (Exhibit 1A)
- 3) SOD does not provide sufficient pasture and adequate drinking water for its herd (from 2006 complaint). (Exhibit 1A)
- 4) SOD claimed that they could "average" the herd (to meet DMI requirements) to "intentionally" undermine the intent of the outdoor access requirements. (Exhibit 1B)

Note: the above allegations were compiled from both complaints filed in 2006 and 2014.

October, 2014

QAI, SOD's certifying agent, conducted an onsite inspection and investigated the above allegations. QAI concluded that SOD's animal welfare/pasture practices were generally compliant with USDA organic requirements and regulations. The findings are as follows: (Exhibit 2A-2B)

Allegation 1: SOD is "milking three times per day and confining cattle between two of the three milkings."

Findings: QAI confirmed that SOD was milking cows in its east dairy three times per day. However, it was determined that this practice was compliant as the cows met the 120 days/30% Dry Matter Intake (DMI) requirements of §205.237(c)(1) and (c)(2) and §205.239(c)(4). Specifically, SOD's milk cows were on pasture for 120 days with a DMI of 31.6%. (Exhibit 2B)

Allegation 2: “fresh, high producing cows were being milked four times a day and entirely confined until their production dropped off.”

Findings: QAI confirmed that SOD confined its “fresh cows” for up to one week and performed milkings four times per day. Specifically, SOD milked its fresh cows four times a day for up to seven days to stimulate milk production and keep the cow comfortable during its initial week of lactation. Per § 205.239(c)(1), denial of outdoor access or pasture is allowed for one week after parturition.

Allegation 3: SOD does not provide sufficient pasture and adequate drinking water for its herd.
Note: This was part of the 2006 complaint.

Findings: QAI refuted this allegation as cows were witnessed near portable water tanks during inspection. Additionally, QAI reported that SOD had an intensive rotational management that allows pastures to be maintained in excellent condition. SOD’s records demonstrated that its cows had outdoor access and met the 120 day/30% DMI requirement.

Allegation 4: SOD claimed that they could “average” the herd (to meet DMI requirements) to “intentionally” undermine the intent of the outdoor access requirements.

Findings: QAI refuted this allegation. QAI determined that SOD’s “feed intake records identify each class [of animals] separately and do not average across the heard.” QAI found that all classes of animals (milk cows, far off dry, young stock, breeding heifers, and pregnant heifers) separately met the minimum 30% DMI requirements.

Note: In addition to the above findings, a noncompliance and several issues were found during QAI’s inspection. However, the noncompliance and most issues were not directly related to outdoor access, pasture practices or the above allegations. (Exhibit 3)

RECOMMENDATION:

In light of the above findings, this complaint is recommended for closure as the allegations were refuted or proven to be compliant with USDA organic regulations. Specifically, SOD’s milking practices and milking frequencies were found to be compliant with §205.239. Further, it was determined that SOD cows had access to pasture/outdoors and water and DMI calculated separately per class of animal.

APPROVED FOR CLOSURE BY:

MM
Matthew Michael

6/3/15
Date



**Agricultural
Marketing
Service**

**1400 Independence Avenue, S.W.
Room 2646-S, STOP 0268
Washington, D.C. 20250-0268**

JUN 09 2015

VIA EMAIL

Mr. Craig Morr
Quality Assurance International
9191 Towne Center Drive, Suite 200
San Diego, CA 92122
cmorr@nsf.org

Re: Sunrise Organic Dairy, LLC (NOPC-087-14)

Dear Mr. Morr:

The U.S. Dept. of Agriculture National Organic Program (NOP) has concluded its investigation of a complaint filed against Sunrise Organic Dairy, LLC (SOD). The complaint alleged violations of NOP outdoor access and pasture requirements. Our review of your investigation found no apparent violations of the USDA organic regulations by SOD. The complaint is hereby closed.

Thank you for your assistance in investigating this complaint.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Michael".

Matthew Michael
Director, Compliance & Enforcement Division
National Organic Program

Cc: Theresa Hughes, NSF International



**Agricultural
Marketing
Service**

1400 Independence Avenue, S.W.
Room 2646-S, STOP 0268
Washington, D.C. 20250-0268

JUN 09 2015

VIA EMAIL

Mr. (b) (6), (b) (7)(C), (b) (7)(D)
(b) (6), (b) (7)(C), (b) (7)(D)

Re: Sunrise Organic Dairy, LLC (formerly Horizon Organic Dairy), Paul, Idaho (NOPC-087-14)

Dear Mr. (b) (6), (b) (7)(C), (b) (7)(D)

The U.S. Department of Agriculture (USDA) National Organic Program (NOP) has concluded its investigation of the complaints you filed against Sunrise Organic Dairy, LLC (SOD) (formerly Horizon Organic Dairy), Paul, Idaho, on February 10 and 11, 2014. Your complaints alleged that SOD is violating USDA organic animal welfare provisions by failing to provide adequate water, outdoor access, and pasture to its cows. Specifically, you alleged that SOD is milking its cows 3-4 times per day and confining the cows between milking. In addition to the above, you alleged that SOD is intentionally subverting the organic standards by taking the "average" of the entire herd to meet the 30% dry matter intake requirement (DMI).

An onsite investigation of SOD's operation found no apparent violations of USDA organic regulations. Its milking practices were found to be in compliance with §205.237 and §205.239 of the USDA organic regulations. Additionally, it was determined that cows were given access to water and met pasture and DMI requirements.

Based on the above information, the investigation is closed.

Thank you for bringing this matter to our attention. We appreciate your support of the NOP and USDA.

Sincerely,

Matthew Michael
Director, Compliance & Enforcement Division
National Organic Program

INSPECTION WORK ORDER #15547

844826

This Organic Inspection Record and supporting documentation must be submitted to QAI by the inspector within 7 calendar days after the completion of the inspection.

Inspectors name:	(b) (6), (b) (7)(C), (b) (7)(D)				
CPM name:	John Johnson Joseph 858-792-3531 x148				
CPM email:	john@qai-inc.com				
Work Order number:	#15547				
Name of Certified Entity:	Sunrise Organic Dairy LLC	New <input checked="" type="checkbox"/>	Renewal <input type="checkbox"/>		
Facility Name:	Sunrise Organic Dairy LLC	CE <input checked="" type="checkbox"/>	AP <input type="checkbox"/>	Location <input type="checkbox"/>	
Date assigned:	September 29, 2014	Application #A0132884			
Standards/Programs Applied for (NOP, EU, COR, US/Can Equiv, etc.)	NOP				
To be completed by QAI:					
Location (City, State):	Sunrise Organic Dairy LLC				
To be completed by auditor:	Sunrise Organic Dairy at; East Dairy 303 S 2800E; West Dairy 2480 E 500S; all fields; Calf barn on SE corner of Crestview Rd and E800S; Calf milk prep barn and seed storage NW corner of Crestview Rd and E800S; calf hutches along Crestview Rd north of field (b) (4)				
Location(s) visited by auditor:					
Preparation Time Total:	3 hrs	Follow-up Time Total:	5 hrs		
Time arrived:	8 am 10/14/14 8 am 10/15/14	Time departed:	5:30 pm 10/14/14 1:45 pm 10/15/14	Total:	15.25 hrs working lunch 10/14 (8 hrs prep & follow up)
Date(s)	Audited:	10/14 and 10/15/14			
	Submitted:	10/30/14			
Type of Compliance Plan: (Producer, Processor, etc.)	Processor, Producer, Livestock/Dairy				
Contact person:	Carl Sklavos, (208) 438-2435, carl@agrakey.com				
Personnel (& titles) present:	Carl Sklavos, General Manager; Carla McDonald, Office Manager; Dirk Reitsma, Partner + Farm Manager				
Brief narrative of operation inspected (please be sure to detail number of fields or processing lines in production and observed during audit, on-site / off-site warehouses, general & brief description of production activities, types of products grown or handled, etc):					
<p>This is Sunrise Organic Dairy's first renewal inspection after buying the existing dairy from Horizon in November of 2013. The dairy is comprised of (b) (4) milking facilities; the (b) (4) (b) (4). The West Dairy was used by Horizon many years ago, after the East Dairy with the (b) (4) cow milking carousel was built, the west dairy was no longer used for milk production. In March/April of 2014, Sunrise started producing milk at the West Dairy. They ship whole milk from both locations.</p> <p>East Dairy – Milk about (b) (4)</p> <p>(b) (4) The milk from here goes to (b) (4) Ship 4 loads a day. This dairy is managed for volume production. The hospital barn is here.</p> <p>West Dairy – Milk about (b) (4)</p>					

CE Name: **Sunrise Organic Dairy LLC**

(b) (4) The milk from this barn goes to (b) (4).

West dairy is where the maternity ward is. They average about ^{(b) (4)} calf births a day, on average (b) (4)

At the time of inspection, observed dry cow, calf, and heifer herds on pastures. The grazing season this year was May 13 to Sept 11. The non-milking groups of the herd went on pasture starting mid to late April and were still out at inspection.

With the addition of the west dairy, more acres were opened up as pasture so that herds have access at both dairies.

Locations visited;

East Dairy; milking parlor, 2 free stall barns, hospital barn, offices, pastures

West Dairy; milking parlor maternity barn, feed storage, pastures

Calf milk prep and seed storage

All fields. Obtained an electronic copy of their office map which shows all fields, pastures and sub-pastures/paddocks on one map. Show the small paddocks used for their intensive grazing rotation (See SI 33). This was very helpful in understanding their program.

Baling 4th cutting of alfalfa hay.

Dairy uses a database called (b) (4) to manage feed tracking. Numbers of cows in each group are entered, tracked by pen number, feed ration recipes are entered, all commodities coming and going are weighed on site and the data loaded into (b) (4) Program tracks feed ration recipes, how much fed, how many cows fed, commodities and inventories, can calculate how much of a feed is in inventory and projected days of inventory left based on usage.

Section 1: SPECIFIC INSTRUCTIONS

Inspector: Please address each specific instruction appearing below. If the item has been addressed in any of the sections below, please just indicate the relevant section and number where that issue is addressed. If completing form by hand, please use extra sheets if required.

SPECIFIC INSTRUCTIONS	Has each specific instruction been adequately addressed / implemented / complied with? If no, please explain the discrepancy. If yes, please provide a brief statement (e.g., "no salt used", "verified", "advised applicant", etc); please also identify any documents or methods used to verify the SI.
1. QAI contract to be verified by Auditor to be on file if plant being inspected is deemed the Corporate/Headquarters. (If CE BOX is checked above then it is the corporate location)	On file, dated 11/21/13.
2. Please confirm that, as an inspector, you were able to observe the key aspects of production that impact organic integrity and therefore this is the optimal time of year for an organic inspection to occur. If not, please suggest a more suitable time of year and explain why.	Yes and no. No to observe milking cows on pasture during grazing season (May 13- Sept 11 for 2014); Yes to verify the number of grazing days and DMI from pasture for milkers, and to see non-milking groups on pasture; Yes to verify crop production (except for alfalfa hay, finishing the 4 th cutting)
3. Please verify the name and the address of the facility provided on the Application for Organic Certification is correct. If applicable please note	Correct, no changes. However, pastures were not listed on Producer or Dairy/Livestock certificates and OSPs. Discussed with John at

CE Name: **Sunrise Organic Dairy LLC**

any changes directly on the document. Please include "VBI, your initials, and the date" per the Paperless Inspection Report Work Instructions and make reference to the changes in the Work Order. The client's signature on the Work Order is verification that they agree to the changes.	inspection, will be added to producer field listing. Listed on OSPS included in updated docs.pdf. Added barley silage and changed oat hay to oat silage on Producer and Livestock OSPS.
4. When inspecting split operations (operations that produce/process both organic and conventional products) please confirm the client's record keeping system clearly distinguishes nonorganic sales from organic sales. Provide a clear description to support your observations.	N/A, operation is 100% organic.
5. Please conduct a trace-back audit using the attached Sample Audit Worksheets. Return all calculations with your report. If organic product has not been handled, please either conduct this exercise on non-organic goods or explain whether or not the client's current record keeping system is set up to enable a compliant traceback of organic goods at future inspections. Please read carefully and follow the instructions given in the Trace Back worksheets attached at the end of this Work Order.	Done successfully for raw milk, see worksheet. Crops are grown only for on-farm use, no processed milk products sold.
6. Please conduct an input / output balance using the attached Sample Audit Worksheets. Return all calculations with your report. If organic product has not been handled, please conduct this exercise on non-organic goods unless no production at all has occurred and, in that case, please explain whether or not the client's record keeping system is set up to enable a complete input/output balance of organic goods at future inspections. Please read carefully and follow the instructions given in the In-Out worksheets attached at the end of this Work Order.	Done successfully for 2 months of milk production, May (5/13 pasture start) and Sept (9/11 pasture end) of 2014, see SI 35.
7. If any form or documentation is updated during your inspection, please include "VBI, your initials and the date" on the updated document per the Paperless Inspection Report Work Instructions. Your initials and the client's signature on the Work Order will serve as confirmation that the client has made the same updates to their copies of their documents (e.g. OCP, AML, SOPs, etc). This process will allow QAI to update the documents on file at QAI. Please inform the client that initialed changes will be made to their Organic Plan on file at QAI for them. If the client would rather update their own documents, please include updates with your inspection report.	Updated docs.pdf OSPS producer (fields and acreage) OSPS dairy/livestock (crops) OCP page 1 Livestock address OCP page 1 Producer address OMRI certs (crop inputs, cow salt) DHP HPP Organic cert for feed suppliers (b) (4) label, MSDS, letter (left over from (b) (4) still on site but not used) (b) (4), label, MSDS (left over from (b) (4), still on site but not used) Updated doc.pdf Map of all fields showing paddocks (file is too big to merge, wants to make Adobe freeze up) Updated doc.Word Sunrise OCP document (tables extracted from text and all in Appendix A) (Appendices B-G not modified)

CE Name: **Sunrise Organic Dairy LLC**

	Updated Docs Excel SIRPI New Docs.pdf (b) (4), label, MSDS, OMRI cert Organic certificate for cows purchased from (b) (4), list of cows purchased (b) (4) printout for milking cows showing DM intake on and off pasture (b) (4) Conditioner (part of TMR, new) Retired Docs.pdf DHP HPP SIRPI OSP
8. Please verify that the client has a procedure in place regarding complaints related to organic compliance. The procedure must address the following: a. That a complaint log is in place which documents any incoming complaints regarding organic compliance; b. That the complaint log will include actions taken to correct any deficiencies with products or services of the relevant organic requirement; c. If the complaint log is not available for review during inspection, that all complaints and resolutions related to organic compliance will be made available to QAI upon request.	In place, no entries to date.
Processor	
9. Please verify that the information on the profile form(s) (IPP(s), SIRPI(s), DTIPI(s) etc...) and label(s) are consistent with actual formulation(s) used and that the label(s) submitted are current. Please include "VBI, your initials, and the date" per the Paperless Inspection Report Work Instruction. **** If they are revised and/or new document is submitted, please provide a clean copy in Excel format if possible with the report for the client's file.	Verified, no changes. Have not processed all commodities to date, may in the future if commodities become available. SIRPI was updated to change Horizon to Sunrise. Attached as an Excel doc.
10. Please verify that certification documentation (e.g., certificates) from all certifiers that verifies NOP compliance is on file and current (i.e. dated within the last 18 months) for all products/ingredients. If any documentation was issued more than 18 months from the date of the inspection please verify that it was current at the time of the last purchase. Please note that TC's do not replace the Organic Certificate.	Verified for commodities purchased in 2014. Note: all ISDA certificates do not include a 100% organic category. Purchased as feed, and under processor. None were sold, all used on farm. (b) (4), ID State Dept of Ag (ISDA), 4/7/14 issued (b) (4), OneCert, 5/19/14 issued (listed as 100%) (b) (4), ISDA, 7/10/14 issued (b) (4), ISDA, 7/9/13 issued (b) (4), ISDA, 6/16/14 issued (b) (4), Organic Certifiers, 3/24/14 issued (not 100%) (b) (4), ISDA, 8/9/13 issued (b) (4), ISDA, 9/9/14 issued (b) (4), ISDA, 8/29/14 issued (b) (4), MOSA, 9/23/13 issued (not 100%) (b) (4), ISDA, 6/12/14 issued (b) (4), ISDA, 6/12/14 issued

CE Name: **Sunrise Organic Dairy LLC**

	<p>(b) (4), ISDA, 6/20/14 issued</p> <p>(b) (4), ISDA, 1/30/14 issued</p> <p>(b) (4), QAI, 9/25/13 issued</p>
11. For products seeking certification to the 100% Organic claim, please verify that supplier certificates for ingredients/products confirm 100% Organic status.	OneCert is only certifier that listed 100% organic on cert.
12. Please verify that non-organic ingredient documentation (non-GMO, irradiation, sewage sludge, annotation statements, and specification sheets) is on file for all non-organic ingredients/ingredient suppliers. Note, as long as the non-organic ingredient has not changed, these documents do not have to be dated within the last 18 months. If you determine that ingredient suppliers have changed, or new products are added at the inspection, please submit copies of relevant ingredient supplier documentation with your report. If suppliers have not been updated there is no need to collect and submit documentation.	On file. Added a new mineral for TMR rations, (b) (4). (b) (4), OMRI cert is included in New docs file. Other suppliers have not changed.
13. Please verify if salt is used. If yes, please verify that any free-flowing or anti-caking agents appear on the National List. Please obtain the specification sheet and include with your report.	Yes, have some (b) (4) loose and block salt in inventory from (b) (4)'s purchase. Have not purchased any. OMRI certs are included in the Updated Docs file.
14. As per the NOP directive – February 25, 2009, please verify that the operation is currently registered with the State Health Authorities or Food Safety Authorities. Please indicate in your inspection report: <ul style="list-style-type: none"> a. If recent health inspections have been conducted and reports issued. b. Dates reflected on the provided documentation (certificates). c. Report any potential NOP or food safety issues noted in the reports (if available for review) or observed during the inspection. d. If food safety issues were reported by state or food safety authorities, please clarify if they have been mitigated, in the process of being mitigated, or when they will be mitigated. 	<p>Registered with State of ID Dept of Ag</p> <p>Permit #001 to Sunrise Dairy posted, issued 1/2/14</p> <p>Inspected monthly, milk samples taken monthly. Most recent inspection was 9/15/14, no food safety issues. A one gallon bottle of teat dip was not labeled in the East Dairy milking parlor.</p>
<u>Producer</u>	
15. Please verify that the information provided on the Individual Field Profile(s) is correct. Please include "VBI, your initials, and the date" per the Paperless Inspection Report Work Instruction. **** If the IFP's are revised and/or a new IFP's submitted, please provide a clean copy in Excel format if possible with the report for the client's file.	<p>Verified 2014 Crop production report which is part of IFPs in Appendix C.</p> <p>Barley and Oats were 2 separate plantings for silage.</p> <p>The alfalfa & oats was for hay, used oats as a nurse crop in the new alfalfa field to get alfalfa established. First cutting was an alfalfa/oat blend (mostly oats and went to silage), and subsequent cutting were alfalfa hay.</p> <p>Note, OSPS did not list pasture acres. OSPS was updated to list all crops. Field (b) (4) should not have been on the list, fields (b) (4) are no longer leased by Sunrise. They have split corners out of many pivots and are listed as field (b) (4). Fields (b) (4) and (b) (4) are</p>

CE Name: **Sunrise Organic Dairy LLC**

	the corners of 2 pivots each lumped together. The 2014 crop report lists 2 acreages, column called Acres is planted acres, Total acres column is acreage of certified field. Use the Total Acres number to determine the client's acreage. Field (b) (4) has been split into the dry pasture portion and the irrigated portion, and given 2 field ID's.
16. Please review all seed purchase documents to verify organic status of the seeds. Perform an audit for seeds planted/ per acre against purchase invoices and seed tags to verify that enough seed was purchased to plant the numbers of acres.	All seeds planted were certified organic; oats, barley, alfalfa, and 4 corn varieties were purchased; replanted 2 pastures using left over organic seeds from (b) (4) inventory which were certified organic at time of purchase (they mixed 10% medium red clover, and 90% pasture mix 1) some of those seeds are still in storage, verified seed tags) Barley planted for silage; records show (b) (4) purchased and used; planted (b) (4) acres. Planted at (b) (4), goal was (b) (4). Found this heavy seeding rate really helped with weed suppression.
17. If non-organic seeds have been used, please submit documents with your inspection report verifying that Non-GMO, Non-Treated seeds have been used.	N/A, all seed planted was certified organic.
18. If non-organic seeds have been used, please verify that the producer has the Commercial Availability Worksheet retained in the audit trail records, and that there is clear documentation from suppliers of known organic seeds in the types and varieties grown by the producer verifying that organic seeds were not available. Include documentation that the producer is performing trials with organic seeds, if applicable, and include the producer's future plans to plant only organic seeds.	N/A, see SI 17.
19. Please verify that organic certificates are on file for organic seed. If not on file, please verify the seeds are from the applicant's previous year's organically managed crops.	(b) (4), OCIA, 5/16/14 signed (corn & alfalfa) (b) (4), EcoCert, 12/4/13 issued (corn) (b) (4), Pro-Cert, 11/1/13 issued (barley, oats)
20. Please verify if any seed inoculants, treatments, coatings, pelletizing materials, etc. are being used by either the producer or the company manufacturing and/or supplying the seed. If so, please verify that the materials being used comply with the NOP. Please include any documentation that is available and which demonstrates compliance.	Alfalfa was purchased with (b) (4) coating, listed on (b) (4) certificate as (b) (4). No additional documentation on file.
21. Please verify if there are any new/replacement perennial crop plants planted into the certified fields. If new plants exist, verify that applicant has documentation to show the plants have been managed organically for at least one year prior to being harvested and represented as organic.	No perennial plants, just seed for perennial alfalfa crop was planted, see SI 20.
22. Please verify the information provided on the Annual Input Record is correct. Please include "VBI, your initials, and the date" per the Paperless Inspection Report Work Instruction. ****If the AIR is revised and/or a new AIR is submitted, please provide a clean copy in Excel	Verified, See table 10.4 in Appendix A of the updated OSP Four inputs on the list used since last inspection, opted to leave the rest on in case they need them for the coming crop year. Added a new input, (b) (4) Used; (b) (4)

CE Name: **Sunrise Organic Dairy LLC**

format if possible with the report for the client's file.	(b) (4)
23. If not already provided, Please obtain specification sheets for all inputs and media verifying NOP compliance.	(b) (4) is the only new product, balance of products on file from last inspection. Label, MSDS and current OMRI cert are attached in new docs.pdf.
24. Please verify inputs are brand name OMRI listed or compliant with the NOP National List. If National List pesticides are used, please verify that inert ingredients appear on EPA list	Verified current OMRI certs on file. No pesticides were used.
25. Please verify and provide documentation that the client has followed the pest control hierarchy as set forth in NOP 205.206(a)-(d) before using approved pesticides.	No pesticides were applied. Only material used was (b) (4) along perimeters of fields for thistle.
26. Please verify that the client maintains documents recording soil deficiency for boron, copper, iron, Mg, and zinc before using fertilizers/ soil amendments.	No micronutrients were applied. Client understands requirement to document the need before using.
27. Please verify if there are any liquid fertilizers in use with a nitrogen analysis greater than three % and, if yes, confirm they are approved through an independent 3rd party inspection of the fertilizer manufacturer (eg, certified by OMRI or WSDA).	Yes, (b) (4), current OMRI included in updated docs file.
28. Please verify if alkali-extracted humic acid is being used.	Yes, (b) (4)
29. Please verify if no Chilean (Sodium) nitrate is being used. Please also verify if there is any hydroponic/ aeroponic production.	No Chilean nitrate was used. No hydro/aeroponic production, all fields crops direct seeded.
<u>Livestock/Dairy</u>	
30. Please note at the last inspection, it was noted that a large number of cows had been purchased from California and Oregon. Given the increased number of animals, please conduct a thorough DMI assessment to ensure that all applicable groups of animals the pasture requirements for a minimum of 120 grazing days and 30% DMI from pasture.	<p>In the new docs.pdf file is a sheet showing the Actual Feed Intake Summary from (b) (4) for the milking strings, one report shows the time interval from 1/1/14 to 5/12/14 when cows are not on pasture, and the other report shows 5/13/14 to 9/11/14 when cows were on pasture. See narrative for (b) (4) description. Ave dry matter w/out pasture (100%) was (b) (4) came from pasture.</p> <p>Did a mass balance on the cows purchased (they submit monthly detailed reports to the corp office showing herd composition for accounting purposes, as value changes with milking status) Data shown are for milkers and heifers.</p> <p>From a milking cow perspective 10/2/14 (b) (4) head of milking cows</p>



	1/13/14 (b) (4) head of milking cows (b) (4) Net increase in milking cows for the purchase of (b) (4) animals. Heavy culling to make room.																								
<p>31. Please verify the information provided on the following documents is correct:</p> <ul style="list-style-type: none"> a. Livestock Farm Profile b. Livestock Producer Individual Field Profile c. Dairy Herd Profile d. Dry Matter Demand and Intake Summary e. Dry Matter Fed Calculation Worksheet f. Planned Dry Matter Demand and Intake Summary g. Average Dry Matter Intake (DMI) from Pasture Calculation Worksheet <p>Please verify that the records demonstrate compliance with the Pasture Rule</p>	<p>a) LFP, verified, no changes.</p> <p>b) LPIFP, verified, no changes see SI 15 for IFP's which are the same</p> <p>c) DHP was updated to reflect new genetics in herd</p> <p>d, e, f, g) Verified, no changes.</p> <p>See SI 30 re pasture rule DMI.</p> <p>2014 Pasture days are shown for the various groups by pen;</p> <table border="1"> <thead> <tr> <th>Class(pen)</th> <th>Pasture start</th> <th>Pasture end</th> <th>% Pasture DMI</th> </tr> </thead> <tbody> <tr> <td>Milk cows</td> <td>(b) (4)</td> <td></td> <td></td> </tr> <tr> <td>Far off dry (pen 30)</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Young stock II (pen 20)</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Breeding heifers (pen 25)</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Preg heifers (pen 27)</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Class(pen)	Pasture start	Pasture end	% Pasture DMI	Milk cows	(b) (4)			Far off dry (pen 30)				Young stock II (pen 20)				Breeding heifers (pen 25)				Preg heifers (pen 27)			
Class(pen)	Pasture start	Pasture end	% Pasture DMI																						
Milk cows	(b) (4)																								
Far off dry (pen 30)																									
Young stock II (pen 20)																									
Breeding heifers (pen 25)																									
Preg heifers (pen 27)																									
<p>32. Please conduct a complete audit of origin of livestock for all dairy livestock, as follows:</p> <ul style="list-style-type: none"> a. If the dairy began operating as a 100% organic feed transitional dairy, please include with your inspection report a copy of the audit to verify that the all dairy replacement animals have completed a full one year of transitioning prior to selling, labeling, or otherwise representing the milk as 'organic'. b. If the dairy began operation under the former "80-20" feed exemption rule, please include a copy of the audit to verify that all replacement animals were from animals raised as organic from last 3rd of gestation. c. If the dairy began operating as an organic dairy after June 9, 2007, please include a copy of the audit which verifies that all replacement animals have been transitioned for one year prior to selling, labeling, or otherwise representing the milk as 'organic'. 	<p>Dairy was purchased from (b) (4) as a certified organic dairy. Client stated purchased replacement cows were purchased as last third of gestation organic heifers and cows, and purchase price supports this. Own replacements are last third of gestation (at least).</p> <p>On 8/22 an additional (b) (4) and 9/23/14 another (b) (4) were purchased from (b) (4). The total number of 2014 purchases was (b) (4) head.</p> <p>Reviewed organic certificates for all 2014 heifers purchased;</p> <p>(b) (4) on sheet), OTCO, 1/14/14 LGS</p> <p>(b) (4), OTCO, 2/18/14 LGS</p> <p>(b) (4), OTCO, 2/28/14 (don't know if conversion purchased) certificate and list of cows attached as an example of the records on file</p> <p>(b) (4), ISDA, 9/10/13</p> <p>(b) (4), CCOF, 1/28/1 (last 1/3 stated on cert)</p> <p>(b) (4), Organic Certifiers, 9/6/13</p> <p>(b) (4), Organic Certifiers, 10/2/13</p> <p>(b) (4), WSDA, 4/10/13 (last 1/3 stated on cert)</p> <p>(b) (4) OTCO, 3/13/14</p>																								
<p>33. Please verify stocking rates for livestock and include specific information in your inspection report.</p>	<p>Pastures around dairies are irrigated and intensively grazed. During the grazing season, (b) (4) acres in the vicinity of the east dairy milk barn are grazed by (b) (4) milk cows. There are (b) (4) which are (b) (4) acres each. The intensive rotational management allows the pastures to be maintained in excellent condition. The pasture forage mix in the rotated fields is approximately 24" tall and rotationally grazed for a single day down to 4" and rested for an average of 30 days until the forage re-grows to approximately 24" (can be 20 days in early spring when grasses are starting, and as long as 35 days toward the end of the growing season). Each of the paddocks will have been grazed about 4 - 6 times during the 120 day grazing season. The farm overview map attached as New Doc SOD Paddocks map shows how pastures are subdivided into paddocks numbered.</p>																								



	Daily records are kept (hard and electronic copies) of the pastures/paddocks grazed, and the before and after grass height measurements. They have an electronic pasture measuring tool and data logger that allows them to measure grass height in the pastures. This is used as a pasture management tool.												
34. Please provide the total number of pasture acres provided and please provide the total number of animals that have access to that (those) pasture(s); if access to pasture is restricted at any time, please provide details regarding the applicant's justification for temporary confinement.	<p>There are (b) (4) acres available, all of which can be used for pasture. For instance, part of dry cow herd was in field (b) (4) which is a crop field, used as pasture after the grazing season so the cows could graze crop residue. There are (b) (4) acres dedicated as pasture. (See SI 33 re paddock grazing) Herd composition for 3 different dates is listed below;</p> <table><tr><td>Date</td><td>Milk Cows</td><td>Dry Cows</td><td>Heifers</td><td>Total Head</td></tr><tr><td>(b) (4)</td><td></td><td></td><td></td><td></td></tr></table> <p>There are calves under 6 months not on pasture, but part of the total herd number.</p> <p>Temporary confinement is for hospital treatment, any medical/breeding treatments. Adverse weather could restrict pasture access during the grazing season. All barns have outdoor access/loafing areas. Review of random medical records showed reason and time of confinement.</p>	Date	Milk Cows	Dry Cows	Heifers	Total Head	(b) (4)						
Date	Milk Cows	Dry Cows	Heifers	Total Head									
(b) (4)													
35. Please conduct a complete audit of milk records to verify that there are enough organic animals in production to justify the sale of the organic milk using a statistically accurate method for determining days of production. Please include the audit results with your inspection report.	<table><tr><td>May 2014</td><td>Sept 2014</td></tr><tr><td>(b) (4)</td><td>(b) (4) lbs West Dairy</td></tr><tr><td>(b) (4)</td><td>(b) (4) lbs East Dairy</td></tr><tr><td>(b) (4)</td><td>(b) (4) lbs total shipped</td></tr><tr><td>(b) (4)</td><td>(b) (4) ave # cows milked</td></tr><tr><td>(b) (4)</td><td>(b) (4) lb/cow average production</td></tr></table> <p>These averages are about 8 to 10 lbs/cow lower than reported in last year's inspection report. Many of the cows are heifers in their first lactation as the new animals were brought on board. Decrease in production is not unexpected, in May they were on pasture for half the month in cooler weather, in September they had been on pasture all summer during the heat of summer and still on for the first half of the month. Client stated that the milk production always drops as the grazing season wraps up, summer temperatures and the exercise of hiking to pasture takes a toll. Their goal is 70 – 75 lbs/cow average production.</p>	May 2014	Sept 2014	(b) (4)	(b) (4) lbs West Dairy	(b) (4)	(b) (4) lbs East Dairy	(b) (4)	(b) (4) lbs total shipped	(b) (4)	(b) (4) ave # cows milked	(b) (4)	(b) (4) lb/cow average production
May 2014	Sept 2014												
(b) (4)	(b) (4) lbs West Dairy												
(b) (4)	(b) (4) lbs East Dairy												
(b) (4)	(b) (4) lbs total shipped												
(b) (4)	(b) (4) ave # cows milked												
(b) (4)	(b) (4) lb/cow average production												
36. Please verify that the information provided on the Individual Feed Ration(s) is correct. Please include "VBI, your initials, and the date" per the Paperless Inspection Report Work Instruction. **** If the IFR's are revised and/or new IFR's submitted please provide a clean copy in Excel format if possible with the report for the client's file.	Verified the various current feed rations, they will vary as the moisture content in the various commodities changes, as feed values change, or commodity availability changes. Recipes are monitored closely by what the cows actually eat, milk production and animal overall condition. The (b) (4) database tracks the various rations both real time and historically. Verified the supplier list in their OSP. Not all suppliers have been used, but are left on list as possible suppliers if commodities become available.												
37. Please ensure that the client has current NOP certificates and specification sheets for all purchased feed on file and return copies to QAI with your report.	Verified for suppliers purchased from, certificates included in updated docs file. See list in SI 10. Mineral packs have not changed, documents on file are current. See SI 12 for new (b) (4) mineral.												
38. Please verify that the information provided on the Medical Input Profile(s) is correct. Review	Verified, list is tables 8.1a, b in OSP Appendix 1. Not all products have been used or are on site. Client opted to leave all												

CE Name: **Sunrise Organic Dairy LLC**

the operator material usage logs and explain whether all materials are being used according to the use described on the MIP and approved on the label (i.e. for electrolytes, material usage logs would indicate a short duration of use and note the specific illness). Please include "VBI, your initials, and the date" per the Paperless Inspection Report Work Instruction. ****If the MIPs are revised and/or new MIPs submitted please provide a clean copy in Excel format if possible with the report for the client's file.	MIP on as these have been reviewed and approved for use. This gives them products to use in an emergency. Reviewed cow medical database. Searched for (b) (4) in cows, could not find any use. Used for calves in calf barn for elevated temps and pneumonia. Looked up records for cow 36207 in the hospital barn, as of 10/11/14 she was in for mastitis. Given (b) (4) Noted as on hold from milk production.
39. Please verify parasiticides (ivermectin, moxidectin and etc.) are used in accordance with their annotation and their usage is properly documented.	Reviewed medical treatment database, could not find any records of parasiticide use in 2013 or 2014. Verified with Carl that ivermec and moxidectin were not used. Carl stated it has not been needed. Cows did not appear stressed by parasites, in good body condition, shiny, calm, and alert. Annotations are well understood. Cow medical records indicate if a cow has ever been given a parasiticide and is no longer slaughter eligible. Tagging/marketing system covers this.
40. Please note that due to directives received from the NOP, only verify pest control materials in use on or around the milking parlor.	Reviewed, use tin cats around the milking parlor.
41. As it is sometimes difficult to communicate a discrepancy or observation in written form, it may be helpful or necessary to photograph an area, or areas, of an operation for sight review at QAI. If the client will not allow you to take photographs, please make a note of this in your report, providing the client's explanation or reasoning for lack of permission. If pictures are not allowed, please do your best to fully explain the discrepancy or observation without a picture, and why you felt a picture would best assist QAI in the review.	See attached photos.pdf file. Photos were taken of 2 dry cow herds still on pasture; water tanks for pastured cows, teenager herd on pasture at their water station; free stall barns interior and exterior, loafing area, shot of rotary milking unit, automatic water units in barn and alleyway to/from milking parlor. Locations marked w/photo number on maps included in photo file. Client had no objections to photos, very forthcoming and open.
42. Please provide photographs of pasture areas including animals, barns, etc. with descriptions of each photograph including the location of the photograph.	See photos.pdf file.

Section 2: PREVIOUS NON-COMPLIANCE OR DEFICIENCY

Inspector: Please review each previous noncompliance or area of deficiency listed below. QAI received written responses to each issue and determined the client adequately mitigated the deficiency. Please report if any deficiency remains an area of concern based on your observations. If completing form by hand, please use extra sheets if required.

