

From: [Yang, RobertH - AMS](#)
To: [Michael, Matthew - AMS](#); [Wilburn, Tammie - AMS](#)
Subject: FW: Information Requested Re Follow up to positive chemical residue testing results
Date: Friday, May 22, 2015 2:02:54 PM
Attachments: [Correspondence - Mail Out Business Letter on Letterhead 05 21 2015.pdf](#)
[CFIA ACIA-#6631933-v1-Letter to CCOF \(2015-05-04\) Re 2014 .pdf](#)
[image001.png](#)

Hello Matthew, Tammie:

I'm forwarding this to both of you as an FYI.

Canada's COO/CFIA notified CCOF about various organic products shipped to Canada that tested positive for chemical residues. Among them was organic bell pepper from Mexico, packaged by (b) (4) (sampled on 6/3/14). They tested positive for piperonyl butoxide.

Regards,

Robert Yang

Accreditation Manager
USDA National Organic Program
1400 Independence Ave, SW
Room 2649-South, Stop 0268
Washington, DC 20250-0268
Office: (202) 690-4540
www.ams.usda.gov/nop



From: Kelly Lehman Goswamy [mailto:kelly@ccof.org]
Sent: Thursday, May 21, 2015 12:50 PM
To: Valeriya.Staykova@inspection.gc.ca
Cc: roberth.yang@usda.gov; vilela.vincent@caeq.ca; Accreditation; Lewin Jake-FASConatct; Patrick Arndt; Sean Feder; Amy Lamendella
Subject: Information Requested Re Follow up to positive chemical residue testing results

Dear Valeriya,

CCOF reviewed the positive chemical residue testing results CFIA submitted to us on May 12, 2015. Please find attached a letter requesting additional information regarding these results.

Sincerely,

Kelly Lehman Goswamy
Associate Quality System Manager
CCOF Certification Services, LLC

2155 Delaware Ave., Suite 150

Santa Cruz, CA 95060

[\(831\) 423-2263](tel:(831)423-2263), ext. 6255

fax [\(831\) 423-4528](tel:(831)423-4528)

kelly@ccof.org

www.ccof.org

Visit CCOF on [Facebook](#) and [Twitter](#)

New Non-GMO & More Seal! CCOF has produced new optional seals for use by CCOF-certified members to clearly communicate to consumers that organic products are not only non-GMO but also farmed ecologically. [See how you can utilize the new seal!](#)



Agence canadienne
d'inspection des aliments

Canadian Food
Inspection Agency

Food Import-Export and Consumer Protection Directorate
Consumer Protection and Market Fairness Division
1400 Merivale, Tower 2, 6th floor
Ottawa, ON, K1A 0Y9

Telephone: (613) 773-5244
Fax.: (613) 773-5603
email: benoit.dube@inspection.gc.ca

May 11th, 2015

CCOF Certification Services, LLC (CCOF)

2155 Delaware Avenue, Suite 150
Santa Cruz, California
95060, United States

Subject: For follow up to positive chemical residue testing results

The Canada Organic Office (COO) of the Canadian Food Inspection Agency (CFIA) would like to inform you that, through the 2014 National Chemical Residue Monitoring Program, we found the following organic products tested positive for chemical residues.

We have included the information that is known to us about each sample in the tables below. We understand that you may not be able to follow-up on certain samples based on the available information.

CFIA Sample # FCR14-10352

Product: Organic Orange
Origin: United States
Brand: Cousins Organic Citrus
Packaged By: (b) (4) CA 93646
Date Sampled: 2014-05-14

Analyte	Amount
Imazalil	Under 5% of the maximum residue limit (MRL)



CFIA Sample # FCR14-11669

Product: Organic Grape
Origin: Mexico
Brand: Heaven's Best
Details: Plu 94022
Lot Code: 5051 1247 5309 GRP1
Packaged By: Vinedos Alta, Vinedos Prima & Agrícola Alta Pozo
Mannel S.A. de C.V.
Distributed By: (b) (4) AZ 85648
Date Sampled: 2014-05-16

Analyte	Amount
Imidacloprid	Under 5% of the maximum residue limit (MRL)

CFIA Sample # C2014PEST01102

Product: Organic Pepper
Origin: Mexico
Brand: Sunny Valley
Details: Plu 94088
Lot Code: AL032
Packaged By: (b) (4)
Distributed By: (b) (4) AZ 85621
Date Sampled: 2014-06-03

Analyte	Amount
Piperonyl butoxide	Between 5% and 100% of the maximum residue limit (MRL)

CFIA Sample # C2014PEST01102

Product: Organic Kiwi
Origin: United States
Brand: (b) (4)
Distributed By: (b) (4) California 95948
Date Sampled: 2014-04-11

Analyte	Amount
Fludioxonil	Under 5% of the maximum residue limit (MRL)

As per Directive 14-01- *Procedure for follow-up to positive chemical residue testing results in organic products*, section 5.0, we kindly request that you follow-up and inspect to determine why residues are present. You are required to report the findings to the Canada Organic Office through your Conformity Verification Body after the inspection is complete.

We thank you for your cooperation.

Sincerely,



Benoit Dubé
Regulations and Standards Officer
Canada Organic Office
Canadian Food Inspection Agency



Cc: Vincent Vilela, Accreditation Director, **Committee on Accreditation for Evaluation of Quality (CAEQ)**



CCOF

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May 21, 2015

Valeriya Staykova

Canadian Food Inspection Agency (CFIA)

1400 Merivale Road, Tower 2

Floor 6, Room 252

Ottawa, ON K1A 0Y9

valeriya.staykova@inspection.gc.ca

RE: For follow up to positive chemical residue testing results

Dear Valeriya,

Thank you for the information the CFIA provided to CCOF on May 11, 2015 regarding positive residue testing results.

CCOF will investigate the residue results to the best of our ability given the information provided. When information is not available regarding the sample collection location, chain of custody of the product, lot codes, or a sampling report, we have found it can be difficult to determine causation, particularly for fresh products when it is over a year later. However, we will implement heightened oversight where appropriate and attempt to determine if measures to define borders, implement buffers and avoid contamination are sufficient. Where applicable this may include additional testing during our upcoming inspections.

We have a general request regarding all four of the sample IDs (item 1 below). A response to this request would greatly improve the quality of our investigation. It is important to verify the product source at the third party collection location so that CCOF may complete specific product verification and complete a more thorough investigation overall. If the information below cannot be provided, we will still be able to integrate these positive results into our risk assessment of the operators mentioned (however, more information is needed to link (b) (4) to a particular CCOF operation, see 3. below).

We have specific clarification questions regarding the results (see items 2 and 3 below).

1. Please provide the following information for each result, if available, so that we may provide the operator with evidence of conclusive traceability:

- a. Collection location of the sample, including business name and address.
- b. Complete chain of custody documents for sample collected tracing the product back to the operators named in the May 11, 2015 notification. If product was collected from a retailer, handler, wholesale distributor or other post-harvest handling source, include adequate traceability documentation such as receiving documents, delivery receipts, BOLs, etc.
- c. **Lot codes** for CFIA sample # FCR14-10352 packaged by (b) (4) and CFIA sample that was noted as distributed by (b) (4) if available.
- d. Investigative report for each sample collection event. This report should include all relevant details surrounding the collection of the sample, including the party who



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collected it, observations of the surrounding area (field or facility), photos if taken, and any other investigative action that has been taken.

- e. Pesticide residue levels of the results that are in excess of 5% of MRL (the level of the residue in parts per million was not provided) for CFIA sample #

C2014PEST01102/Organic (b) (4)

2. Regarding **CFIA sample # C2014PEST01102**, this sample code was reported for both the third and fourth sample on the list provided. **Please clarify.**

3. Regarding the **CFIA sample linked to (b) (4)**, this is a Distributor/Brand name and is connected to multiple CCOF operations. Since we cannot identify a specific operation to trace this product back to, we kindly request some or all of the information listed in 1. above in order to help us identify a specific operator.