NON-COMPLIANCE ISSUE OR DEFICIENCY

If you have an observation that indicates the previous deficiency has not adequately been resolved please provide an explanation next to that item. Alternatively please state "no repeat issue observed"

If the item has been addressed in another section above, you may indicate the relevant section and number where the issue was addressed.

New Client

Customer Service Advisement

CE Name: **Sunrise Organic Dairy LLC**

<p>1. There were no issues of concern noted during the recent inspection. QAI would like to commend Sunrise Organic Dairy LLC's efforts to implement and maintain a compliant organic program. Certification will be effective when the transfer of ownership is complete. Once QAI receives confirmation of ownership transfer the certificate will be generated. Additionally, as previously discussed, an additional inspection will be carried out at a mutually agreed upon date (no later than 3 months time) to ensure the approved organic system plan has remained in place after the ownership change J0432051-1</p>	<p>Noted. Stated inspections to date had been positive experiences.</p>
---	---

Section 3: ORGANIC SYSTEM PLAN

Inspector: Please indicate any discrepancies or relevant inspector observations pertinent to the Application, OCP(s) and Product Profile(s) by listing a reference number from the question then your description. If completing form by hand, please use extra sheets if required.

A: Application

Ref #	Relevant Observation

B: Compliance Plan

Ref #	Relevant Auditor Observation
Buffers	Map shows adjoining land use. Adjoining is mostly BLM or certified operations. Terrain serves as protection as does an irrigation ditch. No issues noted.
Feed	West dairy is where bulk feeds are stored and rations are mixed. Silage and hay are stored here. Hay stacks are also stage around farm to make delivery more convenient. Observed bagged round bales of their own grass hay produced this year.
Water	State tests every 3 years, Sunrise tests their water at least 2x a year. Well water is used for livestock and milking areas. Fields are irrigated with well and irrigation district water.
Sanitation	Current materials used for milking equipment are (b) (4). Teat dips observed in use are (b) (4).
Manure handling	Manure is vacuumed from the barns and alleys, observed at inspection. Hauled to pit for separation, solids piled and used on farm for fertilizer. Liquids used on fields. Consistent with OSP.

C: Product Profile(s)

Ref #	Relevant Auditor Observation

CE Name: **Sunrise Organic Dairy LLC**

SIRPI, IPPs	Addressed in SI's
HPP	Updated with number of animals present at inspection

Section 4: ATTACHMENTS. Please do not attach organic certificates or ingredient/input compliance documentation unless specifically requested in an SI above or unless it needs to be submitted as evidence of a discrepancy.

Please list attachments to your report below.

Updated docs.pdf (OSPS producer (fields and acreage); OSPS dairy/livestock (crops); OCP page 1 Livestock address; OCP page 1 Producer address; OMRI certs (crop inputs, cow salt); DHP; HPP; Organic cert for feed suppliers; (b) (4) label, MSDS, letter (left over from (b) (4) still on site but not used); (b) (4), label, MSDS (left over from (b) (4), still on site but not used)

Updated doc.pdf (Map of all fields showing paddocks (file is too big to merge, wants to make Adobe freeze up)

Updated doc.Word (Sunrise OCP document (tables extracted from text and all in Appendix A) (Appendices B-G not modified)

Updated Docs Excel SIRPI

New Docs.pdf ((b) (4), label, MSDS, OMRI cert; Organic certificate for cows purchased from (b) (4), list of cows purchased; (b) (4) printout for milking cows showing DM intake on and off pasture; (b) (4) Conditioner (part of TMR, new))

Retired Docs.pdf (OSP; DHP; HPP; SIRPI)

CE Name: Sunrise Organic Dairy LLC**Section 5: Applicant Authorization: NOP 205.403(a)(2)**

I, the client, hereby acknowledge that I have reviewed and accept these observations of the Inspector and that all information is true and correct to the best of my knowledge. I understand that additional unannounced visits by QAI may be required, for which I hereby give my permission. **I hereby acknowledge that all corrective actions noted by the auditor are recommendations only and may be overturned or added to by QAI, and that I will implement corrective actions only after receiving formal notification from QAI.**

(b) (6)

APPLICANT SIGNATURE

DATE

10-15-14**Section 6: Inspector Authorization:**

Under penalty of perjury, I swear that I have reviewed the application and its supporting documents; and that all of the information I have collected and submitted with this audit package is true to the best of my knowledge. I understand that if I fraudulently misrepresent information, or violate the terms and conditions of the Inspection Agreement, I am liable for all damages rendered by a court of law. I further indemnify and hold harmless Quality Assurance International, its agents and all others from liability for mistakes I knowingly commit. In addition, I attest to the following (*please initial*):

1. **(b) (6)** I understand that neither I nor an immediate family member are currently providing services or in any way involved commercially with this operation. Furthermore, I understand I nor an immediate family member may engage in such activities within the next 12 months without informing QAI.
2. **(b) (6)** I attest that I have not accepted payment, gifts, or favors of any kind from the operation
3. **(b) (6)** I understand that I am required to submit my inspection report to QAI within 7 calendar days of inspection. If I am not able to submit my report in the allotted time frame it must be approved by QAI. My audit fee will be subject to a delayed payment penalty of 30 days.
4. **(b) (6)** I attest that I am an active member of a recognized inspector/inspector training organization IOIA.
5. **(b) (6)** I attest that I have not inspected this operation for more than four consecutive years.
6. **(b) (6)** I attest that neither I nor an immediate family member have provided consulting services for, or had a commercial interest in, the applicant/operation (within the last (24) twenty-four months).

(b) (6)

INSPECTOR SIGNATURE

DATE

10/15/14**Section 7: Report Copy:**

A copy of this completed report will be provided to you by QAI per NOP 205.403(e)(2).

CE Name: **Sunrise Organic Dairy LLC**

SAMPLE AUDIT WORKSHEET FOR Processor/Producer/Livestock/Dairy

I. Trace-back Audit Worksheet: Please choose **a title transfer document** (Invoice, BOL, or Shipping Document) for a finished organic product and trace it, or some of its ingredients back to the supplier(s) and date(s) of delivery of raw materials. List all documents necessary, and the connecting data elements between the documents that allow the finished product to be traced back to the incoming raw materials and their compliance documentation.

1. State product chosen	Raw milk
2. Lot #, Date Code, or product tracking system code for the above product	Lot 091014
3. Describe the trail of documents	BOL # 31573 on 9/10/14 from Sunrise Dairy to Model Dairy in Reno, NV states raw milk, grade A, references PO# 2743973, time 5 am, milk temp 37 F, lot # 091014 Scale ticket # 3792 dated 9/10/14 references PO# 2743973 Wash out ticket for tanker #39 part of file
4. Does the trace-back audit confirm that the facility has a complete audit trail, and is product being accurately tracked through the system?	Yes.
5. Does the trace-back audit verify the accuracy of the IPP(s) for the product chosen?	Yes, they are the supplier of the raw milk.

Signed

(b) (6)

Date

10/15/14

INSPECTOR SIGNATURE

CE Name: **Sunrise Organic Dairy LLC**

II. Input/Output Balance: Please choose a product or ingredient to conduct a mass balance and select a time period that makes sense for this business. Considerations include the dates for which inventory balances are available, volume of sales, frequency of production. A month should be the minimum time period with a quarter year being most common and a half year or total year in specific circumstances. The time frame should coincide with inventory cycles so you can get accurate Beginning and Ending Inventories. (Use the attached worksheet to do your calculations)

1. Time period chosen	May and Sept 2014, beginning and end of grazing season. Please see SI 35 for details
2. Name of product or ingredient	
3. If prepackaged product go to line 11.	
4. If ingredient, how many products contain this ingredient?	
5. Total Ingredient (Raw Material) used in production based on Inventory and Purchases (Box A from Worksheet)	
6. Total Ingredient in Finished Goods Production per production records (Box B)	
7. Comment on differences between Box A and Box B. eg. Yield losses, used in conventional etc. Note : The value in Box A should be equal to or slightly larger than the value in Box B.	
8. Total usage/sales of ingredient based on inventories and production. (Box C)	
9. Total sales of ingredient, taking into account all products containing the ingredient (Box D)	
10. Comment on differences between Box C and Box D. Eg. Samples shipped, inventory losses etc. Note : The value in Box C should be equal to or slightly larger than the value in Box D.	
11. Total sales of prepackaged product (Box E)	
12. Total usage/sales of prepackaged product based on Inventories and Purchases. (Box F)	
13. Comment on differences between Box F and Box E. Eg. Samples shipped, inventory losses etc. Note : The value in Box F should be equal to or slightly larger than the value in Box E.	

Signed

(b) (6)

INSPECTOR SIGNATURE

Date

10/15/14

CE Name: **Sunrise Organic Dairy LLC**



* -- Internal Use Only --

Reviewer Recommendation:

MA	REQ	MI	OFI	NI	I attest that I have not inspected, provided consulting services for, nor had a commercial interest in, this applicant/operation (within the last (24) months). Should any conflict arise, I will not participate in any work, discussion and/or decision in the review of this application for organic compliance: (signature of Reviewer & Date):
Notes to the CPM					
Notes to the L3					



9191 Towne Centre Drive, Suite 200
San Diego, CA 92122 • USA
858-792-3531 • Fax: 858-792-8665
www.qai-inc.com

11-Dec-2014

Carl Sklavos
303 South 2800 East
Paul, ID 83347
USA

Re: Sunrise Organic Dairy LLC / Sunrise Organic Dairy LLC

Dear Carl Sklavos:

As part of your obligation for ongoing participation in the QAI Organic Certification Program, the Certification Department has asked us to convey to you that your program will require the following corrective action and/or improvement. Please address each item within the noted time frame.

Within 30 Days – Notice of Non Compliance

Please provide information about how you will correct each of the following deficiencies, or documentation that it has been corrected, within **Thirty Days (30 days)** of receipt of this letter. Alternatively, you may provide additional information to demonstrate that your operation complies with the referenced section of the Organic Regulation:

Number	J0566073-7
Description	It was unable to be determined if the animals purchased from (b) (4) Pastures were transitioned animals or organically managed from the last third of gestation. (b) (4) Pastures organic certificate list both last 3rd gestation and transitioned animals, and the animal list submitted at inspection did not clarify these animals' status. Section 205.236(c) of the National Organic Standard requires that an organic operation maintain records sufficient to preserve the identity of all organically managed animals on their operation. Additionally, the Sunrise Organic Dairy certificate includes slaughter stock, and animals that are transitioned to organic are not eligible for organic slaughter.

Please respond with the following:

1. Documentation that verifies the status of the animals purchased from (b) (4) Pastures.
2. Sunrise Organic Dairy's plan to ensure that only animals that have been managed organically from the last third of gestations will be sold as slaughter stock.

Compliance	NOP - Livestock (Dairy/Livestock)
Standard Clause	7 CFR Part 205.236(b)(2), 205.236(c)
Issue Date	11-Dec-2014
Due Date	10-Jan-2015

Within 30 Days - Request for More Information (Conditions for Continued Certification)

Prior to issuing an organic certificate, QAI requests further information in order to assess compliance. Please provide this information within **Thirty Days (30 days)** of receipt of this letter:

Number	J0566073-2
Description	During the recent QAI inspection, a review of Sunrise Organic Dairy's January 2, 2014 State of Idaho Department of Agriculture inspection report identified that an unlabeled 1 gallon bottle of teat dip was found at the East Dairy milking parlor. National Organic Standards 205.105 outlines allowed and prohibited substances to be used in organic production. Without a label, QAI is unable to verify compliance with this part of the standard. Please submit the following to QAI for review:



9191 Towne Centre Drive, Suite 200
San Diego, CA 92122 • USA
858-792-3531 • Fax: 858-792-8665
www.qai-inc.com

1. Identification of the product in the unlabeled bottle.
2. An explanation of how this issue was addressed with the Idaho Department of Agriculture.
3. An explanation of how Sunrise Organic Dairy's procedures have been updated to ensure all materials on-site are identifiable.

Compliance NOP - Handler (Processor)
Standard Clause 7 CFR Part 205.105, 205.201(a)(2)
Issue Date 11-Dec-2014
Due Date 10-Jan-2015

Number J0566073-10

Description Please be advised that all medical inputs used must meet the following requirements:

- Active ingredients must be either non-synthetic or listed in 7 CFR Part 205.603.
- Excipients must be identified by the FDA as Generally Recognized As Safe, approved by the FDA as a food additive, or Included in the FDA review and approval of a New Animal Drug Application or New Drug Application.

It is not clear if the following materials are synthetic or non-synthetically produced:

- a. Glycine in the (b) (4)
- b. Magnesium trisilicate listed as an active ingredient in the (b) (4)
- c. Pectin listed as an active ingredient in the (b) (4)

Please submit the following to QAI for review:

1. An updated section 8.1b of Appendix A with these products removed, and verification that they are no longer at your facility; or
2. (b) (4) - Full ingredient disclosure, including excipients. Verification that the glycine is non-synthetic. Verification that all excipients are identified by the FDA as Generally Recognized As Safe, approved by the FDA as a food additive, or Included in the FDA review and approval of a New Animal Drug Application or New Drug Application.
3. (b) (4) - Documentation that demonstrates the magnesium trisilicate and pectin are non-synthetic.
4. The inspector noted that not all products listed in 8.1b of Appendix A have been used or on-site. Please provide the last date of use for (b) (4)

Compliance NOP - Livestock (Dairy/Livestock)
Standard Clause 7 CFR Part 205.105, 205.201(a)(2), 205.603
Issue Date 11-Dec-2014
Due Date 10-Jan-2015

Number J0566073-9

Description It was noted during the review of the file that (b) (4) has been added to section 8.1b of Appendix A of the Organic Systems Management Plan. Additional information is needed to verify NOP compliance. Please submit the following documentation to QAI for review:

1. A specification sheet, label, or other document with full ingredient disclosure.
2. Any supporting documentation to demonstrate component compliance with the NOP. Alternatively, a current OMRI or WSDA certificate may be submitted.



3. Please provide the last date of use for the (b) (4)

Compliance NOP - Livestock (Dairy/Livestock)
Standard Clause 7 CFR Part 205.201(a)
Issue Date 11-Dec-2014
Due Date 10-Jan-2015

Number J0566073-5
Description The Producer Annual Input Record (AIR) must identify all of the inputs which have been applied to the fields from the date of the last inspection to the present and which are or may be used in the next 12 months. In lieu of an AIR, Sunrise Organic Dairy includes this information in Appendix A of the Organic Systems Management Plan. The following crop input materials were previously registered with WSDA Brand Name Materials List or OMRI; however, they are no longer registered with these material review organizations:

- a. (b) (4) from (b) (4)
- b. (b) (4) (liquid fertilizer) from (b) (4)
- c. (b) (4) from (b) (4)

Please submit the following documentation to QAI for review:

- 1. An updated Appendix A, which does not include the aforementioned inputs along with a statement that these materials are no longer at your facility; or
- 2. For each input, please submit a specification sheet, label, or other document with full ingredient disclosure. Be sure to include any supporting documentation to demonstrate compliance with the NOP. Alternatively, a current OMRI or WSDA certificate may be submitted.

Compliance NOP - Crop (Producer)
Standard Clause 7 CFR Part 205.201(a)
Issue Date 11-Dec-2014
Due Date 10-Jan-2015

Number J0566073-4
Description The inspector indicated that the current acreage listed on the Organic System Plan Summary was the planted acreage rather than the total acreage of some fields. In a review of the 2013 crop report submitted at Sunrise Organic Dairy's initial application for organic certification, these acreage adjustments were confirmed. The sites have been adjusted in the QAI database. However, some fields require additional clarification for their acreage increase.

The following sites had acreage increases by comparison with your 2013 submitted crop report:

- a. Site # (b) (4) was (b) (4) acres on your 2013 crop report; your 2014 crops report listed (b) (4) as the total acreage, a 5.7 acre increase.
- b. Site # (b) (4) - On the 2013 crop report, Site # (b) (4) and (b) (4) were listed together as (b) (4) acres. On the 2014 crop report, Site # (b) (4) was listed as (b) (4) and Site # (b) (4) as (b) (4) totaling (b) (4) an (b) (4) acre increase.
- c. Site # (b) (4) was (b) (4) acres on your 2013 crop report; your 2014 crops report listed (b) (4) acres, a (b) (4) acre increase.
- d. Site # (b) (4) was (b) (4) acres on your 2013 crop report; your 2014 crops report listed (b) (4) a (b) (4) acre increase.
- e. Site # (b) (4) was (b) (4) acres on your 2013 crop report; your 2014 crops report listed (b) (4) acres, a (b) (4) acre increase.



There is no documentation demonstrating the origin of the additional acres that are requesting to be added to the certificate for these fields.

1. Please provide documentation demonstrating where the additional acres are from, and clarify whether animals have grazed these additional acres.
2. Submit notarized Land Use History Verification forms for the additional acres, as applicable.

Compliance	NOP - Crop (Producer)
Standard Clause	7 CFR Part 205.202(b)
Issue Date	11-Dec-2014
Due Date	10-Jan-2015

Number	J0566073-1
Description	<p>In order for products to be listed on Sunrise Organic Dairy LLC's handler certificate (e.g. calf grain mix, ground, roasted, and rolled products), documentation must be on file from the supplier that demonstrates the product is certified 100% organic. During a review of supplier certificates for the handled products, it was noted that many of the commodity suppliers' organic certificates do not list agricultural commodities as 100% organic. Raw agricultural products listed on a producer certificate are understood to be 100% organic, but products listed on handler certificates must be specifically listed under the 100% organic claim. Please submit either of the following for the suppliers listed on the Organic Feed Commodities Supplier List for handled products:</p> <ol style="list-style-type: none">1. A producer certificate; or2. A handler certificate that specifically lists each received commodity as 100% organic.3. Alternatively, confirm in writing that the commodities listed on Sunrise Organic Dairy LLC's handler certificate can be listed under the "organic" claim.

Compliance	NOP - Handler (Processor)
Standard Clause	7 CFR Part 205.237(a); 205.301(e)
Issue Date	11-Dec-2014
Due Date	10-Jan-2015

Number	J0566073-6
Description	<p>During Sunrise Organic Dairy's recent inspection, the inspector observed all animals out on pasture except the milk cows. It was noted that the milk cows came off pasture September 11, 2014. Additionally, section 9.3.a of the organic system plan lists differing grazing seasons for different classes of animal. The National Organic Standard requires that the grazing season must be based on regional location, and requires management on pasture and daily grazing throughout the grazing season except as provided by 205.239(b)(c) and (d). Please provide the following to QAI for review:</p> <ol style="list-style-type: none">1. Clarification of the beginning and end dates of the Sunrise Organic Dairy's grazing season and an updated organic system plan as applicable.2. Justification for the beginning and end dates end of the grazing season for Sunrise Organic Dairy's region. Include an explanation of how Sunrise Organic Dairy updates the organic system plan if conditions allow a longer grazing season or require the grazing season to be shortened.3. An explanation for why the milk cow grazing season ended September 11 while the grazing season for the other classes continued for at least another month.4. An explanation for the early dormant and late dormant pasture access dates listed in section 9.3.b of the Organic System Plan, and why late dormant pasture access was not given for the milk cows in 2014.



9191 Towne Centre Drive, Suite 200
San Diego, CA 92122 • USA
858-792-3531 • Fax: 858-792-8665
www.qai-inc.com

Compliance	NOP - Livestock (Dairy/Livestock)
Standard Clause	7 CFR Part 205.239(a)(2), 205.240(c)
Issue Date	11-Dec-2014
Due Date	10-Jan-2015

Within 90 Days – Conditions for Continued Certification

Please include a written response to each item within **Ninety Days (90 days)** of receipt of this letter. If the 90 day due date is past the start of your renewal cycle, responses to each point will be required before we can begin the renewal process.

Number	J0566073-11
Description	Sunrise Organic Dairy has the following materials listed in section 8.1b of Appendix A of their Organic Systems Management Plan that include in their ingredients the generic terms of flavor, artificial color or palatable base:

- a. (b) (4) – includes palatable base
- b. (b) (4) – includes flavor base
- c. (b) (4) – includes flavor base
- d. (b) (4) from (b) (4) – includes flavored base
- e. (b) (4) – includes artificial color
- f. (b) (4) – includes flavored base and artificial color

All medical inputs used must meet the following requirement: Excipients must be identified by the FDA as Generally Recognized As Safe, approved by the FDA as a food additive, or Included in the FDA review and approval of a New Animal Drug Application or New Drug Application.

So that QAI has a complete record of all materials verified by the inspector and used in the organic operation, please submit the following to QAI for review:

- 1. Full ingredient disclosure, including the details of the palatable base, flavor base and artificial colors.
- 2. Verification that all excipients are identified by the FDA as Generally Recognized As Safe, approved by the FDA as a food additive, or Included in the FDA review and approval of a New Animal Drug Application or New Drug Application.
- 3. The inspector noted that not all products listed in 8.1b of Appendix A have been used or on-site. Please provide the last date of use for the products listed above.

Compliance	NOP - Livestock (Dairy/Livestock)
Standard Clause	7 CFR Part 205.201(a)(2), 205.603
Issue Date	11-Dec-2014
Due Date	11-Mar-2015

Customer Service Advisement

Please be advised that the following items are communicated to you as part of our customer service. These issues do not require a response at this time:

Number	J0566073-3
Description	It was verified at the recent inspection that a number of sites were split into separate sites. The following site changes have been made to your Organic Certificate:

- 1. Site # (b) (4) is now represented as
- Site # (b) (4)



- Site # (b) (4)
- Site # (b) (4)
- 2. Site # (b) (4) is now represented as
 - Site # (b) (4)
 - Site # (b) (4)
- 3. Site # (b) (4) is now represented as
 - Site # (b) (4)
 - Site # (b) (4)
- 4. Site # (b) (4) is now represented as
 - Site # (b) (4)
 - Site # (b) (4)
- 5. Site # (b) (4) is now represented as
 - Site # (b) (4)
 - Site # (b) (4)
- 6. Site # (b) (4) is now represented as
 - Site # (b) (4)
 - Site # (b) (4)
- 7. Site # (b) (4) is now represented as
 - Site # (b) (4)
 - Site # (b) (4)
 - Site # (b) (4)
- 8. Site # (b) (4) is now represented as
 - Site # (b) (4)
 - Site # (b) (4)

These site names and numbers have been updated in the QAI database.

Compliance
Standard Clause
Issue Date

NOP - Crop (Producer)
11-Dec-2014

Number
Description

J0566073-8
Appendix A section 11.1 of Sunrise Organic Dairy's Organic Systems Management Plan lists all suppliers for Organic Feed Commodities purchased by Sunrise Organic Dairy. Please be advised that prior to purchasing the following products, the following must be clarified:

1. (b) (4) was identified as a purchased feed; however, no supplier was listed. Upon determining a supplier for organic (b) (4), Appendix A must be updated and a current supplier certificate must be submitted to QAI.

2. (b) (4) was identified as being sourced from (b) (4). The current organic certificate for (b) (4) does not include (b) (4). Prior to purchasing organic (b) (4), submit an organic certificate from the supplier that specifically lists this product.

3. An organic certificate was submitted with the inspection report for (b) (4). No commodities were noted in Appendix A section 11.1 of the Organic Systems Management Plan as being purchased from (b) (4). If necessary, please clarify what is being purchased from this certified organic operation and update



9191 Towne Centre Drive, Suite 200
San Diego, CA 92122 • USA
858-792-3531 • Fax: 858-792-8665
www.qai-inc.com

the organic system plan accordingly.

Compliance	NOP - Livestock (Dairy/Livestock)
Standard Clause	7 CFR Part 205.103
Issue Date	11-Dec-2014

We at QAI appreciate your effort and dedication to the organic process and look forward to continuing to work together. Deficiencies requiring correction within 7, 15 or 30 days must be addressed before we can resume consideration of your certification. If an adequate response is not received within the specified time, we will assume you no longer wish to be certified by QAI, and a Notice of Proposed Suspension of your certification will be issued. Responses must be sent to the corporate office in San Diego via a delivery service that provides dated return receipts.

If you have any questions, or require any assistance, please contact me by phone at 858-200-9718 or fax at 734 827 3896.

Sincerely,

(b) (6)

John Joseph
Certification Project Manager

cc:

National Organic Program Administrator

Inspector: (b) (6), (b) (7)(C), (b) (7)(D)

From: [McEvoy, Miles - AMS](#)
To: [AMS - NOPCompliance](#)
Subject: FW: An open letter concerning federal organic regulation violations
Date: Monday, February 10, 2014 2:43:23 PM
Attachments: [Open letter on ID dairy FINAL.pdf](#)

Please review and prepare response.

Miles McEvoy
Deputy Administrator
National Organic Program

From: (b) (6), (b) (7)(C), (b) (7)(D) [mailto:(b) (6)]
Sent: Monday, February 10, 2014 1:47 PM
To: McEvoy, Miles - AMS; AMS - Office Of The AMS Administrator
Cc: (b) (6), (b) (7)(C), (b) (7)(D)
Subject: An open letter concerning federal organic regulation violations

Please find the attached open letter.

You may contact us at your convenience regarding this matter.

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

(b) (7)(D)



February 10, 2014

USDA National Organic Program
1400 Independence Ave., SW
Room 2646, Ag Stop 0268
Washington, DC 20250

Dear Mr. McEvoy and Ms. Alonzo,

The (b) (7)(D) is calling your attention to the consistent lack of serious attention paid to enforcement of specific organic regulations concerning §205.240, the pasture practice standard, and its application at the former Dean Foods/WhiteWave factory-scale dairy located in Paul, ID. In December, ownership and operation of the dairy was transferred to John Reitsma, who lives in Twin Falls, Idaho.

In 2005 and in 2006, (b) (7)(D) filed legal complaints with the NOP alleging the illegal confinement of the thousands of cows in the dairy herd at this operation (then owned by Dean Foods). Based on correspondence from the USDA, and the review of records obtained through a FOIA, complaints were closed by the NOP without a site visit and investigation.

The performance and the National Organic Program, during both the Bush and Obama administrations, should be an embarrassment to all USDA political appointees and staff. It appears that the NOP is making accommodations for industrial-scale dairies, and their owners and commercial patrons, to operate outside of the spirit and letter of the law while materially damaging the ability of family-scale farmers to compete in the marketplace.

Our latest complaint alleges a continued pattern of abuse of the pasture practice standard and mandated access to the outdoors. Thousands of cows are being milked at the facility are being milked three times a day with the animals confined between two of the three milking sessions.

Furthermore, reports from more than one individual intimately involved in the operation state that a percentage of the lactating cows, "high producers," are being milked four times per day and being afforded no access to pasture whatsoever. It was reported to us that Dean/WhiteWave management claimed that they could "average" the entire herd in an effort to meet the 30% minimum dry matter intake.

(b) (6)



Averages might be appropriate if their use was not to intentionally subvert the intent of the standards which require all livestock to have access to the outdoors and for all ruminants to have access to pasture.

We once again reiterate our interest in having the department carefully scrutinize the work of the operation's certifier, Quality Assurance International (QAI), to ascertain whether or not they were part of a conspiracy to undermine the integrity of the certification process on dairies.

It is unclear, based on the testimony we have received, whether the high production animals were afforded the minimum 120 days on pasture or if the farm operators were using the same averaging technique and violating the standards in that regard as well.

As you know, there are provisions to "temporarily" confine cattle, primarily due to health or environmental factors. Confining cattle in order to increase milk production, or because the size of the milk herd (currently 2400) requires walking too far to access fresh pasture, would not be one of the legally allowed exemptions from requiring "access to pasture."

We also submit that there is no statute of limitations regarding the allegations previously raised by (b) (7)(D) in the complaints filed in 2005 and 2006 regarding this particular dairy and its operation. We request that NOP investigators closely scrutinize the current management practices in place at the Paul, ID dairy and examine past records regarding management practices to ensure compliance with all pertinent organic regulations and apply appropriate penalties if justified.

Should (b) (7)(D) allegations prove true, the lack of judicious enforcement by the USDA will have allowed major corporate agribusiness concerns to use their ill-gotten gains to develop commanding market shares and place their competitors, purchasing milk from ethical family-scale farmers, at a competitive disadvantage.

We request that you keep (b) (7)(D) appraised of the status of your investigation and contact us for corroborating information.


Sincerely,

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

(b) (6), (b) (7)(C), (b) (7)(D), Codirector

(b) (7)(D)

(b) (7)(D)



February 10, 2014

NOP Compliance and Enforcement Branch
Attn: Mr. Matthew Michael
Agricultural Marketing Service
United States Department of Agriculture
1400 Independence Avenue, S.W.
Mail Stop 0268, Room 2648-S
Washington, D.C. 20250-0268

Dear Mr. Michael:

This new legal complaint is an update to the complaint (attached below) from 2006 that was never properly adjudicated by the National Organic Program.

We respectfully request, once again, that your office thoroughly investigate the history of past illegalities at the former Horizon dairy located near Paul, Idaho.

In addition, new intelligence has come to our attention, from employees at the operation, that was recently sold to private investors. They have shared with us that throughout 2013 the dairy, which previously was milking twice a day and putting cows out between each milking, had been shifted to milking three times a day and confining cattle between two of the three milkings.

Furthermore, they reported that fresh, high producing cows were being milked for times a day and entirely confined until their production dropped off.

As you know, there are provisions for the "temporarily" confinement of cattle, primarily due to health or environmental factors as detailed in §205.238 and §205.239. However, confining cattle in order to increase milk production, or because the size of the milk herd (currently 2400) requires walking too far to access fresh pasture, would not be among the enumerated legal exemptions from requiring "access to the outdoors/access to pasture."

A statute of limitations is not incorporated into the federal organic standards. Based on freedom of information documents previously obtained by (b) (7)(D), it does not appear that NOP investigators ever visited the Dean/WhiteWave operation in Idaho despite our multiple requests to have them fully scrutinized.

We respectfully request investigators thoroughly review all records and interview relevant personnel based on this and prior complaints.

(b) (6)



If you contact our office we will attempt to facilitate confidential interviews of staff to substantiate our current allegations. However, the current practices in question should be fully documented in their Organic Systems Plan and could be subject to confirmation by other farm personnel.

(b) (7)(D) requests that the NOP's Compliance and Enforcement Branch make a timely, full, and good faith effort in their investigation of these allegations. In fact, failure to take such action will only encourage future scofflaws and corner cutting by organic operators, and will make a mockery of the federal organic regulations that are so diligently observed by the vast majority of participants in the nation's organic agriculture and food sector.

It should be noted that nothing in this formal complaint shall be interpreted as a waiver of our right to appeal under the Adverse Action Appeals Process cited above.

What follows is a copy of the complaint filed with the NOP in 2006 regarding our allegations of organic violations at the Paul, ID dairy then owned by Dean Foods. A similar lack of investigative action toward this complaint is unacceptable.

You may contact us at your convenience.

Sincerely,

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

(b) (6), (b) (7)(C), (b) (7)(D), Codirector

(b) (6)

August 9, 2006

TO: Eileen Broomell, NOP Compliance, USDA

RE: Complaint concerning multiple violations of the National Organic Program's regulatory standards by the Horizon Organic Dairies (Dean Foods/WhiteWave) in Paul, ID, and Kennedyville, MD

Dear Ms. Broomell,

(b) (7)(D) is filing this formal complaint with your office concerning possible violations of National Organic Program (NOP) regulatory standards governing ruminants (dairy cows) by two organic dairy facilities operated by the Dean Foods Corporation (Horizon/WhiteWave) and located near Paul, Idaho, and Kennedyville, Maryland. We are asking that you fully investigate this complaint to determine whether violations of NOP regulatory standards have occurred, are occurring, or will occur.

We are willing to share with your investigators all of the factual evidence we have directly gathered from our site visit to the Idaho facility and the evidence provided to us by numerous other sources on both operations. At the conclusion of your investigation, we ask that you take all warranted enforcement actions to bring both of these dairy operations

into compliance with NOP rules in a timely fashion or to decertify and/or fine the operators, if appropriate.

If the allegations we have gathered are proven to have merit, we believe that there is a reasonable basis to conclude that Dean/Horizon's Idaho and Maryland organic dairies are violating the following provisions of the NOP regulations:

Subpart C

§ 205.237 Livestock feed.

- (a) The producer of an organic livestock operation must provide livestock with a total feed ration composed of agricultural products, **including pasture** and forage, that are organically produced and, if applicable, organically handled ... (emphasis added)

and

§ 205.238 Livestock health care practice standard

- (a) The producer must establish and maintain preventive livestock health care practices, including:
 - (3) Establishment of appropriate housing, pasture conditions, and sanitation practices to minimize the occurrence and spread of diseases and parasites;
 - (4) Provision of conditions which allow for exercise, freedom of movement, and reduction of stress appropriate to the species;

and

§ 205.239 Livestock living conditions.

- (a) The producer of an organic livestock operation must establish and maintain livestock living conditions which accommodate the health and natural behavior of animals, including:
 - (1) Access to the outdoors, shade, shelter, exercise areas, fresh air, and direct sunlight suitable to the species, its stage of production, the climate, and the environment;
 - (2) Access to pasture for ruminants;
- (b) The producer of an organic livestock operation may provide temporary confinement for an animal because of:
 - (1) Inclement weather;
 - (2) The animal's stage of production;
 - (3) Conditions under which the health, safety, or well being of the animal could be jeopardized; or
 - (4) Risk to soil or water quality.

Regarding the Paul, Idaho, operation, (b) (7)(D) contends that Horizon's drylot facility—located in an arid climate averaging 10 inches of rain annually—does not provide sufficient pasture for their lactating herd numbering approximately 4000–4500 head, as well as the approximately 4000 heifers and dry cows also located at this site. Earlier this year, in an attempt to upgrade the extremely limited pasture available on the farm, Horizon officials planted oats on which to allegedly pasture milk cows—with a stocking rate of approximately 7 cows per acre. Cattle were then paraded outside of their drylot facility on several occasions to show visiting VIP members of the organic community and reporters that the milk herd had access to pasture.

Staff from (b) (7)(D) also visited the Idaho facility in June, 2006. A portion of the milking herd was rotated at that time onto the oats from their “winter quarters” to demonstrate the facility's pasturing regime. However, the oats, at the time of this visit, were approximately 2.5 feet tall and had headed-out /gone-to-seed. This direct visual evidence contradicts the claims of regular pasturing by the dairy herd on the oat field. Furthermore, even if the field of oats was intended to regularly pasture the herd during the period of our staff's visit, the material was not palatable at this stage of growth and is indigestible for dairy cattle. This fails the standard established under NOP regulation § **205.239. Terms defined:**

Pasture. Land used for livestock grazing that is managed to provide feed value and maintain or improve soil, water, and vegetative resources.

Furthermore, since our visit to the Idaho facility and according to our Idaho-based sources and photographic evidence, the oats have been mechanically harvested, leaving stubble and virtually no pasture accessible to the milking herd. Staff from (b) (7)(D) also observed no watering facilities providing needed water to animals out on the available pasture—something that would be a necessity for organic operations seeking to humanely manage their dairy herd while truly meeting the pasture standard. (b) (7)(D) contends that certified organic farms cannot operate without access to pasture for their animals.

The Horizon operation manages a total of approximately (b) (4) acres. This acreage was described as “desert country” by the farm's general manager in 2001. Feed for lactating cows, which are milked three times a day, is reportedly delivered to the herd's “winter quarters” by truck.

(b) (7)(D) recognizes that certified organic dairy operations can remove cows from pasture for temporary considerations based on weather, environmental, or health considerations, as noted above in § **205.239.** (b) (7)(D) contends, however, that geographic or climatic conditions—which make pasture impractical or not cost-effective—cannot be used to justify year-round noncompliance with the pasture rule.

Horizon's Kennedyville, Maryland, organic dairy milks approximately 500 head. Based on expert testimony from a number of sources with intimate, first-hand familiarity with this operation, only token pasturing, at best, is occurring at the dairy. Cattle have been prevented from accessing pasture during this growing season despite the presence of

excellent pasturing conditions. These conditions include ideal and lush pasture quality on the farm's fields and weather perfect for grazing with cloudy skies and temperatures in the 65–70 degree range. We have additional photographic evidence documenting this condition.

NOP regulations, according to § 205.239(b), are very precise and clear, stating when animals can be legally confined on a temporary basis. Neither the weather nor pasture conditions on the Horizon-operated Maryland farm met the weather and/or pasture standards permitting the temporary confinement of the facility's milking herd.

Evidence gathered by (b) (7)(D) from eye-witnesses to the Maryland operation have testified that the facility's pasture was mowed (brush-hogged) on a number of occasions, rather than harvested for its nutritive feed value. This was done because the pasture crop had reached maturity and had not yet been grazed down by cattle.

Furthermore, (b) (7)(D) requests that the USDA investigate whether or not the organic label may be used in the branded dairy products produced by Dean Foods/Horizon Organics (and made from milk at both of the Dean/Horizon operated organic dairies) if it is found to not meet the following criteria stated in the national organic regulations:

Subpart D - Labels, Labeling, and Market Information
§ 205.300 Use of the term, "organic."

(a) The term, "organic," may only be used on labels and in labeling of raw or processed agricultural products, including ingredients, that have been produced and handled in accordance with the regulations in this part. The term, "organic," may not be used in a product name to modify a non-organic ingredient in the product.

(b) (7)(D) requests that the USDA investigate the applicability of this national organic regulation, should it be deemed appropriate:

Subpart B – Applicability
§ 205.100 What has to be certified

(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 \$10,000 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.

Both of Dean's Horizon organic dairies appear to have been certified by Quality Assurance International, Inc. (QAI). QAI may be contacted at 858-792-3531.

Contact information for the Idaho Horizon Organic Dairy is:

Horizon Organic Dairy
2589 E 500 S
Paul, ID 83347-5019
208-438-8450 (p)

Contact information for the Maryland Horizon Organic Dairy is:

Horizon Organic Dairy
11471 Augustine Herman Highway
Kennedyville, MD 21645
(410) 348-5472

Please keep (b) (7)(D) apprised of the status of and progress of your investigation into this formal complaint. We take this matter very seriously. Farmers who have made the difficult conversion to organics and consumers who are paying premium prices for organic foods rely upon the USDA and its approved certifying agents to uniformly and fairly enforce the nation's organic law.

Lastly, pursuant to **Subpart C** and the following provision:

§ 205.680 General

- (a) Persons subject to the Act who believe they are adversely affected by a noncompliance decision of the National Organic Program's Program Manager may appeal such decision to the Administrator.

(b) (7)(D) requests that the USDA's Office of Compliance make a timely, full, and good faith effort in their investigation of these allegations. A previous complaint filed on February 16, 2005 by the Institute (Case Number NOP-039-05 and concerning livestock management practices at the above-named Idaho facility) was closed by the Office *without*, according to documents that were obtained by the Institute pursuant to a Freedom of Information Act request, so much as a farm site visit, examination of farm records, consultation with the certifying agencies, or a request made to staff at the Institute for background information supporting the merits of its complaint.

A similar lack of investigative action toward this complaint is unacceptable. The evidence we have collected has been gathered from a number of knowledgeable individuals with backgrounds in livestock agriculture, and the first-hand knowledge of Institute staff. We do not convey these allegations frivolously—they are a serious matter. And while the Institute lacks specific investigative powers possessed by the USDA (the ability to take sworn testimony, access certification documents, or subpoena relevant material), we expect the USDA to take these allegations seriously and conduct a meaningful investigation.

In fact, failure to take such action will only encourage future scofflaws and corner cutting by organic operators, and will make a mockery of the federal organic regulations that are so diligently observed by the vast majority of participants in the nation's organic agriculture and food sector.

It should be noted that nothing in this formal complaint shall be interpreted as a waiver of our right to appeal under the Adverse Action Appeals Process cited above.

You may contact us at your convenience.

Sincerely,

(b) (6), (b) (7)(C), (b) (7)(D)
[Redacted signature]

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

(b) (6) [Redacted text]

[Redacted text]

[Redacted text]

From: (b) (6), (b) (7)(C), (b) (7)(D)
To: [AMS - NOPCompliance](#)
Cc: [Michael, Matthew - AMS](#)
Subject: Legal complaint from (b) (7)(D)
Date: Monday, February 10, 2014 1:44:24 PM
Attachments: [Horizon USDA Complaint 2014 V5.pdf](#)

Hello –

Please see the attached complaint regarding alleged violations of federal organic regulations at the former Dean Foods/WhiteWave corporate-owned dairy near Paul, ID.

Should you have questions regarding this mater, please contact us at your convenience.

Thank you.

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

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

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

February 21, 2014

(b) (6), (b) (7)(C), (b) (7)(D)
Codirector
(b) (6), (b) (7)(D), (b) (7)(C)

Dear Mr. (b) (6), (b) (7)(C), (b) (7)(D)

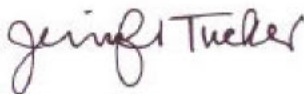
I am writing in response to your February 10, 2014, letter and February 11, 2014, complaint alleging violations of the USDA organic regulations by the Horizon Farm organic dairy operating in Paul, ID. The National Organic Program (NOP) investigates every complaint it receives and has opened an investigation of yours. As complainant, you will receive written notification upon the investigation's closure. The notification will include information regarding the investigation findings and any resulting enforcement action taken, as applicable.

Note that the NOP and its accredited certifying agent, Quality Assurance International, investigated the complaints filed by (b) (7)(D) in 2005 and 2006 against this same operation and an associated dairy in Kennedyville, MD, visiting both operations. That investigation found no violations of the USDA organic regulations and was closed. The NOP may revisit issues raised in that investigation, as appropriate, in investigating your new complaint.

In your letter and complaint, you suggest that you have evidence to support these allegations. Having any objective evidence upfront will assist our investigation. As such, please send us any evidence you have by March 15, 2014; we prefer to receive all evidence in writing.

If you have questions, please contact Matthew Michael, Director, NOP Compliance and Enforcement Division at 202-260-8657 or via email at matthew.michael@ams.usda.gov.

Sincerely,



For:
Miles V. McEvoy
Deputy Administrator
National Organic Program



9191 Towne Centre Drive, Suite 200
San Diego, CA 92122 • USA
858-792-3531 • Fax: 858-792-8665
www.qai-inc.com

December 11, 2014

SENT VIA EMAIL

Andrew Regalado
Compliance & Enforcement Division
USDA-AMS-National Organic Program
1400 Independence Ave SW, Room 2648
andrew.regalado@ams.usda.gov

Re: Sunrise Organic Dairy, LLC – NOPC-087-14

Dear Mr. Regalado,

QAI received a request for investigation of Sunrise Organic Dairy, LLC from the NOP on October 14, 2014 regarding alleged violations of NOP outdoor access and pasture requirements specified in 7CFR205.239. Pursuant to this request, QAI has conducted an investigation and its conclusions are summarized below.

QAI conducted the annual renewal inspection of Sunrise Organic Dairy on October 14 and 15, 2014 (see Exhibit A). Following is a summary of findings for the four alleged violations specified in NOPC-087-14:

1. "Throughout 2013 the dairy, which previously was milking twice a day and putting cows out between each milking, had been shifted to milking three times a day and confining cattle between two of the three milkings."
 - The QAI inspector stated that at the East Dairy, cows are milked three times a day, and generally two times a day at the West Dairy (except for maternity cows, see below). The inspector further noted that temporary confinement is for hospital treatment, and any medical/breeding treatments. Adverse weather could restrict pasture access during the grazing season. The inspector did not note any concerns with milking three times a day.
 - QAI has issued a post-inspection review letter to the client (see Exhibit B) which includes the following point to clarify why the milk cows were off pasture prior to other classes of animals. It should be noted, however, that the milk cows met the 120 days/30% DMI requirements.

"During Sunrise Organic Dairy's recent inspection, the inspector observed all animals out on pasture except the milk cows. It was noted that the milk cows came off pasture September 11, 2014. Additionally, section 9.3.a of the organic system plan lists differing grazing seasons for different classes of animal. The National Organic Standard requires that the grazing season must be based on regional location, and requires management on pasture and daily grazing throughout the grazing season except as provided by 205.239(b)(c) and (d). Please provide the following to QAI for review:

1. Clarification of the beginning and end dates of the Sunrise Organic Dairy's grazing season and an updated organic system plan as applicable.



9191 Towne Centre Drive, Suite 200
San Diego, CA 92122 • USA
858-792-3531 • Fax: 858-792-8665
www.qai-inc.com

2. Justification for the beginning and end dates end of the grazing season for Sunrise Organic Dairy's region. Include an explanation of how Sunrise Organic Dairy updates the organic system plan if conditions allow a longer grazing season or require the grazing season to be shortened.
 3. An explanation for why the milk cow grazing season ended September 11 while the grazing season for the other classes continued for at least another month.
 4. An explanation for the early dormant and late dormant pasture access dates listed in section 9.3.b of the Organic System Plan, and why late dormant pasture access was not given for the milk cows in 2014.
2. "Fresh, high producing cows were being milked four times a day and entirely confined until their production dropped off."
- Fresh cows are allowed to be confined for one week. Per the QAI inspector's statement:
(b) (4)
3. "SOD does not provide sufficient pasture and adequate drinking water for its herd."
- The inspector reported seeing dry cows and calves (teenage heifers) on pasture near portable water tanks. The inspector did not note any concerns regarding access to water.
 - The inspector reported that milk cows get about 1/3 acre per animal. The inspector made the following observations about pasture:

"The intensive rotational management allows the pastures to be maintained in excellent condition. The pasture forage mix in the rotated fields is approximately 24" tall and rotationally grazed for a single day down to 4" and rested for an average of 30 days until the forage re-grows to approximately 24" (can be 20 days in early spring when grasses are starting, and as long as 35 days toward the end of the growing season). Each of the paddocks will have been grazed about 4 - 6 times during the 120 day grazing season. Daily records are kept (hard and electronic copies) of the pastures/paddocks grazed, and the before and after grass height measurements. They have an electronic pasture measuring tool and data logger that allows them to measure grass height in the pastures."
 - Sunrise Organic Dairy has some dedicated pastures and some crop fields which are also used for pasture. The inspector observed the dry cow herd in a harvested crop field grazing the crop residue.
 - Sunrise Organic Dairy updated their Organic System Plan with some field renaming and redrawing. There were some unexplained acreage increases in the field listings, and QAI has asked for an explanation by issuing the following request for information point to the client (see Exhibit B):

"The inspector indicated that the current acreage listed on the Organic System Plan Summary was the planted acreage rather than the total acreage of some fields. In a review of the 2013 crop report submitted at Sunrise Organic Dairy's initial application for organic certification, these acreage adjustments were confirmed. The sites have been



9191 Towne Centre Drive, Suite 200
San Diego, CA 92122 • USA
858-792-3531 • Fax: 858-792-8665
www.qai-inc.com

adjusted in the QAI database. However, some fields require additional clarification for their acreage increase.

The following sites had acreage increases by comparison with your 2013 submitted crop report:

- a. Site # (b) (4) was (b) (4) acres on your 2013 crop report; your 2014 crops report listed (b) (4) as the total acreage, a (b) (4) acre increase.
- b. Site # (b) (4) – On the 2013 crop report, Site # (b) (4) and (b) (4) were listed together as (b) (4) acres. On the 2014 crop report, Site # (b) (4) was listed as (b) (4) and Site # (b) (4) as (b) (4) totaling (b) (4) an (b) (4) acre increase.
- c. Site # (b) (4) was (b) (4) acres on your 2013 crop report; your 2014 crops report listed (b) (4) acres, a (b) (4) acre increase.
- d. Site # (b) (4) was (b) (4) acres on your 2013 crop report; your 2014 crops report listed (b) (4) a (b) (4) acre increase.
- e. Site # (b) (4) was (b) (4) acres on your 2013 crop report; your 2014 crops report listed (b) (4) acres, a (b) (4) acre increase.

There is no documentation demonstrating the origin of the additional acres that are requesting to be added to the certificate for these fields.

1. Please provide documentation demonstrating where the additional acres are from, and clarify whether animals have grazed these additional acres.
2. Submit notarized Land Use History Verification forms for the additional acres, as applicable.
4. “SOD claimed that they could “average” the herd (to meet DMI requirements) to “intentionally” subvert the intent of outdoor access requirements.”
 - The inspector calculated DMIs for the classes separately: milk cows, far off dry, young stock, breeding heifers, and pregnant heifer. All met 30% DMI requirements with milk cows at 31.6%.
 - The operator’s feed intake records identify each class separately and do not average across the herd.

Based on the inspection results and observations, QAI has determined that there was no activity on the part of Sunrise Organic Dairy, LLC to confirm the allegations in NOPC-087-14.



9191 Towne Centre Drive, Suite 200
San Diego, CA 92122 • USA
858-792-3531 • Fax: 858-792-8665
www.qai-inc.com

If you have any questions, please do not hesitate to contact me.

Sincerely,
Theresa Hughes

Digitally signed by Theresa Hughes
Date: 2014.12.11 07:50:38 -05'00'

Quality Specialist
734-214-6272
thughes@nsf.org

Attachments: Exhibit A – Sunrise Organic Dairy, LLC Inspection Report
Exhibit B – Sunrise Organic Dairy, LLC Post-Inspection Review Letter

From: [Hughes, Theresa](#)
To: [Regalado, Andrew - AMS](#)
Subject: RE: Complaint Referral/Investigation Request - Sunrise Organic Dairy, LLC (NOPC-087-14)
Date: Monday, March 30, 2015 1:36:39 PM
Attachments: [Sunrise Initial RFI Response.pdf](#)
[J0566073-6 Response part 2.pdf](#)
Importance: High

Good Afternoon Andrew,

Attached is the full response from Sunrise Organic Dairy that QAI approved for J0566073-6.
Following is context regarding the initial response and additional response received from Sunrise.

The grazing season is a season for the region and entire herd. It is common for different classes of animals to have shorter or longer days on pasture during the season as the quality of the pasture changes over time. The inspector noted the milk string came off pasture before the end of the full season although the milk cows did meet the minimum 30% DMI and 120 days on pasture rule. However, the inspector did not include information about the determining factors to take the milk cows off pasture at that time. QAI requested additional information from the client to verify if the operation was in compliance with its own organic system plan as well as the regulation. QAI received the attached information and determined the operator is in compliance.

Please let me know if you require any further information.

Thank you,

Theresa

Theresa Hughes

Quality Specialist
NSF International
789 Dixboro Road
Ann Arbor, MI 48105
P: (734) 214-6272
F: (734) 827-7738
thughes@nsf.org

From: Regalado, Andrew - AMS [mailto:Andrew.Regalado@ams.usda.gov]
Sent: Monday, March 23, 2015 3:08 PM
To: Hughes, Theresa
Subject: RE: Complaint Referral/Investigation Request - Sunrise Organic Dairy, LLC (NOPC-087-14)

Hi Theresa-

Back in December the attached notice/letter was submitted as part of QAI's investigation of Sunrise Organic Dairy (SOD).

Could you please send me SOD's response to "QAI's request of more information" re: SOD's limited

grazing season for milk cows (Number J0566073-6)?

Thanks for your assistance.

Regards,

Andrew

Andrew Regalado

Compliance & Enforcement Division
USDA, National Organic Program
202-205-5605
202-205-7808 (fax)

From: Hughes, Theresa [<mailto:thughes@nsf.org>]
Sent: Thursday, December 11, 2014 12:27 PM
To: Regalado, Andrew - AMS; Morr, Craig
Cc: Courtney, Cheri - AMS; Mann, Renee - AMS
Subject: RE: Complaint Referral/Investigation Request - Sunrise Organic Dairy, LLC (NOPC-087-14)

Good Morning Andrew,

Attached please find QAI's final response to NOPC-087-14 as well as the supporting documentation referenced in the response. Please let me know if you have any questions or issues viewing these attachments.

Best Regards,

Theresa

Theresa Hughes

Quality Specialist
NSF International
789 Dixboro Road
Ann Arbor, MI 48105
P: (734) 214-6272
F: (734) 827-7738
thughes@nsf.org

From: Regalado, Andrew - AMS [<mailto:Andrew.Regalado@ams.usda.gov>]
Sent: Tuesday, October 14, 2014 2:11 PM
To: Morr, Craig

Cc: Hughes, Theresa; Courtney, Cheri - AMS; Mann, Renee - AMS

Subject: Complaint Referral/Investigation Request - Sunrise Organic Dairy, LLC (NOPC-087-14)

Mr. Morr-

Please see the attached complaint referral.

Contact me directly should you have questions or need clarification.

Regards,

Andrew Regalado

Compliance & Enforcement Division

USDA, National Organic Program

202-205-5605

202-205-7808 (fax)

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

NOTICE: This email and its contents/attachments may be confidential and are intended solely for the individual to whom it is addressed.

If you are not the named addressee or if this email is otherwise received in error, please immediately notify the sender without reading it and do not take any action based on its contents or otherwise copy or disclose it to anyone. Any opinions or views expressed in this transmission are solely of the author and do not necessarily represent those of NSF International or its affiliates.

NOTICE: This email and its contents/attachments may be confidential and are intended solely for the individual to whom it is addressed.

If you are not the named addressee or if this email is otherwise received in error, please immediately notify the sender without reading it and do not take any action based on its contents or otherwise copy or disclose it to anyone. Any opinions or views expressed in this transmission are solely of the author and do not necessarily represent those of NSF International or its affiliates.

From: [Hughes, Theresa](#)
To: [Regalado, Andrew - AMS](#); [Morr, Craig](#)
Cc: [Courtney, Cheri - AMS](#); [Mann, Renee - AMS](#)
Subject: RE: Complaint Referral/Investigation Request - Sunrise Organic Dairy, LLC (NOPC-087-14)
Date: Thursday, December 11, 2014 12:27:25 PM
Attachments: [Exhibit A - Sunrise Organic Dairy, LLC Inspection Report.pdf](#)
[Exhibit B - Sunrise Organic Dairy, LLC Post-Inspection Review Letter.pdf](#)
[QAI Response - NOPC-087-14.pdf](#)

Good Morning Andrew,

Attached please find QAI's final response to NOPC-087-14 as well as the supporting documentation referenced in the response. Please let me know if you have any questions or issues viewing these attachments.

Best Regards,

Theresa

Theresa Hughes

Quality Specialist
NSF International
789 Dixboro Road
Ann Arbor, MI 48105
P: (734) 214-6272
F: (734) 827-7738
thughes@nsf.org

From: Regalado, Andrew - AMS [mailto:Andrew.Regalado@ams.usda.gov]
Sent: Tuesday, October 14, 2014 2:11 PM
To: Morr, Craig
Cc: Hughes, Theresa; Courtney, Cheri - AMS; Mann, Renee - AMS
Subject: Complaint Referral/Investigation Request - Sunrise Organic Dairy, LLC (NOPC-087-14)

Mr. Morr-

Please see the attached complaint referral.
Contact me directly should you have questions or need clarification.

Regards,

Andrew Regalado
Compliance & Enforcement Division
USDA, National Organic Program
202-205-5605
202-205-7808 (fax)

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

NOTICE: This email and its contents/attachments may be confidential and are intended solely for the individual to whom it is addressed.

If you are not the named addressee or if this email is otherwise received in error, please immediately notify the sender without reading it and do not take any action based on its contents or otherwise copy or disclose it to anyone. Any opinions or views expressed in this transmission are solely of the author and do not necessarily represent those of NSF International or its affiliates.



Sunrise Organic Dairy, LLC

1/5/15

Sunrise Organic Dairy, LLC
303 S 2800 E
Paul, ID 83347

RE: J0566073-6

Dear John:

1. Clarification of the beginning and end date of the SOD grazing season:

The overall grazing season followed the schedule as defined in section 9.3a and 9.3b of the OSP. The first of the heifers went to pasture on 4/22/14 and the milk cows began pasturing on 5/14/14. The end of the season for the milk cows was 9/11/14 and the heifers came in on 10/11/14.

2. Justification for the beginning and end dates of the grazing season:

The climate in this region last year was very good and allowed for the early grazing for the heifers. The optimum feed in the pastures for the milking cows is normally mid-May through September; therefore those dates are chosen for the compliance of the 120-day Pasture Rule. If conditions allow for a longer grazing season or require the grazing season to be shortened, this will be noted in the OSP in sections 9.3a and 9.3b

3. Explanation for why the milk cow grazing season ended September 11:

The heifers could stay out longer as their nutritional needs were being well met by the pastures that were producing because of a good, late growing season; however, because of the nutritional needs of milk cows, the pastures were not producing well enough at the end of the season and the cows were getting too thin.

4. Explanation for the early dormant and late dormant pasture access dates in section 9.3b:

As mentioned above, the weather here this year was almost perfect for the growing season and the grass came up early and needed to be grazed before growing too much. That is also the reason the heifers were able to stay out until October. The pastures were suitable for non-lactating heifers.

Sincerely,

(b) (6)

Carla McDonald, Office Manager
Sunrise Organic Dairy, LLC
carla@agrakey.com

cc: Carl Sklavos



Sunrise Organic Dairy, LLC

3/24/15

QAI, Inc.
9191 Towne Centre Drive, Suite 200
San Diego, CA 92122

RE: J0566073-6

To Whom It May Concern:

Yes, field samples are taken of the pastures on a weekly basis. A sample lab result is attached.

Documentation of visual inspections of the fields:

Prior to the cows going to out to pasture each day, the pasture crew measures the field where the cows will be grazing and gives the pasture a rating of 1, 2, or 3 based on the density of the feed in the field. This rating is then used in the calculation of dry matter intake (as back-up data to the (b) (4) program). A measurement of the height of the field after grazing is also taken to determine the total number of inches grazed for that period of time. A sample of the spreadsheet is attached.

Sincerely,

(b) (6)

Carla McDonald, Office Manager
Sunrise Organic Dairy, LLC
carla@agrakey.com

Date	Field #	Cell #	Acres	Man In	Man Out
(b) (4)					

Field #	Cell #	Acres	Man In	Man Out
(b) (4)				

Total Cows in Pen	Total inches consumed	Total Acres	lbs/acre consumed	Drylbs/cow/d ay	% Dry Matter from Pasture
(b) (4)					

From: (b) (6), (b) (7)(C), (b) (7)(D)
To: [AMS - NOPCompliance](#)
Cc: [Michael, Matthew - AMS](#)
Subject: RE: Updated Legal complaint from (b) (7)(D)
Date: Tuesday, February 11, 2014 11:13:36 AM
Attachments: [Horizon USDA Complaint 2014_FinalAmended.pdf](#)

Hello –

I am providing you with a slightly amended complaint, as we found a consequential typo in the original.

Sorry for the confusion.

– (b) (6), (b) (7)(C), (b) (7)(D)

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

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

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

From: (b) (6), (b) (7)(C), (b) (7)(D) [mailto:(b) (6), (b) (7)(C), (b) (7)(D)]
Sent: Monday, February 10, 2014 12:44 PM
To: 'NOPCompliance@ams.usda.gov'
Cc: 'Matthew.Michael@ams.usda.gov'
Subject: Legal complaint from (b) (7)(D)

Hello –

Please see the attached complaint regarding alleged violations of federal organic regulations at the former Dean Foods/WhiteWave corporate-owned dairy near Paul, ID.

Should you have questions regarding this mater, please contact us at your convenience.

Thank you.

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

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

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

(b) (7)(D)

February 11, 2014

NOP Compliance and Enforcement Branch
Attn: Mr. Matthew Michael
Agricultural Marketing Service
United States Department of Agriculture
1400 Independence Avenue, S.W.
Mail Stop 0268, Room 2648-S
Washington, D.C. 20250-0268

Dear Mr. Michael:

This new legal complaint is an update to the complaint (attached below) from 2006 that was never properly adjudicated by the National Organic Program.

We respectfully request, once again, that your office thoroughly investigate the history of past illegalities at the former Horizon dairy located near Paul, Idaho.

In addition, new intelligence has come to our attention from employees at the operation that was recently sold to private investors. They have shared with us that throughout 2013 the dairy, which previously was milking twice a day and putting cows out between each milking, had been shifted to milking three times a day and confining cattle between two of the three milkings.

Furthermore, they reported that fresh, high producing cows were being milked four times a day and entirely confined until their production dropped off.

As you know, there are provisions for the "temporary" confinement of cattle, primarily due to health or environmental factors, as detailed in §205.238 and §205.239. However, confining cattle in order to increase milk production, or because the size of the milk herd (currently 2,400) requires walking too far to access fresh pasture, would not be among the enumerated legal exemptions from requiring "access to the outdoors/access to pasture."

A statute of limitations is not incorporated into the federal organic standards. Based on freedom of information documents previously obtained by (b) (7)(D), it does not appear that NOP investigators ever visited the Dean/WhiteWave operation in Idaho despite our multiple requests to have them fully scrutinized.

We respectfully request investigators thoroughly review all records and interview relevant personnel based on this and prior complaints.

(b) (6)

If you contact our office we will attempt to facilitate confidential interviews of staff to substantiate our current allegations. However, the current practices in question should be fully documented in their Organic Systems Plan and could be subject to confirmation by other farm personnel.

(b) (7)(D) requests that the NOP's Compliance and Enforcement Branch make a timely, full, and good faith effort in their investigation of these allegations. In fact, failure to take such action will only encourage future scofflaws and corner cutting by organic operators, and will make a mockery of the federal organic regulations that are so diligently observed by the vast majority of participants in the nation's organic agriculture and food sector.

It should be noted that nothing in this formal complaint shall be interpreted as a waiver of our right to appeal under the Adverse Action Appeals Process cited above.

What follows is a copy of the complaint filed with the NOP in 2006 regarding our allegations of organic violations at the Paul, ID dairy then owned by Dean Foods. A similar lack of investigative action toward this complaint is unacceptable.

You may contact us at your convenience.

Sincerely,

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

(b) (6), (b) (7)(C), (b) (7)(D), Codirector

(b) (6)

August 9, 2006

TO: Eileen Broomell, NOP Compliance, USDA

RE: Complaint concerning multiple violations of the National Organic Program's regulatory standards by the Horizon Organic Dairies (Dean Foods/WhiteWave) in Paul, ID, and Kennedyville, MD

Dear Ms. Broomell,

(b) (7)(D) is filing this formal complaint with your office concerning possible violations of National Organic Program (NOP) regulatory standards governing ruminants (dairy cows) by two organic dairy facilities operated by the Dean Foods Corporation (Horizon/WhiteWave) and located near Paul, Idaho, and Kennedyville, Maryland. We are asking that you fully investigate this complaint to determine whether violations of NOP regulatory standards have occurred, are occurring, or will occur.

We are willing to share with your investigators all of the factual evidence we have directly gathered from our site visit to the Idaho facility and the evidence provided to us by numerous other sources on both operations. At the conclusion of your investigation, we ask that you take all warranted enforcement actions to bring both of these dairy operations

into compliance with NOP rules in a timely fashion or to decertify and/or fine the operators, if appropriate.

If the allegations we have gathered are proven to have merit, we believe that there is a reasonable basis to conclude that Dean/Horizon's Idaho and Maryland organic dairies are violating the following provisions of the NOP regulations:

Subpart C

§ 205.237 Livestock feed.

- (a) The producer of an organic livestock operation must provide livestock with a total feed ration composed of agricultural products, **including pasture** and forage, that are organically produced and, if applicable, organically handled ... (emphasis added)

and

§ 205.238 Livestock health care practice standard

- (a) The producer must establish and maintain preventive livestock health care practices, including:
 - (3) Establishment of appropriate housing, pasture conditions, and sanitation practices to minimize the occurrence and spread of diseases and parasites;
 - (4) Provision of conditions which allow for exercise, freedom of movement, and reduction of stress appropriate to the species;

and

§ 205.239 Livestock living conditions.

- (a) The producer of an organic livestock operation must establish and maintain livestock living conditions which accommodate the health and natural behavior of animals, including:
 - (1) Access to the outdoors, shade, shelter, exercise areas, fresh air, and direct sunlight suitable to the species, its stage of production, the climate, and the environment;
 - (2) Access to pasture for ruminants;
- (b) The producer of an organic livestock operation may provide temporary confinement for an animal because of:
 - (1) Inclement weather;
 - (2) The animal's stage of production;
 - (3) Conditions under which the health, safety, or well being of the animal could be jeopardized; or
 - (4) Risk to soil or water quality.

Regarding the Paul, Idaho, operation. (b) (7)(D) contends that Horizon's drylot facility—located in an arid climate averaging 10 inches of rain annually—does not provide sufficient pasture for their lactating herd numbering approximately 4000–4500 head, as well as the approximately 4000 heifers and dry cows also located at this site. Earlier this year, in an attempt to upgrade the extremely limited pasture available on the farm, Horizon officials planted oats on which to allegedly pasture milk cows—with a stocking rate of approximately 7 cows per acre. Cattle were then paraded outside of their drylot facility on several occasions to show visiting VIP members of the organic community and reporters that the milk herd had access to pasture.

Staff from (b) (7)(D) also visited the Idaho facility in June, 2006. A portion of the milking herd was rotated at that time onto the oats from their “winter quarters” to demonstrate the facility's pasturing regime. However, the oats, at the time of this visit, were approximately 2.5 feet tall and had headed-out /gone-to-seed. This direct visual evidence contradicts the claims of regular pasturing by the dairy herd on the oat field. Furthermore, even if the field of oats was intended to regularly pasture the herd during the period of our staff's visit, the material was not palatable at this stage of growth and is indigestible for dairy cattle. This fails the standard established under NOP regulation § **205.239. Terms defined:**

Pasture. Land used for livestock grazing that is managed to provide feed value and maintain or improve soil, water, and vegetative resources.

Furthermore, since our visit to the Idaho facility and according to our Idaho-based sources and photographic evidence, the oats have been mechanically harvested, leaving stubble and virtually no pasture accessible to the milking herd. Staff from (b) (7)(D) also observed no watering facilities providing needed water to animals out on the available pasture—something that would be a necessity for organic operations seeking to humanely manage their dairy herd while truly meeting the pasture standard. (b) (7)(D) contends that certified organic farms cannot operate without access to pasture for their animals.

The Horizon operation manages a total of approximately (b) (4) acres. This acreage was described as “desert country” by the farm's general manager in 2001. Feed for lactating cows, which are milked three times a day, is reportedly delivered to the herd's “winter quarters” by truck.

(b) (7)(D) recognizes that certified organic dairy operations can remove cows from pasture for temporary considerations based on weather, environmental, or health considerations, as noted above in § **205.239.** (b) (7)(D) contends, however, that geographic or climatic conditions—which make pasture impractical or not cost-effective—cannot be used to justify year-round noncompliance with the pasture rule.

Horizon's Kennedyville, Maryland, organic dairy milks approximately 500 head. Based on expert testimony from a number of sources with intimate, first-hand familiarity with this operation, only token pasturing, at best, is occurring at the dairy. Cattle have been prevented from accessing pasture during this growing season despite the presence of

excellent pasturing conditions. These conditions include ideal and lush pasture quality on the farm's fields and weather perfect for grazing with cloudy skies and temperatures in the 65–70 degree range. We have additional photographic evidence documenting this condition.

NOP regulations, according to § 205.239(b), are very precise and clear, stating when animals can be legally confined on a temporary basis. Neither the weather nor pasture conditions on the Horizon-operated Maryland farm met the weather and/or pasture standards permitting the temporary confinement of the facility's milking herd.

Evidence gathered by (b) (7)(D) from eye-witnesses to the Maryland operation have testified that the facility's pasture was mowed (brush-hogged) on a number of occasions, rather than harvested for its nutritive feed value. This was done because the pasture crop had reached maturity and had not yet been grazed down by cattle.

Furthermore, (b) (7)(D) requests that the USDA investigate whether or not the organic label may be used in the branded dairy products produced by Dean Foods/Horizon Organics (and made from milk at both of the Dean/Horizon operated organic dairies) if it is found to not meet the following criteria stated in the national organic regulations:

Subpart D - Labels, Labeling, and Market Information
§ 205.300 Use of the term, "organic."

(a) The term, "organic," may only be used on labels and in labeling of raw or processed agricultural products, including ingredients, that have been produced and handled in accordance with the regulations in this part. The term, "organic," may not be used in a product name to modify a non-organic ingredient in the product.

(b) (7)(D) requests that the USDA investigate the applicability of this national organic regulation, should it be deemed appropriate:

Subpart B – Applicability
§ 205.100 What has to be certified

(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 \$10,000 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.

Both of Dean's Horizon organic dairies appear to have been certified by Quality Assurance International, Inc. (QAI). QAI may be contacted at 858-792-3531.

Contact information for the Idaho Horizon Organic Dairy is:

Horizon Organic Dairy
2589 E 500 S
Paul, ID 83347-5019
208-438-8450 (p)

Contact information for the Maryland Horizon Organic Dairy is:

Horizon Organic Dairy
11471 Augustine Herman Highway
Kennedyville, MD 21645
(410) 348-5472

Please keep (b) (7)(D) apprised of the status of and progress of your investigation into this formal complaint. We take this matter very seriously. Farmers who have made the difficult conversion to organics and consumers who are paying premium prices for organic foods rely upon the USDA and its approved certifying agents to uniformly and fairly enforce the nation's organic law.

Lastly, pursuant to **Subpart C** and the following provision:

§ 205.680 General

- (a) Persons subject to the Act who believe they are adversely affected by a noncompliance decision of the National Organic Program's Program Manager may appeal such decision to the Administrator.

(b) (7)(D) requests that the USDA's Office of Compliance make a timely, full, and good faith effort in their investigation of these allegations. A previous complaint filed on February 16, 2005 by the Institute (Case Number NOP-039-05 and concerning livestock management practices at the above-named Idaho facility) was closed by the Office *without*, according to documents that were obtained by the Institute pursuant to a Freedom of Information Act request, so much as a farm site visit, examination of farm records, consultation with the certifying agencies, or a request made to staff at the Institute for background information supporting the merits of its complaint.

A similar lack of investigative action toward this complaint is unacceptable. The evidence we have collected has been gathered from a number of knowledgeable individuals with backgrounds in livestock agriculture, and the first-hand knowledge of Institute staff. We do not convey these allegations frivolously—they are a serious matter. And while the Institute lacks specific investigative powers possessed by the USDA (the ability to take sworn testimony, access certification documents, or subpoena relevant material), we expect the USDA to take these allegations seriously and conduct a meaningful investigation.

In fact, failure to take such action will only encourage future scofflaws and corner cutting by organic operators, and will make a mockery of the federal organic regulations that are so diligently observed by the vast majority of participants in the nation's organic agriculture and food sector.

It should be noted that nothing in this formal complaint shall be interpreted as a waiver of our right to appeal under the Adverse Action Appeals Process cited above.

You may contact us at your convenience.

Sincerely,

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

[Redacted signature]

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

Director of Research

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

[Redacted signature]



Sunrise Organic Dairy, LLC

1/5/15

Sunrise Organic Dairy, LLC
303 S 2800 E
Paul, ID 83347

RE: J0566073-6

Dear John:

1. Clarification of the beginning and end date of the SOD grazing season:

The overall grazing season followed the schedule as defined in section 9.3a and 9.3b of the OSP. The first of the heifers went to pasture on 4/22/14 and the milk cows began pasturing on 5/14/14. The end of the season for the milk cows was 9/11/14 and the heifers came in on 10/11/14.

2. Justification for the beginning and end dates of the grazing season:

The climate in this region last year was very good and allowed for the early grazing for the heifers. The optimum feed in the pastures for the milking cows is normally mid-May through September; therefore those dates are chosen for the compliance of the 120-day Pasture Rule. If conditions allow for a longer grazing season or require the grazing season to be shortened, this will be noted in the OSP in sections 9.3a and 9.3b

3. Explanation for why the milk cow grazing season ended September 11:

The heifers could stay out longer as their nutritional needs were being well met by the pastures that were producing because of a good, late growing season; however, because of the nutritional needs of milk cows, the pastures were not producing well enough at the end of the season and the cows were getting too thin.

4. Explanation for the early dormant and late dormant pasture access dates in section 9.3b:

As mentioned above, the weather here this year was almost perfect for the growing season and the grass came up early and needed to be grazed before growing too much. That is also the reason the heifers were able to stay out until October. The pastures were suitable for non-lactating heifers.

Sincerely,

(b) (6)

Carla McDonald, Office Manager
Sunrise Organic Dairy, LLC
carla@agrakey.com

cc: Carl Sklavos



Sunrise Organic Dairy, LLC

3/24/15

QAI, Inc.
9191 Towne Centre Drive, Suite 200
San Diego, CA 92122

RE: J0566073-6

To Whom It May Concern:

Yes, field samples are taken of the pastures on a weekly basis. A sample lab result is attached.