CCOF appreciates the opportunity to respond to and investigate positive residue results. We recognize the importance of our role in this regard. Please let us know if we can answer any questions.

Sincerely,

Kelly Lehman Goswamy
Associate Quality System Manager
kelly@ccof.org, 831-423-2263 ext. 6255

Refer to correspondence number 528547-15



From: Wilburn, Tammie - AMS
To: ["brian@primuslabs.com"](mailto:brian@primuslabs.com)
Cc: [Michael, Matthew - AMS](#)
Subject: FW: Inspections of oranic pepper operations
Date: Tuesday, September 16, 2014 3:30:00 PM
Attachments: [ACA.Request.to.Investigate-PL.signed.pdf](#)

Brian,

We have not heard back from you regarding our August 27, 2014, request regarding organic bell peppers. Please review and respond to the attached letter. Feel free to call if you have questions.

Tammie B. Wilburn
Compliance and Enforcement Division
National Organic Program, USDA
202-690-2624

From: Wilburn, Tammie - AMS
Sent: Wednesday, August 27, 2014 2:30 PM
To: 'PrimusOrganic@primuslabs.com'
Cc: Yang, RobertH - AMS; Mann, Renee - AMS
Subject: Inspections of oranic pepper operations

Mr. Mansfield:

Please see the attached request regarding organic pepper operations in Mexico. Questions, please call.

Best,

Tammie B. Wilburn
Compliance and Enforcement Division
National Organic Program, USDA
202-690-2624 ---- please note new ph number



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

SENT VIA EMAIL

August 27, 2014

Brian Mansfield
1259 Furukawa Way
Santa Maria, CA 93458
PrimusOrganic@primuslabs.com

Re: Inspections of organic pepper operations

Dear Mr. Mansfield:

Information received by the USDA National Organic Program (NOP) indicates pesticide residues on organic peppers originating from Mexico. The information does not identify which farm(s) or handler(s) the residues are originating from so we are looking at all potential sources. Pursuant to 7 CFR 205.403 you are directed to conduct inspections of each organic pepper producer and handler certified by Primus Labs in Mexico to determine the source of the residues and if the operation is compliant with the USDA organic regulations.

Prior to conducting the inspections please:

1. Update the attached list of operations to ensure it includes all operations that you certify that are producing/handling organic peppers in Mexico; and
2. Submit an inspection plan for conducting unannounced onsite inspections and sampling, taking into account production volumes, harvest times, and other factors that may be a source of the residues. Please ensure that you include plans for conducting audit trails and product in/product out audits as a component of the inspections.

The NOP will cover the cost of sample analysis. You may contact the AMS National Science Laboratory directly should you have specific questions regarding sample submissions.

Samples should be sent to:

USDA, AMS, National Science Laboratory
801 Summit Crossing Place, Suite B
Gastonia, North Carolina 28054
ATTN: Roger Simonds
Roger.Simonds@ams.usda.gov

Inspections of Organic Pepper Operations
Page 2

Please respond to us with your inspection plan within 14 days of receipt of this letter. Upon review and approval of your plan, we will provide further direction as necessary for conducting inspections and sampling.

This matter is being handled as an open investigation and all information associated with the investigation is confidential and may not be released. Should you have any questions regarding this matter, you may contact me at (202) 260-8657 or matthew.michael@ams.usda.gov.

Sincerely,

A handwritten signature in blue ink that reads "Matthew Michael". The signature is fluid and cursive, with the first name "Matthew" being more prominent than the last name "Michael".

Matthew Michael
Director, Compliance & Enforcement Division
National Organic Program

Enclosure

cc: Director, Accreditation and International Activities Division, NOP, AMS
Roger Simonds, National Science Laboratories Chief, AMS

Inspections of Organic Pepper Operations
Page 3

Attachment – Primus Labs List of Operations

Primus Labs
Primus Labs
Primus Labs
Primus Labs
Primus Labs

(b) (4)



Mexico
Mexico
Mexico
Mexico
Mexico

From: Wilburn, Tammie - AMS
To: [Gebault King, ReneeA - AMS](#)
Cc: [Mann, Renee - AMS](#)
Subject: FW: Inspections of Organic Bell Pepper Operations
Date: Thursday, December 11, 2014 1:03:00 PM
Attachments: [Colorado Dept of Ag 9 16 14.pdf](#)

Hi Renee:

Would you please contact Colorado Dept. of Ag to request they immediately respond to my request of September 16, 2014. This is a priority for Miles.

Thanks much.

Tammie

From: Wilburn, Tammie - AMS
Sent: Tuesday, September 16, 2014 4:12 PM
To: casey.palmer@ag.state.co.us
Subject: Inspections of Organic Bell Pepper Operations

Hi Casey,

The NOP is conducting an investigation into organic bell peppers from Mexico. Please respond to the attached letter by October 1, 2014. Feel free to call if you have questions.

Tammie B. Wilburn
Compliance and Enforcement Division
National Organic Program, USDA
202-690-2624



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

SENT VIA EMAIL

September 16, 2014

Casey Palmer
Colorado Department of Agriculture
700 Kipling Street, Suite 4000
Lakewood, Colorado 80215

Re: Inspections of Organic Bell Pepper Operations

Dear Ms. Palmer:

Information received by the USDA National Organic Program (NOP) showed pesticide residues on organic bell peppers imported from Mexico. This information also indicated that some of the peppers sampled were certified by the Colorado Department of Agriculture (CDA). Enclosed is a listing of the specific pesticides found with residue concentrations exceeding 5% of the Environmental Protection Agency tolerance (Enclosure). The information does not identify which farm(s) or handler(s) the residues are originating from so we are looking at all potential sources.

Pursuant to 7 CFR 205.403, you are directed to conduct onsite inspections of each organic bell pepper producer and handler certified by CDA in Mexico to assist in determining the source of the residues and to determine if each operation is compliant with the USDA organic regulations. Prior to conducting the inspections:

1. Please provide us with a list of operations that you certify who are producing organic bell peppers in Mexico or handling organic peppers from Mexico. If you certify no such operations, let us know;
2. If you certify operations producing or handling Mexican bell peppers, please submit an inspection plan for conducting unannounced onsite inspections and sampling, taking into account production volumes, harvest times, and other factors that may be a source of the residues. Please include plans for conducting audit trails and product in/product out audits as a component of the inspections.

Inspections of Organic Pepper Operations
Page 2

The NOP will cover the cost of sample analysis. You may contact the AMS National Science Laboratory directly should you have specific questions regarding sample submissions.

Samples should be sent to:

USDA, AMS, National Science Laboratory
801 Summit Crossing Place, Suite B
Gastonia, North Carolina 28054
ATTN: Roger Simonds
Roger.Simonds@ams.usda.gov

Please respond to us with your inspection plan within 14 days of receipt of this letter. Upon review and approval of your plan, we will provide further direction as necessary for conducting inspections and sampling.

Please also note that this matter is being handled as an open investigation and all information associated with the investigation is confidential and may not be released. Should you have any questions regarding this matter, you may contact me at (202) 260-8657 or matthew.michael@ams.usda.gov.