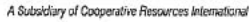
Documentation of visual inspections of the fields:

Prior to the cows going to out to pasture each day, the pasture crew measures the field where the cows will be grazing and gives the pasture a rating of 1, 2, or 3 based on the density of the feed in the field. This rating is then used in the calculation of dry matter intake (as back-up data to the (b) (4) program). A measurement of the height of the field after grazing is also taken to determine the total number of inches grazed for that period of time. A sample of the spreadsheet is attached.

Sincerely,

(b) (6)

Carla McDonald, Office Manager
Sunrise Organic Dairy, LLC
carla@agrakey.com



Date	Field #	Cell #	Acres	Man In	Man Out
(b) (4)					

Field #	Cell #	Acres	Man In	Man Out
(b) (4)				

Total Cows in Pen	Total inches consumed	Total Acres	lbs/acre consumed	Drylbs/cow/d ay	% Dry Matter from Pasture
(b) (4)					



NOFA-NY Certified Organic, LLC

840 Upper Front Street • Binghamton, New York 13905

Phone 607-724-9851 • Fax: 607-724-9853

Email: certifiedorganic@nofany.org • www.nofany.org/organic-certification

January 14, 2014

Jeri Woodhouse
North Fork Specialty Kitchen
8595 Cox Lane Unit #3
Cutchogue, NY 11935

Subject: **Notice of Proposed Suspension**

Dear Jeri:

This is an official Notice of Proposed Suspension, pursuant to the National Organic Programs National Organic Standards Section 205.662 (c). It is being issued because the required response to your Notice of Noncompliance, issued on **December 17, 2013**, was not received / deemed to be a complete response that is in compliance with the National Organic Standards.

The outstanding issue is as follows:

§ 205.401 Application for certification.

A person seeking certification of a production or handling operation under this subpart must submit an application for certification to a certifying agent. The application must include the following information:

(d) Other information necessary to determine compliance with the Act and the regulations in this part.

Noncompliance:

- 1. Failure to submit information requested on November 20, 2013 by December 9, 2013 (extended deadline) necessary to complete annual review.**

Because the noncompliance has not been corrected to meet the National Organic Program Standards, your certification will be suspended for **30 days**. The proposed effective date of your suspension is **February 23, 2014**.

As noted in the November 20, 2013 correspondence, organic production of VSC products has not been approved and production of this or any other product that does not have approval and is not listed on your certificate must be discontinued immediately.

To avoid suspension of your organic certification you must do one (1) of the following:

1. Submit acceptable corrective action in writing to the notice of noncompliance by **February 14, 2014** to NOFA-NY Certified Organic, LLC. To avoid suspension, the proposed corrective action must fully address the noncompliance and be accepted by NOFA-NY Certified Organic, LLC.

or

2. File an appeal to this Proposed Suspension pursuant to §205.681 of the NOP regulations. The appeal must be submitted in writing to the:

USDA-AMS- Administrator c/o NOP Appeals Team 1400 Independence Avenue SW Room 2095-S, STOP 0203
Washington, DC 20250

The Appeal must be filed within 30 calendar days, of receipt of this notice, and a copy provided to this office, in addition to a copy of the adverse action decision.

or

3. Request mediation pursuant to §205.663 of the NOP regulations, in writing to NOFA-NY Certified Organic, LLC within 30 days of receipt of this notice. If your request for mediation is accepted and the mediation is unsuccessful, upon written notification, you will have 30 calendar days, from receipt of the notice, to appeal the Proposed Suspension. If your request for mediation is rejected, you will receive written notification and have 30 days, from the date of that notice, to appeal the Proposed Suspension.

If you do not request mediation or file an appeal within the timeframes indicated above, your certification to the National Organic Program will be suspended for 30 days, and your operation will be unable to sell, or label its product as organic.

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 notification of suspension, submit a request to the Secretary [of Agriculture] for reinstatement of its certification. The request must be accompanied by evidence demonstrating correction of each noncompliance and corrective taken to comply with and remain in compliance with the Act and the regulations in this part."

Should this proposed suspension become effective, you will be able to submit a request for reinstatement certification to the Secretary of Agriculture 30 days after the date of your final suspension notification.

Sincerely,

(b) (6)

Certification Director

cc: AMS Administrator, c/o NOP Appeals Staff



NOFA-NY Certified Organic, LLC

840 Upper Front Street • Binghamton, New York 13905

Phone 607-724-9851 • Fax: 607-724-9853

Email: certifiedorganic@nofany.org • www.nofany.org/organic-certification

February 23, 2014

Jeri Woodhouse
North Fork Specialty Kitchen
8595 Cox Lane Unit #3
Cutchogue, NY 11935

Subject: **Notice of Suspension**

Dear Jeri:

This letter is to notify you that as of today, **February 23, 2014**, your certificate has been suspended as an organic operator with the National Organic Program (NOP) pursuant to §205.662(e) of the National Organic Program Standards. In addition to suspension, any operation knowingly selling or labeling a product as organic shall be subject to civil penalty.

The suspension of your operation's certificate was due to the failure to correct the following violation:

1. § 205.401 Application for certification.

A person seeking certification of a production or handling operation under this subpart must submit an application for certification to a certifying agent. The application must include the following information:

(d) Other information necessary to determine compliance with the Act and the regulations in this part.

Noncompliance:

1. Failure to submit complete information requested on November 20, 2013 by December 9, 2013 (extended deadline) necessary to complete annual review.

The noncompliance was not corrected to meet the National Organic Program Standards and a proposed suspension notice was issued to you on **January 14, 2014**. The required response was not received within the timeframe specified in the Notice of Proposed Suspension to either:

Submit a request for mediation to NOFA-NY Certified Organic LLC, or file an appeal with the USDA.

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 [of Agriculture] 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 of this part."

You may submit a request for reinstatement of certification to the Secretary after **March 24, 2014**. If you have questions regarding this letter, please contact me.

Sincerely,

(b) (6)

Nancy L. Sandstrom
Handling Certification Coordinator
cc: AMS Administrator, c/o NOP Appeals Staff



NOFA-NY Certified Organic, LLC

840 Upper Front Street • Binghamton, New York 13905
607-724-9851 • Fax: 607-724-9853
Email: certifiedorganic@nofany.org • www.nofany.org

April 16, 2013

Jeri Woodhouse
North Fork Specialty Kitchen
8595 Cox Lane Unit #3
Cutchogue, NY 11935

Determination Notification

Certification is pending
Submission of information below

Please note: A written response to the item(s) noted below is required. The response must be postmarked, faxed or e-mailed by May 7, 2013. Certification or Transition is contingent upon a complete written response.

Salt – the technical data sheet for salt indicates it contains magnesium carbonate as an anti caking agent. This is prohibited for organic production. Please find an alternate sea salt and submit a documentation of ingredient sheet and technical data sheet for review. Product containing sea salt will not be certified until an appropriate salt is found. Production of currently certified products needs to be discontinued until the new salt product is approved for use.

Documentation of Ingredients: needed for Chipotle and Liquid Smoke (blank form attached)

Labels – the following labels need revisions:

Carrot Soup does not list vegetable broth

Preserved Organic Lemon does not list Bay Leaf

Rosemary-infused Olive Oil and **Organic Olive Oil** needs the certified organic By..... statement directly below the Taste of the North Fork information.

Chili Infused Olive Oil need label.

Lavender Honey and Lemon Verbena Honey certified by NOFA-NY Certified Organic, LLC statement needs to be changed to **certified organic by.....** You may use a shortened version of NOFA NY Certified Organic, LLC i.e. NOFA-NY, LLC, but the word organic needs to be in the certified organic by..... portion of the statement.

Browders Pickled Eggs – need label

Blue Canoe/The Canoe Club/VCS Products – labels needed for all except VCS Steak Sauce

Certificate updates still needed: (b) (4),
(b) (4) (for products not supplied by (b) (4)).

Product Profiles: VCS Steak Sauce does not equal 100% it currently equals 99.1%

Non-Compliances: None

~The maintenance of all Audit Trail Records is a requirement for continuing certification.

~Any changes to the Organic Farm Plan must be updated with the certification office.

~Any labels to be used must be submitted to the certification office for approval prior to printing and use.

~An updated organic certificate will be issued once a complete response has been verified.

Office Use Only:

Applicant Responded to all Items & Responses are Complete: ____ yes ____ no

Producer # 2010057

NOFA-NY Certified Organic, LLC

Determination
Notification

Date: 03/13/2013

Jeri Woodhouse
North Fork Specialty Kitchen
8595 Cox Lane Unit #3
Cutchogue, NY 11935

Your 2012 certification is pending submission of additional information.

Areas of Non-Compliance - ☐ Yes ☒ No *If the "yes" box is checked, please see attached notice.*

CLARIFICATIONS / REMINDERS

Requested items/clarifications must be postmarked, faxed or emailed by: **4/3/2013**

Your certification will remain pending the receipt of the following information.

1. Master list of all ingredients used in your organic production. This should include the name of the supplier and certificate date as well. The products to be listed once certification is approved: Browders Blends: Fry, Roast, Grill, Brine; Nanny's Gourmet: Vegetarian Chopped Liver, A Taste of the North Fork: Lavender Honey, Lemon Verbena Honey, Rosemary Infused Olive Oil. All other (b) (4) products have been discontinued and removed from certification.
2. An up to date flow of all production.
3. All updated certificates including (b) (4). (b) (4) is on file and does not need to be submitted.
4. Documentation of Ingredients and Technical Data Sheet for salt
5. The updated product profiles for: Nanny's Vegetarian Chopped Liver, Browder's Dry Rub Grill and Rosemary Oil. Please be sure all ingredient percentages are listed correctly and the total percentage of the ingredients equal 100%.
6. An updated flow chart of the processing needs to be submitted
7. Rosemary Olive Oil Label
8. On 12/5/12 a response was received from you stating carrot soup was not being sold as organic. Please provide an updated product profile and label if you wish to add this to the Taste of The North Fork label.
9. The Blue Canoe label needs to be submitted once developed.
10. Be sure to submit all product profiles, supplier certificates, updated master list and label samples for product approval prior to production for sale.

Please note: this information must be received in the time frame listed. Many of these items have been previously requested.

(b) (6)

Sherrie Hastings, Certification Director

CC: Jennifer Clifford

Print Date: 3/13/2013

From: [Ragonesi, Judith - AMS](#)
To: [Michael, Matthew - AMS](#)
Subject: another Cease/desist w/ settlement NOPC 105-14 North Fork specialty kitchen
Date: Tuesday, June 17, 2014 2:02:00 PM

Hi Matthew-

Here are the links to both documents.

[\NOPC-105-14\Notice to Cease and Desist and Proposed Settlement.docx](#)

[NOPC-105-14\Settlement Agreement.docx](#)

This complaint was filed by (b) (7)(D) –who originally certified North Fork Specialty Kitchen. NOFA-NY issued a NONC to North Fork on November 20, 2013, for failure to provide sufficient information concerning the production and labeling of new products under the Blue Canoe and Vine Street Café labels. The operation was warned by NOFA-NY not to produce these products until approved. North Fork failed to provide additional information to its certifier and was ultimately suspended on Feb. 23, 2014.

The product were delivered to Vine Street Café (don't know the exact time frame for this) and displayed for sale sometime before March 2014. Vine Street Café who was trying to gain its own certification with NOFA-NY was denied on March 12, 2014. After speaking to the manager of Vine Street in April, I was assured that all cases in inventory and on display were removed for sale. I was sent additional information by the manager that somewhere between 65-80 cases (12 bottles per case) were produced and labeled by North Fork.

Thanks-

J

Judith A. Ragonesi
Agriculture Marketing Specialist
USDA/AMS
National Organic Program
1400 Independence Avenue, S.W.
Room 2646 (Stop 0268)
Washington, D.C. 20250
(202) 205-5712 (direct line)

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

Register for the NOP Organic Insider, the National Organic Program's email notification service, by visiting <http://bit.ly/NOPOrganicInsiderRegistration>.

Investigation Summary/Closure Memorandum

March 17, 2015

TO: Matthew Michael
Director
Compliance and Enforcement Division
National Organic Program

FROM: Judith Ragonesi
Compliance and Enforcement Division
National Organic Program

CASE NO: NOPC-105-14 and North Fork Specialty Kitchen

SUBJECT: Jerilyn Woodhouse
North Fork Specialty Kitchen
8595 Cox Lane Unit #3
Cutchogue, New York 11935
Email: (b) (6) .com>

CERTIFYING AGENT INVOLVED: NOFA-NY

COMPLAINANT: (b) (6), (b) (7)(C), (b) (7)(D)
(b) (6), (b) (7)(C), (b) (7)(D)

ALLEGED VIOLATION:

North Fork Specialty Kitchen continued to produce, package and label products as organic for Vine Street Café and Blue Canoe, after being notified by its certifier NOFA-NY, that it had not complied by providing sources of some ingredients used in production of these products.

SUMMARY:

This complaint was filed on February 27, 2014, against North Fork Specialty Kitchen for continuing to produce, package, label and sell products as organic for Vine Street Café and Blue Canoe, after being notified by its certifier NOFA-NY, that it had not complied by providing sources of ingredients used in production of these products. A NONC was issued to North Fork on Dec 17, 2013 followed by a proposed suspension on January 14, 2014 for failure to provide information for its annual update (specifically on ingredients used to produce products for Vine

Street and Blue Canoe). The final suspension was issued against North Fork on February 23, 2014. According to the manager of Vine Street, (b) (6), which was also working with NOFA-NY to get certified, but was denied on March 12, 2014, North Fork sold them 65-80 boxes of steak sauce and bbq sauce. Approximately 40 cases were still in storage at Vine Street and would not be sold. Mr. (b) (6) assured me that all products had been pulled from the shelf and none of the remaining stock would be sold. According to Mr. (b) (6) he stated that North Fork was certified when it produced and sold the product and he was unaware of any problems. Based on the denial of certification issued by NOFA-NY (which Mr. (b) (6) was requesting mediation on), Bottlehouse Food (dba Vine Street and Blue Canoe) continued to sell the noncompliant products (3-10-2014 bottles were seen on the shelf at Vine Street Cafe) after being notified on February 18, 2014, that North Fork was no longer certified.

The NOP in communication with Jeri Woodhouse, after receiving the cease and desist notice and proposed settlement dated on 12-10-2014 (Ms Woodhouse claims she never received the C&E sent 11-3-2014 certified mail) that she had already ceased all organic production, labeling and sales when notified of proposed suspension. Additionally she had returned to the client (Vine Street) all the products labeled for Vine Street Cafe and Blue Canoe, who according to Ms. Woodhouse had failed to provide her with the information necessary to produce them in compliance with the regulations. Ms. Woodhouse requested that the civil penalty be withdrawn because the product was produced prior to any notification of suspension and returned to Bottle House for non-sale. Ms. Woodhouse also stated that (b) (6) as a result of this incident and had to cut back her business considerably. The NOP revised the proposed settlement, withdrawing the civil penalty.

RECOMMENDATION: The complaint is recommended for closure. The operation ceased all production and sale of organic products upon notice of proposed suspension and returned the noncompliant products back to the customer. The operation agreed and signed the revised settlement agreement.

APPROVED FOR CLOSURE BY:

Matthew Michael

Date



NOFA-NY Certified Organic, LLC

840 Upper Front Street • Binghamton, New York 13905

Phone 607-724-9851 • Fax: 607-724-9853

Email: certifiedorganic@nofany.org • www.nofany.org/organic-certification

January 14, 2014

Jeri Woodhouse
North Fork Specialty Kitchen
8595 Cox Lane Unit #3
Cutchogue, NY 11935

Subject: **Notice of Proposed Suspension**

Dear Jeri:

This is an official Notice of Proposed Suspension, pursuant to the National Organic Programs National Organic Standards Section 205.662 (c). It is being issued because the required response to your Notice of Noncompliance, issued on **December 17, 2013**, was not received / deemed to be a complete response that is in compliance with the National Organic Standards.

The outstanding issue is as follows:

§ 205.401 Application for certification.

A person seeking certification of a production or handling operation under this subpart must submit an application for certification to a certifying agent. The application must include the following information:

(d) Other information necessary to determine compliance with the Act and the regulations in this part.

Noncompliance:

- 1. Failure to submit information requested on November 20, 2013 by December 9, 2013 (extended deadline) necessary to complete annual review.**

Because the noncompliance has not been corrected to meet the National Organic Program Standards, your certification will be suspended for **30 days**. The proposed effective date of your suspension is **February 23, 2014**.

As noted in the November 20, 2013 correspondence, organic production of VSC products has not been approved and production of this or any other product that does not have approval and is not listed on your certificate must be discontinued immediately.

To avoid suspension of your organic certification you must do one (1) of the following:

1. Submit acceptable corrective action in writing to the notice of noncompliance by **February 14, 2014** to NOFA-NY Certified Organic, LLC. To avoid suspension, the proposed corrective action must fully address the noncompliance and be accepted by NOFA-NY Certified Organic, LLC.

or

2. File an appeal to this Proposed Suspension pursuant to §205.681 of the NOP regulations. The appeal must be submitted in writing to the:

USDA-AMS- Administrator c/o NOP Appeals Team 1400 Independence Avenue SW Room 2095-S, STOP 0203
Washington, DC 20250

The Appeal must be filed within 30 calendar days, of receipt of this notice, and a copy provided to this office, in addition to a copy of the adverse action decision.

or

3. Request mediation pursuant to §205.663 of the NOP regulations, in writing to NOFA-NY Certified Organic, LLC within 30 days of receipt of this notice. If your request for mediation is accepted and the mediation is unsuccessful, upon written notification, you will have 30 calendar days, from receipt of the notice, to appeal the Proposed Suspension. If your request for mediation is rejected, you will receive written notification and have 30 days, from the date of that notice, to appeal the Proposed Suspension.

If you do not request mediation or file an appeal within the timeframes indicated above, your certification to the National Organic Program will be suspended for 30 days, and your operation will be unable to sell, or label its product as organic.

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 notification of suspension, submit a request to the Secretary [of Agriculture] for reinstatement of its certification. The request must be accompanied by evidence demonstrating correction of each noncompliance and corrective taken to comply with and remain in compliance with the Act and the regulations in this part.”

Should this proposed suspension become effective, you will be able to submit a request for reinstatement certification to the Secretary of Agriculture **30 days** after the date of your final suspension notification.

Sincerely,

(b) (6)

Certification Director

cc: AMS Administrator, c/o NOP Appeals Staff



NOFA-NY Certified Organic, LLC

840 Upper Front Street • Binghamton, New York 13905

Phone 607-724-9851 • Fax: 607-724-9853

Email: certifiedorganic@nofany.org • www.nofany.org/organic-certification

February 23, 2014

Jeri Woodhouse
North Fork Specialty Kitchen
8595 Cox Lane Unit #3
Cutchogue, NY 11935

Subject: **Notice of Suspension**

Dear Jeri:

This letter is to notify you that as of today, **February 23, 2014**, your certificate has been suspended as an organic operator with the National Organic Program (NOP) pursuant to §205.662(e) of the National Organic Program Standards. In addition to suspension, any operation knowingly selling or labeling a product as organic shall be subject to civil penalty.

The suspension of your operation's certificate was due to the failure to correct the following violation:

1. § 205.401 Application for certification.

A person seeking certification of a production or handling operation under this subpart must submit an application for certification to a certifying agent. The application must include the following information:

(d) Other information necessary to determine compliance with the Act and the regulations in this part.

Noncompliance:

1. Failure to submit complete information requested on November 20, 2013 by December 9, 2013 (extended deadline) necessary to complete annual review.

The noncompliance was not corrected to meet the National Organic Program Standards and a proposed suspension notice was issued to you on **January 14, 2014**. The required response was not received within the timeframe specified in the Notice of Proposed Suspension to either:

Submit a request for mediation to NOFA-NY Certified Organic LLC, or file an appeal with the USDA.

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 [of Agriculture] 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 of this part."

You may submit a request for reinstatement of certification to the Secretary after **March 24, 2014**. If you have questions regarding this letter, please contact me.

Sincerely,

(b) (6)

Nancy L. Sandstrom
Handling Certification Coordinator
cc: AMS Administrator, c/o NOP Appeals Staff



NOFA-NY Certified Organic, LLC

840 Upper Front Street • Binghamton, New York 13905
607-724-9851 • Fax: 607-724-9853
Email: certifiedorganic@nofany.org • www.nofany.org

April 16, 2013

Jeri Woodhouse
North Fork Specialty Kitchen
8595 Cox Lane Unit #3
Cutchogue, NY 11935

Determination Notification

Certification is pending
Submission of information below

Please note: A written response to the item(s) noted below is required. The response must be postmarked, faxed or e-mailed by May 7, 2013. Certification or Transition is contingent upon a complete written response.

Salt – the technical data sheet for salt indicates it contains magnesium carbonate as an anti caking agent. This is prohibited for organic production. Please find an alternate sea salt and submit a documentation of ingredient sheet and technical data sheet for review. Product containing sea salt will not be certified until an appropriate salt is found. Production of currently certified products needs to be discontinued until the new salt product is approved for use.

Documentation of Ingredients: needed for Chipotle and Liquid Smoke (blank form attached)

Labels – the following labels need revisions:

Carrot Soup does not list vegetable broth

Preserved Organic Lemon does not list Bay Leaf

Rosemary-infused Olive Oil and **Organic Olive Oil** needs the certified organic By..... statement directly below the Taste of the North Fork information.

Chili Infused Olive Oil need label.

Lavender Honey and Lemon Verbena Honey certified by NOFA-NY Certified Organic, LLC statement needs to be changed to **certified organic by.....** You may use a shortened version of NOFA NY Certified Organic, LLC i.e. NOFA-NY, LLC, but the word organic needs to be in the certified organic by..... portion of the statement.

Browders Pickled Eggs – need label

Blue Canoe/The Canoe Club/VCS Products – labels needed for all except VCS Steak Sauce

Certificate updates still needed: (b) (4)

(b) (4) (for products not supplied by (b) (4) .

Product Profiles: VCS Steak Sauce does not equal 100% it currently equals 99.1%

Non-Compliances: None

~The maintenance of all Audit Trail Records is a requirement for continuing certification.

~Any changes to the Organic Farm Plan must be updated with the certification office.

~Any labels to be used must be submitted to the certification office for approval prior to printing and use.

~An updated organic certificate will be issued once a complete response has been verified.

Office Use Only:

Applicant Responded to all Items & Responses are Complete: ____ yes ____ no

Producer # 2010057

NOFA-NY Certified Organic, LLC

Determination
Notification

Date: 03/13/2013

Jeri Woodhouse
North Fork Specialty Kitchen
8595 Cox Lane Unit #3
Cutchogue, NY 11935

Your 2012 certification is pending submission of additional information.

Areas of Non-Compliance - ☐ Yes ☒ No *If the "yes" box is checked, please see attached notice.*

CLARIFICATIONS / REMINDERS

Requested items/clarifications must be postmarked, faxed or emailed by: **4/3/2013**

Your certification will remain pending the receipt of the following information.

1. Master list of all ingredients used in your organic production. This should include the name of the supplier and certificate date as well. The products to be listed once certification is approved: Browders Blends: Fry, Roast, Grill, Brine; Nanny's Gourmet: Vegetarian Chopped Liver, A Taste of the North Fork: Lavender Honey, Lemon Verbena Honey, Rosemary Infused Olive Oil. All other (b) (4) products have been discontinued and removed from certification.
2. An up to date flow of all production.
3. All updated certificates including (b) (4) is on file and does not need to be submitted.
4. Documentation of Ingredients and Technical Data Sheet for salt
5. The updated product profiles for: Nanny's Vegetarian Chopped Liver, Browder's Dry Rub Grill and Rosemary Oil. Please be sure all ingredient percentages are listed correctly and the total percentage of the ingredients equal 100%.
6. An updated flow chart of the processing needs to be submitted
7. Rosemary Olive Oil Label
8. On 12/5/12 a response was received from you stating carrot soup was not being sold as organic. Please provide an updated product profile and label if you wish to add this to the Taste of The North Fork label.
9. The Blue Canoe label needs to be submitted once developed.
10. Be sure to submit all product profiles, supplier certificates, updated master list and label samples for product approval prior to production for sale.

Please note: this information must be received in the time frame listed. Many of these items have been previously requested.

(b) (6)

Sherrie Hastings, Certification Director

CC: Jennifer Clifford

Print Date: 3/13/2013

From: [Lauren Lawrence](#)
To: [Ragonesi, Judith - AMS](#)
Cc: [Jessica Terry](#); [Pat Huizing](#)
Subject: Complaint NFSK 105-14
Date: Tuesday, April 08, 2014 9:54:00 AM
Attachments: [1.14.14 Notice of Proposed Suspension.pdf](#)
[2.23.14 Notice of Suspension.pdf](#)
[4.16.13 Determination 2012.pdf](#)
[2012 Determination Notification.pdf](#)
Importance: High

Hi Judith:

Attached are the items that you requested when we spoke on the phone. I also included the determination notification indicating that the certification is pending the receipt of the audit trail documents.

If I can be of any further assistance or provide you with any additional documentation please let me know.

Kind Regards,

Lauren Lawrence
NOFA-NY Certified Organic, LLC
840 Upper Front Street
Binghamton, New York 13905
Phone: 607-724-9851
Fax: 607-724-9853

The information in this email message and any attachment thereto, are confidential and may contain privileged information intended only for the use of the addressee. If you are not the intended recipient, please notify the sender by return e-mail immediately and delete this message and any attachment from your system. Furthermore, if you are not the intended recipient, you are prohibited from, and it may be unlawful to copy, distribute or disclose this message or attachment or take any action or omit to take action in reliance on it. Neither the sender nor NOFA-NY Certified Organic, LLC, the company to which the sender belongs, accepts any responsibility for any use or misuse of this message or any attachment.



NOFA-NY Certified Organic, LLC

840 Upper Front Street • Binghamton, New York 13905

Phone 607-724-9851 • Fax: 607-724-9853

Email: certifiedorganic@nofany.org • www.nofany.org/organic-certification

February 23, 2014

Jeri Woodhouse
North Fork Specialty Kitchen
8595 Cox Lane Unit #3
Cutchogue, NY 11935

Subject: **Notice of Suspension**

Dear Jeri:

This letter is to notify you that as of today, **February 23, 2014**, your certificate has been suspended as an organic operator with the National Organic Program (NOP) pursuant to §205.662(e) of the National Organic Program Standards. In addition to suspension, any operation knowingly selling or labeling a product as organic shall be subject to civil penalty.

The suspension of your operation's certificate was due to the failure to correct the following violation:

1. § 205.401 Application for certification.

A person seeking certification of a production or handling operation under this subpart must submit an application for certification to a certifying agent. The application must include the following information:

(d) Other information necessary to determine compliance with the Act and the regulations in this part.

Noncompliance:

1. Failure to submit complete information requested on November 20, 2013 by December 9, 2013 (extended deadline) necessary to complete annual review.

The noncompliance was not corrected to meet the National Organic Program Standards and a proposed suspension notice was issued to you on **January 14, 2014**. The required response was not received within the timeframe specified in the Notice of Proposed Suspension to either:

Submit a request for mediation to NOFA-NY Certified Organic LLC, or file an appeal with the USDA.

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 [of Agriculture] 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 of this part."

You may submit a request for reinstatement of certification to the Secretary after **March 24, 2014**. If you have questions regarding this letter, please contact me.

Sincerely,

(b) (6)

Nancy L. Sandstrom
Handling Certification Coordinator
cc: AMS Administrator, c/o NOP Appeals Staff



NOFA-NY Certified Organic, LLC

840 Upper Front Street • Binghamton, New York 13905
607-724-9851 • Fax: 607-724-9853
Email: certifiedorganic@nofany.org • www.nofany.org

April 16, 2013

Jeri Woodhouse
North Fork Specialty Kitchen
8595 Cox Lane Unit #3
Cutchogue, NY 11935

Determination Notification

Certification is pending
Submission of information below

Please note: A written response to the item(s) noted below is required. The response must be postmarked, faxed or e-mailed by May 7, 2013. Certification or Transition is contingent upon a complete written response.

Salt – the technical data sheet for salt indicates it contains magnesium carbonate as an anti caking agent. This is prohibited for organic production. Please find an alternate sea salt and submit a documentation of ingredient sheet and technical data sheet for review. Product containing sea salt will not be certified until an appropriate salt is found. Production of currently certified products needs to be discontinued until the new salt product is approved for use.

Documentation of Ingredients: needed for Chipotle and Liquid Smoke (blank form attached)

Labels – the following labels need revisions:

Carrot Soup does not list vegetable broth

Preserved Organic Lemon does not list Bay Leaf

Rosemary-infused Olive Oil and **Organic Olive Oil** needs the certified organic By..... statement directly below the Taste of the North Fork information.

Chili Infused Olive Oil need label.

Lavender Honey and Lemon Verbena Honey certified by NOFA-NY Certified Organic, LLC statement needs to be changed to **certified organic by.....** You may use a shortened version of NOFA NY Certified Organic, LLC i.e. NOFA-NY, LLC, but the word organic needs to be in the certified organic by..... portion of the statement.

Browders Pickled Eggs – need label

Blue Canoe/The Canoe Club/VCS Products – labels needed for all except VCS Steak Sauce

Certificate updates still needed: (b) (4)

(b) (4) (for products not supplied by (b) (4)).

Product Profiles: VCS Steak Sauce does not equal 100% it currently equals 99.1%

Non-Compliances: None

~The maintenance of all Audit Trail Records is a requirement for continuing certification.

~Any changes to the Organic Farm Plan must be updated with the certification office.

~Any labels to be used must be submitted to the certification office for approval prior to printing and use.

~An updated organic certificate will be issued once a complete response has been verified.

Office Use Only:

Applicant Responded to all Items & Responses are Complete: ____ yes ____ no

Producer # 2010057

NOFA-NY Certified Organic, LLC

Determination
Notification

Date: 03/13/2013

Jeri Woodhouse
North Fork Specialty Kitchen
8595 Cox Lane Unit #3
Cutchogue, NY 11935

Your 2012 certification is pending submission of additional information.

Areas of Non-Compliance - ☐ Yes ☒ No *If the "yes" box is checked, please see attached notice.*

CLARIFICATIONS / REMINDERS

Requested items/clarifications must be postmarked, faxed or emailed by: **4/3/2013**

Your certification will remain pending the receipt of the following information.

1. Master list of all ingredients used in your organic production. This should include the name of the supplier and certificate date as well. The products to be listed once certification is approved: Browders Blends: Fry, Roast, Grill, Brine; Nanny's Gourmet: Vegetarian Chopped Liver, A Taste of the North Fork: Lavender Honey, Lemon Verbena Honey, Rosemary Infused Olive Oil. All other (b) (4) products have been discontinued and removed from certification.
2. An up to date flow of all production.
3. All updated certificates including (b) (4). (b) (4) is on file and does not need to be submitted.
4. Documentation of Ingredients and Technical Data Sheet for salt
5. The updated product profiles for: Nanny's Vegetarian Chopped Liver, Browder's Dry Rub Grill and Rosemary Oil. Please be sure all ingredient percentages are listed correctly and the total percentage of the ingredients equal 100%.
6. An updated flow chart of the processing needs to be submitted
7. Rosemary Olive Oil Label
8. On 12/5/12 a response was received from you stating carrot soup was not being sold as organic. Please provide an updated product profile and label if you wish to add this to the Taste of The North Fork label.
9. The Blue Canoe label needs to be submitted once developed.
10. Be sure to submit all product profiles, supplier certificates, updated master list and label samples for product approval prior to production for sale.

Please note: this information must be received in the time frame listed. Many of these items have been previously requested.

(b) (6)

Sherrie Hastings, Certification Director

CC: Jennifer Clifford

Print Date: 3/13/2013



NOFA-NY Certified Organic, LLC

840 Upper Front Street • Binghamton, New York 13905

Phone 607-724-9851 • Fax: 607-724-9853

Email: certifiedorganic@nofany.org • www.nofany.org/organic-certification

January 14, 2014

Jeri Woodhouse
North Fork Specialty Kitchen
8595 Cox Lane Unit #3
Cutchogue, NY 11935

Subject: **Notice of Proposed Suspension**

Dear Jeri:

This is an official Notice of Proposed Suspension, pursuant to the National Organic Programs National Organic Standards Section 205.662 (c). It is being issued because the required response to your Notice of Noncompliance, issued on **December 17, 2013**, was not received / deemed to be a complete response that is in compliance with the National Organic Standards.

The outstanding issue is as follows:

§ 205.401 Application for certification.

A person seeking certification of a production or handling operation under this subpart must submit an application for certification to a certifying agent. The application must include the following information:

(d) Other information necessary to determine compliance with the Act and the regulations in this part.

Noncompliance:

- 1. Failure to submit information requested on November 20, 2013 by December 9, 2013 (extended deadline) necessary to complete annual review.**

Because the noncompliance has not been corrected to meet the National Organic Program Standards, your certification will be suspended for **30 days**. The proposed effective date of your suspension is **February 23, 2014**.

As noted in the November 20, 2013 correspondence, organic production of VSC products has not been approved and production of this or any other product that does not have approval and is not listed on your certificate must be discontinued immediately.

To avoid suspension of your organic certification you must do one (1) of the following:

1. Submit acceptable corrective action in writing to the notice of noncompliance by **February 14, 2014** to NOFA-NY Certified Organic, LLC. To avoid suspension, the proposed corrective action must fully address the noncompliance and be accepted by NOFA-NY Certified Organic, LLC.

or

2. File an appeal to this Proposed Suspension pursuant to §205.681 of the NOP regulations. The appeal must be submitted in writing to the:

USDA-AMS- Administrator c/o NOP Appeals Team 1400 Independence Avenue SW Room 2095-S, STOP 0203
Washington, DC 20250

The Appeal must be filed within 30 calendar days, of receipt of this notice, and a copy provided to this office, in addition to a copy of the adverse action decision.

or

3. Request mediation pursuant to §205.663 of the NOP regulations, in writing to NOFA-NY Certified Organic, LLC within 30 days of receipt of this notice. If your request for mediation is accepted and the mediation is unsuccessful, upon written notification, you will have 30 calendar days, from receipt of the notice, to appeal the Proposed Suspension. If your request for mediation is rejected, you will receive written notification and have 30 days, from the date of that notice, to appeal the Proposed Suspension.

If you do not request mediation or file an appeal within the timeframes indicated above, your certification to the National Organic Program will be suspended for 30 days, and your operation will be unable to sell, or label its product as organic.

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 notification of suspension, submit a request to the Secretary [of Agriculture] for reinstatement of its certification. The request must be accompanied by evidence demonstrating correction of each noncompliance and corrective taken to comply with and remain in compliance with the Act and the regulations in this part.”

Should this proposed suspension become effective, you will be able to submit a request for reinstatement certification to the Secretary of Agriculture 30 days after the date of your final suspension notification.

Sincerely,

(b) (6)

Certification Director

cc: AMS Administrator, c/o NOP Appeals Staff

From: [Lauren Lawrence](#)
To: [Ragonesi, Judith - AMS](#)
Cc: [Jessica Terry](#); [Pat Huizing](#)
Subject: Complaint NFSK 105-14
Date: Tuesday, April 08, 2014 9:54:00 AM
Attachments: [1.14.14 Notice of Proposed Suspension.pdf](#)
[2.23.14 Notice of Suspension.pdf](#)
[4.16.13 Determination 2012.pdf](#)
[2012 Determination Notification.pdf](#)
Importance: High

Hi Judith:

Attached are the items that you requested when we spoke on the phone. I also included the determination notification indicating that the certification is pending the receipt of the audit trail documents.

If I can be of any further assistance or provide you with any additional documentation please let me know.

Kind Regards,

Lauren Lawrence
NOFA-NY Certified Organic, LLC
840 Upper Front Street
Binghamton, New York 13905
Phone: 607-724-9851
Fax: 607-724-9853

The information in this email message and any attachment thereto, are confidential and may contain privileged information intended only for the use of the addressee. If you are not the intended recipient, please notify the sender by return e-mail immediately and delete this message and any attachment from your system. Furthermore, if you are not the intended recipient, you are prohibited from, and it may be unlawful to copy, distribute or disclose this message or attachment or take any action or omit to take action in reliance on it. Neither the sender nor NOFA-NY Certified Organic, LLC, the company to which the sender belongs, accepts any responsibility for any use or misuse of this message or any attachment.

SETTLEMENT AGREEMENT

THIS AGREEMENT is entered into by the United States Department of Agriculture (USDA) Agricultural Marketing Service (AMS), and , and any person responsibly connected with North Fork Specialty Kitchen, collectively referred to as the Parties.

USDA AMS and North Fork Specialty Kitchen have decided to settle the issues between them related to alleged violations of the Organic Foods Production Act of 1990 (7 U.S.C. §§ 6501 et seq.) (OFPA), and the regulations promulgated thereunder (7 CFR Part 205).

Accordingly, the Parties agree to the following:

1. The Secretary of Agriculture has jurisdiction in this matter.
2. USDA AMS agrees not to file a formal administrative complaint charging North Fork Specialty Kitchen with alleged violations of the OFPA and the regulations for any actions disclosed by the investigation that gave rise to this agreement.
3. North Fork Specialty Kitchen agrees to the following:
 - A. North Fork Specialty Kitchen has been given the opportunity for a hearing, and waives such hearing and further procedure for the purpose of settling these matters and for such purposes only.
 - B. North Fork Specialty Kitchen failure to comply with the terms of this Agreement shall automatically void paragraph number 2 above, and USDA AMS may thereafter institute enforcement proceedings against North Fork Specialty Kitchen, and pursue any and all remedies available under the OFPA and the USDA organic regulations.
 - C. North Fork Specialty Kitchen agrees to immediately cease and desist selling, labeling, or representing agricultural products in violation of the OFPA and the USDA organic regulations.

This Agreement shall become effective upon execution by the Parties.

(b) (6)

Date 3.16.15

(b) (6) Ben Woodhouse

North Fork Specialty Kitchen

Gift Tucker FORMUM
Miles McEvoy

Date 3.17.15

Deputy Administrator, National Organic Program
USDA Agricultural Marketing Service

From: [Ragonesi, Judith - AMS](#)
To: [Michael, Matthew - AMS](#)
Subject: FW: another Cease/desist w/ settlement NOPC 105-14 North Fork specialty kitchen
Date: Wednesday, July 16, 2014 2:21:00 PM

Hi Matthew-

When you get a chance could you review these letters....we discussed the case shortly before I left but I don't think you had the opportunity to review the drafts.

[\Open\NOPC-105-14\Notice to Cease and Desist.docx](#)

[NOPC-105-14\Settlement Agreement.docx](#)

Thanks-
Judy



NOFA-NY Certified Organic, LLC

840 Upper Front Street • Binghamton, New York 13905

Phone 607-724-9851 • Fax: 607-724-9853

Email: certifiedorganic@nofany.org • www.nofany.org/organic-certification

January 14, 2014

Jeri Woodhouse
North Fork Specialty Kitchen
8595 Cox Lane Unit #3
Cutchogue, NY 11935

Subject: **Notice of Proposed Suspension**

Dear Jeri:

This is an official Notice of Proposed Suspension, pursuant to the National Organic Programs National Organic Standards Section 205.662 (c). It is being issued because the required response to your Notice of Noncompliance, issued on **December 17, 2013**, was not received / deemed to be a complete response that is in compliance with the National Organic Standards.

The outstanding issue is as follows:

§ 205.401 Application for certification.

A person seeking certification of a production or handling operation under this subpart must submit an application for certification to a certifying agent. The application must include the following information:

(d) Other information necessary to determine compliance with the Act and the regulations in this part.

Noncompliance:

- 1. Failure to submit information requested on November 20, 2013 by December 9, 2013 (extended deadline) necessary to complete annual review.**

Because the noncompliance has not been corrected to meet the National Organic Program Standards, your certification will be suspended for **30 days**. The proposed effective date of your suspension is **February 23, 2014**.

As noted in the November 20, 2013 correspondence, organic production of VSC products has not been approved and production of this or any other product that does not have approval and is not listed on your certificate must be discontinued immediately.

To avoid suspension of your organic certification you must do one (1) of the following:

1. Submit acceptable corrective action in writing to the notice of noncompliance by **February 14, 2014** to NOFA-NY Certified Organic, LLC. To avoid suspension, the proposed corrective action must fully address the noncompliance and be accepted by NOFA-NY Certified Organic, LLC.

or

2. File an appeal to this Proposed Suspension pursuant to §205.681 of the NOP regulations. The appeal must be submitted in writing to the:

USDA-AMS- Administrator c/o NOP Appeals Team 1400 Independence Avenue SW Room 2095-S, STOP 0203
Washington, DC 20250

The Appeal must be filed within 30 calendar days, of receipt of this notice, and a copy provided to this office, in addition to a copy of the adverse action decision.

or

3. Request mediation pursuant to §205.663 of the NOP regulations, in writing to NOFA-NY Certified Organic, LLC within 30 days of receipt of this notice. If your request for mediation is accepted and the mediation is unsuccessful, upon written notification, you will have 30 calendar days, from receipt of the notice, to appeal the Proposed Suspension. If your request for mediation is rejected, you will receive written notification and have 30 days, from the date of that notice, to appeal the Proposed Suspension.

If you do not request mediation or file an appeal within the timeframes indicated above, your certification to the National Organic Program will be suspended for 30 days, and your operation will be unable to sell, or label its product as organic.

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 notification of suspension, submit a request to the Secretary [of Agriculture] for reinstatement of its certification. The request must be accompanied by evidence demonstrating correction of each noncompliance and corrective taken to comply with and remain in compliance with the Act and the regulations in this part.”

Should this proposed suspension become effective, you will be able to submit a request for reinstatement certification to the Secretary of Agriculture **30 days** after the date of your final suspension notification.

Sincerely,

(b) (6)

Certification Director

cc: AMS Administrator, c/o NOP Appeals Staff

Nutrition Facts

Serving Size: 2 tablespoons (28g)

Servings Per Container: 18

Amount Per Serving		Cal from Fat 10
Calories 30		% Daily Value*
Total Fat 2g		3%
Saturated Fat 0g		0%
Trans Fat 0g		0%
Cholesterol 0mg		0%
Sodium 190mg		8%
Total Carb 6g		2%
Dietary Fiber 1g		4%
Sugars 5g		
Protein 0g		0%
Vitamin A 2%		Vitamin C 4%

*Percent Daily Values are based on a diet of organic diet.

ORGANIC

BLUE CANOE™

ORIGINAL

MILD & SMOKEY

COFFEE BBQ SAUCE

NET WT 18 OZ (510g)

REFRIGERATE AFTER OPENING
SHAKE WELL BEFORE USING

INGREDIENTS

ORGANIC TOMATO PUREE, ORGANIC
COFFEE, ORGANIC VINEGAR, ORGANIC CANE
SUGAR, NATURAL SMOKE FLAVOR, ORGANIC
CANOLA OIL, SEA SALT, SPICES.



6 09408 37042 7

BOTTLED AT:

N. FORK SPECIALTY KITCHEN, INC.
OUTCHOGUE, NY 11955
CERTIFIED ORGANIC BY NDFA-NY
CERTIFIED ORGANIC, LLC
www.bluecanoeysterbar.com

RECEIVED
SEP 18 2013

(b) (7)(D)



February 27, 2014

Complaint against: Jeri Woodhouse
North Fork Specialty Kitchen
8595 Cox Lane Unit #3
Cutchogue, NY 11935

(b) (4)



Complaint:

(b) (7)(D)

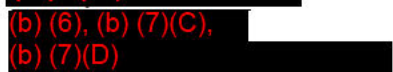


Respectfully submitted,

(b) (6)



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



From: [Handling](#)
To: [Jeriwood \(b\) \(6\) .com](#)
Subject: Information needed to complete review
Importance: High

Jeri:

Bethany has indicated that you have paid your fees for the 2013 update and I would like to move forward with your review. The update application is incomplete and I will not be able to proceed until I have the following:

Master list of ingredients and suppliers

Current supplier certificates (these need to be current within the last 12 months or have a letter of good standing)

ALSO:

Please submit product profiles, supplier certificates and labels for VSC Organic Basic Tomato Sauce, VSC Organic North Fork Vegetable Sauce, VSC Organic Steak Sauce, and Blue Canoe Original Mild & Smokey Coffee BBQ Sauce that match up. None of the information currently on file matches.

Please pay close attention that the ingredients listed on the supplier certificate, product profile and the labels match. (i.e tomato paste, tomato sauce, ketchup etc.) If you are using an ingredient that contains multiple ingredients be sure they are broken out in (). Be sure your formulations equal 100%. **The VSC/Blue Canoe Products are still in a pending classification, they cannot be produced for sale until they are approved.** Organic production of this product or any other product that does not have approval and is not listed on your certificate must stop immediately.

The VSC/Blue Canoe products can be added to your certificate as soon as the information is received, verified and approved. Please be sure all your information is submitted in one packet to avoid excessive review time.

What is the status of Browder's Pickled Eggs? This product is currently pending.

Are you no longer producing the Chili Infused Olive Oil. That is not currently listed on intended products to produce list in your application.

Please submit this information by November 27, 2013.

Nancy Sandstrom

Nancy Sandstrom
Handling Certification Coordinator
NOFA-NY Certified Organic, LLC
840 Upper Front St
Binghamton, NY 13905
607-218-6188
607-724-9851
607-724-9853 fax

handling@nofany.org

The information in this email message and any attachment thereto, are confidential and may contain privileged information intended only for the use of the addressee. If you are not the intended recipient, please notify the sender by return e-mail immediately and delete this message and any attachment from your system. Furthermore, if you are not the intended recipient, you are prohibited from, and it may be unlawful to copy, distribute or disclose this message or attachment or take any action or omit to take action in reliance on it. Neither the sender nor NOFA-NY Certified Organic, LLC, the company to which the sender belongs, accepts any responsibility for any use or misuse of this message or any attachment.

From: [Handling](#)
To: (b) (6) .com
Subject: RE: Nancy

Yes Jeri, this will be fine. I will look for your response by December 9. Thanks for contacting me and have a wonderful holiday. Nancy

From: (b) (6) .com [mailto:(b) (6) .com]
Sent: Wednesday, November 27, 2013 9:37 AM
To: handling@nofany.org
Subject: att: Nancy

Hi Nancy,
I received the list of outstanding items from my application.
I would like to respectfully ask that you extend the response date until December 9.
The reason for this request is to allow me to have sufficient time to meet with my client, Terry Harwood, owner of Blue Canoe and Vine Street in order to discuss changes to his formulations which will affect my responses directly, Also Terry has indicated that he is seeking or going to be seeking organic certification for his restaurant to produce some or all of his products and this will impact my plans for 2014. I plan to discuss these items with him right after this Holiday weekend and will prepare my determination response next week.

Please let me know if this is acceptable to you.

Best regards and Happy Thanksgiving to you,
Jeri

From: (b) (6)
To: [AMS - NOPCompliance](#)
Cc: (b) (6)
Subject: NOP Complaint Letter 2. 27.14
Date: Thursday, February 27, 2014 1:26:27 PM
Attachments: [Complaint to NOP regarding Vine Street Cafe and Blue Canoe.doc](#)
[Blue Canoe Label - Coffee BBQ Sauce.pdf](#)
[Vine Street Cafe Labels - Basic Tomato Sauce, Vegetable Sauce, Steak Sauce.pdf](#)
[1.14.14 Notice of Proposed Suspension.pdf](#)
[2.23.14 Notice of Suspension.pdf](#)
[RE Nancy.msg](#)
[12.17.13 North Fork 12.17.13 Specialty Kitchen Notice of Noncompliance.pdf](#)
[Information needed to complete review.msg](#)
Importance: High

February 27, 2014

Dear NOP Compliance:

(b) (7)(D) would like to file a complaint against the North Fork Specialty Kitchen, 8595 Cox lane Unit #3, Cutchogue, NY 11935 – NOFA-NY producer 2010057. This producer produced and represented products for Vine Street Café and Blue Canoe without proper approval. The following items are attached.

1. Complaint
2. Copies of labels for the Vine Street Café and Blue Canoe products. All labels display the USDA Seal and indicate certified organic by NOFA-NY Certified Organic, LLC.
3. Copies of correspondence requesting information and cautioning against organic representation until approval is granted
4. Copies of compliance letters leading to suspension

Thank you in advance for your prompt attention to this matter. If you have questions please do not hesitate to contact me.

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

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

The information in this email message and any attachment thereto, are confidential and may contain privileged information intended only for the use of the addressee. If you are not the intended recipient, please notify the sender by return e-mail immediately and delete this message and any

attachment from your system. Furthermore, if you are not the intended recipient, you are prohibited from, and it may be unlawful to copy, distribute or disclose this message or attachment or take any action or omit to take action in reliance on it. Neither the sender nor NOFA-NY Certified Organic, LLC, the company to which the sender belongs, accepts any responsibility for any use or misuse of this message or any attachment.



NOFA-NY Certified Organic, LLC

840 Upper Front Street • Binghamton, New York 13905

Phone 607-724-9851 • Fax: 607-724-9853

Email: certifiedorganic@nofany.org • www.nofany.org/organic-certification

February 23, 2014

Jeri Woodhouse
North Fork Specialty Kitchen
8595 Cox Lane Unit #3
Cutchogue, NY 11935

Subject: **Notice of Suspension**

Dear Jeri:

This letter is to notify you that as of today, **February 23, 2014**, your certificate has been suspended as an organic operator with the National Organic Program (NOP) pursuant to §205.662(e) of the National Organic Program Standards. In addition to suspension, any operation knowingly selling or labeling a product as organic shall be subject to civil penalty.

The suspension of your operation's certificate was due to the failure to correct the following violation:

1. § 205.401 Application for certification.

A person seeking certification of a production or handling operation under this subpart must submit an application for certification to a certifying agent. The application must include the following information:

(d) Other information necessary to determine compliance with the Act and the regulations in this part.

Noncompliance:

1. Failure to submit complete information requested on November 20, 2013 by December 9, 2013 (extended deadline) necessary to complete annual review.

The noncompliance was not corrected to meet the National Organic Program Standards and a proposed suspension notice was issued to you on **January 14, 2014**. The required response was not received within the timeframe specified in the Notice of Proposed Suspension to either:

Submit a request for mediation to NOFA-NY Certified Organic LLC, or file an appeal with the USDA.

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 [of Agriculture] 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 of this part."

You may submit a request for reinstatement of certification to the Secretary after **March 24, 2014**. If you have questions regarding this letter, please contact me.

Sincerely,

(b) (6)

Nancy L. Sandstrom
Handling Certification Coordinator
cc: AMS Administrator, c/o NOP Appeals Staff

Vine Street Cafe

* shelter island *

Using a simple approach and a few basic ingredients we've created a sauce that is ideal for children's pasta dishes or as a starter for more complex sauces... even homemade pizza!

PIZZA MARGARITA

Spread a thin layer of sauce over your favorite pizza dough and top it off with slices of fresh mozzarella. Once out of the oven, garnish with fresh basil leaves and a drizzle of extra virgin olive oil.

Vine Street Cafe

* shelter island *

Organic seasonal vegetables from the North Fork of Long Island are used to make this chunky vegetable sauce. Heat it up at the last minute and ladle it over your favorite pasta.

PENNE WITH CHUNKY VEGETABLES

One jar is good for one pound of pasta. Boil and drain pasta then place in a bowl. Fold a handful of fresh spinach into heated sauce and immediately ladle over pasta. Garnish with fresh grated Pecorino cheese and herbs.

Vine Street Cafe

* shelter island *

VSC

ORGANIC

BASIC TOMATO SAUCE

NET WT. 24 OZ (680g)

INGREDIENTS:

ORGANIC DICED TOMATOES, ORGANIC ONION, ORGANIC EXTRA VIRGIN OLIVE OIL, ORGANIC TOMATO PUREE, ORGANIC GARLIC, SEA SALT, ORGANIC CRACKED PEPPER.



BOTTLED AT:

N. FORK SPECIALTY KITCHEN INC., CUTOCHQUE, NY 11935

CERTIFIED ORGANIC BY NOFA-NY CERTIFIED ORGANIC, LLC

WWW.VINESTREETCAFE.COM



6 09408137043 4

REFRIGERATE AFTER OPENING
SHAKE WELL BEFORE USING

Nutrition Facts

Serving Size 2 Ounces (57g)

Servings Per Container 15

Amount Per Serving

Calories 80

Calories from Fat 15

% Daily Value*

Total Fat 2g

Saturated Fat 0g

Trans Fat 0g

Cholesterol 0mg

Sodium 720mg

Total Carbohydrate 12g

Dietary Fiber 0g

Sugars 0g

Protein 0g

Vitamin A 6%

Calcium 0%

*Percent Daily Values are based on a diet of other people's secrets.

Total Fat 2g

Saturated Fat 0g

Trans Fat 0g

Cholesterol 0mg

Sodium 720mg

Total Carbohydrate 12g

Dietary Fiber 0g

Sugars 0g

Protein 0g

Vitamin A 6%

Calcium 0%

*Percent Daily Values are based on a diet of other people's secrets.

Total Fat 2g

Saturated Fat 0g

Trans Fat 0g

Cholesterol 0mg

Sodium 720mg

Total Carbohydrate 12g

Dietary Fiber 0g

Sugars 0g

Protein 0g

Vitamin A 6%

Calcium 0%

*Percent Daily Values are based on a diet of other people's secrets.

Total Fat 2g

Saturated Fat 0g

Trans Fat 0g

Cholesterol 0mg

Sodium 720mg

Total Carbohydrate 12g

Dietary Fiber 0g

Sugars 0g

Protein 0g

Vitamin A 6%

Calcium 0%

*Percent Daily Values are based on a diet of other people's secrets.

Total Fat 2g

Saturated Fat 0g

Trans Fat 0g

Cholesterol 0mg

Sodium 720mg

Total Carbohydrate 12g

Dietary Fiber 0g

Sugars 0g

Protein 0g

Vitamin A 6%

Calcium 0%

*Percent Daily Values are based on a diet of other people's secrets.

Total Fat 2g

Saturated Fat 0g

Trans Fat 0g

Cholesterol 0mg

Sodium 720mg

Total Carbohydrate 12g

Dietary Fiber 0g

Sugars 0g

Protein 0g

Vitamin A 6%

Calcium 0%

*Percent Daily Values are based on a diet of other people's secrets.

Total Fat 2g

Saturated Fat 0g

Trans Fat 0g

Cholesterol 0mg

Sodium 720mg

Total Carbohydrate 12g

Dietary Fiber 0g

Sugars 0g

Protein 0g

Vitamin A 6%

Calcium 0%

*Percent Daily Values are based on a diet of other people's secrets.

Total Fat 2g

Saturated Fat 0g

Trans Fat 0g

Cholesterol 0mg

Sodium 720mg

Total Carbohydrate 12g

Dietary Fiber 0g

Sugars 0g

Protein 0g

Vitamin A 6%

Calcium 0%

*Percent Daily Values are based on a diet of other people's secrets.

Total Fat 2g

Saturated Fat 0g

Trans Fat 0g

Cholesterol 0mg

Sodium 720mg

Total Carbohydrate 12g

Dietary Fiber 0g

Sugars 0g

Protein 0g

Vitamin A 6%

Calcium 0%

*Percent Daily Values are based on a diet of other people's secrets.

Total Fat 2g

Saturated Fat 0g

Trans Fat 0g

Cholesterol 0mg

Sodium 720mg

Total Carbohydrate 12g

Dietary Fiber 0g

Sugars 0g

Protein 0g

Vitamin A 6%

Calcium 0%

*Percent Daily Values are based on a diet of other people's secrets.

Total Fat 2g

Saturated Fat 0g

Trans Fat 0g

Cholesterol 0mg

Sodium 720mg

Total Carbohydrate 12g

Dietary Fiber 0g

Sugars 0g

Protein 0g

Vitamin A 6%

Calcium 0%

*Percent Daily Values are based on a diet of other people's secrets.

Total Fat 2g

Saturated Fat 0g

Trans Fat 0g

Cholesterol 0mg

Sodium 720mg

Total Carbohydrate 12g

Dietary Fiber 0g

Sugars 0g

Protein 0g

Vitamin A 6%

Calcium 0%

*Percent Daily Values are based on a diet of other people's secrets.

Total Fat 2g

Saturated Fat 0g

Trans Fat 0g

Cholesterol 0mg

Sodium 720mg

Total Carbohydrate 12g

Dietary Fiber 0g

Sugars 0g

Protein 0g

Vitamin A 6%

Calcium 0%

*Percent Daily Values are based on a diet of other people's secrets.

Total Fat 2g

Saturated Fat 0g

Trans Fat 0g

Cholesterol 0mg

Sodium 720mg

Total Carbohydrate 12g

Dietary Fiber 0g

Sugars 0g

Protein 0g

Vitamin A 6%

Calcium 0%

*Percent Daily Values are based on a diet of other people's secrets.

Total Fat 2g

Saturated Fat 0g

Trans Fat 0g

Cholesterol 0mg

Sodium 720mg

Total Carbohydrate 12g

Dietary Fiber 0g

Sugars 0g

Protein 0g

Vitamin A 6%

Calcium 0%

*Percent Daily Values are based on a diet of other people's secrets.

Total Fat 2g

Saturated Fat 0g

Trans Fat 0g

Cholesterol 0mg

Sodium 720mg

Total Carbohydrate 12g

Dietary Fiber 0g

Sugars 0g

Protein 0g

Vitamin A 6%

Calcium 0%

*Percent Daily Values are based on a diet of other people's secrets.

Total Fat 2g

Saturated Fat 0g

Trans Fat 0g

Cholesterol 0mg

Sodium 720mg

Total Carbohydrate 12g

Dietary Fiber 0g

Sugars 0g

Protein 0g

Vitamin A 6%

Calcium 0%

*Percent Daily Values are based on a diet of other people's secrets.

Total Fat 2g

Saturated Fat 0g

Trans Fat 0g

Cholesterol 0mg

Sodium 720mg

Total Carbohydrate 12g

Dietary Fiber 0g

Sugars 0g

Protein 0g

Vitamin A 6%

Calcium 0%

*Percent Daily Values are based on a diet of other people's secrets.

Total Fat 2g

Saturated Fat 0g

Trans Fat 0g

Cholesterol 0mg

Sodium 720mg

Total Carbohydrate 12g

Dietary Fiber 0g

Sugars 0g

Protein 0g

Vitamin A 6%

Calcium 0%

*Percent Daily Values are based on a diet of other people's secrets.

Total Fat 2g

Saturated Fat 0g

Trans Fat 0g

Cholesterol 0mg

Sodium 720mg

Total Carbohydrate 12g

Dietary Fiber 0g

Sugars 0g

Protein 0g

Vitamin A 6%

Calcium 0%

*Percent Daily Values are based on a diet of other people's secrets.

Total Fat 2g

Saturated Fat 0g

Trans Fat 0g

Cholesterol 0mg

Sodium 720mg

Total Carbohydrate 12g

Dietary Fiber 0g

Sugars 0g

Protein 0g

Vitamin A 6%

Calcium 0%

*



NOFA-NY Certified Organic, LLC

840 Upper Front Street • Binghamton, New York 13905

Phone 607-724-9851 • Fax: 607-724-9853

Email: certifiedorganic@nofany.org • www.nofany.org/organic-certification

December 17, 2013

Jeri Woodhouse
North Fork Specialty Kitchen
8595 Cox Lane Unit #3
Cutchogue, NY 11935

Subject: **Notice of Noncompliance**

Dear Jeri,

This letter is an official Notice of Noncompliance pursuant to section 205.662(a) of the USDA National Organic Program Regulations. A description of the area (s) of noncompliance and response requirements are detailed in the text of this notice.

Area(s) of noncompliance:

§ 205.401 Application for certification.

A person seeking certification of a production or handling operation under this subpart must submit an application for certification to a certifying agent. The application must include the following information:

(d) Other information necessary to determine compliance with the Act and the regulations in this part.

Noncompliance:

1. *Failure to submit information requested on November 20, 2013 by December 9, 2013 (extended deadline) necessary to complete annual review.*

NOFA-NY Certified Organic, LLC must receive a full response to the noncompliance listed above, postmarked by **January 7, 2014**, so we can ensure proper consideration for ongoing certification. Failure to submit this information by the deadline provided can lead to the issuance of a proposed suspension or revocation of your operation's organic certificate.

If you have any questions please feel free to contact me.

Sincerely,

(b) (6)

Certification Director
NOFA-NY Certified Organic, LLC

cc: AMS Administrator, c/o NOP Appeals Staff

From: [Ragonesi, Judith - AMS](#)
To: [\(b\) @bottlehousefoods.com](#)
Subject: NOPC 105-14 Vine Street Cafe (Sent Registered)
Date: Monday, April 07, 2014 2:52:47 PM

Dear (b) (6):

We have received a complaint alleging that Vine Street Café (dba- Bottlehouse Foods) has sold products labeled as “organic” without certification, in violation of USDA organic regulations. Please contact me as soon as possible regarding this matter.

Regards,

Judith

Judith A. Ragonesi

Agriculture Marketing Specialist
USDA/AMS/National Organic Program
1400 Independence Avenue S.W.
Washington, D.C. 20250
Phone- (202) 205-5712



1400 Independence Avenue, S.W.
Room 2646-S, STOP 0268
Washington, D.C. 20250-0268

November 3, 2014

VIA CERTIFIED MAIL

Jeri Woodhouse
North Fork Specialty Kitchen
8595 Cox Lane Unit #3
Cutchogue, New York 11935

Re: NOPC-105-14 and North Fork Specialty Kitchen

NOTICE TO CEASE AND DESIST AND PROPOSED SETTLEMENT AGREEMENT

Dear Mr. Woodhouse:

The U.S. Department of Agriculture, National Organic Program (NOP) is responsible for enforcing the Organic Foods Production Act of 1990, as amended, and its implementing regulations at 7 CFR 205. All agricultural products sold, labeled or represented as organic must comply with the USDA organic regulations. The NOP received a complaint alleging that North Fork Specialty Kitchen produced and labeled products as organic, in violation of the USDA organic regulations.

Our investigation confirmed the allegation. Specifically, we found that North Fork Specialty Kitchen produced and labeled approximately 80 cases of products as organic under the Vine Street Café and Blue Canoe labels, without the review and approval of its certifying agent. We also found that North Fork Specialty Kitchen continued to represent these products as organic after being notified by its certifying agent that there was insufficient information provided to complete a review of the products' compliance with USDA organic regulations. The circumstances surrounding these actions demonstrate knowing violation of the USDA organic regulations.

In light of the above findings, North Fork Specialty Kitchens is directed to immediately cease and desist the representation of its agricultural products as organic. Also, be advised that Section 205.100(c)(1) of the USDA organic regulations states that "[a]ny operation that knowingly sells or labels a product as organic, except in accordance with the [Organic Foods Production Act of 1990], shall be subject to a civil penalty of not more than [\$11,000 per violation]."

Mr. Woodhouse
NOPC-105-14

The USDA is willing to settle this matter informally by offering you the enclosed settlement agreement, which includes a reduced civil penalty, as an alternative to initiating an administrative proceeding. Such an administrative proceeding would begin with the filing of a complaint alleging the above violations of the USDA organic regulations. The case would be heard and decided by an administrative law judge authorized to assess civil penalties of up to \$11,000 per violation.

Please read the enclosed settlement agreement that contains the terms under which the USDA is willing to settle this matter. If you agree to the terms contained therein, please sign the original and return it to the address noted below by **September 22, 2014**, along with a certified check or money order made payable to the "Treasurer of the United States." Our address is:

USDA, National Organic Program
Compliance & Enforcement Division
1400 Independence Ave. SW
Room 2648-S, Mail Stop 0268
Washington, D.C. 20250-0268

APPEAL

If you choose not to settle, you may appeal the noncompliance decision within 30 days of receipt of this notice, pursuant to §205.681(c) of the USDA organic regulations. Appeals must be filed in writing to:

Administrator, USDA, AMS
c/o NOP Appeals Staff
1400 Independence Avenue, SW
Room 2095-S, STOP 0203
Washington, DC 20250

If you have any questions regarding this notice, please contact Judith Ragonesi, Compliance Specialist, at (202) 205-5712 or judith.ragonesi2@ams.usda.gov.

Sincerely,



Matthew Michael, Director
Compliance and Enforcement Division
National Organic Program

Enclosure:

Settlement Agreement



1400 Independence Avenue, S.W.
Room 2646-S, STOP 0268
Washington, D.C. 20250-0268

March 18, 2015

VIA EMAIL

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

A large black rectangular redaction box covers the majority of the upper half of the page, obscuring the recipient's name and address. The text "(b) (6), (b) (7)(C), (b) (7)(D)" is printed in red at the top left corner of this redacted area.

Re: NOPC-105-14 and North Fork Specialty Kitchen

Dear Ms. (b) (6), (b) (7)(C), (b) (7)(D):

The U.S. Department of Agriculture (USDA) National Organic Program (NOP) has concluded its investigation of the complaint you filed against North Fork Specialty Kitchen. Your complaint alleged that North Fork Specialty Kitchen packaged and labeled products as "organic" without approval from its certifier, in violation of USDA organic regulations.

Our investigation confirmed the allegation. In response to the investigation North Fork Specialty Kitchen was issued a cease and desist notice and entered into a settlement agreement with the USDA.

This investigation is hereby closed.

Thank you for bringing this matter to our attention. We appreciate your support of the NOP and USDA.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matthew Michael", is written over the "Sincerely," text.

Matthew Michael
Director, Compliance & Enforcement Division
National Organic Program



1400 Independence Avenue, S.W.
Room 2646-S, STOP 0268
Washington, D.C. 20250-0268

March 18, 2015

VIA EMAIL

Jeri Woodhouse
North Fork Specialty Kitchen
8595 Cox Lane Unit #3
Cutchogue, New York 11935

Re: NOPC-105-14 and North Fork Specialty Kitchen

Dear Ms. Woodhouse:

Attached is an executed settlement agreement that contains the terms under which you agreed to settle this matter with the United States Department of Agriculture. Please retain this agreement for your records. This investigation is hereby closed.

Please be advised that any future representation of agricultural products as organic without certification may result in a civil penalty of \$11,000 per violation.

If you have any questions, please contact Judith Ragonese at (202) 684-5620 or at judith.ragonese2@ams.usda.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matt Michael".

Matthew Michael, Director
Compliance and Enforcement Division
National Organic Program

Enclosure:

Executed Settlement Agreement



1400 Independence Avenue, S.W.
Room 2646-S, STOP 0268
Washington, D.C. 20250-0268

November 3, 2014

VIA CERTIFIED MAIL

Jeri Woodhouse
North Fork Specialty Kitchen
8595 Cox Lane Unit #3
Cutchogue, New York 11935

Re: NOPC-105-14 and North Fork Specialty Kitchen

NOTICE TO CEASE AND DESIST AND PROPOSED SETTLEMENT AGREEMENT

Dear Mr. Woodhouse:

The U.S. Department of Agriculture, National Organic Program (NOP) is responsible for enforcing the Organic Foods Production Act of 1990, as amended, and its implementing regulations at 7 CFR 205. All agricultural products sold, labeled or represented as organic must comply with the USDA organic regulations. The NOP received a complaint alleging that North Fork Specialty Kitchen produced and labeled products as organic, in violation of the USDA organic regulations.

Our investigation confirmed the allegation. Specifically, we found that North Fork Specialty Kitchen produced and labeled approximately 80 cases of products as organic under the Vine Street Café and Blue Canoe labels, without the review and approval of its certifying agent. We also found that North Fork Specialty Kitchen continued to represent these products as organic after being notified by its certifying agent that there was insufficient information provided to complete a review of the products' compliance with USDA organic regulations. The circumstances surrounding these actions demonstrate knowing violation of the USDA organic regulations.

In light of the above findings, North Fork Specialty Kitchens is directed to immediately cease and desist the representation of its agricultural products as organic. Also, be advised that Section 205.100(c)(1) of the USDA organic regulations states that "[a]ny operation that knowingly sells or labels a product as organic, except in accordance with the [Organic Foods Production Act of 1990], shall be subject to a civil penalty of not more than [\$11,000 per violation]."

Mr. Woodhouse
NOPC-105-14

The USDA is willing to settle this matter informally by offering you the enclosed settlement agreement, which includes a reduced civil penalty, as an alternative to initiating an administrative proceeding. Such an administrative proceeding would begin with the filing of a complaint alleging the above violations of the USDA organic regulations. The case would be heard and decided by an administrative law judge authorized to assess civil penalties of up to \$11,000 per violation.

Please read the enclosed settlement agreement that contains the terms under which the USDA is willing to settle this matter. If you agree to the terms contained therein, please sign the original and return it to the address noted below by **September 22, 2014**, along with a certified check or money order made payable to the "Treasurer of the United States." Our address is:

USDA, National Organic Program
Compliance & Enforcement Division
1400 Independence Ave. SW
Room 2648-S, Mail Stop 0268
Washington, D.C. 20250-0268

APPEAL

If you choose not to settle, you may appeal the noncompliance decision within 30 days of receipt of this notice, pursuant to §205.681(c) of the USDA organic regulations. Appeals must be filed in writing to:

Administrator, USDA, AMS
c/o NOP Appeals Staff
1400 Independence Avenue, SW
Room 2095-S, STOP 0203
Washington, DC 20250

If you have any questions regarding this notice, please contact Judith Ragonesi, Compliance Specialist, at (202) 205-5712 or judith.ragonesi2@ams.usda.gov.

Sincerely,



Matthew Michael, Director
Compliance and Enforcement Division
National Organic Program

Enclosure:

Settlement Agreement

SETTLEMENT AGREEMENT

THIS AGREEMENT is entered into by the United States Department of Agriculture (USDA) Agricultural Marketing Service (AMS), and , and any person responsibly connected with North Fork Specialty Kitchen, collectively referred to as the Parties.

USDA AMS and North Fork Specialty Kitchen have decided to settle the issues between them related to alleged violations of the Organic Foods Production Act of 1990 (7 U.S.C. §§ 6501 et seq.) (OFPA), and the regulations promulgated thereunder (7 CFR Part 205).

Accordingly, the Parties agree to the following:

1. The Secretary of Agriculture has jurisdiction in this matter.
2. USDA AMS agrees not to file a formal administrative complaint charging North Fork Specialty Kitchen with alleged violations of the OFPA and the regulations for any actions disclosed by the investigation that gave rise to this agreement.
3. North Fork Specialty Kitchen agrees to the following:
 - A. North Fork Specialty Kitchen has been given the opportunity for a hearing, and waives such hearing and further procedure for the purpose of settling these matters and for such purposes only.
 - B. North Fork Specialty Kitchen failure to comply with the terms of this Agreement shall automatically void paragraph number 2 above, and USDA AMS may thereafter institute enforcement proceedings against North Fork Specialty Kitchen, and pursue any and all remedies available under the OFPA and the USDA organic regulations.
 - C. North Fork Specialty Kitchen agrees to pay a reduced civil penalty of \$500 for alleged violations of the OFPA and the regulations, in full settlement of this matter.
 - D. North Fork Specialty Kitchen agrees to immediately cease and desist selling, labeling, or representing agricultural products in violation of the OFPA and the USDA organic regulations.

This Agreement shall become effective upon execution by the Parties.

Jeri Woodhouse
North Fork Specialty Kitchen

Date _____

Miles McEvoy
Deputy Administrator, National Organic Program
USDA Agricultural Marketing Service

Date _____

From: [Ragonesi, Judith - AMS](#)
To: [\(b\) \(6\) .com](#)
Subject: Notice to Cease and Desist NOPC 105-14 North Fork Specialty Kitchen
Date: Wednesday, December 10, 2014 2:11:00 PM
Attachments: [NOPC-105-14 CD.pdf](#)
[image001.png](#)
[Settlement Agreement.pdf](#)

Dear Ms. Woodhouse:

As per our conversation today, attached please find a Notice to Cease and Desist and a Proposed Settlement Agreement.

Should you have any questions please feel free to contact me.