Sincerely,



Matthew Michael
Director, Compliance & Enforcement Division
National Organic Program

Enclosure

cc: Director, Accreditation and International Activities Division, NOP, AMS
Roger Simonds, National Science Laboratories Chief, AMS

From: [Josie Quevedo](#)
To: [Wilburn, Tammie - AMS](#)
Cc: [Regalado, Andrew - AMS](#); [Yang, RobertH - AMS](#); [Humberto Gonzalez](#)
Subject: FW: La Campana Organic Produce- NOP Bell Peppers (2 of 3 e-mails)
Date: Thursday, April 2, 2015 9:43:00 PM
Attachments: [image002.jpg](#)
[image001.jpg](#)
[OSP \(part 1\) La Campana Organic Produce Plc-OR-116.pdf](#)

Part 2 of 3 e-mails



Josie Quevedo

Audit Coordinator

Josie.Quevedo@PrimusLabs.com

Voice 805.922.0055 | Fax 805.352.1364

PrimusLabs | 1259 Furukawa Way | Santa Maria, CA

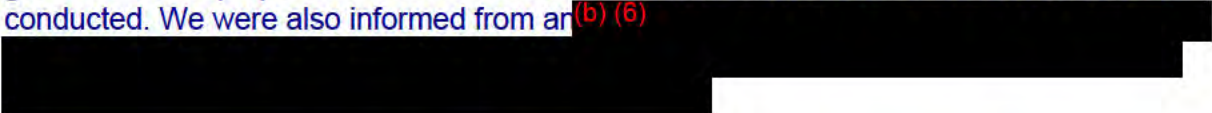
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From: Josie Quevedo
Sent: Thursday, April 02, 2015 6:39 PM
To: 'Wilburn, Tammie - AMS'
Cc: Regalado, Andrew - AMS; Yang, RobertH - AMS; Humberto Gonzalez
Subject: RE: La Campana Organic Produce- NOP Bell Peppers (1 of 3 e-mails)

Hello Tammie,

Please find attached the information for La Campana Organic Produce.

Per our conversation; regarding La Campana Organic Produce. Our concern is that we have not been able to collect a sample from the client due to no product being available for bell peppers in the operation. We have had one of PrimusLabs sales representative stop by at the operation from time to time to check if there is any activity of any bell peppers being grown in the crop operation and none have been seen since the un-announced audit was conducted. We were also informed from an (b) (6)



With these observations in mind we have proposed to conduct another un-announced audit to confirm if the statements and surveillances provided to be in fact what is happening with the certified operation.

We are coordinating to have the un-announced audit conducted for April 13, 2015. If any changes prevail I will be sure to contact you and give you an update.

If you have any questions or concerns please feel free to contact me.

Kind regards,



Josie Quevedo

Audit Coordinator

Josie.Quevedo@PrimusLabs.com

Voice 805.922.0055 | Fax 805.352.1364

PrimusLabs | 1259 Furukawa Way | Santa Maria, CA

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From: Wilburn, Tammie - AMS [mailto:Tammie.Wilburn@ams.usda.gov]

Sent: Wednesday, April 01, 2015 7:29 AM

To: Josie Quevedo

Cc: Regalado, Andrew - AMS; Yang, RobertH - AMS

Subject: La Campana Organic Produce

Importance: High

Hi Josie:

Please send the inspection report from your initial inspection at La Campana, by Monday, April 6, 2015. Please also provide the exact dates of when you will re-visit and collect a sample from La Campana.

Tammie

From: Josie Quevedo [mailto:josie.quevedo@primuslabs.com]

Sent: Friday, February 06, 2015 3:48 PM

To: Wilburn, Tammie - AMS

Subject: RE: La Campana Organic Produce

Hello Tammie,

There was a unannounced audit conducted. I would like to apologize; I believe the file was a bit to large to send. I will get that inspection report to you ASAP.

You are correct we did not collect a sample for La Campana Organic Produce due to the fact that there was no product available at the time of the inspection. I will get back to you and provide exact dates of when the sample will be collected.

Kind regards,

Josie Quevedo

Audit Coordinator

Josie.Quevedo@PrimusLabs.com



Voice 805.922.0055 | Fax 805.352.1364

PrimusLabs | 1259 Furukawa Way | Santa Maria, CA

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From: Wilburn, Tammie - AMS [<mailto:Tammie.Wilburn@ams.usda.gov>]
Sent: Friday, February 06, 2015 12:36 PM
To: Josie Quevedo
Subject: La Campana Organic Produce

Josie,

Did Primus do an inspection of La Campana Organic Produce?

Tammie

From: Wilburn, Tammie - AMS
Sent: Tuesday, February 03, 2015 6:31 AM
To: 'Josie Quevedo'
Cc: PrimusOrganic
Subject: RE: Notice of Non Compliance & Exclusion from Organic Sale Costa Azul Orgánica S. de R.L. de C.V. PLC-OR-146

Josie,

Please provide the inspection reports from your unannounced inspections; I believe there are six reports? Also, I haven't received a sample for La Campana Organic Produce? Did you submit one?

Tammie




when food safety counts

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1. INFORMACIÓN GENERAL:

Nombre de la Operación: LA CAMPANA ORGANIC PRODUCE			
Dirección: CARRETERA ESCUINAPA-TEPEC KM. 1105			
Ciudad: ESCUINAPA, MEX.	Estado: SINALOA	Código Postal: 82440	
Dirección para Correo (Si es diferente): AV. FEDERALISMO 3119-7			
Ciudad: CUIACAN, MEX.	Estado: SINALOA	Código Postal: 60100	
Información Contacto Primario:			
Nombre: RODOLFO DIAZ DE LA VEGA	Título (Sr./Sra./Srita.): SR.		
Teléfono: 667 228 0748	Fax: 667 761 8307		
E-mail: organic-valleyfarms@hotmail.com			
Otro Contacto:			
Nombre: CARLOS MACÍAS SALDIVAR	Título (Sr./Sra./Srita.): SR.		
Teléfono: 695 109 1561 / 667 303 0328	Fax: 695 953 1019		
E-mail: (b) (6)			
Tipo de Operación: <input checked="" type="checkbox"/> Solo Orgánico <input type="checkbox"/> Producción Paralela			
¿Ocurrió algún procesamiento interno en el rancho, de productos orgánicos convencionales o cualquier otro proceso de productos multi-ingrediente, durante esta operación?			
<input checked="" type="checkbox"/> No <input type="checkbox"/> Si, por favor complete el Plan de Sistema Orgánico para Procesadora / Manejo			
Registro Orgánico Estatal: Está la operación registrada para cultivar orgánicos en algún programa orgánico estatal?			
<input checked="" type="checkbox"/> No <input type="checkbox"/> Si; Favor de enlistar el estado y el (los) número (s) de registro. <input type="text"/>			
En mi conocimiento, toda la información proporcionada en este Plan de Sistema Orgánico describe exactamente esta operación de cultivo orgánico.			
Nombre: RODOLFO DIAZ DE LA VEGA	Firma: 	Fecha: <input type="text"/>	

1. INFORMACIÓN GENERAL (cont.)

2 de 26

Esta operación alguna vez ha aplicado para registro, ha sido registrada, inspeccionada o certificada por otra agencia certificadora?

☐ No

☒ Si, aplicó para registro o fue registrada. Proporcione copia de los documentos de registro / nombre de agencia certificadora. *PRIMUS LABS PLC-OR-116*

☐ Si, fue inspeccionada y/o certificada. Proporcione copia del reporte de inspección más reciente, todas las no conformidades encontradas y las acciones correctivas tomadas.

Se hará una revisión del PSO (Plan de Sistema Orgánico) para asegurar que su operación cae dentro del alcance de los requerimientos Programa Orgánico Nacional de USDA, y será usado para estimar el costo para el desarrollo de la inspección del lugar.

En el PSO, donde se le requiere describir sus métodos, si su operación tiene procedimientos formales, usted podría referenciar el número de procedimiento en esa sección y anexar una copia del mismo.