Regards,

Judith



JUDITH RAGONESI | AGRICULTURE MARKETING SPECIALIST | COMPLIANCE & ENFORCEMENT DIVISION

USDA • AMS • NATIONAL ORGANIC PROGRAM | 1400 Independence Avenue SW | Washington, DC 20250 | phone: 202 684-5620

| ✉ Judith.ragonesi2@ams.usda.gov

From: [Lauren Lawrence](#)
To: [Ragonesi, Judith - AMS](#)
Cc: [Pat Huizing](#); [Jessica Terry](#)
Subject: RE: Complaint NFSK 105-14
Date: Tuesday, April 08, 2014 10:48:19 AM

Hi Judy,

I do not have exact number of how much product was packaged and labeled by NFSK. It was never approved so we did not have the audit trail documents on the amounts produced. Perhaps (b) (6) (b) (6) may be willing to share with us the amount that was produced for him. I also have photographs of the shelves at The Vine Street Café with the non compliant product in them. The photos have 30-40 visible products but, many more were in the shop that I did not get to photograph.

Let me know if you would like us to reach out to (b) (6) and see if he is willing to share any documentation with us or if you would like the pictures from Vine St. Café although I believe they were sent in the initial complaint.

Thanks,
Lauren

From: Ragonesi, Judith - AMS [mailto:Judith.Ragonesi2@ams.usda.gov]
Sent: Tuesday, April 08, 2014 10:08 AM
To: Lauren Lawrence
Subject: RE: Complaint NFSK 105-14

Hi Lauren:

Thank you so much for the prompt response. I was wondering if you knew how much of the Bottlehouse product was packaged and labeled by North Fork Specialty Kitchen?

Thank you again-
Judy

From: Lauren Lawrence [mailto:lauren@nofany.org]
Sent: Tuesday, April 08, 2014 9:53 AM
To: Ragonesi, Judith - AMS
Cc: Jessica Terry; Pat Huizing
Subject: Complaint NFSK 105-14
Importance: High

Hi Judith:

Attached are the items that you requested when we spoke on the phone. I also included the determination notification indicating that the certification is pending the receipt of the audit trail documents.

If I can be of any further assistance or provide you with any additional documentation please let me know.

Kind Regards,

Lauren Lawrence
NOFA-NY Certified Organic, LLC
840 Upper Front Street
Binghamton, New York 13905
Phone: 607-724-9851
Fax: 607-724-9853

The information in this email message and any attachment thereto, are confidential and may contain privileged information intended only for the use of the addressee. If you are not the intended recipient, please notify the sender by return e-mail immediately and delete this message and any attachment from your system. Furthermore, if you are not the intended recipient, you are prohibited from, and it may be unlawful to copy, distribute or disclose this message or attachment or take any action or omit to take action in reliance on it. Neither the sender nor NOFA-NY Certified Organic, LLC, the company to which the sender belongs, accepts any responsibility for any use or misuse of this message or any attachment.

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

From: [Ragonesi, Judith - AMS](#)
To: [Lauren Lawrence](#)
Subject: RE: Complaint NFSK 105-14
Date: Tuesday, April 08, 2014 11:06:00 AM

Hi Lauren:

If (b) (6) will provide you the approximate amount of products that were packed and labeled by NFSK, that would be very helpful. The amount of product produced and labeled, helps us to determine the civil penalty amount. Right now I don't need any additional pictures, but thank you very much for asking.

Judy

From: Lauren Lawrence [mailto:lauren@nofany.org]
Sent: Tuesday, April 08, 2014 10:48 AM
To: Ragonesi, Judith - AMS
Cc: Pat Huizing; Jessica Terry
Subject: RE: Complaint NFSK 105-14

Hi Judy,

I do not have exact number of how much product was packaged and labeled by NFSK. It was never approved so we did not have the audit trail documents on the amounts produced. Perhaps (b) (6) (b) (6) may be willing to share with us the amount that was produced for him. I also have photographs of the shelves at The Vine Street Café with the non compliant product in them. The photos have 30-40 visible products but, many more were in the shop that I did not get to photograph.

Let me know if you would like us to reach out to (b) (6) and see if he is willing to share any documentation with us or if you would like the pictures from Vine St. Café although I believe they were sent in the initial complaint.

Thanks,
Lauren

From: Ragonesi, Judith - AMS [mailto:Judith.Ragonesi2@ams.usda.gov]
Sent: Tuesday, April 08, 2014 10:08 AM
To: Lauren Lawrence
Subject: RE: Complaint NFSK 105-14

Hi Lauren:

Thank you so much for the prompt response. I was wondering if you knew how much of the Bottlehouse product was packaged and labeled by North Fork Specialty Kitchen?

Thank you again-
Judy

From: Lauren Lawrence [<mailto:lauren@nofany.org>]
Sent: Tuesday, April 08, 2014 9:53 AM
To: Ragonesi, Judith - AMS
Cc: Jessica Terry; Pat Huizing
Subject: Complaint NFSK 105-14
Importance: High

Hi Judith:

Attached are the items that you requested when we spoke on the phone. I also included the determination notification indicating that the certification is pending the receipt of the audit trail documents.

If I can be of any further assistance or provide you with any additional documentation please let me know.

Kind Regards,

Lauren Lawrence
NOFA-NY Certified Organic, LLC
840 Upper Front Street
Binghamton, New York 13905
Phone: 607-724-9851
Fax: 607-724-9853

The information in this email message and any attachment thereto, are confidential and may contain privileged information intended only for the use of the addressee. If you are not the intended recipient, please notify the sender by return e-mail immediately and delete this message and any attachment from your system. Furthermore, if you are not the intended recipient, you are prohibited from, and it may be unlawful to copy, distribute or disclose this message or attachment or take any action or omit to take action in reliance on it. Neither the sender nor NOFA-NY Certified Organic, LLC, the company to which the sender belongs, accepts any responsibility for any use or misuse of this message or any attachment.

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

From: [Lauren Lawrence](#)
To: [Ragonesi, Judith - AMS](#)
Subject: RE: Complaint NFSK 105-14
Date: Thursday, April 24, 2014 7:55:30 AM

Good Morning Judy:

I heard back from (b) (6) regarding the amount of products that were packed and labeled at NFSK. His response is below. Let me know if you need any additional information.

Have a great day,
Lauren

I've done the best I can to come up with ball park numbers regarding what NFSK produced for us with a USDA Certified Organic label. From what I can tell, the total number of cases (12 bottles per case) is between 65-80 cases. Roughly 50% of which was comprised of the steak sauce, and the remaining 50% equally split between the remaining three sauces.

From: Ragonesi, Judith - AMS [mailto:Judith.Ragonesi2@ams.usda.gov]
Sent: Tuesday, April 08, 2014 11:06 AM
To: Lauren Lawrence
Subject: RE: Complaint NFSK 105-14

Hi Lauren:

If (b) (6) will provide you the approximate amount of products that were packed and labeled by NFSK, that would be very helpful. The amount of product produced and labeled, helps us to determine the civil penalty amount. Right now I don't need any additional pictures, but thank you very much for asking.

Judy

From: Lauren Lawrence [mailto:lauren@nofany.org]
Sent: Tuesday, April 08, 2014 10:48 AM
To: Ragonesi, Judith - AMS
Cc: Pat Huizing; Jessica Terry
Subject: RE: Complaint NFSK 105-14

Hi Judy,

I do not have exact number of how much product was packaged and labeled by NFSK. It was never approved so we did not have the audit trail documents on the amounts produced. Perhaps (b) (6) (b) (6) may be willing to share with us the amount that was produced for him. I also have photographs of the shelves at The Vine Street Café with the non compliant product in them. The photos have 30-40 visible products but, many more were in the shop that I did not get to photograph.

Let me know if you would like us to reach out to (b) (6) and see if he is willing to share any documentation with us or if you would like the pictures from Vine St. Café although I believe they were sent in the initial complaint.

Thanks,
Lauren

From: Ragonesi, Judith - AMS [<mailto:Judith.Ragonesi2@ams.usda.gov>]
Sent: Tuesday, April 08, 2014 10:08 AM
To: Lauren Lawrence
Subject: RE: Complaint NFSK 105-14

Hi Lauren:

Thank you so much for the prompt response. I was wondering if you knew how much of the Bottlehouse product was packaged and labeled by North Fork Specialty Kitchen?

Thank you again-
Judy

From: Lauren Lawrence [<mailto:lauren@nofany.org>]
Sent: Tuesday, April 08, 2014 9:53 AM
To: Ragonesi, Judith - AMS
Cc: Jessica Terry; Pat Huizing
Subject: Complaint NFSK 105-14
Importance: High

Hi Judith:

Attached are the items that you requested when we spoke on the phone. I also included the determination notification indicating that the certification is pending the receipt of the audit trail documents.

If I can be of any further assistance or provide you with any additional documentation please let me know.

Kind Regards,

Lauren Lawrence
NOFA-NY Certified Organic, LLC
840 Upper Front Street
Binghamton, New York 13905
Phone: 607-724-9851
Fax: 607-724-9853

The information in this email message and any attachment thereto, are confidential and may contain

privileged information intended only for the use of the addressee. If you are not the intended recipient, please notify the sender by return e-mail immediately and delete this message and any attachment from your system. Furthermore, if you are not the intended recipient, you are prohibited from, and it may be unlawful to copy, distribute or disclose this message or attachment or take any action or omit to take action in reliance on it. Neither the sender nor NOFA-NY Certified Organic, LLC, the company to which the sender belongs, accepts any responsibility for any use or misuse of this message or any attachment.

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

From: [Ragonesi, Judith - AMS](#)
To: [Lauren Lawrence](#)
Subject: RE: Complaint NFSK 105-14
Date: Thursday, April 24, 2014 8:15:00 AM

Thank you!

From: Lauren Lawrence [<mailto:lauren@nofany.org>]
Sent: Thursday, April 24, 2014 7:55 AM
To: Ragonesi, Judith - AMS
Subject: RE: Complaint NFSK 105-14

Good Morning Judy:

I heard back from (b) (6) regarding the amount of products that were packed and labeled at NFSK. His response is below. Let me know if you need any additional information.

Have a great day,
Lauren

I've done the best I can to come up with ball park numbers regarding what NFSK produced for us with a USDA Certified Organic label. From what I can tell, the total number of cases (12bottles per case) is between 65-80 cases. Roughly 50% of which was comprised of the steak sauce, and the remaining 50% equally split between the remaining three sauces.

From: Ragonesi, Judith - AMS [<mailto:Judith.Ragonesi2@ams.usda.gov>]
Sent: Tuesday, April 08, 2014 11:06 AM
To: Lauren Lawrence
Subject: RE: Complaint NFSK 105-14

Hi Lauren:

If (b) (6) will provide you the approximate amount of products that were packed and labeled by NFSK, that would be very helpful. The amount of product produced and labeled, helps us to determine the civil penalty amount. Right now I don't need any additional pictures, but thank you very much for asking.

Judy

From: Lauren Lawrence [<mailto:lauren@nofany.org>]
Sent: Tuesday, April 08, 2014 10:48 AM
To: Ragonesi, Judith - AMS
Cc: Pat Huizing; Jessica Terry
Subject: RE: Complaint NFSK 105-14

Hi Judy,

I do not have exact number of how much product was packaged and labeled by NFSK. It was never approved so we did not have the audit trail documents on the amounts produced. Perhaps (b) (6) (b) (6) may be willing to share with us the amount that was produced for him. I also have photographs of the shelves at The Vine Street Café with the non compliant product in them. The photos have 30-40 visible products but, many more were in the shop that I did not get to photograph.

Let me know if you would like us to reach out to (b) (6) and see if he is willing to share any documentation with us or if you would like the pictures from Vine St. Café although I believe they were sent in the initial complaint.

Thanks,
Lauren

From: Ragonesi, Judith - AMS [<mailto:Judith.Ragonesi2@ams.usda.gov>]
Sent: Tuesday, April 08, 2014 10:08 AM
To: Lauren Lawrence
Subject: RE: Complaint NFSK 105-14

Hi Lauren:

Thank you so much for the prompt response. I was wondering if you knew how much of the Bottlehouse product was packaged and labeled by North Fork Specialty Kitchen?

Thank you again-
Judy

From: Lauren Lawrence [<mailto:lauren@nofany.org>]
Sent: Tuesday, April 08, 2014 9:53 AM
To: Ragonesi, Judith - AMS
Cc: Jessica Terry; Pat Huizing
Subject: Complaint NFSK 105-14
Importance: High

Hi Judith:

Attached are the items that you requested when we spoke on the phone. I also included the determination notification indicating that the certification is pending the receipt of the audit trail documents.

If I can be of any further assistance or provide you with any additional documentation please let me know.

Kind Regards,

Lauren Lawrence

NOFA-NY Certified Organic, LLC
840 Upper Front Street
Binghamton, New York 13905
Phone: 607-724-9851
Fax: 607-724-9853

The information in this email message and any attachment thereto, are confidential and may contain privileged information intended only for the use of the addressee. If you are not the intended recipient, please notify the sender by return e-mail immediately and delete this message and any attachment from your system. Furthermore, if you are not the intended recipient, you are prohibited from, and it may be unlawful to copy, distribute or disclose this message or attachment or take any action or omit to take action in reliance on it. Neither the sender nor NOFA-NY Certified Organic, LLC, the company to which the sender belongs, accepts any responsibility for any use or misuse of this message or any attachment.

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

From: [Ragonesi, Judith - AMS](#)
To: [Lauren Lawrence](#)
Subject: RE: Complaint NFSK 105-14
Date: Tuesday, April 08, 2014 10:08:00 AM

Hi Lauren:

Thank you so much for the prompt response. I was wondering if you knew how much of the Bottlehouse product was packaged and labeled by North Fork Specialty Kitchen?

Thank you again-
Judy

From: Lauren Lawrence [mailto:lauren@nofany.org]
Sent: Tuesday, April 08, 2014 9:53 AM
To: Ragonesi, Judith - AMS
Cc: Jessica Terry; Pat Huizing
Subject: Complaint NFSK 105-14
Importance: High

Hi Judith:

Attached are the items that you requested when we spoke on the phone. I also included the determination notification indicating that the certification is pending the receipt of the audit trail documents.

If I can be of any further assistance or provide you with any additional documentation please let me know.

Kind Regards,

Lauren Lawrence
NOFA-NY Certified Organic, LLC
840 Upper Front Street
Binghamton, New York 13905
Phone: 607-724-9851
Fax: 607-724-9853

The information in this email message and any attachment thereto, are confidential and may contain privileged information intended only for the use of the addressee. If you are not the intended recipient, please notify the sender by return e-mail immediately and delete this message and any attachment from your system. Furthermore, if you are not the intended recipient, you are prohibited from, and it may be unlawful to copy, distribute or disclose this message or attachment or take any action or omit to take action in reliance on it. Neither the sender nor NOFA-NY Certified Organic, LLC, the company to which the sender belongs, accepts any responsibility for any use or misuse of this message or any attachment.

From: [Lauren Lawrence](#)
To: [Ragonesi, Judith - AMS](#)
Cc: [Pat Huizing](#); [Jessica Terry](#)
Subject: RE: Complaint NFSK 105-14
Date: Tuesday, April 08, 2014 10:48:19 AM

Hi Judy,

I do not have exact number of how much product was packaged and labeled by NFSK. It was never approved so we did not have the audit trail documents on the amounts produced. Perhaps (b) (6) (b) (6) may be willing to share with us the amount that was produced for him. I also have photographs of the shelves at The Vine Street Café with the non compliant product in them. The photos have 30-40 visible products but, many more were in the shop that I did not get to photograph.

Let me know if you would like us to reach out to (b) (6) and see if he is willing to share any documentation with us or if you would like the pictures from Vine St. Café although I believe they were sent in the initial complaint.

Thanks,
Lauren

From: Ragonesi, Judith - AMS [mailto:Judith.Ragonesi2@ams.usda.gov]
Sent: Tuesday, April 08, 2014 10:08 AM
To: Lauren Lawrence
Subject: RE: Complaint NFSK 105-14

Hi Lauren:

Thank you so much for the prompt response. I was wondering if you knew how much of the Bottlehouse product was packaged and labeled by North Fork Specialty Kitchen?

Thank you again-
Judy

From: Lauren Lawrence [mailto:lauren@nofany.org]
Sent: Tuesday, April 08, 2014 9:53 AM
To: Ragonesi, Judith - AMS
Cc: Jessica Terry; Pat Huizing
Subject: Complaint NFSK 105-14
Importance: High

Hi Judith:

Attached are the items that you requested when we spoke on the phone. I also included the determination notification indicating that the certification is pending the receipt of the audit trail documents.

If I can be of any further assistance or provide you with any additional documentation please let me know.

Kind Regards,

Lauren Lawrence
NOFA-NY Certified Organic, LLC
840 Upper Front Street
Binghamton, New York 13905
Phone: 607-724-9851
Fax: 607-724-9853

The information in this email message and any attachment thereto, are confidential and may contain privileged information intended only for the use of the addressee. If you are not the intended recipient, please notify the sender by return e-mail immediately and delete this message and any attachment from your system. Furthermore, if you are not the intended recipient, you are prohibited from, and it may be unlawful to copy, distribute or disclose this message or attachment or take any action or omit to take action in reliance on it. Neither the sender nor NOFA-NY Certified Organic, LLC, the company to which the sender belongs, accepts any responsibility for any use or misuse of this message or any attachment.

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

From: [Ragonesi, Judith - AMS](#)
To: (b) (6) [.com.rpost.org](#)
Subject: RE: Notice to Cease and Desist NOPC 105-14 North Fork Specialty Kitchen
Date: Monday, December 22, 2014 10:48:27 AM
Attachments: [image001.png](#)
[regdata.txt](#)
Importance: High

Dear Ms. Woodhouse:

The civil penalties have been removed from the proposed settlement agreement (please see attached). Please read the proposed settlement agreement, print it, sign and date it; and scan and return it via email to me or mail it to:

USDA, National Organic Program
Compliance & Enforcement Division
1400 Independence Ave. SW
Room 2648-S, Mail Stop 0268
Washington, D.C. 20250-0268

Please return the signed agreement no later than January 9th, 2015. Should you have any questions please feel free to contact me at 202 684-5620.

Thank you,

Judith Ragonesi



JUDITH RAGONESI | AGRICULTURE MARKETING SPECIALIST | COMPLIANCE & ENFORCEMENT DIVISION

USDA • AMS • NATIONAL ORGANIC PROGRAM | 1400 Independence Avenue SW | Washington, DC 20250 | phone: [202 684-5620](tel:2026845620)

| ✉ Judith.ragonesi2@ams.usda.gov

From: Jerilyn Woodhouse [mailto:(b) (6) [.com](#)]
Sent: Wednesday, December 10, 2014 5:18 PM
To: Ragonesi, Judith - AMS
Subject: Re: Notice to Cease and Desist NOPC 105-14 North Fork Specialty Kitchen

Thank you, Judith

I received and read the notice and agreement.

I no longer produce or sell products labeled certified organic by NOFA-NY. All products labeled for Vine Street Cafe and Blue Canoe were returned to the client who had failed to provide me with the information necessary to produce them in compliance with the regulations.

On Wed, Dec 10, 2014 at 2:12 PM, Ragonesi, Judith - AMS <Judith.Ragonesi2@ams.usda.gov> wrote:

Dear Ms. Woodhouse:

As per our conversation today, attached please find a Notice to Cease and Desist and a Proposed Settlement Agreement.

Should you have any questions please feel free to contact me.

Regards,

Judith



JUDITH RAGONESI | AGRICULTURE MARKETING SPECIALIST | COMPLIANCE & ENFORCEMENT DIVISION

USDA • AMS • NATIONAL ORGANIC PROGRAM | 1400 Independence Avenue SW | Washington, DC 20250 | phone: [202.684-5620](tel:2026845620)

| ✉ Judith.ragonesi2@ams.usda.gov

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

From: [Jerilyn Woodhouse](#)
To: [Ragonesi, Judith - AMS](#)
Subject: Re: Notice to Cease and Desist NOPC 105-14 North Fork Specialty Kitchen
Date: Wednesday, December 10, 2014 5:18:16 PM
Attachments: [image001.png](#)

Thank you, Judith

I received and read the notice and agreement.

I no longer produce or sell products labeled certified organic by NOFA-NY. All products labeled for Vine Street Cafe and Blue Canoe were returned to the client who had failed to provide me with the information necessary to produce them in compliance with the regulations.

On Wed, Dec 10, 2014 at 2:12 PM, Ragonesi, Judith - AMS <Judith.Ragonesi2@ams.usda.gov> wrote:

Dear Ms. Woodhouse:

As per our conversation today, attached please find a Notice to Cease and Desist and a Proposed Settlement Agreement.

Should you have any questions please feel free to contact me.

Regards,

Judith



JUDITH RAGONESI | AGRICULTURE MARKETING SPECIALIST | COMPLIANCE & ENFORCEMENT DIVISION

USDA • AMS • NATIONAL ORGANIC PROGRAM | 1400 Independence Avenue SW | Washington, DC 20250 | phone: [202 684-5620](tel:2026845620) | ✉ Judith.ragonesi2@ams.usda.gov

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

SETTLEMENT AGREEMENT

THIS AGREEMENT is entered into by the United States Department of Agriculture (USDA) Agricultural Marketing Service (AMS), and , and any person responsibly connected with North Fork Specialty Kitchen, collectively referred to as the Parties.

USDA AMS and North Fork Specialty Kitchen have decided to settle the issues between them related to alleged violations of the Organic Foods Production Act of 1990 (7 U.S.C. §§ 6501 et seq.) (OFPA), and the regulations promulgated thereunder (7 CFR Part 205).

Accordingly, the Parties agree to the following:

1. The Secretary of Agriculture has jurisdiction in this matter.
2. USDA AMS agrees not to file a formal administrative complaint charging North Fork Specialty Kitchen with alleged violations of the OFPA and the regulations for any actions disclosed by the investigation that gave rise to this agreement.
3. North Fork Specialty Kitchen agrees to the following:
 - A. North Fork Specialty Kitchen has been given the opportunity for a hearing, and waives such hearing and further procedure for the purpose of settling these matters and for such purposes only.
 - B. North Fork Specialty Kitchen failure to comply with the terms of this Agreement shall automatically void paragraph number 2 above, and USDA AMS may thereafter institute enforcement proceedings against North Fork Specialty Kitchen, and pursue any and all remedies available under the OFPA and the USDA organic regulations.
 - C. North Fork Specialty Kitchen agrees to immediately cease and desist selling, labeling, or representing agricultural products in violation of the OFPA and the USDA organic regulations.

This Agreement shall become effective upon execution by the Parties.

Jeri Woodhouse
North Fork Specialty Kitchen

Date _____

Miles McEvoy
Deputy Administrator, National Organic Program
USDA Agricultural Marketing Service

Date _____

From: [Ragonesi, Judith - AMS](#)
To: [Jerilyn Woodhouse](#)
Subject: RE: Notice to Cease and Desist NOPC 105-14 North Fork Specialty Kitchen
Date: Monday, December 22, 2014 1:43:00 PM
Attachments: [image001.png](#)
[Settlement Agreement revised 12-22-2014.pdf](#)
Importance: High

Dear Ms. Woodhouse:

The civil penalties have been removed from the proposed settlement agreement (please see attached). Please read the proposed settlement agreement, print it, sign and date it; and scan and return it via email to me or mail it to:

USDA, National Organic Program
Compliance & Enforcement Division
1400 Independence Ave. SW
Room 2648-S, Mail Stop 0268
Washington, D.C. 20250-0268

Please return the signed agreement no later than January 9th, 2015. Should you have any questions please feel free to contact me at 202 684-5620.

Thank you,

Judith Ragonesi



JUDITH RAGONESI | AGRICULTURE MARKETING SPECIALIST | COMPLIANCE & ENFORCEMENT DIVISION

USDA • AMS • NATIONAL ORGANIC PROGRAM | 1400 Independence Avenue SW | Washington, DC 20250 | phone: [202 684-5620](tel:2026845620)
| ✉ Judith.ragonesi2@ams.usda.gov

From: Jerilyn Woodhouse [[mailto:\(b\) \(6\)@ams.usda.gov](#)]
Sent: Wednesday, December 10, 2014 5:18 PM
To: Ragonesi, Judith - AMS
Subject: Re: Notice to Cease and Desist NOPC 105-14 North Fork Specialty Kitchen

Thank you, Judith

I received and read the notice and agreement.

I no longer produce or sell products labeled certified organic by NOFA-NY. All products labeled for Vine Street Cafe and Blue Canoe were returned to the client who had failed to provide me with the information necessary to produce them in compliance with the regulations.

On Wed, Dec 10, 2014 at 2:12 PM, Ragonesi, Judith - AMS <Judith.Ragonesi2@ams.usda.gov> wrote:

Dear Ms. Woodhouse:

As per our conversation today, attached please find a Notice to Cease and Desist and a Proposed Settlement Agreement.
Should you have any questions please feel free to contact me.

Regards,

Judith



JUDITH RAGONESI | AGRICULTURE MARKETING SPECIALIST | COMPLIANCE & ENFORCEMENT DIVISION

USDA • AMS • NATIONAL ORGANIC PROGRAM | 1400 Independence Avenue SW | Washington, DC 20250 | phone: [202.684-5620](tel:2026845620)

| ✉ Judith.ragonesi2@ams.usda.gov

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

From: [Ragonesi, Judith - AMS](#)
To: (b) (6)
Subject: RE: Response to your inquiry
Date: Thursday, April 24, 2014 8:36:00 AM

Thank you!

From: (b) (6) [mailto:(b) (6).com]
Sent: Wednesday, April 23, 2014 3:00 PM
To: Ragonesi, Judith - AMS
Subject: Response to your inquiry

Hello Judith,

This is (b) (6) responding to your inquiry regarding non-compliant organic production at North Fork Specialty Kitchen, Cutchogue, New York.

I've done the best I can to come up with ball park numbers regarding what NFSK produced for us with a USDA Certified Organic label. From what I can tell, the total number of cases (12 bottles per case) is between 65-80 cases. Roughly 50% of which was comprised of the steak sauce, and the remaining 50% equally split between our remaining three sauces.

I hope you find this information useful, please let me know if I can help further.

Sincerely,

(b) (6)



To authenticate this receipt, forward this email with its attachment to 'verify@rpost.net'

*UTC represents Coordinated Universal Time.

Message Statistics	
Message ID:	02139AFAAF9E43623ECF818464FF41D37890971C
Message Size:	72696
Additional Notes:	

Delivery Audit Trail
<p>From:postmaster@mta1.la1.rpost.net:Hello, this is the mail server on mta1.la1.rpost.net. I am sending you this message to inform you on the delivery status of a message you previously sent. Immediately below you will find a list of the affected recipients; also attached is a Delivery Status Notification (DSN) report in standard format, as well as the headers of the original message. relayed to mailer gmail-smtp-in.l.google.com (74.125.28.26)</p>
<p>From:opendetection@rpost.net:From:postmaster@mta1.la1.rpost.net:Hello, this is the mail server on mta1.la1.rpost.net. I am sending you this message to inform you on the delivery status of a message you previously sent. Immediately below you will find a list of the affected recipients; also attached is a Delivery Status Notification (DSN) report in standard format, as well as the headers of the original message. relayed to mailer gmail-smtp-in.l.google.com (74.125.28.26) Opened from IP 66.249.83.242 \n ---- Connection: Keep-alive Content-Length: 0 Accept-Encoding: gzip,deflate Host: open.rpost.net User-Agent: Mozilla/5.0 (Windows NT 5.1; rv:11.0) Gecko Firefox/11.0 (via ggpht.com GoogleImageProxy) /LM/W3SVC/3/ROOTE:\Open Detection\n \n \n \n \n \n CGI/1.1offn 3/LM/W3SVC/3\n 64.70.1.89/rpost.aspxE:\Open Detection\rpost.aspx404;http://open.rpost.net:80/02139AFAAF9E43623ECF818464FF41D37890971C-1_E32960694F0BB43799B27ED0E679CA36E70B3373/rpost.gif\n 66.249.83.24266.249.83.24237420GET\n /rpost.aspxopen.rpost.net800\n HTTP/1.1Microsoft-IIS/7.5/rpost.aspxKeep-alive\n 0gzip,deflateopen.rpost.netMozilla/5.0 (Windows NT 5.1; rv:11.0) Gecko Firefox/11.0 (via ggpht.com GoogleImageProxy)</p>
<p>2014-12-22 07:58:19 starting gmail.com/mta1\n 2014-12-22 07:58:19 connecting from mta1.la1.rpost.net (64.70.1.107) to gmail-smtp-in.l.google.com (74.125.28.26)\n 2014-12-22 07:58:19 connected from 64.70.1.107:54558\n 2014-12-22 07:58:19 >>> 220 mx.google.com ESMTP aw10si25725485pbd.53 - gsmt\n 2014-12-22 07:58:19 <<< EHLO mta1.la1.rpost.net\n 2014-12-22 07:58:19 >>> 250-mx.google.com at your service, [64.70.1.107]\n 2014-12-22 07:58:19 >>> 250-SIZE 35882577\n 2014-12-22 07:58:19 >>> 250-8BITMIME\n 2014-12-22 07:58:19 >>> 250-STARTTLS\n 2014-12-22 07:58:19 >>> 250-ENHANCEDSTATUSCODES\n 2014-12-22 07:58:19 >>> 250-PIPELINING\n 2014-12-22 07:58:19 >>> 250-CHUNKING\n 2014-12-22 07:58:19 >>> 250 SMTPUTF8\n 2014-12-22 07:58:19 <<< MAIL FROM: <rcpt02139AFAAF9E43623ECF818464FF41D37890971C-1@rpost.net> BODY=7BIT\n 2014-12-22 07:58:19 <<< RCPT TO:</p>

(b) (6) .com>\n 2014-12-22 07:58:19 <<< DATA\n 2014-12-22 07:58:19 >>> 250 2.1.0 OK
aw10si25725485pbd.53 - gsmtpl\n 2014-12-22 07:58:19 >>> 250 2.1.5 OK aw10si25725485pbd.53 - gsmtpl\n 2014-12-22
07:58:19 >>> 354 Go ahead aw10si25725485pbd.53 - gsmtpl\n 2014-12-22 07:58:20 <<< .\n 2014-12-22 07:58:20 >>> 250
2.0.0 OK 1419263899 aw10si25725485pbd.53 - gsmtpl\n 2014-12-22 07:58:20 <<< QUIT\n 2014-12-22 07:58:20 >>> 221 2.0.0
closing connection aw10si25725485pbd.53 - gsmtpl\n 2014-12-22 07:58:20 closed gmail-smtp-in.l.google.com (74.125.28.26)
in=463 out=60520\n 2014-12-22 07:58:20 done gmail.com/mta1

This Registered Receipt email is verifiable proof of your Registered Email transaction. It contains:

1. An official time stamp.
2. Proof that your message was sent and to whom it was sent.
3. Proof that your message was delivered to its addressees or their authorized electronic agents.
4. Proof of the content of your original message and all of its attachments.

Note: By default, RPost does not retain a copy of your email or this receipt and you should not rely on the information above until the receipt is verified with RPost. Keep this email and its attachment in place for your records. General terms and conditions are available at the RPost [Legal Notice](#) web page.

For more information about RPost services, visit www.rpost.com.

An RPost Service

From: (b) (6)
To: [Ragonesi, Judith - AMS](#)
Subject: Response to your inquiry
Date: Wednesday, April 23, 2014 3:00:32 PM

Hello Judith,

This is (b) (6) responding to your inquiry regarding non-compliant organic production at North Fork Specialty Kitchen, Cutchogue, New York.

I've done the best I can to come up with ball park numbers regarding what NFSK produced for us with a USDA Certified Organic label. From what I can tell, the total number of cases (12bottles per case) is between 65-80 cases. Roughly 50% of which was comprised of the steak sauce, and the remaining 50% equally split between our remaining three sauces.

I hope you find this information useful, please let me know if I can help further.

Sincerely,

(b) (6)

SETTLEMENT AGREEMENT

THIS AGREEMENT is entered into by the United States Department of Agriculture (USDA) Agricultural Marketing Service (AMS), and , and any person responsibly connected with North Fork Specialty Kitchen, collectively referred to as the Parties.

USDA AMS and North Fork Specialty Kitchen have decided to settle the issues between them related to alleged violations of the Organic Foods Production Act of 1990 (7 U.S.C. §§ 6501 et seq.) (OFPA), and the regulations promulgated thereunder (7 CFR Part 205).

Accordingly, the Parties agree to the following:

1. The Secretary of Agriculture has jurisdiction in this matter.
2. USDA AMS agrees not to file a formal administrative complaint charging North Fork Specialty Kitchen with alleged violations of the OFPA and the regulations for any actions disclosed by the investigation that gave rise to this agreement.
3. North Fork Specialty Kitchen agrees to the following:
 - A. North Fork Specialty Kitchen has been given the opportunity for a hearing, and waives such hearing and further procedure for the purpose of settling these matters and for such purposes only.
 - B. North Fork Specialty Kitchen failure to comply with the terms of this Agreement shall automatically void paragraph number 2 above, and USDA AMS may thereafter institute enforcement proceedings against North Fork Specialty Kitchen, and pursue any and all remedies available under the OFPA and the USDA organic regulations.
 - C. North Fork Specialty Kitchen agrees to immediately cease and desist selling, labeling, or representing agricultural products in violation of the OFPA and the USDA organic regulations.

This Agreement shall become effective upon execution by the Parties.

Jeri Woodhouse
North Fork Specialty Kitchen

Date _____

Miles McEvoy
Deputy Administrator, National Organic Program
USDA Agricultural Marketing Service

Date _____

SETTLEMENT AGREEMENT

THIS AGREEMENT is entered into by the United States Department of Agriculture (USDA) Agricultural Marketing Service (AMS), and , and any person responsibly connected with North Fork Specialty Kitchen, collectively referred to as the Parties.

USDA AMS and North Fork Specialty Kitchen have decided to settle the issues between them related to alleged violations of the Organic Foods Production Act of 1990 (7 U.S.C. §§ 6501 et seq.) (OFPA), and the regulations promulgated thereunder (7 CFR Part 205).

Accordingly, the Parties agree to the following:

1. The Secretary of Agriculture has jurisdiction in this matter.
2. USDA AMS agrees not to file a formal administrative complaint charging North Fork Specialty Kitchen with alleged violations of the OFPA and the regulations for any actions disclosed by the investigation that gave rise to this agreement.
3. North Fork Specialty Kitchen agrees to the following:
 - A. North Fork Specialty Kitchen has been given the opportunity for a hearing, and waives such hearing and further procedure for the purpose of settling these matters and for such purposes only.
 - B. North Fork Specialty Kitchen failure to comply with the terms of this Agreement shall automatically void paragraph number 2 above, and USDA AMS may thereafter institute enforcement proceedings against North Fork Specialty Kitchen, and pursue any and all remedies available under the OFPA and the USDA organic regulations.
 - C. North Fork Specialty Kitchen agrees to pay a reduced civil penalty of \$500 for alleged violations of the OFPA and the regulations, in full settlement of this matter.
 - D. North Fork Specialty Kitchen agrees to immediately cease and desist selling, labeling, or representing agricultural products in violation of the OFPA and the USDA organic regulations.

This Agreement shall become effective upon execution by the Parties.

Jeri Woodhouse
North Fork Specialty Kitchen

Date _____

Miles McEvoy
Deputy Administrator, National Organic Program
USDA Agricultural Marketing Service

Date _____

SETTLEMENT AGREEMENT

THIS AGREEMENT is entered into by the United States Department of Agriculture (USDA) Agricultural Marketing Service (AMS), and , and any person responsibly connected with North Fork Specialty Kitchen, collectively referred to as the Parties.

USDA AMS and North Fork Specialty Kitchen have decided to settle the issues between them related to alleged violations of the Organic Foods Production Act of 1990 (7 U.S.C. §§ 6501 et seq.) (OFPA), and the regulations promulgated thereunder (7 CFR Part 205).

Accordingly, the Parties agree to the following:

1. The Secretary of Agriculture has jurisdiction in this matter.
2. USDA AMS agrees not to file a formal administrative complaint charging North Fork Specialty Kitchen with alleged violations of the OFPA and the regulations for any actions disclosed by the investigation that gave rise to this agreement.
3. North Fork Specialty Kitchen agrees to the following:
 - A. North Fork Specialty Kitchen has been given the opportunity for a hearing, and waives such hearing and further procedure for the purpose of settling these matters and for such purposes only.
 - B. North Fork Specialty Kitchen failure to comply with the terms of this Agreement shall automatically void paragraph number 2 above, and USDA AMS may thereafter institute enforcement proceedings against North Fork Specialty Kitchen, and pursue any and all remedies available under the OFPA and the USDA organic regulations.
 - C. North Fork Specialty Kitchen agrees to immediately cease and desist selling, labeling, or representing agricultural products in violation of the OFPA and the USDA organic regulations.

This Agreement shall become effective upon execution by the Parties.

(b) (6)

(b) (6)

Ben Woodhouse

North Fork Specialty Kitchen

Gift Tucker FORM

Miles McEvoy

Deputy Administrator, National Organic Program

USDA Agricultural Marketing Service

Date 3.16.15

Date 3.17.15

International Certification Services, Inc.

301 5th Ave Southeast, Medina, North Dakota 58467 USA

Ph: (701) 486-3578 Fax: (701) 486-3580

E-mail: info@ics-intl.com Website: www.ics-intl.com

APPROVAL OF ORGANIC CERTIFICATION

April 5, 2016

Honey Girl Organics LLC
Honey Girl Organics
59-486 Alapio Rd
Haleiwa, Hawaii 96712

Dear Christina Sirlin:

Thank you for taking time with our inspector during our most recent inspection visit of your operation. The Certification Team has reviewed the inspector's report and your full certification file, and is pleased to continue certification to the NOP program, and verify compliance with the US-Canada Organic Export Equivalency Arrangement. Please review the enclosed schedule for a list of products included in your certification.

Enclosed you will find the following:

1. REVISED Schedule of Organic Operation (includes all programs of operation)

Based on our review of your responses and website updates and our review of your Organic System Plan (OSP), we wish to communicate our findings to you. The **following Conditions for Continued Certification** are considered reminders in ensuring your OSP is maintained accurate and up-to-date. Please address these issues in your next annual OSP update or on an ongoing basis, as appropriate.

1. **Honey Girl Organics Japanese website Main page**
<<http://www.honeygirlorganics.jp/>>: **Labels displayed here do not meet the requirements of the US-Japan Organic Export Equivalency Arrangement (US-JOE).** See below for details.
 - A. **H-2-Product Specification Sheets: Honey Girl After Sun Rejuvenating Face and Body Lotion; Beautiful Skin Care Rejuvenating Face & Eye Cream: US-Japan Export Requirements**
 - a. Products certified as "organic" in the U.S. that meet the terms of the arrangement may be sold as "organic" in Japan. Plants, including fungi, and plant-based processed product labels must include the JAS organic seal and may also include the USDA organic seal.
 - b. U.S. exporters may apply the JAS logo to their plants or plant-based processed products in one of two ways:
 - i. U.S. exporters who have a contract with a JAS-certified importer may apply the JAS logo to their products directly for sale in either Japan or the U.S. To view a list of JAS-certified importers, see <http://bit.ly/importers-jas>.
 - ii. U.S. exporters who do not have a contract with a JAS-certified importer may not apply the JAS logo to their products prior to

export. A JAS-certified importer must import the product, and that importer must apply the JAS logo to the product prior to sale within Japan.

- c. All organic plant, including fungi, and plant-based processed products exported from the U.S. to Japan must be accompanied by an export certificate. To view the USDA's TM-11 export certificate, see <http://bit.ly/usda-organic-export>.

Approval of two products previously approved under the US-Japan Organic Equivalency Arrangement (US-JOEA) has been rescinded. No TM-11 export certificates have been requested to date. Ensure that product labels intended for shipment to Japan meet US-JOEA requirements prior to use on product/in stream of commerce/shipment to Japan.

ICS appreciates working with you and is always looking for ways to better serve you. Please contact us with any questions or comments.

Sincerely,

Sarah Townsend
Customer Care Specialist

May 3, 2016

Closure Memorandum

TO: Matthew Michael
Director
Compliance and Enforcement Division
National Organic Program

FROM: Kristin Thornblad
Compliance and Enforcement Division
National Organic Program

CASE NO: NOPC-109-14

SUBJECTS: Honey Girl Organics, Haleiwa, Hawaii

CERTIFYING AGENTS INVOLVED: International Certification Services, Inc.

COMPLAINANT: (b) (6), (b) (7)(C), (b) (7)(D), (b) (6), (b) (7)(C), (b) (7)(D)

ALLEGED VIOLATION: Operator misrepresented certified organic personal care products.

RELEVANT LAW:

7 U.S.C 6505(a)(1)(B) of the Organic Food Production Act of 1990 “no person may affix a label to, or provide other market information concerning, an agricultural product if such label or information implies, directly or indirectly, that such product is produced and handled using organic methods, except in accordance with [the NOP].”

SUMMARY:

In March 2014, the NOP Compliance and Enforcement Division received a complaint against Honey Girl Organics for allegedly misrepresenting certified organic personal care products. Specifically, the complaint alleged that Honey Girl Organics marketed through its commercial website products certified to the “Made with (specific organic ingredients)” category of USDA organic standards with use of precise “percentage ingredient” statements of “75%” and “94%.”

Initial NOP investigation determined that Honey Girl Organics is certified to the USDA organic standard by USDA-approved accredited certifying agent International Certification Services, Inc. (ICS.) NOP staff review of the Honey Girl Organics website confirmed that the operation marketed personal care products with PDP display of specific organic ingredient percentage claims, such as “94% organic ingredients.” The operation’s website also included prominent display of the USDA organic seal across multiple pages.

In response to the NOP's request to investigate, ICS representatives verified that the certifying agent certified several Honey Girls Organics personal care products in both the "95% Organic" and "Made with (specific organic ingredients)" categories. The representatives further attested that the operation was in the process of transitioning its entire certified product line to the "95% Organic" category exclusively. In November 2015, ICS representatives reported to NOP staff that the operation's transition was complete and that every product represented as "organic" through the Honey Girls Organic website was properly certified to the USDA organic standard.

In January and February 2016, NOP staff review of the Honey Girls Organic website determined that the "Made with (specific organic ingredients)" products cited in the complaint had been removed from sale. Only products certified to the "95% Organic" category remained offered for sale. However, the review also determined that the website continued to include prominent display of the USDA organic seal. In response to the NOP's request to investigate the continued seal display, ICS issued to Honey Girls Organics a Notice of Noncompliance on March 1, 2016 to cite and address the marketing information violation.

In April 2016, ICS representatives attested to C&E Division staff that Honey Girl Organics had taken corrective action to address the March 1, 2016 Notice of Noncompliance. The operation revised its website to remove display of the USDA organic seal, except when used to represent products certified to the "95% Organic" category of USDA organic standards and, thus, eligible for such display. The operation also verified the removal of any use of the term "organic" in marketing information related to non-certified products. ICS representatives further attested that the certifying agent would take action to ensure the operation's compliance with the USDA organic regulations going forward.

In April 2016, NOP staff review of the Honey Girl Organics website confirmed that the operation had removed violative display of the USDA organic seal and that its online marketing information was in accordance with USDA organic standards.

REQUESTED ACTION:

I recommend closing the complaint. A Notice of Closure letter will be issued to ICS and the complainant.

APPROVED FOR CLOSURE BY:

Matthew Michael

Date



1400 Independence Avenue, S.W.
Room 2648-S, STOP 0268
Washington, D.C. 20250-0268

VIA EMAIL

May 3, 2016

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

Re: NOPC-109-14 Honey Girl Organics

Dear Ms. (b) (6), (b) (7)(C):

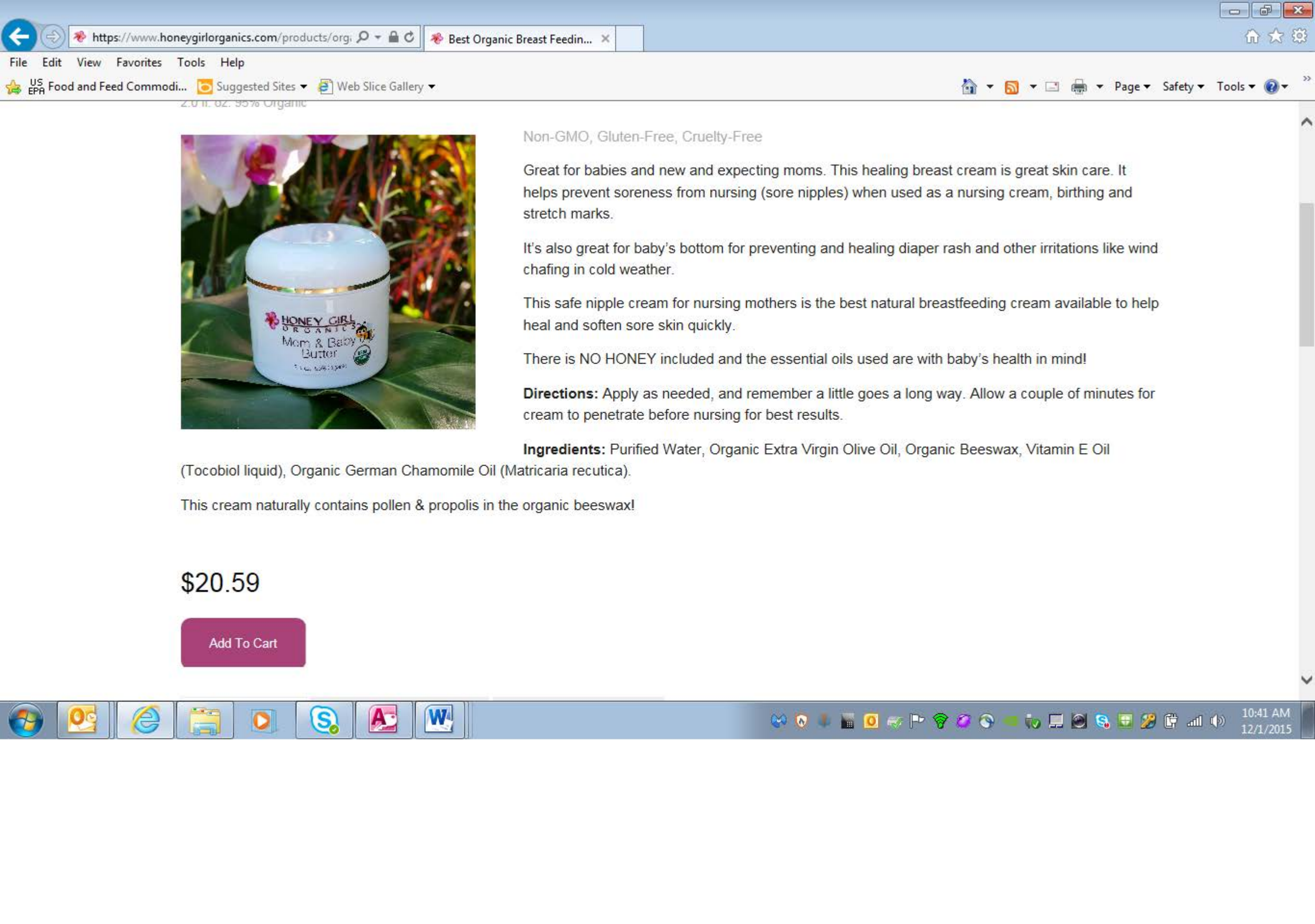
The U.S. Department of Agriculture (USDA), National Organic Program (NOP) concluded its investigation of the complaint you filed against Honey Girl Organics on March 5, 2014. Your complaint alleged that the operation mislabeled certified organic personal care products, in violation of the USDA organic regulations.

Our investigation confirmed your allegation. In response, the operation modified its labels and market information to comply with the law. The operation was also issued a Notice of Noncompliance. The investigation is hereby closed.

Thank you for bringing this matter to our attention. We appreciate your support of the NOP and the USDA.

Sincerely,

Matthew Michael, Director
Compliance and Enforcement Division
National Organic Program



Non-GMO, Gluten-Free, Cruelty-Free

Great for babies and new and expecting moms. This healing breast cream is great skin care. It helps prevent soreness from nursing (sore nipples) when used as a nursing cream, birthing and stretch marks.

It's also great for baby's bottom for preventing and healing diaper rash and other irritations like wind chafing in cold weather.

This safe nipple cream for nursing mothers is the best natural breastfeeding cream available to help heal and soften sore skin quickly.

There is NO HONEY included and the essential oils used are with baby's health in mind!

Directions: Apply as needed, and remember a little goes a long way. Allow a couple of minutes for cream to penetrate before nursing for best results.

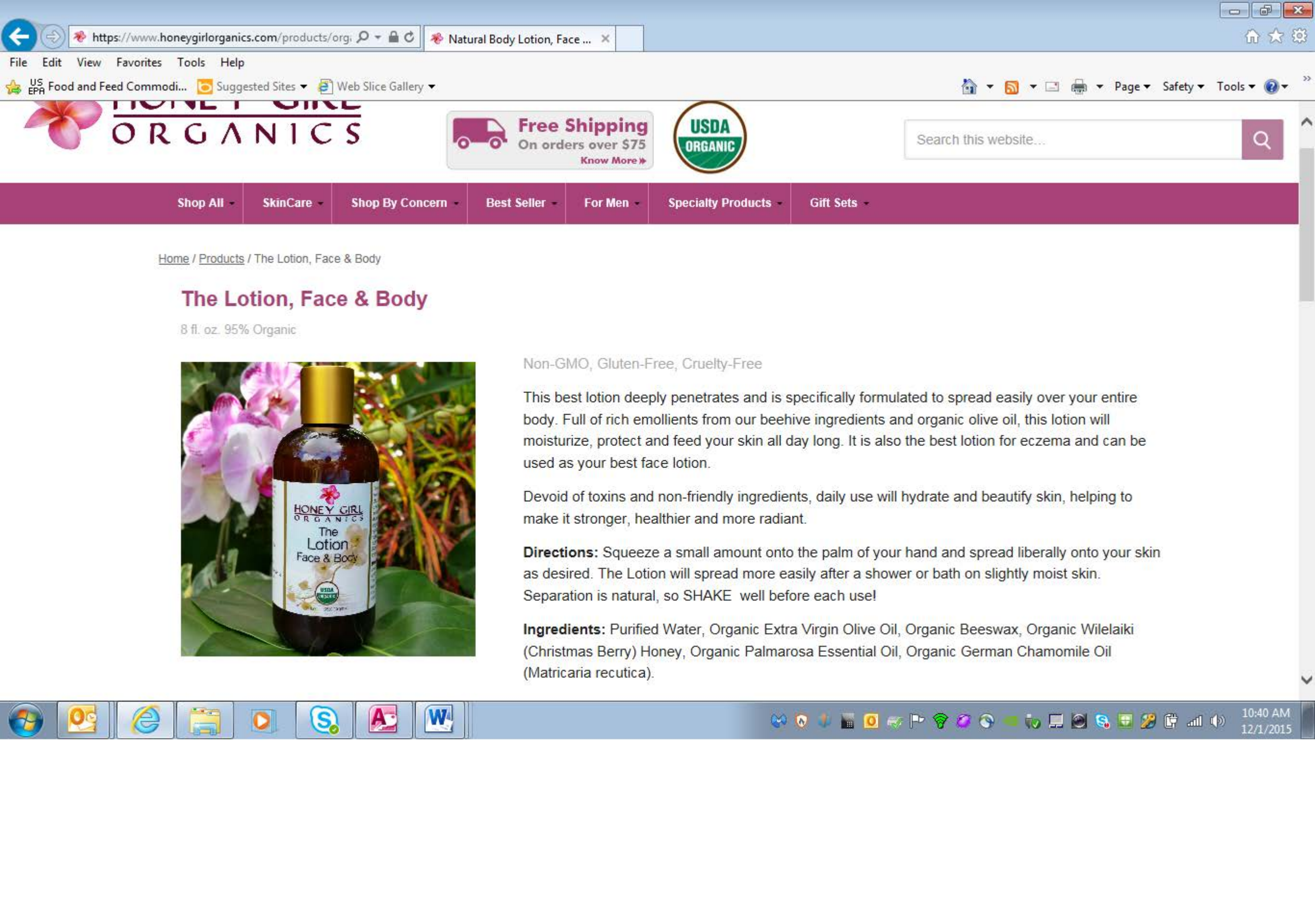
Ingredients: Purified Water, Organic Extra Virgin Olive Oil, Organic Beeswax, Vitamin E Oil

(Tocobiol liquid), Organic German Chamomile Oil (Matricaria recutita).

This cream naturally contains pollen & propolis in the organic beeswax!

\$20.59

Add To Cart



[Home](#) / [Products](#) / The Lotion, Face & Body

The Lotion, Face & Body

8 fl. oz. 95% Organic



Non-GMO, Gluten-Free, Cruelty-Free

This best lotion deeply penetrates and is specifically formulated to spread easily over your entire body. Full of rich emollients from our beehive ingredients and organic olive oil, this lotion will moisturize, protect and feed your skin all day long. It is also the best lotion for eczema and can be used as your best face lotion.

Devoid of toxins and non-friendly ingredients, daily use will hydrate and beautify skin, helping to make it stronger, healthier and more radiant.

Directions: Squeeze a small amount onto the palm of your hand and spread liberally onto your skin as desired. The Lotion will spread more easily after a shower or bath on slightly moist skin. Separation is natural, so SHAKE well before each use!

Ingredients: Purified Water, Organic Extra Virgin Olive Oil, Organic Beeswax, Organic Wilelaiki (Christmas Berry) Honey, Organic Palmarosa Essential Oil, Organic German Chamomile Oil (Matricaria recutica).

International Certification Services, Inc.

301 5th Ave Southeast, Medina, North Dakota 58467 USA

Ph: (701) 486-3578 Fax: (701) 486-3580

E-mail: info@ics-intl.com Website: www.ics-intl.com

NOTICE OF NON-COMPLIANCE RESOLUTION

April 5, 2016

Honey Girl Organics LLC
Honey Girl Organics
59-486 Alapio Rd
Haleiwa, Hawaii 96712

Dear Christina Sirlin:

This is official Notice of Resolution of Noncompliance pursuant to the USDA National Organic Standards §205.662(b) Noncompliance Procedure for Certified Operations.

ICS has received your response dated March 31, 2016. The noncompliances identified in our March 1, 2016 Notice of Noncompliance have been successfully corrected.

Thank you for your attention to this matter. Please contact me with any questions.

Sincerely,

Sarah Townsend
Customer Care Specialist

Cc: NOP Appeals team – NOPACAAverseActions@ams.usda.gov

International Certification Services, Inc.

301 5th Ave Southeast, Medina, North Dakota 58467 USA

Ph: (701) 486-3578 Fax: (701) 486-3580

E-mail: info@ics-intl.com Website: www.ics-intl.com

NOTICE OF NONCOMPLIANCE

March 1, 2016

Honey Girl Organics LLC
Christina Sirlin
59-486 Alapio Rd
Haleiwa, Hawaii 96712

Dear Christina Sirlin:

This letter is official Notice of Noncompliance pursuant to the USDA National Organic Standards §205.662 Noncompliance Procedure for Certified Operations. The noncompliance was identified as a result of a review of your website marketing in response to a compliance inquiry from the National Organic Program (NOP).

The noncompliance is as follows:

A. USA website:

1. **Main page** <<http://www.honeygirlorganics.com/>> displays the USDA Organic Seal. A photo of the HGO family of products in the slideshow on this page includes two products that contain less than 70 percent organically produced ingredients (*Facial Scrub, Rejuvenating Mask*). Per NOP §§ 205.305(b) and 205.311(a), *these two products must not be displayed with the USDA Organic Seal.*
1. **After Sun Rejuvenating Face & Body Lotion page:**
<<https://www.honeygirlorganics.com/products/organic-after-sun-rejuvenating-face-and-body-lotion/>> displays the USDA Organic Seal. The product is a 70% organic ingredient product that has been approved for labeling and marketing in the “Made with Organic ***” category (MWO). Per NOP §§ 205.304(c) *products in this category must not display The USDA Organic Seal.*
2. **Facial Scrub page:** <<https://www.honeygirlorganics.com/products/facial-scrub/>> displays the USDA Organic Seal. The product contains less than 70 percent organically produced ingredients. Per NOP §§ 205.305(b) and 205.311(a), *this product must not be displayed with the USDA Organic Seal. Additionally, the organic claim is prohibited* (found in the “All Natural & Organic” language at the top of the product description).
3. **Rejuvenating Mask page:** <<https://www.honeygirlorganics.com/products/rejuvenating-face-mask/>> displays the USDA Organic Seal. The product contains less than 70 percent organically produced ingredients. Per NOP §§ 205.305(b) and 205.311(a), *this product must not be displayed with the USDA Organic Seal. Additionally, the organic claim is prohibited* (found in the “All Natural & Organic” language at the top of the product description).
4. **Shop by concern – Organic Lotion page:**
<https://www.honeygirlorganics.com/products_category/organic-lotion/> displays the USDA Organic Seal.
 - a. The *Facial Scrub* product displayed on this page contains less than 70 percent organically produced ingredients. Per NOP §§ 205.305(b) and 205.311(a), *this product must not be displayed with the USDA Organic Seal. Additionally, the organic claim is prohibited* (found in the following “romance” language in the

product description: “This *organic* face wash started as a homemade sugar scrub for a face scrub and is now one of the best sugar scrubs and *organic* face wash available.”).

- b. The *After Sun Rejuvenating Face & Body Lotion* product displayed on this page product is a 70% organic ingredient product that has been approved for labeling and marketing in the “Made with Organic ***” category (MWO). Per NOP §§ 205.304(c) *products in this category must not display The USDA Organic Seal.*
5. **For Men – Organic Lotion for Men page:** <https://www.honeygirlorganics.com/products_category/for_men/> displays the USDA Organic Seal. The *After Sun Rejuvenating Face & Body Lotion* product displayed on this page product is a 70% organic ingredient product that has been approved for labeling and marketing in the “Made with Organic ***” category (MWO). Per NOP §§ 205.304(c) *products in this category must not display The USDA Organic Seal.*
6. **All Products / Shop Online page:** <<https://www.honeygirlorganics.com/products-all/>> displays the USDA Organic Seal.
- a. Two products that contain less than 70 percent organically produced ingredients are included here (*Facial Scrub, Rejuvenating Mask*). Per NOP §§ 205.305(b) and 205.311(a), *these two products must not be displayed with the USDA Organic Seal. Additionally, the organic claim is prohibited* (found in the “All Natural & Organic” language above each product photo).
 - b. The *After Sun Rejuvenating Face & Body Lotion* product displayed on this page product is a 70% organic ingredient product that has been approved for labeling and marketing in the “Made with Organic ***” category (MWO). Per NOP §§ 205.304(c) *products in this category must not display The USDA Organic Seal.*

A. Canadian website:

7. **Facial Scrub page:** <<http://honeygirlorganics.ca/products/rejuvenating-mask.html>> displays the following description, “This *organic* skincare is good for all skin types.” The product contains less than 70 percent organically produced ingredients and so *is not eligible to be represented as “organic.”*
8. **Rejuvenating Mask page:** <<http://honeygirlorganics.ca/products/facial-scrub.html>> displays the following description, “This *organic* skincare Mask is good for all skin types.” The product contains less than 70 percent organically produced ingredients and so *is not eligible to be represented as “organic.”*

B. Japanese website:

9. **Main page** <<http://www.honeygirlorganics.jp/>> Labels displayed here *do not meet the requirements of the US-Japan Organic Export Equivalency Arrangement (US-JOEA) and were not submitted to ICS for review approval prior to being put into the stream of commerce.* This is also a violation of NOP §205.406(a)(3) because your most recent Certification Approval letter (issued January 4, 2016) included the following Condition for Continued Certification:

2. H-2-Product Specification Sheets: US-Japan Export Requirements

- a. Products certified as “organic” in the U.S. and meet the terms of the arrangement may be sold as “organic” in Japan. Plants, including fungi, and plant-based processed product labels must include the JAS organic seal and may also include the USDA organic seal.
- b. U.S. exporters may apply the JAS logo to their plants or plant-based processed products in one of two ways:
 - i. U.S. exporters who have a contract with a JAS-certified importer may apply the JAS logo to their products directly for sale in either Japan or the U.S. To view a list of JAS-certified importers, see <http://bit.ly/importers-jas>.

- ii. U.S. exporters who do not have a contract with a JAS-certified importer may not apply the JAS logo to their products prior to export. A JAS-certified importer must import the product, and that importer must apply the JAS logo to the product prior to sale within Japan.
- c. All organic plant, including fungi, and plant-based processed products exported from the U.S. to Japan must be accompanied by an export certificate. To view the USDA's TM-11 export certificate, see <http://bit.ly/usda-organic-export>.

All labels must be reviewed and approved prior to printing and use.

**[NOP Subpart D – Labels, Labeling, and Market Information §§205.304, 205.305, 205.311;
Subpart E – Certification §§205.400, 205.406]**

ICS must receive a written response to this Notice of Noncompliance within 30 days of receipt of this Notice or by close of business on March 31, 2016, whichever is later. The response may correct the above noncompliance and include documentation showing the correction, or rebut the noncompliance and include documentation showing the initial practice is compliant with the rule. Failure to submit a written response by the deadline provided can lead to further Adverse Action, including but not limited to issuance of Notice of Proposed Suspension and/or Proposed Revocation of your operation's organic certificate.

Alternatively, you may withdraw the request for certification. If you are unable to provide the information within the deadline, you must submit a written notification as to the reason.

If you have questions regarding this Notice of Noncompliance, please contact us.

Sincerely,

Sarah Townsend
Customer Care Specialist

Cc: NOP Appeals team – NOPACAAdverseActions@ams.usda.gov

HONEY GIRL
ORGANICS™

AFTER SUN
REJUVENATING
FACE & BODY
LOTION

4 fl. oz.

70% Organic



Face & Body rejuvenating lotion will hydrate, cool and help heal sun-damaged skin cells. You'll feel refreshed and relieved knowing that your skin is being pampered by nature's finest healing ingredients.

Ingredients: Organic Extra Virgin Olive Oil, Purified Water, Aloe Gel, Beeswax* with Pollen* and Propolis,* Raw Pupuhea Honey,* Essential Oils.

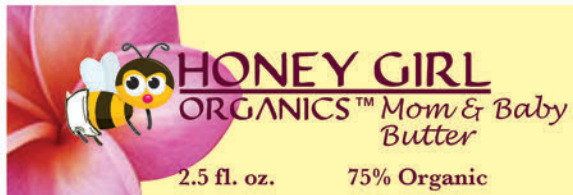
**from our holistically managed Hawaiian beehives*

Cruelty-free

Handmade in Hawaii, U.S.A.
Honey Girl Organics, LLC
59-495 Alapio Rd.
Haleiwa, HI 96712
www.honeygirlorganics.com
808-638-5302

Certified Organic by
International Certification
Services, Inc.





Honey Girl Organics' Mom & Baby Butter is great for babies and expectant and new moms. This healing salve helps to prevent stretch marks and soreness from nursing (sore nipples) and birthing (perineum). It's great for baby to prevent and heal diaper rash and other irritations. There is no honey included and the essential oils used are with baby's health in mind. **Directions:** Apply as needed. Remember, a little goes a long way.

Ingredients: Purified Water, Organic Extra Virgin Olive Oil, Beeswax with Pollen & Propolis,* Vitamin E, German Chamomile Ess. Oil, Calendula Flower Oil.

**from our holistically managed
Hawaiian beehives
Cruelty-free*

Honey Girl Organics
59-495 Alapio Rd.
Haleiwa, HI 96712

honeygirlorganics.com
1-808-638-5302

Certified Organic by International
Certification Services, Inc.

From: [Kelly Abbott](#)
To: [Thornblad, Kristin - AMS](#)
Cc: [Christina Dockter](#)
Subject: NOP request for information (NOPC-109-14)
Date: Tuesday, July 15, 2014 3:17:41 PM
Attachments: [after_sun.pdf](#)
[ATT00001.htm](#)
[mom & baby butter.pdf](#)
[ATT00002.htm](#)

Dear Ms Thornblad:

ICS does currently certify Honey Girl Organics to the NOP standard. I have attached labels of the two products in question which we reviewed and approved during their last renewal cycle for 2013. The use of the term “organic” is not used to modify ingredient content of these products but is their legal trademark name, “Honey Girl Organics”. Percentage of ingredient content is clearly indicated on the PDP.

Due to NOP Guidance Document 5032 effective May 2, 2014, we are now requiring Honey Girl Organics to add the statement “Made with Organic***” if they wish to continue to include the percentage of organic ingredients in their labeling claim.

NOP 5032 3.2 Labeling Claims

If a product meets all the composition requirements of the “made with organic ***” labeling category ([7 CFR § 205.301\(c\)](#)), then:

- Labels may include the statement, “made with organic (insert up to three ingredients, food groups, or combination of ingredients and food groups).” The statement, “made with organic ingredients” is not allowed. For restrictions on this statement, see section 3.4 below.
- If the “made with organic ***” statement is used, labels may also include the percentage of organic ingredients of the finished product.

Acceptable

- 70 percent organic*;
- 99% organic ingredients*; and
- Contains 92% certified organic ingredients*.

*If ingredient-specific claim such as “made with organic corn” is also on the label.

Honey Girl Organics is currently in the review process for 2014 and has submitted label revisions. To the best of our knowledge, they remain in compliance.

Some of Honey Girl Organics products use the ICS logo and some do not. NOP 205.304(a)(3) allows for the optional use of seal, logo, or other identifying mark of the certifying agent that certified the handler of the finished product.

§205.304 Packaged products labeled “made with organic (specified ingredients or food group(s)).”

(a) Agricultural products in packages described in §205.301(c) may display on the principal display panel, information panel, and any other panel and on any labeling or market information concerning the product:

(1) The statement:

(i) “Made with organic (specified ingredients)”: *Provided*, That, the statement does not list more than three organically produced ingredients; or

(ii) “Made with organic (specified food groups)”: *Provided*, That, the statement does not list more than three of the following food groups: beans, fish, fruits, grains, herbs, meats, nuts, oils, poultry, seeds, spices, sweeteners, and vegetables or processed milk products; and, *Provided further*, That, all ingredients of each listed food group in the product must be organically produced; and

(iii) Which appears in letters that do not exceed one-half the size of the largest type size on the panel and which appears in its entirety in the same type size, style, and color without highlighting.

(2) The percentage of organic ingredients in the product. The size of the percentage statement must not exceed one-half the size of the largest type size on the panel on which the statement is displayed and must appear in its entirety in the same type size, style, and color without highlighting.

(3) The seal, logo, or other identifying mark of the certifying agent that certified the handler of the finished product.

None of Honey Girl Organics products use the USDA Organic Seal.

Please let me know if you have any additional questions or concerns.

Sincerely,

Kelly Abbott
Compliance Team Leader
International Certification Services, Inc.
www.ICS-Intl.com
kabbott@ics-intl.com

Connect with ICS using social media!
<http://twitter.com/IntlCertSvcs>
<http://facebook.com/InternationalCertificationServices>

****International Certification Services’ mission is to provide the most complete, highest quality certification services to growers, processors, manufacturers and traders worldwide. We offer value-added opportunities to growers, unparalleled service to the trade and uncompromising point of purchase assurance to consumers.****

Caution: The information contained in this e-mail is confidential and may be legally privileged. If the reader of this message is not the intended recipient you are hereby notified that any use, dissemination, distribution, or reproduction of this message is prohibited. If you have received this message in error, please forward this message to info@ics-intl.com and delete all copies of this message.

From: Thornblad, Kristin - AMS [<mailto:Kristin.Thornblad@ams.usda.gov>]
Sent: Monday, July 14, 2014 2:34 PM
To: Ethel Heinle
Subject: NOP request for information (NOPC-109-14)

In response to the NOP's request to investigate, ICS representatives verified that the certifying agent certified several Honey Girls Organics personal care products in both the "95% Organic" and "Made with (specific organic ingredients)" categories. The representatives further attested that the operation was in the process of transitioning its entire certified product line to the "95% Organic" category exclusively. In November 2015, ICS representatives reported to NOP staff that the operation's transition was complete and that every product represented as "organic" through the Honey Girls Organic website was properly certified to the USDA organic standard.

In January and February 2016, NOP staff review of the Honey Girls Organic website determined that the "Made with (specific organic ingredients)" products cited in the complaint had been removed from sale. Only products certified to the "95% Organic" category remained offered for sale. However, the review also determined that the website continued to include prominent display of the USDA organic seal. In response to the NOP's request to investigate the continued seal display, ICS issued to Honey Girls Organics a Notice of Noncompliance on March 1, 2016 to cite and address the marketing information violation.

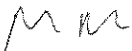
In April 2016, ICS representatives attested to C&E Division staff that Honey Girl Organics had taken corrective action to address the March 1, 2016 Notice of Noncompliance. The operation revised its website to remove display of the USDA organic seal, except when used to represent products certified to the "95% Organic" category of USDA organic standards and, thus, eligible for such display. The operation also verified the removal of any use of the term "organic" in marketing information related to non-certified products. ICS representatives further attested that the certifying agent would take action to ensure the operation's compliance with the USDA organic regulations going forward.

In April 2016, NOP staff review of the Honey Girl Organics website confirmed that the operation had removed violative display of the USDA organic seal and that its online marketing information was in accordance with USDA organic standards.

REQUESTED ACTION:

I recommend closing the complaint. A Notice of Closure letter will be issued to ICS and the complainant.

APPROVED FOR CLOSURE BY:



Matthew Michael

5/3/16
Date



1400 Independence Avenue, SW.
Room 2646-S, STOP 0268
Washington, DC 20250-0201

VIA EMAIL

May 3, 2016

Kelli Abbott
Compliance Team Leader
International Certification Services, Inc.
301 5th Avenue SE
Medina, ND 58467
Kabbott@ics-intl.com

Re: NOPC-109-14 (Honey Girl Organics)

Dear Ms. Abbott:

The U.S. Department of Agriculture (USDA) National Organic Program (NOP) is responsible for enforcing the Organic Foods Production Act of 1990, as amended, and its implementing regulations (7 CFR Part 205). All agricultural products sold, labeled, or represented as organic must comply with the USDA organic regulations. The NOP received a complaint regarding Honey Girl Organics, an ICS client. The complaint alleged that Honey Girl Organics mislabeled certified organic personal care products, in violation of the USDA organic regulations.

Our investigation confirmed the allegation. In response to the complaint, you issued to Honey Girl Organics a Notice of Noncompliance. In communications with NOP staff, you stated that Honey Girl Organics took corrective action to address the violation. You also stated that ICS will take action to ensure the operation's compliance with organic standards going forward. This investigation is hereby closed.

If you have any questions, please contact Kristin Thornblad at (202) 720-1153 or at Kristin.Thornblad@ams.usda.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "Matthew Michael".

Matthew Michael
Director, Compliance & Enforcement Division
National Organic Program



1400 Independence Avenue, S.W.
Room 2648-S, STOP 0268
Washington, D.C. 20250-0268

VIA EMAIL

May 3, 2016

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

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

Re: NOPC-109-14 Honey Girl Organics

Dear Ms. (b) (6), (b) (7)(C)

The U.S. Department of Agriculture (USDA), National Organic Program (NOP) concluded its investigation of the complaint you filed against Honey Girl Organics on March 5, 2014. Your complaint alleged that the operation mislabeled certified organic personal care products, in violation of the USDA organic regulations.

Our investigation confirmed your allegation. In response, the operation modified its labels and market information to comply with the law. The operation was also issued a Notice of Noncompliance. The investigation is hereby closed.

Thank you for bringing this matter to our attention. We appreciate your support of the NOP and the USDA.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Michael".

Matthew Michael, Director
Compliance and Enforcement Division
National Organic Program



1400 Independence Avenue, SW.
Room 2646-S, STOP 0268
Washington, DC 20250-0201

VIA EMAIL

April 14, 2017

Kelli Abbott
Compliance Team Leader
International Certification Services, Inc.
301 5th Avenue SE
Medina, ND 58467
Kabbott@ics-intl.com

Re: NOPC-109-14 (Honey Girl Organics)

Dear Ms. Abbott:

The U.S. Department of Agriculture (USDA) National Organic Program (NOP) is responsible for enforcing the Organic Foods Production Act of 1990, as amended, and its implementing regulations (7 CFR Part 205). All agricultural products sold, labeled, or represented as organic must comply with the USDA organic regulations. The NOP received a complaint regarding Honey Girl Organics, an ICS client. The complaint alleged that Honey Girl Organics mislabeled certified organic personal care products, in violation of the USDA organic regulations.