2. INFORMACIÓN DE REGISTRO

Nota: Esta sección es solo para el uso de PrimusLabs.com

Número de Reg.: PLc -

Tipo de Certificación: ☐ Nuevo

☐ Recertificación

: Fecha de recepción del paquete de aplicación y PSO

3. INFORMACIÓN DEL PLAN DEL RANCHO

3 de 26

a. Información de Identificación y Localización

Identificador del rancho: LA CAMPANA ORGANIC PRODUCE SPR DE RL de CV.

Sección/Ciudad/Rango, Municipio o algún descriptor similar: ESCUINAPA, SIN. MEX.

(Adjuntar una copia del mapa que muestre la ubicación)

b. Detalles del Sitio - enviar un mapa que refleje con exactitud la información siguiente

Superficie - (b) (4) HAS. :total en el lugar

 HAS. :total orgánico en el lugar

 :total en transición a orgánico

Proporcione detalles de la superficie mencionada arriba, que no es producción orgánica o que está en transición a producción orgánica

SOLO HAY DESMONTADO LAS 15 HAS. ORGANICAS CON
INVERNADEROS DE MALLA Y ZONA PEQUEÑA ALEDAÑA.
EL RESTO DE TERRENO ES MONTE VERGEN.

(agregue hojas adicionales si es necesario)

c. Información Histórica del Uso del Terreno

Para toda la superficie de producción orgánica que tenga menos de 4 años a partir de la fecha de esta aplicación, proporcione una historia detallada del uso del suelo, que indique el uso anterior del terreno, fertilización y arreglos del suelo (aplicaciones y fechas). Productos usados en el control de plagas y fechas de aplicación, detalle específicamente cualquier aplicación de materiales prohibidos.

Enliste los cultivos para los cuales se está requiriendo la certificación orgánica, incluya la superficie de cada cultivo orgánico. Si hay también una operación de producción paralela, enliste todos los cultivos que no se incluirán en la certificación orgánica y su respectiva superficie.

[illegible]

4. INFORMACIÓN DE LA SEMILLA

5 de 26

Los agricultores deben emplear semillas orgánicas. Las semillas no orgánicas pueden emplearse de conformidad con los estándares del Programa Orgánico Nacional, cuando su equivalente orgánico no está disponible a la venta. Si se requiere por regulaciones fitosanitarias, podría utilizarse semilla con sustancias prohibidas, sin embargo, queda prohibido el uso de semilla Genéticamente Modificada (GMO).

a. Fuente de la Semilla (Marque todas las que apliquen)

☐ N/A, La semilla no se usa en esta operación

☒ Plántula utilizada en esta operación

☒ Orgánica

☐ No orgánica

☒ No tratada

☐ Tratada

☒ No GMO

☒

Semilla que es utilizada en la operación

☒ Orgánica

☐ No orgánica

☒ No tratada

☐ Tratada

☒ No GMO

b. Semilla Usada - En el anexo "Semilla y Tratamiento de Semilla - Información Detallada" proporcione

c. Tratamientos de Semilla ☒ No son utilizados tratamientos de semilla en esta operación

☐ Si se da tratamiento a la semilla, proporcione los detalles de todos los

SECCIÓN 4 (cont.) SEMILLA Y TRATAMIENTO DE SEMILLA - INFORMACIÓN DETALLADA

6 de 26

Complete esta hoja para cada cultivo/variedad de semilla que utilice en la operación

Nombre del Cultivo: PEPINO / CUCUMBERVariedad de Semilla: PARAISOFuente de la Semilla: KEITHY WILLIAMS - VITALIS (SEMILLAS ORGÁNICAS DE ENZA 2).Orgánica ☒ No orgánica ☐ Sin tratamiento ☐ Tratada ☐ No GMO ☐Si se marca alguna no orgánica, proveer detalles completos sobre esta semilla y su justificación:

— • —

Si marca alguna tratada, proveer detalles completos sobre el tratamiento empleado y su justificación

— • —

5. INFORMACIÓN SOBRE SIEMBRA DIRECTA (SEMILLA/TRANSPLANTE)

7 de 26

El agricultor debe usar para siembra directa, semillas/transplante orgánicos. En caso que no, pueden usarse otros no orgánicos, en cumplimiento con los estándares del PON, cuando su equivalente orgánico no está disponible comercialmente. Si es requerido por regulaciones fitosanitarias, tratar con materiales prohibidos la semilla/transplante, se pueden utilizar, sin embargo, materiales genéticamente modificados están prohibidos.

a. Fuente de semilla/transplante (marque todas las que apliquen)

☐ N/A, no se utilizan semillas/transplante en esta operación.

☒ Fuente de semilla/transplante son cultivadas en esta operación

☒ Orgánica

☐ No orgánica

☒ No tratada

☐ Tratada

☒ No GMO

☒ Semilla comprada es utilizada en esta operación

☒ Orgánica

☐ No Orgánica

☒ No Tratada

☐ Tratada

☒ No GMO

b. En la hoja del adjunto "Siembra Directa (Semilla/Trasplante) y Tratamiento - Información Detallada"

c. Tratamientos

☒ Tratamientos no son utilizados en esta operación

☐ Si son usados tratamientos, proporcione detalles de todos los tratamientos en el adjunto "Siembra Directa (Semilla/Trasplante) y Tratamiento - Información Detallada"

SECCIÓN 5 (cont.) SIEMBRA DIRECTA (SEMILLA/TRASPLANTE) Y TRATAMIENTO -

8 de 26

INFORMACIÓN DETALLADA

Complete esta hoja para cada cultivo/variedad de semilla o material de disipación usado en esta operación

Nombre del Cultivo: PEPINO / CUCUMBER

Variedad de Semilla: PARAISO

Fuente de la Semilla: KEITHLY WILLIAMS - VITALIS (ORGANICAS LE ENZA ZADEN)

Orgánica ☒ No orgánica ☐ No tratada ☐ Tratada ☐ No GMO ☐

Si se marca alguna no orgánica, proveer detalles completos sobre este material y justificación de uso:

— 0 —

Si marca alguna tratada, proveer detalles completos sobre el tratamiento empleado y justificación

— 0 —

SECCIÓN 5 (cont.) SIEMBRA DIRECTA (SEMILLA/TRASPLANTE) Y TRATAMIENTO -

8 de 26

INFORMACIÓN DETALLADA

Complete esta hoja para cada cultivo/variedad de semilla o material de disipación usado en esta operación

Nombre del Cultivo: TOMATE / TOMATEVariedad de Semilla: NIOCTEZUMA (HMX 7865)Fuente de la Semilla: KEITHLY - WILLIAMS SEEDSOrgánica ☐ No orgánica ☐ No tratada ☒ Tratada ☐ No GMO ☐Si se marca alguna no orgánica, proveer detalles completos sobre este material y justificación de uso:

ESTA VARIEDAD NO SE ENCUENTRA ORGÁNICA EN EL MERCADO, DON
LO QUE SE PIDE SIN TRATAMIENTO. EN LA CAMPAÑA ORGÁNICA LE
DAREMOS EL PROCESO ORGÁNICO CON T-22 Y MICORRIZAS A LA SEMILLA.
VALORAMOS LA RESISTENCIA GENÉTICA A ENFERMEDADES Y PLAGAS,
DE ESTA VARIEDAD, LO QUE IMPLICA MENOS APLICACIONES AUN ORGÁ-
NICAS Y MENOS STRESS DE LA PLANTA, TENIENDO FRUTOS MAS SAKOS.