Our investigation confirmed the allegation. In response to the complaint, you issued to Honey Girl Organics a Notice of Noncompliance. In communications with NOP staff, you stated that Honey Girl Organics took corrective action to address the violation. You also stated that ICS will take action to ensure the operation's compliance with organic standards going forward. This investigation is hereby closed.

If you have any questions, please contact Kristin Thornblad at (202) 720-1153 or at Kristin.Thornblad@ams.usda.gov.

Sincerely,

Matthew Michael
Director, Compliance & Enforcement Division
National Organic Program

From: (b) (6), (b) (7)(C), (b) (7)(D)
To: [AMS - NOPCompliance](#)
Subject: Question regarding ICS following USDA guidelines - from (b) (6), (b) (7)(C), (b) (7)(D)
Date: Wednesday, March 05, 2014 5:57:39 PM

To whom this may concern:

- Honey Girl Organics (in Hawaii) has skincare products that are made with organic ingredients ranging from 72 % - 94 %.
- On their labels, they state that their products are Certified Organic through International Certification Services, Inc. & they also use the ICS Certified Organic logo.
- If ICS is accredited by the USDA, shouldn't they follow the same guidelines & only allow products with 95 % or more organic ingredients to use those terms & logo ?
- To me, this is very misleading to the American consumer.

Please advise.

Thank you,

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



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

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

International Certification Services, Inc.

301 5th Ave Southeast, Medina, North Dakota 58467 USA

Ph: (701) 486-3578 Fax: (701) 486-3580

E-mail: info@ics-intl.com Website: www.ics-intl.com

APPROVAL OF ORGANIC CERTIFICATION

April 5, 2016

Honey Girl Organics LLC
Honey Girl Organics
59-486 Alapio Rd
Haleiwa, Hawaii 96712

Dear Christina Sirlin:

Thank you for taking time with our inspector during our most recent inspection visit of your operation. The Certification Team has reviewed the inspector's report and your full certification file, and is pleased to continue certification to the NOP program, and verify compliance with the US-Canada Organic Export Equivalency Arrangement. Please review the enclosed schedule for a list of products included in your certification.

Enclosed you will find the following:

1. REVISED Schedule of Organic Operation (includes all programs of operation)

Based on our review of your responses and website updates and our review of your Organic System Plan (OSP), we wish to communicate our findings to you. The **following Conditions for Continued Certification** are considered reminders in ensuring your OSP is maintained accurate and up-to-date. Please address these issues in your next annual OSP update or on an ongoing basis, as appropriate.

1. **Honey Girl Organics Japanese website Main page**
<<http://www.honeygirlorganics.jp/>>: **Labels displayed here do not meet the requirements of the US-Japan Organic Export Equivalency Arrangement (US-JOE).** See below for details.
 - A. **H-2-Product Specification Sheets: Honey Girl After Sun Rejuvenating Face and Body Lotion; Beautiful Skin Care Rejuvenating Face & Eye Cream: US-Japan Export Requirements**
 - a. Products certified as "organic" in the U.S. that meet the terms of the arrangement may be sold as "organic" in Japan. Plants, including fungi, and plant-based processed product labels must include the JAS organic seal and may also include the USDA organic seal.
 - b. U.S. exporters may apply the JAS logo to their plants or plant-based processed products in one of two ways:
 - i. U.S. exporters who have a contract with a JAS-certified importer may apply the JAS logo to their products directly for sale in either Japan or the U.S. To view a list of JAS-certified importers, see <http://bit.ly/importers-jas>.
 - ii. U.S. exporters who do not have a contract with a JAS-certified importer may not apply the JAS logo to their products prior to

export. A JAS-certified importer must import the product, and that importer must apply the JAS logo to the product prior to sale within Japan.

- c. All organic plant, including fungi, and plant-based processed products exported from the U.S. to Japan must be accompanied by an export certificate. To view the USDA's TM-11 export certificate, see <http://bit.ly/usda-organic-export>.

Approval of two products previously approved under the US-Japan Organic Equivalency Arrangement (US-JOEA) has been rescinded. No TM-11 export certificates have been requested to date. Ensure that product labels intended for shipment to Japan meet US-JOEA requirements prior to use on product/in stream of commerce/shipment to Japan.

ICS appreciates working with you and is always looking for ways to better serve you. Please contact us with any questions or comments.

Sincerely,

Sarah Townsend
Customer Care Specialist

International Certification Services, Inc.

301 5th Ave Southeast, Medina, North Dakota 58467 USA

Ph: (701) 486-3578 Fax: (701) 486-3580

E-mail: info@ics-intl.com Website: www.ics-intl.com

NOTICE OF NON-COMPLIANCE RESOLUTION

April 5, 2016

Honey Girl Organics LLC
Honey Girl Organics
59-486 Alapio Rd
Haleiwa, Hawaii 96712

Dear Christina Sirlin:

This is official Notice of Resolution of Noncompliance pursuant to the USDA National Organic Standards §205.662(b) Noncompliance Procedure for Certified Operations.

ICS has received your response dated March 31, 2016. The noncompliances identified in our March 1, 2016 Notice of Noncompliance have been successfully corrected.

Thank you for your attention to this matter. Please contact me with any questions.

Sincerely,

Sarah Townsend
Customer Care Specialist

Cc: NOP Appeals team – NOPACAAverseActions@ams.usda.gov

From: [Kelly Abbott](#)
To: [Thornblad, Kristin - AMS](#)
Cc: [Christina Dockter](#)
Subject: [CAUTION: Suspicious Link]Re: USDA NOP compliance inquiry: Honey Girl Organics (NOPC-109-14)
Date: Wednesday, March 02, 2016 2:17:09 PM
Attachments: [NONC Marketing-Website HGO 2016.doc](#)
[ATT00001.htm](#)

[CAUTION: Suspicious Link]

THINK Before YOU Click!

The following message contains links to web content using **potentially** malicious URLs/links. Links structured like these are used in targeted phishing and malware attacks against USDA recipients.

Prior to trusting any links, please weigh the preceding **warning** by considering whether you are expecting the message below, along with a careful inspection of all links you may be considering following for spoofed or unexpected domains.

With all trusted links, and when practical, type URLs into a browser instead of clicking.

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

Hello Kristin,

These guys really like to keep us on our toes!

To answer your question, no, all Honey Girl Organics products are not eligible for representation with the USDA Organic Seal.

Attached is the Notice of NonCompliance going out today for all the infractions we could find pertaining to their website marketing.

Thank you for bringing it to our attention so that we may continue to follow up on the changing dynamic of marketing materials.

Sincerely,

Kelly Abbott
Compliance Team Leader

International Certification Services, Inc.
301 5th Ave. SE
Medina, ND 58467 USA
Tel: 701-486-3578
Fax: 701-486-3580
Email: Kabbott@ics-intl.com
Web Site: www.ics-intl.com

Connect with ICS using social media!

<http://twitter.com/IntlCertSvcs>
<http://facebook.com/InternationalCertificationServices>

****International Certification Services' Mission is to provide the most complete, highest quality certification services to growers, processors, manufacturers and traders worldwide. We offer value-added opportunities to growers, unparalleled service to the trade and uncompromised point of purchase assurance to consumers.****

Caution: The information contained in this e-mail is confidential and may be legally privileged. If the reader of this message is not the intended recipient you are hereby notified that any use, dissemination, distribution, or reproduction of this message is prohibited. If you have received this message in error, please forward this message to info@ics-intl.com and delete all copies of this message.

On Feb 29, 2016, at 5:15 AM, Thornblad, Kristin - AMS
<Kristin.Thornblad@ams.usda.gov> wrote:

Good morning Kelly—

I hope that the end of February finds you and your colleagues well. Thank you for your continued assistance with NOP complaint NOPC-109-14, Honey Girl Organics.

In on-going investigation regarding the compliance of Honey Girl Organics products to the USDA organic standard, questions remain concerning representation and marketing information. The Honey Girl Organics website includes prominent display of the USDA organic seal. Would you respond to this email with verification that all Honey Girl Organics products on the site are eligible for such representation?

In addition, marketing information for several products includes organic claims, though it is unclear whether the products are certified to the appropriate USDA standard. I've included several examples below. Please provide verification of the products' certification statuses.

Again, many thanks for your assistance and cooperation. Please contact me with any questions.

<https://www.honeygirlorganics.com/products/organic-after-sun-rejuvenating-face-and-body-lotion/> : marketing claims "70% Organic"; use of USDA organic seal on webpage

<https://www.honeygirlorganics.com/products/facial-scrub/> : marketing claim: "All Natural & Organic"; use of USDA organic seal on webpage.

Sincerely,

Kristin Thornblad

From: Kelly Abbott [<mailto:kabbott@ics-intl.com>]
Sent: Wednesday, November 04, 2015 2:22 PM
To: Thornblad, Kristin - AMS
Cc: Christina Dockter
Subject: Re: USDA NOP compliance inquiry: Honey Girl Organics (NOPC-109-14)

Ms Thornblad-

We have reviewed the contents displayed on the Honey Girl Organics website and determined that they are all products consistent with their OSP and information collected at the most recent inspection which occurred in October 2015.

Please let me know if you have any additional questions or concerns.

Sincerely

Kelly Abbott
Compliance Team Leader

International Certification Services, Inc.
301 5th Ave. SE
Medina, ND 58467 USA
Tel: 701-486-3578
Fax: 701-486-3580
Email: [Kabbott@ics-intl.com](mailto:kabbott@ics-intl.com)
Web Site: www.ics-intl.com

Connect with ICS using social media!

<http://twitter.com/IntlCertSvc>

<http://facebook.com/InternationalCertificationServices>

****International Certification Services' Mission is to provide the most complete, highest quality certification services to growers, processors, manufacturers and traders worldwide. We offer value-added opportunities to growers, unparalleled service to the trade and uncompromised point of purchase assurance to consumers.****

Caution: The information contained in this e-mail is confidential and may be legally privileged. If the reader of this message is not the intended recipient you are hereby notified that any use, dissemination, distribution, or reproduction of this message is prohibited. If you have received this message in error, please forward this message to info@ics-intl.com and delete all copies of this message.

Please Do Your Part:

Reduce: don't print this email unless you really need to;

Reuse: use as scratch paper when no longer needed (if printed);

Recycle: drop off recyclable paper at your closest recycling center!

On Nov 3, 2015, at 7:14 AM, Thornblad, Kristin - AMS
<Kristin.Thornblad@ams.usda.gov> wrote:

Hello Ms. Abbott and Ms. Dockter:

Good morning. I am writing regarding a National Organic Program (NOP) complaint (NOPC-109-14) inquiry involving Honey Girl Organics, Haleiwa,

Hawaii, an ICS client for USDA organic certification.

In response to our request for information, in July 2014 you provided via email detail about the operator's current labeling practices and certification status.

We now are conducting follow-up review of the matter. Would you respond with confirmation that Honey Girl Organics remains an ICS client? Further, please provide confirmation that the operator's labels currently in use, and on display through its commercial website, have been reviewed and approved for use pursuant to the USDA organic standard.

Thank you. We most appreciate your time and cooperation. Please let me know if I can answer any clarifying questions.

Sincerely,

Kristin Thornblad

Agricultural Marketing Specialist, Compliance and Enforcement
USDA National Organic Program
1400 Independence Ave., S.W.
Room 2957-S
Washington, D.C. 20250
(202) 720-1153
(202) 205-7808 (fax)

Register for the USDA Organic Insider, the National Organic Program's email notification service, by visiting <http://bit.ly/NOPOrganicInsiderRegistration>.

This email has been scanned by the Secure Email Security System on behalf of [Netrix IT](#). If this email is SPAM please report it by clicking [Submit Spam](#)

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

This email has been scanned by the Secure Email Security System on behalf of [Netrix IT](#). If this email is SPAM please report it by clicking [Submit Spam](#)

International Certification Services, Inc.

301 5th Ave Southeast, Medina, North Dakota 58467 USA

Ph: (701) 486-3578 Fax: (701) 486-3580

E-mail: info@ics-intl.com Website: www.ics-intl.com

NOTICE OF NONCOMPLIANCE

March 1, 2016

Honey Girl Organics LLC
Christina Sirlin
59-486 Alapio Rd
Haleiwa, Hawaii 96712

Dear Christina Sirlin:

This letter is official Notice of Noncompliance pursuant to the USDA National Organic Standards §205.662 Noncompliance Procedure for Certified Operations. The noncompliance was identified as a result of a review of your website marketing in response to a compliance inquiry from the National Organic Program (NOP).

The noncompliance is as follows:

A. USA website:

1. **Main page** <<http://www.honeygirlorganics.com/>> displays the USDA Organic Seal. A photo of the HGO family of products in the slideshow on this page includes two products that contain less than 70 percent organically produced ingredients (*Facial Scrub, Rejuvenating Mask*). Per NOP §§ 205.305(b) and 205.311(a), *these two products must not be displayed with the USDA Organic Seal.*
1. **After Sun Rejuvenating Face & Body Lotion page:**
<<https://www.honeygirlorganics.com/products/organic-after-sun-rejuvenating-face-and-body-lotion/>> displays the USDA Organic Seal. The product is a 70% organic ingredient product that has been approved for labeling and marketing in the “Made with Organic ***” category (MWO). Per NOP §§ 205.304(c) *products in this category must not display The USDA Organic Seal.*
2. **Facial Scrub page:** <<https://www.honeygirlorganics.com/products/facial-scrub/>> displays the USDA Organic Seal. The product contains less than 70 percent organically produced ingredients. Per NOP §§ 205.305(b) and 205.311(a), *this product must not be displayed with the USDA Organic Seal. Additionally, the organic claim is prohibited* (found in the “All Natural & Organic” language at the top of the product description).
3. **Rejuvenating Mask page:** <<https://www.honeygirlorganics.com/products/rejuvenating-face-mask/>> displays the USDA Organic Seal. The product contains less than 70 percent organically produced ingredients. Per NOP §§ 205.305(b) and 205.311(a), *this product must not be displayed with the USDA Organic Seal. Additionally, the organic claim is prohibited* (found in the “All Natural & Organic” language at the top of the product description).
4. **Shop by concern – Organic Lotion page:**
<https://www.honeygirlorganics.com/products_category/organic-lotion/> displays the USDA Organic Seal.
 - a. The *Facial Scrub* product displayed on this page contains less than 70 percent organically produced ingredients. Per NOP §§ 205.305(b) and 205.311(a), *this product must not be displayed with the USDA Organic Seal. Additionally, the organic claim is prohibited* (found in the following “romance” language in the

product description: “This *organic* face wash started as a homemade sugar scrub for a face scrub and is now one of the best sugar scrubs and *organic* face wash available.”).

- b. The *After Sun Rejuvenating Face & Body Lotion* product displayed on this page product is a 70% organic ingredient product that has been approved for labeling and marketing in the “Made with Organic ***” category (MWO). Per NOP §§ 205.304(c) *products in this category must not display The USDA Organic Seal.*
5. **For Men – Organic Lotion for Men page:** <https://www.honeygirlorganics.com/products_category/for_men/> displays the USDA Organic Seal. The *After Sun Rejuvenating Face & Body Lotion* product displayed on this page product is a 70% organic ingredient product that has been approved for labeling and marketing in the “Made with Organic ***” category (MWO). Per NOP §§ 205.304(c) *products in this category must not display The USDA Organic Seal.*
6. **All Products / Shop Online page:** <<https://www.honeygirlorganics.com/products-all/>> displays the USDA Organic Seal.
- a. Two products that contain less than 70 percent organically produced ingredients are included here (*Facial Scrub, Rejuvenating Mask*). Per NOP §§ 205.305(b) and 205.311(a), *these two products must not be displayed with the USDA Organic Seal. Additionally, the organic claim is prohibited* (found in the “All Natural & Organic” language above each product photo).
 - b. The *After Sun Rejuvenating Face & Body Lotion* product displayed on this page product is a 70% organic ingredient product that has been approved for labeling and marketing in the “Made with Organic ***” category (MWO). Per NOP §§ 205.304(c) *products in this category must not display The USDA Organic Seal.*

A. Canadian website:

7. **Facial Scrub page:** <<http://honeygirlorganics.ca/products/rejuvenating-mask.html>> displays the following description, “This *organic* skincare is good for all skin types.” The product contains less than 70 percent organically produced ingredients and so *is not eligible to be represented as “organic.”*
8. **Rejuvenating Mask page:** <<http://honeygirlorganics.ca/products/facial-scrub.html>> displays the following description, “This *organic* skincare Mask is good for all skin types.” The product contains less than 70 percent organically produced ingredients and so *is not eligible to be represented as “organic.”*

B. Japanese website:

9. **Main page** <<http://www.honeygirlorganics.jp/>> Labels displayed here *do not meet the requirements of the US-Japan Organic Export Equivalency Arrangement (US-JOEA) and were not submitted to ICS for review approval prior to being put into the stream of commerce.* This is also a violation of NOP §205.406(a)(3) because your most recent Certification Approval letter (issued January 4, 2016) included the following Condition for Continued Certification:
 2. **H-2-Product Specification Sheets: US-Japan Export Requirements**
 - a. Products certified as “organic” in the U.S. and meet the terms of the arrangement may be sold as “organic” in Japan. Plants, including fungi, and plant-based processed product labels must include the JAS organic seal and may also include the USDA organic seal.
 - b. U.S. exporters may apply the JAS logo to their plants or plant-based processed products in one of two ways:
 - i. U.S. exporters who have a contract with a JAS-certified importer may apply the JAS logo to their products directly for sale in either Japan or the U.S. To view a list of JAS-certified importers, see <http://bit.ly/importers-jas>.

- ii. U.S. exporters who do not have a contract with a JAS-certified importer may not apply the JAS logo to their products prior to export. A JAS-certified importer must import the product, and that importer must apply the JAS logo to the product prior to sale within Japan.
- c. All organic plant, including fungi, and plant-based processed products exported from the U.S. to Japan must be accompanied by an export certificate. To view the USDA's TM-11 export certificate, see <http://bit.ly/usda-organic-export>.

All labels must be reviewed and approved prior to printing and use.

**[NOP Subpart D – Labels, Labeling, and Market Information §§205.304, 205.305, 205.311;
Subpart E – Certification §§205.400, 205.406]**

ICS must receive a written response to this Notice of Noncompliance within 30 days of receipt of this Notice or by close of business on March 31, 2016, whichever is later. The response may correct the above noncompliance and include documentation showing the correction, or rebut the noncompliance and include documentation showing the initial practice is compliant with the rule. Failure to submit a written response by the deadline provided can lead to further Adverse Action, including but not limited to issuance of Notice of Proposed Suspension and/or Proposed Revocation of your operation's organic certificate.

Alternatively, you may withdraw the request for certification. If you are unable to provide the information within the deadline, you must submit a written notification as to the reason.

If you have questions regarding this Notice of Noncompliance, please contact us.

Sincerely,

Sarah Townsend
Customer Care Specialist

Cc: NOP Appeals team – NOPACAAdverseActions@ams.usda.gov

From: [Kelly Abbott](#)
To: [Thornblad, Kristin - AMS](#)
Cc: [Christina Dockter](#)
Subject: Re: USDA NOP compliance inquiry: Honey Girl Organics (NOPC-109-14)
Date: Wednesday, November 04, 2015 2:21:50 PM

Ms Thornblad-

We have reviewed the contents displayed on the Honey Girl Organics website and determined that they are all products consistent with their OSP and information collected at the most recent inspection which occurred in October 2015.

Please let me know if you have any additional questions or concerns.

Sincerely

Kelly Abbott
Compliance Team Leader

International Certification Services, Inc.
301 5th Ave. SE
Medina, ND 58467 USA
Tel: 701-486-3578
Fax: 701-486-3580
Email: Kabbott@ics-intl.com
Web Site: www.ics-intl.com

Connect with ICS using social media!

<http://twitter.com/IntlCertSvc>

<http://facebook.com/InternationalCertificationServices>

****International Certification Services' Mission is to provide the most complete, highest quality certification services to growers, processors, manufacturers and traders worldwide. We offer value-added opportunities to growers, unparalleled service to the trade and uncompromised point of purchase assurance to consumers.****

Caution: The information contained in this e-mail is confidential and may be legally privileged. If the reader of this message is not the intended recipient you are hereby notified that any use, dissemination, distribution, or reproduction of this message is prohibited. If you have received this message in error, please forward this message to info@ics-intl.com and delete all copies of this message.

Please Do Your Part:

Reduce: don't print this email unless you really need to;

Reuse: use as scratch paper when no longer needed (if printed);

Recycle: drop off recyclable paper at your closest recycling center!

On Nov 3, 2015, at 7:14 AM, Thornblad, Kristin - AMS
<Kristin.Thornblad@ams.usda.gov> wrote:

Hello Ms. Abbott and Ms. Dockter:

Good morning. I am writing regarding a National Organic Program (NOP) complaint

(NOPC-109-14) inquiry involving Honey Girl Organics, Haleiwa, Hawaii, an ICS client for USDA organic certification.

In response to our request for information, in July 2014 you provided via email detail about the operator's current labeling practices and certification status.

We now are conducting follow-up review of the matter. Would you respond with confirmation that Honey Girl Organics remains an ICS client? Further, please provide confirmation that the operator's labels currently in use, and on display through its commercial website, have been reviewed and approved for use pursuant to the USDA organic standard.

Thank you. We most appreciate your time and cooperation. Please let me know if I can answer any clarifying questions.

Sincerely,

Kristin Thornblad

Agricultural Marketing Specialist, Compliance and Enforcement
USDA National Organic Program
1400 Independence Ave., S.W.
Room 2957-S
Washington, D.C. 20250
(202) 720-1153
(202) 205-7808 (fax)

Register for the USDA Organic Insider, the National Organic Program's email notification service, by visiting <http://bit.ly/NOPOrganicInsiderRegistration>.

This email has been scanned by the Secure Email Security System on behalf of [Netrix IT](#). If this email is SPAM please report it by clicking [Submit Spam](#)

From: [Kelly Abbott](#)
To: [Thornblad, Kristin - AMS](#)
Cc: [Christina Dockter](#)
Subject: Re: USDA NOP compliance inquiry: Honey Girl Organics (NOPC-109-14)
Date: Thursday, April 07, 2016 3:49:41 PM
Attachments: [CERT Approval Ltr wCCC Marktg-Website HGO 2015.pdf](#)
[ATT00001.htm](#)
[NC-RESO HGO Marketing-Website 2015.pdf](#)
[ATT00002.htm](#)

Hello Kristin-

Honey Girl Organics has corrected the issues with their website and resolved the noncompliances identified on March 1, 2016.

I have attached both their noncompliance resolution and their most current approval for continued certification.

Please let me know if you have any questions.

Kelly Abbott
Compliance Team Leader

International Certification Services, Inc.

Kabbott@[ics-intl.com](mailto:kabbott@ics-intl.com)

www.ics-intl.com

Connect with ICS using social media!

<http://twitter.com/IntlCertSvcs>

<http://facebook.com/InternationalCertificationServices>

****International Certification Services' Mission is to provide the most complete, highest quality certification services to growers, processors, manufacturers and traders worldwide. We offer value-added opportunities to growers, unparalleled service to the trade and uncompromised point of purchase assurance to consumers.****

Caution: The information contained in this e-mail is confidential and may be legally privileged. If the reader of this message is not the intended recipient you are hereby notified that any use, dissemination, distribution, or reproduction of this message is prohibited. If you have received this message in error, please forward this message to info@ics-intl.com and delete all copies of this message.

On Mar 3, 2016, at 10:11 AM, Kelly Abbott <kabbott@ics-intl.com> wrote:

Hi Kristin-

We will most definitely submit any responses/corrective actions or adverse actions.

Thank you-

Kelly Abbott
Compliance Team Leader

International Certification Services, Inc.
301 5th Ave. SE
Medina, ND 58467 USA
Tel: 701-486-3578
Fax: 701-486-3580
Email: Kabbott@ics-intl.com

Web Site: www.ics-intl.com
Connect with ICS using social media!

<http://twitter.com/IntlCertSvc>
<http://facebook.com/InternationalCertificationServices>

****International Certification Services' Mission is to provide the most complete, highest quality certification services to growers, processors, manufacturers and traders worldwide. We offer value-added opportunities to growers, unparalleled service to the trade and uncompromised point of purchase assurance to consumers.****

Caution: The information contained in this e-mail is confidential and may be legally privileged. If the reader of this message is not the intended recipient you are hereby notified that any use, dissemination, distribution, or reproduction of this message is prohibited. If you have received this message in error, please forward this message to info@ics-intl.com and delete all copies of this message.

Please Do Your Part:

Reduce: don't print this email unless you really need to;

Reuse: use as scratch paper when no longer needed (if printed);

Recycle: drop off recyclable paper at your closest recycling center!

On Mar 3, 2016, at 9:02 AM, Thornblad, Kristin - AMS
<Kristin.Thornblad@ams.usda.gov> wrote:

Kelly—

Thanks so much for the Notice of Noncompliance update. We do appreciate your continued cooperation. Would you please email me an update when the operator proposes/enacts corrective actions, or when additional enforcement action is taken? We will consider such evidence and information as the investigation moves toward closure. Finally, please feel free to contact me with any questions. Thanks, again.
Kristin

From: Kelly Abbott [<mailto:kabbott@ics-intl.com>]

Sent: Wednesday, March 02, 2016 2:17 PM

To: Thornblad, Kristin - AMS

Cc: Christina Dockter

Subject: [CAUTION: Suspicious Link]Re: USDA NOP compliance inquiry:
Honey Girl Organics (NOPC-109-14)

[CAUTION: Suspicious Link]

THINK Before YOU Click!

The following message contains links to web content using **potentially** malicious URLs/links. Links structured like these are used in targeted phishing and malware attacks against USDA recipients.

Prior to trusting any links, please weigh the preceding **warning** by considering whether you are expecting the message below, along with a careful inspection of all links you may be considering

following for spoofed or unexpected domains.

With all trusted links, and when practical, type URLs into a browser instead of clicking.

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

Hello Kristin,

These guys really like to keep us on our toes!

To answer your question, no, all Honey Girl Organics products are not eligible for representation with the USDA Organic Seal.

Attached is the Notice of NonCompliance going out today for all the infractions we could find pertaining to their website marketing.

Thank you for bringing it to our attention so that we may continue to follow up on the changing dynamic of marketing materials.

Sincerely,

Kelly Abbott

Compliance Team Leader

International Certification Services, Inc.

301 5th Ave. SE

Medina, ND 58467 USA

Tel: 701-486-3578

Fax: 701-486-3580

Email: Kabbott@ics-intl.com

Web Site: www.ics-intl.com

Connect with ICS using social media!

<http://twitter.com/IntlCertSvc>

<http://facebook.com/InternationalCertificationServices>

****International Certification Services' Mission is to provide the most complete, highest quality certification services to growers, processors, manufacturers and traders worldwide. We offer value-added opportunities to growers, unparalleled service to the trade and uncompromised point of purchase assurance to consumers.****

Caution: The information contained in this e-mail is confidential and may be legally privileged. If the reader of this message is not the intended recipient you are hereby notified that any use, dissemination, distribution, or reproduction of this message is prohibited. If you have received this message in error, please forward this message to info@ics-intl.com and delete all copies of this message.

On Feb 29, 2016, at 5:15 AM, Thornblad, Kristin - AMS

<Kristin.Thornblad@ams.usda.gov> wrote:

Good morning Kelly—

I hope that the end of February finds you and your colleagues well. Thank you for your continued assistance with NOP complaint NOPC-109-14, Honey Girl Organics.

In on-going investigation regarding the compliance of Honey Girl Organics products to the USDA organic standard, questions remain concerning representation and marketing information. The Honey Girl Organics website includes prominent display of the USDA organic seal. Would you respond to this email with verification that all Honey Girl

Organics products on the site are eligible for such representation?

In addition, marketing information for several products includes organic claims, though it is unclear whether the products are certified to the appropriate USDA standard. I've included several examples below. Please provide verification of the products' certification statuses.

Again, many thanks for your assistance and cooperation.

Please contact me with any questions.

<https://www.honeygirlorganics.com/products/organic-after-sun-rejuvenating-face-and-body-lotion/> : marketing claims

"70% Organic"; use of USDA organic seal on webpage

<https://www.honeygirlorganics.com/products/facial-scrub/> :

marketing claim: "All Natural & Organic"; use of USDA organic seal on webpage.

Sincerely,

Kristin Thornblad

From: Kelly Abbott [<mailto:kabbott@ics-intl.com>]

Sent: Wednesday, November 04, 2015 2:22 PM

To: Thornblad, Kristin - AMS

Cc: Christina Dockter

Subject: Re: USDA NOP compliance inquiry: Honey Girl Organics (NOPC-109-14)

Ms Thornblad-

We have reviewed the contents displayed on the Honey Girl Organics website and determined that they are all products consistent with their OSP and information collected at the most recent inspection which occurred in October 2015.

Please let me know if you have any additional questions or concerns.

Sincerely

Kelly Abbott

Compliance Team Leader

International Certification Services, Inc.

301 5th Ave. SE

Medina, ND 58467 USA

Tel: 701-486-3578

Fax: 701-486-3580

Email: [Kabbott@ics-intl.com](mailto:kabbott@ics-intl.com)

Web Site: www.ics-intl.com

Connect with ICS using social media!

<http://twitter.com/IntlCertSvc>

<http://facebook.com/InternationalCertificationServices>

****International Certification Services' Mission is to provide the most complete, highest quality certification services to growers, processors, manufacturers and traders worldwide. We offer value-added opportunities to growers, unparalleled service to the trade and uncompromised point of purchase assurance to consumers.****

Caution: The information contained in this e-mail is

confidential and may be legally privileged. If the reader of this message is not the intended recipient you are hereby notified that any use, dissemination, distribution, or reproduction of this message is prohibited. If you have received this message in error, please forward this message to info@ics-intl.com and delete all copies of this message.

Please Do Your Part:

Reduce: don't print this email unless you really need to;

Reuse: use as scratch paper when no longer needed (if printed);

Recycle: drop off recyclable paper at your closest recycling center!

On Nov 3, 2015, at 7:14 AM, Thornblad, Kristin - AMS

<Kristin.Thornblad@ams.usda.gov> wrote:

Hello Ms. Abbott and Ms. Dockter:

Good morning. I am writing regarding a National Organic Program (NOP) complaint (NOPC-109-14) inquiry involving Honey Girl Organics, Haleiwa, Hawaii, an ICS client for USDA organic certification.

In response to our request for information, in July 2014 you provided via email detail about the operator's current labeling practices and certification status.

We now are conducting follow-up review of the matter. Would you respond with confirmation that Honey Girl Organics remains an ICS client? Further, please provide confirmation that the operator's labels currently in use, and on display through its commercial website, have been reviewed and approved for use pursuant to the USDA organic standard.

Thank you. We most appreciate your time and cooperation. Please let me know if I can answer any clarifying questions.

Sincerely,

Kristin Thornblad

Agricultural Marketing Specialist, Compliance and Enforcement

USDA National Organic Program

1400 Independence Ave., S.W.

Room 2957-S

Washington, D.C. 20250

(202) 720-1153

(202) 205-7808 (fax)

Register for the USDA Organic Insider, the National Organic Program's email notification service, by

visiting <http://bit.ly/NOPOrganicInsiderRegistrat>

[ion.](#)

This email has been scanned by the Securence Email Security System on behalf of [Netrix IT.](#) If this email is SPAM please report it by clicking [Submit Spam](#)

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

This email has been scanned by the Securence Email Security System on behalf of [Netrix IT.](#) If this email is SPAM please report it by clicking [Submit Spam](#)

This email has been scanned by the Securence Email Security System on behalf of [Netrix IT.](#) If this email is SPAM please report it by clicking [Submit Spam](#)



1400 Independence Avenue, S.W.
Room 2648-S, STOP 0268
Washington, D.C. 20250-0268

VIA EMAIL

May 3, 2016

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

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

Re: NOPC-109-14 Honey Girl Organics

Dear Ms. (b) (6), (b) (7)(C), (b) (7)(D)

The U.S. Department of Agriculture (USDA), National Organic Program (NOP) concluded its investigation of the complaint you filed against Honey Girl Organics on March 5, 2014. Your complaint alleged that the operation mislabeled certified organic personal care products, in violation of the USDA organic regulations.

Our investigation confirmed your allegation. In response, the operation modified its labels and market information to comply with the law. The operation was also issued a Notice of Noncompliance. The investigation is hereby closed.

Thank you for bringing this matter to our attention. We appreciate your support of the NOP and the USDA.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Michael".

Matthew Michael, Director
Compliance and Enforcement Division
National Organic Program

From: [Thornblad, Kristin - AMS](#)
To: (b) (6), (b) (7)
Subject: USDA National Organic Program complaint NOP-109-14
Date: Wednesday, May 04, 2016 3:38:00 PM
Attachments: [NOPC-109-14NoticeofClosureComplt.pdf](#)

Dear Ms. (b) (6), (b) (7) —

Please see attached a Notice of Closure letter regarding USDA National Organic Program (NOP) complaint NOPC-109-14, Honey Girl Organics.

Thank you. The NOP appreciates your interest in organic integrity.

Sincerely,

Kristin Thornblad

Agricultural Marketing Specialist, Compliance and Enforcement
USDA National Organic Program
1400 Independence Ave., S.W.
Room 2957-S
Washington, D.C. 20250
(202) 720-1153
(202) 205-7808 (fax)

Register for the USDA Organic Insider, the National Organic Program's email notification service, by visiting <http://bit.ly/NOPOrganicInsiderRegistration>.



1400 Independence Avenue, SW.
Room 2646-S, STOP 0268
Washington, DC 20250-0201

VIA EMAIL

May 3, 2016

Kelli Abbott
Compliance Team Leader
International Certification Services, Inc.
301 5th Avenue SE
Medina, ND 58467
Kabbott@ics-intl.com

Re: NOPC-109-14 (Honey Girl Organics)

Dear Ms. Abbott:

The U.S. Department of Agriculture (USDA) National Organic Program (NOP) is responsible for enforcing the Organic Foods Production Act of 1990, as amended, and its implementing regulations (7 CFR Part 205). All agricultural products sold, labeled, or represented as organic must comply with the USDA organic regulations. The NOP received a complaint regarding Honey Girl Organics, an ICS client. The complaint alleged that Honey Girl Organics mislabeled certified organic personal care products, in violation of the USDA organic regulations.

Our investigation confirmed the allegation. In response to the complaint, you issued to Honey Girl Organics a Notice of Noncompliance. In communications with NOP staff, you stated that Honey Girl Organics took corrective action to address the violation. You also stated that ICS will take action to ensure the operation's compliance with organic standards going forward. This investigation is hereby closed.

If you have any questions, please contact Kristin Thornblad at (202) 720-1153 or at Kristin.Thornblad@ams.usda.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "Matthew Michael".

Matthew Michael
Director, Compliance & Enforcement Division
National Organic Program

From: [Thornblad, Kristin - AMS](#)
To: ["Kelly Abbott \(kabbott@ics-intl.com\)"](#)
Subject: USDA NOP complaint NOPC-109-14
Date: Wednesday, May 04, 2016 3:36:00 PM
Attachments: [NOPC-109-14ClosuretoACA.pdf](#)

Ms. Abbott—

Please see attached a Notice of Closure letter concerning USDA National Organic Program (NOP) complaint NOPC-109-14, Honey Girl Organics.

Thank you. The NOP appreciates your cooperation in this matter.

Sincerely,

Kristin Thornblad

Agricultural Marketing Specialist, Compliance and Enforcement

USDA National Organic Program

1400 Independence Ave., S.W.

Room 2957-S

Washington, D.C. 20250

(202) 720-1153

(202) 205-7808 (fax)

Register for the USDA Organic Insider, the National Organic Program's email notification service, by visiting <http://bit.ly/NOPOrganicInsiderRegistration>.