Si marca alguna tratada, proveer detalles completos sobre el tratamiento empleado y justificación

— 0 —

**SECCIÓN 5 (cont.) SIEMBRA DIRECTA (SEMILLA/TRASPLANTE) Y TRATAMIENTO -
INFORMACIÓN DETALLADA**

8 de 26

Complete esta hoja para cada cultivo/variedad de semilla o material de disipación usado en esta operación

Nombre del Cultivo: CALABAZA / ZUCCHINI SQUASH

Variedad de Semilla: JACOBO, PASCOLA Y DESERT.

Fuente de la Semilla: KEITHLY - WILLIAMS - SEEDS

Orgánica ☐ No orgánica ☒ No tratada ☐ Tratada ☐ No GMO ☐

Si se marca alguna no orgánica, proveer detalles completos sobre este material y justificación de uso:

NO EXISTEN ORGÁNICAS ESTAS VARIEDADES EN EL MERCADO, POR LO QUE
LA OBTENDREMOS SIN TRATAMIENTO Y EN EL RANCHO LE DAREMOS LA APLICACIÓN
ORGÁNICA CON T-22 Y RYCORRIZAS.
LAS DOS PRIMERAS VARIEDADES FUERON TESTADAS EN EL RANCHO MOST-
RANDO ALTA RESISTENCIA A ENFERMEDADES Y NAGMS, VALOR GENÉTICO
QUE SE DEBE DAR SU DEBIDO VALOR.

Si marca alguna tratada, proveer detalles completos sobre el tratamiento empleado y justificación

— 0 —



KEITHLY WILLIAMS

Semillas de México

S. de R.L. de C.V.

R.F.C: KWSQ10430NV8

AV. ARGENTINA NO. 1498, COL. ALAMITOS

MEXICALI, B.C. MEXICO C.P. 21210

TEL: (686) 565-7878, 565-3111

FAX: (868) 565-7840

SUC. CULIACAN
PRIVADA DE LAS ORQUIDEAS
#5660

COL. HACIENDA MOLINO DE
FLORES

CULIACAN DE ROSALES,
CULIACAN, SIN, C.P. 80155

FECHA	FACTURA No.
17/9/2013 16:55:01	PSI-MX-007692
FECHA VENCIMIENTO	No. CLIENTE
Septiembre 17 2013	M8816800
FECHA ENTREGA	No. REMISION
Septiembre 1 2013	SHP-MX-007840

NOMBRE : LA CAMPANA ORGANIC PRODUCE SPR DE RL DE CV	VENDEDOR
DIRECCIÓN: CARRETERA FEDERAL LIBRE ESCUINAPA-TEPIC KM 1105, 10 DE MAYO	
CIUDAD: ESCUINAPA, SINALOA, MEXICO, C.P. 82440	37 SERGIO AHUJA
R.F.C: COP100312ME4	TELÉFONOS:

CANT.	TIPO EMPAQUE	CODIGO KW	DESCRIPCIÓN	PRECIO UNIT.	IMPORTE
18.00000	5M	115747	SEMILLA DE: PEPINO, PARAISO LOTE: 2303933 S/C: 13763, TRATADO: PROBIO T22, FECHA: 5/15/13, GERM: 99%, PDCTOR: ENZA ZADEN USA INC.	(b) (4)	
24.00000	5M	115748	PEPINO, PARAISO LOTE: 2304278 S/C: 14042, TRATADO: PROBIO T22, FECHA: 7/15/13, GERM: 99%, PDCTOR: ENZA ZADEN USA INC.	(b) (4)	

IMPORTE CON LETRA	MONEDA: DOLAR AMERICANO	SUBTOTAL:	(b) (4)
(TREINTA Y SIETE MIL DOSCIENTOS SETENTA Y CINCO DÓLARES 00/100 USD)		IVA 0.00 % :	
		TOTAL:	

OBSERVACIONES

	Este documento es una representación impresa de un CFDI *Efectos fiscales al pago FORMA DE PAGO: PAGO EN UNA SOLA EXHIBICION METODO DE PAGO: No Identificado, CUENTA DE PAGO: No Identificado REGIMEN FISCAL DEL EMISOR: REGIMEN GENERAL DE LEY PERSONAS MORALES	
	Folio fiscal:	E84DB134-B639-458A-8E50-D3C6D54EF4A6
	No de Serie del Certificado del Emisor:	00001000000203043830
	No de Serie del Certificado del SAT:	00001000000202864883
	Fecha y hora de certificación:	Septiembre 17 2013 - 18:55:13

Sello digital del CFDI
TFjkup1JaYfx5AfeMIiHX6qNQYIQq752JlTlCYQfZWs07vwyHQJu2nt8HyR0jyMECg5Ox5DEY+8bXY3x7Pzxcf QeSxXOLqSvkAAdf+LtGmAkSSBIyNjx3ssAyUkPMRwQnlm+ito6y/2RyjSeFYiApfmcACRp0QBhbiBWDvuXhv4=

Sello del SAT
RN0moAZmg83yxfBv1WiHkewagnS2oe6nxwEl1Rk7+jG4rFvBeuOmB861PvGQA829fEJEqD0NcGy09/x T6zrt+Jck/BjoEwYwk5g53UbqNLY57EFLlYgMy0iHshH8IxbMBfir6+8DX31XwrZVVZFlceT85iSqeau 1BnKppKps24=

Cadena original del complemento de certificación digital del SAT
1.0 E84DB134-B639-458A-8E50-D3C6D54EF4A6 2013-09-17T18:55:13 TFjkup1JaYfx5AfeMIiHX6qNQYIQq752JlTlCYQfZWs07vwyHQJu2nt8HyR0jyMECg5Ox5DEY+8bXY3x7PzxcfQeSxXOLqSvkAAdf+LtGmAkSSBIyNjx3ssAyUkPMRwQnlm+ito6y/2RyjSeFYiApfmcACRp0QBhbiBWDvuXhv4= 00001000000202864883

P A G A R E

POR ESTE PAGARÉ MERCANTIL, RECONOZCO (CEMOS) Y DEBO (EMOS) Y ESTOY (AMOS) ABLIGADO (S), A PAGAR INCONDICIONALMENTE A LA ORDEN KEITHLY WILLIAMS SEMILLAS DE MEXICO, S DE RL DE CV, EN MEXICALI, B.C., O ENCUALQUIER OTRA CIUDAD DE LA REPUBLICA MEXICANA A ELECCION DEL TENEDOR EN LA FECHA LA CANTIDAD DE \$ 37,275.00 (TREINTA Y SIETE MIL DOSCIENTOS SETENTA Y CINCO DÓLARES 00/100 USD) O SU EQUIVALENTE EN PESOS, EL DIA SEPTIEMBRE 17 2013.

SI NO FUESE CUBIERTO PUNTUALMENTE EL VALOR DE ESTE DOCUMENTO, PAGARÉ (MOS) ADEMAS DE TODA CLASE DE COBRO DE INTERESES A RAZON DEL % MENSUAL SIN QUE POR ESO SE CONSIERE PRORROGADO EL PLAZO FIJADO PARA EL CUMPLIMIENTO DE ESTA OBLIGACION. EN CASO DE PAGAR CON CHEQUE ESTE DEBERA SER DE COBRO INMEDIATO, DE LO CONTRARIO, SI EL DIA DE VENCIMIENTO DE ESTE PAGARÉ EL CUENTE PAGASE CON FECHA DE COBRO

POSTERIOR, EL PAGO SE CONSIDERARA FUERA DE PLAZO Y SE COBRARA EL PORCENTAJE DE INTERES ESTIPULADO, Y EN CASO DE QUE EL CHEQUE GIRADO A NUESTRO FAVOR EL DIA DE LA PRESENTACION Y NO FUESE PAGADO, POR CAUSA IMPUTABLE AL PROPIO LIBRADOR, ESTE ULTIMO RESARCIRA AL TENEDOR DE LOS DAÑOS Y PREJUICIOS QUE CON ELLO OCACIONE, EN NINGUN CASO LA INDEMNIZACION SERA MENOR AL VEINTE POR CIENTO (20%) DEL VALOR DEL CHEQUE.

Mexicali, Baja California a Septiembre 17 2013 -
16:55:01

PSI-MX-007692

DATOS DE LA EMPRESA

NOMBRE: LA CAMPANA ORGANIC PRODUCE SPR DE RL DE CV
DIRECCION: CARRETERA FEDERAL LIBRE ESCUINAPA-TEPIC KM 1105, 10 DE
MAYO
CIUDAD: ESCUINAPA, SINALOA MEXICO 82440
TELÉFONO:

FIRMA DE CONFORMIDAD

EXPEDIDO EN: AV. ARGENTINA NO. 1498, COL. ALAMITOS, MEXICALI, B.C

☐ VERSION 3.2

B-1328



KEITHLY-WILLIAMS SEEDS

Vegetable Seed

5702 W CO 81/2 STREET
YUMA, ARIZONA, 85364
OFFICE: 928-329-7770
FAX: 928-329-7773

www.keithlywilliams.com

20 de Septiembre de 2013

La Campana Organic Produce, S.P.R. de R.L. de C.V.
Carretera Federal Libre Escuinapa-Tepic Km 1105, 10 de Mayo
Escuinapa, Sinaloa, México C.P. 82440

R.F.C. COP-100312-ME4

A quien corresponda:

Por favor acepte esta carta como muestra de nuestro protocolo para la procuración de la calidad de las semillas de hortalizas para La Campana Organic Produce. Cuando se solicita una orden a nuestra Compañía, tratamos de obtener semilla orgánica cuando es posible.

Cuando menos tres diferentes Proveedores o fuentes de semilla son contactados para informarnos si hay semilla producida orgánicamente disponible. En la mayoría de los casos únicamente semilla producida convencionalmente está disponible. Nosotros entendemos que semilla tratada químicamente es inaceptable y por eso la semilla se consigue con tratamiento orgánico autorizado y registrado o sin tratamiento, así también sabemos que ninguna semilla debe de contener Organismos Genéticamente Modificados (Non-GMO's). Para el caso de que la semilla se requiera peletizada tenemos disponible pellets orgánicos, estos son usados cuando semilla peletizada es requerida para realizar siembras con sembradoras de precisión.

Se ha revisado el historial de ventas a La Campana Organic Produce y esta semilla no ha sido tratada con algún tratamiento químico. A continuación se detallan la(s) siguiente(s) factura(s), variedades y nuestro único sistema de numeración KW atrás del original del proveedor o productor de semilla:

PSI-MX-007692

Paraíso, Pepino, Enza Zaden USA Inc., Lot 2303933, KW 115747, Treatment: Probio T22, Seed Count: 13,763, Germ: 99% 5/15/13.

Paraíso, Pepino, Enza Zaden USA Inc., Lot 2304278, KW 115748, Treatment: Probio T22, Seed Count: 14,042, Germ: 99% 7/15/13.

Cabe mencionar, si se da el caso, que al no encontrar toda la semilla solicitada producida de manera orgánica disponible, usamos semilla sin tratar convencional o con tratamiento biológico registrado.

Atentamente,

Ricardo Prieto
Gerente de Control de Calidad-México



KEITHLY-WILLIAMS SEEDS

Vegetable Seed

5702 W CO 8 1/2 STREET
YUMA, ARIZONA, 85364
OFFICE: 928-329-7770
FAX: 928-329-7773

www.keithlywilliams.com

20 de Septiembre de 2013

La Campana Organic Produce, S.P.R. de R.L. de C.V.
Carretera Federal Libre Escuinapa-Tepic Km 1105, 10 de Mayo
Escuinapa, Sinaloa, México C.P. 82440

R.F.C. COP-100312-ME4

A quien corresponda.-

Keithly-Williams Seeds está comprometido a ayudar a La Campana Organic Produce, S.P.R. de R.L. de C.V. a proveer semilla de vegetales para alimentos seguros y de calidad. En un esfuerzo por minimizar riesgos potenciales de seguridad de alimentos, Keithly-Williams Seeds, ha entrenado a todos los empleados que puedan entrar a cualquiera de sus campos en la operación diaria de trabajo con los procedimientos propios de seguridad de alimentos. Por favor permita que esta carta sea evidencia de nuestro compromiso para Las Mejores Prácticas Gerenciales en el manejo, almacenamiento y envíos de semillas de vegetales de calidad para su operación agrícola.

Keithly-Williams Seeds mantiene un estándar actualizado del procedimiento de operación para el manejo de semilla, almacenamiento y contabilidad con relación a toda la venta de semilla. Nosotros no procesamos, tratamos o empaquetamos ninguna semilla en nuestras instalaciones, pero si cumplimos con todas las leyes industriales locales, estatales y federales que gobiernan el manejo y venta de semilla de vegetales. Nuestro inventario de semillas de vegetales típicamente llega en paquetes sellados por parte de nuestros proveedores de semilla, y nosotros mantenemos control completo sobre esa semilla, de ambos aspectos seguridad y calidad hasta que la semilla es abierta por sus empleados cuando la compran. Nuestros proveedores de semilla son bien conocidos por nosotros y muchos de ellos han hecho negocio con nosotros por años. Ellos también tienen sistemas de control de calidad operando así como también procedimientos con estándares de operación para asegurar que todos en la cadena de suministro de un producto seguro y consistente. Esta semilla es inventariada en nuestras bodegas con clima controlado, donde es mantenida hasta que es vendida y entregada a nuestros clientes.

Todas las transacciones de semilla son localizables a través de nuestro único sistema de numeración KW atrás del original del proveedor o productor de semilla. Todos los records de las transacciones de su compañía están disponibles a su solicitud para su conveniencia.

Asimismo Keithly-Williams Seeds es miembro con buena posición de la Asociación Americana de Comercio de Semilla (La Asociación Federal de Semilla que monitorea las Leyes Federales de Semilla-ASTA), así como también forma parte de las Asociaciones de Semilla en todos los estados en los cuales hacemos negocio. Nosotros continuamos monitoreando, cumpliendo, y tomando un rol activo con los estándares de la industria de semilla y regulaciones de gobierno, especialmente las que aplican a seguridad de alimentos.

Adicionalmente, Keithly-Williams Seeds y Keithly Williams Semillas de México cumple con todas las regulaciones de México relacionadas al movimiento y ventas de semillas de vegetales, así mismo es socio de AMSAC-Asociación Mexicana de Semilleros, A.C. Si usted tiene alguna pregunta o comentario por favor comunicarse al (928) 329-7770.

Atentamente,

Ricardo Prieto
Quality Assurance Manager-México
rprieto@keithlywilliams.com

a. Información General

1) Plan de Rotación - Describa con detalle

ó ☐ N/A, proporcione explicación

EL PLAN DE ROTACIÓN BASE EN LA CAMPAÑA ORGANIC PRODUCE ES LA ROTACIÓN DE CUCURBITACIAS CON SOLANACEAS, ES DECIR, EL MÓDULO QUE ES SEMBRADO CON PEPINO, AL AÑO O TEMPORADA SIGUIENTE ES PLANTADO CON BELL PEPPER Y/O TOMATE.

2) Prácticas de Control de Erosión - Describa con detalle

ó ☐ N/A, proporcione explicación

LOS TERRENOS FUERON NIVELADOS CON ALTA TECNOLOGÍA, POR LO QUE SUS PENDIENTES SON LEVES Y DEFINIDAS.

EN EL VERANO CUANDO NO ESTÁN EN PRODUCCIÓN COINCIDE CON LA TEMPORADA DE LUVIAS, EN ESTE TIEMPO SEMBRAMOS O DEJAMOS LA HIERBA NATIVA CUBRA LOS TERRENOS PARA PROTEGERLOS DE LA EROSIÓN.

ADemás LOS TERRENOS TIENEN DRENAJE INTERNO A 1.40 m DE PROFUNDIDAD QUE AYUDA A DESALOJAR LOS EXCESOS DE HUMEDAD Y EVITA LA SATURACIÓN DE LOS MISMOS.

ó ☐ N/A, proporcione explicación

Basicamente cuidamos que los suelos no se erosionen porque pierden su calidad y el otro punto importante es el uso de insumos orgánicos de primera calidad, como son los VERMICOMPOSTOS, HUMICOS, RESONADORES, EXTRACTOS ENRIQUECEDORES y MICROORGANISMOS que favorezcan los suelos por competencia contra patógenos, entre otras actividades.

[illegible]

Documento de Conformidad de Evaluación de Insumos

Emitir a:

Humisol Orgánico S.A. de C.V.

Angel Flores s/n, Cofradía de San Pedro, Navolato Sinaloa, México.

Tel. +672 727 70 23, humisolorganico@hotmail.com

Nombres de los insumos:

BIOHUMISOL GRANULADO

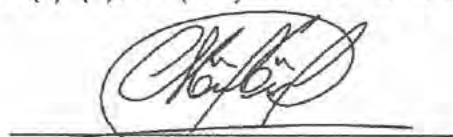
PLCR 048-14, como Acondicionador y Mejorador del suelo

Publicado: 12 de Marzo, 2014

Valido hasta: 11 de Marzo, 2015

Evaluación de acuerdo a las normas orgánicas

a. NOP § 205.105 (b), § 205.203 (c) (2); b. (CE) n° 889.2008 Anexo I; c. JAS/MAFF Cuadro 1.



PrimusLabs

Este no es un certificado orgánico, Exclusivamente para ser utilizado como Insumo de agricultura orgánica

2810 Industrial Parkway, Santa Maria, CA 93455



Este informe de prueba tiene validez únicamente en su forma íntegra y original. No se permite la reproducción parcial de este documento.

Alvaro Obregón Sur 999-301
Col. Guadalupe
C.P. 80220 Culiacán, Sin.

TEL.: (667) 716-50-77
FAX: (667) 716-50-26
www.primuslabs.com

Microbiological Results Resultados Microbiológicos

Página: 1/1

Cliente: Humisol Organico S.A de C.V

Nombre del Productor: Humisol Organico S.A de C.V.

Dirección: Angel Flores S/N, Cofradía de San Pedro, Navolato - Sinaloa

Fecha de Recepción: 2014-06-13

Temperatura: 24,8 °C

Fecha de Análisis: 2014-06-13

Authorization Number Número de Autorización	Sample Description Descripción de la Muestra	Type of Analysis Tipo de Análisis	Method Used Método Usado	Results Resultados
--	---	--------------------------------------	-----------------------------	-----------------------

MXM14.06323

DIVERSOS

Humus sólido

Biohumisol granulado

Lote: 4A-5A

Tamaño de la muestra: 3 kg

Condiciones de la muestra: Bolsa estéril

Muestreado por: Renato Ramos Beltran

Plan de Muestreo: 2

Procedimiento de Muestreo: Procedimiento Interno MT-P-001

Fecha de Muestreo: 2014/06/13

Hora de Muestreo: 14:00

Coliformes totales

LAB-M-005

2

< 3 NMP/g

Coliformes fecales

LAB-M-005

2

< 3 NMP/g

Escherichia coli

LAB-M-005

2

< 3 NMP/g

Salmonella

NOM-114-SSA1-1994

1,2

Ausente en 25 g de muestra

Escherichia coli 0157:H7

AOAC 996.09

1,2

Ausente en 25 g de muestra

1 Autorización COFEPRIS No. TA-25-13 (13 de Junio de 2013 al 13 de Junio de 2015)

2 Acreditación EMA A-034-006/09 (a partir de 2009-08-21)

CFU = Colony Forming Unit UFC = Unidades Formadoras de Colonias MPN = Most Probable Number NMP = Número Más Probable est = Estimated/Estimado

Approved by: Mirna Gpe. Monarres Pérez / Responsable de Laboratorio

Aprobado por: Supervising Microbiologist / Supervisado

Results Date: 2014-06-17

Fecha de Resultados:

PrimusLabs' representation of the results of laboratory analyses is limited to the analyzed samples only. PrimusLabs makes no representations or warranties about other portions of these commodities/lots. PrimusLabs' liability is limited to the cost of the laboratory tests. See also www.primuslabs.com for additional information. La representación de los resultados de los análisis del Laboratorio de PrimusLabs está limitada solamente a las muestras analizadas. PrimusLabs no garantiza ni representa otras porciones de estos lotes o productos. La responsabilidad de PrimusLabs está limitada al costo de los análisis de Laboratorio. Vea también www.primuslabs.com para mas información.

REV-2

LAB-F-044

ANÁLISIS DE FITOPATOLOGÍA
MICRO ORGANISMOS BENEFICOS EN COMPOSTA



FOLIO: 4885

Información General

PRODUCTOR:

HUMISOL ORGANICO S.A. DE C.V.

Técnico Solicitante

LIC. ENRIQUE MUÑOZ

Ciudad / Estado

CULIACÁN, SINALOA

Campo

CULIACÁN, SINALOA

ANÁLISIS SOLICITADO	FECHA DE RECEPCIÓN	FECHA DE ENTREGA
<input checked="" type="checkbox"/> Hongos <input type="checkbox"/> Virus <input checked="" type="checkbox"/> Bacterias <input type="checkbox"/> I.E.B. <input checked="" type="checkbox"/> Nematodos <input type="checkbox"/> Otros	13-Jun-14 Beneficos	19-Jun-14
CULTIVO	ETAPA	SISTEMA DE RIEGO
NO DEFINIDO	NO DEFINIDO	NO DEFINIDO

No. Muestra

1

2

3

4

5

Datos	BIOHUMISOL GRANULADA				
Lote / Tabla	LOTE 4 A Y 5 A				
Etapas / Profundidad					
HONGOS	* UFC/GR.	Medio Utilizado : PDA, OH, PDAa			
<i>Aspergillus sp.</i>	16,820				
<i>Penicillium sp.</i>	4,650				
<i>Trichoderma sp.</i>	6,900				
<i>Glomus sp.</i>	850				
<i>Streptomyces sp.</i>	4,800				
<i>Gilociadium sp.</i>	1,500				
<i>Paecilomyces sp.</i>	180				
<i>Arthrobotrys sp.</i>	45				
<i>Nematocionus sp.</i>	200				
<i>Dactylaria sp.</i>	110				
<i>Dactyliella sp.</i>	0				
BACTERIAS	* UFC/GR.	Medio Utilizado : AN, B'King			
<i>Bacillus subtilis</i>	1.6 * 10 ⁵				
<i>Bacillus cereus</i>	0				
<i>Bacillus spp.</i>	1.2 * 10 ⁶				
<i>Pseudomonas fluorescens</i>	1.2 * 10 ⁶				
<i>Pseudomonas chlororaphis</i>	1.3 * 10 ⁶				
<i>Rhizobium sp.</i>	0				
<i>Azotobacter sp.</i>	0				
<i>Nitrobacter sp.</i>	0				
<i>Actinomyces</i>	1.8 * 10 ⁴				
NEMATODOS	* Individuos por 100 gr.	Medio Utilizado : Tamiz- Centrifuga			
<i>Rhabditis sp.</i>	260				
<i>Acrobelus sp.</i>	120				
<i>Cephalobus sp.</i>	35				
<i>Dorylaimus sp.</i>	150				
<i>Mononchus sp.</i>	35				
<i>Plectus sp.</i>	5				
<i>Aphelenchus sp.</i>	40				
<i>Steinemema sp.</i>	0				
<i>Eudorylaimus sp.</i>	0				
<i>Heterorhabditis sp.</i>	20				
<i>Cruzema sp.</i>	0				
<i>Diplogaster sp.</i>	0				

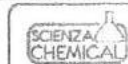
Niveles de Referencia

Importancia	Importancia	Importancia
BAJA	MEDIA	ALTA
UFC/gr	UFC/gr	UFC/gr
<1,000	1,000-10,000	> 10,000
<1,000	1,000-10,000	>10,000
<1,000	1,000-10,000	>10,000
<100	100 - 500	> 500
< 1,000	1,000-10,000	> 10,000
<1,000	1,000-10,000	>10,000
<1,000	1,000-10,000	>10,000
<1,000	1,000-10,000	>10,000
<1,000	1,000-10,000	>10,000
<1,000	1,000-10,000	>10,000
<1,000	1,000-10,000	>10,000
<1,000	1,000-10,000	>10,000
< 1*10 ⁶	1*10 ⁵ - 1 * 10 ⁸	> 1 x 10 ⁸
< 1*10 ⁶	1*10 ⁵ - 1 * 10 ⁸	> 1 x 10 ⁸
< 1*10 ⁶	1*10 ⁵ - 1 * 10 ⁸	> 1 x 10 ⁸
< 1*10 ⁶	1*10 ⁵ - 1 * 10 ⁸	> 1 x 10 ⁸
< 1*10 ⁶	1*10 ⁵ - 1 * 10 ⁸	> 1 x 10 ⁸
< 1*10 ⁶	1*10 ⁵ - 1 * 10 ⁸	> 1 x 10 ⁸
< 1*10 ⁶	1*10 ⁵ - 1 * 10 ⁸	> 1 x 10 ⁸
< 1*10 ⁶	1*10 ⁵ - 1 * 10 ⁸	> 1 x 10 ⁸
< 1*10 ⁶	1*10 ⁵ - 1 * 10 ⁸	> 1 x 10 ⁸
< 100	100-200	> 200
< 100	100-200	> 200
< 100	100-200	> 200
< 27	27-67	> 67
< 100	100-200	> 200
< 100	100-200	> 200
< 27	27 - 67	> 67
< 100	100-200	> 200
< 100	100-200	> 200
< 100	100-200	> 200
< 100	100-200	> 200
< 100	100-200	> 200
< 100	100-200	> 200

OBSERVACIONES:

Excelente presencia Hongos, bacterias y nematodos benéficos.

Análisis de suelo · Análisis de extracto saturado · Análisis de compostas · Análisis de aguas · Análisis de plantas · Análisis de fermentos
Pedro de Tovar #5297, Rincón San Rafael · C. P. 80150 · Culiacán, Sinaloa · Tel: (667) 753 0793 · Cel: (667) 753 0793 · Nextel: 92*10*3335
Correos: laboratorio_agricola@hotmail.com, laboratorios@scienzachemical.com.mx · www.scienzachemical.com.mx



C fepris

ING. ANTONIO GONZALEZ AYALA

DEPARTAMENTO QUIMICO

CEQ PROF. 1452308

www.scienzachemical.com.mx

ANÁLISIS DE FITOPATOLOGÍA
ORGANISMOS PATÓGENOS EN COMPOSTA



FOLIO: 4986

Información General

Agrícola	Ciudad / Estado
HUMISOL ORGANICO S.A. DE C.V.	CULIACÁN, SINALOA
Técnico Solicitante	Campo
LIC. ENRIQUE MUÑOZ	CULIACÁN, SINALOA

ANÁLISIS SOLICITADO	FECHA DE RECEPCIÓN	FECHA DE ENTREGA
<input checked="" type="checkbox"/> Hongos <input type="checkbox"/> Virus	13-jun-14	19-jun-14
<input checked="" type="checkbox"/> Bacterias <input type="checkbox"/> I.E.B.	Patógenos	
<input checked="" type="checkbox"/> Nematodos <input type="checkbox"/> Otros		
CULTIVO	ETAPA	SISTEMA DE RIEGO
NO DEFINIDO	NO DEFINIDO	NO DEFINIDO

No. Muestra

1 2 3 4 5

Datos					
Lote / Tabla	BIOHUMISOL GRANULADA LOTE 4A Y 5A				
Etapas / Profundidad					
HONGOS	* UFC/GR.	Medio Utilizado : PDA, OH, PDAa			
<i>Fusarium oxysporum</i>	0				
<i>Rhizoctonia solani</i>	0				
<i>Macrophomina sp.</i>	0				
<i>Verticillium sp.</i>	0				
<i>Phytophthora sp.</i>	0				
<i>pythium spp.</i>	0				
<i>Fusarium solani</i>	0				
<i>Penicillium sp.</i>	0				
BACTERIAS	* UFC/GR.	Medio Utilizado : AN, B'King			
<i>Pseudomonas sp.</i>	0				
<i>Raistonia sp.</i>	0				
<i>Clavibacter sp.</i>	0				
<i>Erwinia sp.</i>	0				
<i>Xanthomonas sp.</i>	0				
NEMATODOS	* Individuos por 100 Gr.	Medio Utilizado : Tamiz- Centrifuga			
<i>Meloidogyne sp.</i>	0				
<i>Rotylenchulus sp.</i>	0				
<i>Ditylenchus sp.</i>	0				
<i>Tylenchus sp.</i>	0				
<i>Tylenchuluss sp.</i>	0				
<i>Atylenchus sp.</i>	0				
<i>Pratylenchus sp.</i>	0				
<i>Hoplolaimus sp.</i>	0				
<i>Aphelenchides sp.</i>	0				
<i>Paratylenchoides sp.</i>	0				
<i>Helicotylenchus sp.</i>	0				
<i>Anguina sp.</i>	0				
<i>Crinonemoides sp.</i>	0				
<i>Belonolaimus sp.</i>	0				

Niveles de Referencia

Importancia BAJA	Importancia MEDIA	Importancia ALTA
UFC/gr de Muestra	UFC/gr de Muestra	UFC/gr de Muestra
<1,000	1,000-10,000	> 10,000
<1,000	1,000-10,000	> 10,000
<1,000	1,000-10,000	> 10,000
<1,000	1,000-10,000	> 10,000
<1,000	1,000-10,000	> 10,000
<1,000	1,000-10,000	> 10,000
<1,000	1,000-10,000	> 10,000
<1,000	1,000-10,000	> 10,000
< 1*10 ⁶	1*10 ⁶ - 1 * 10 ⁸	> 1 x 10 ⁸
< 1*10 ⁶	1*10 ⁶ - 1 * 10 ⁸	> 1 x 10 ⁸
< 1*10 ⁶	1*10 ⁶ - 1 * 10 ⁸	> 1 x 10 ⁸
< 1*10 ⁶	1*10 ⁶ - 1 * 10 ⁸	> 1 x 10 ⁸
< 1*10 ⁶	1*10 ⁶ - 1 * 10 ⁸	> 1 x 10 ⁸
< 100	100-200	> 200
< 100	100-200	> 200
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< 100	100-200	> 200
< 100	100-200	> 200
< 100	100-200	> 200
< 100	100-200	> 200
< 100	100-200	> 200
< 100	100-200	> 200
< 100	100-200	> 200
< 100	100-200	> 200

OBSERVACIONES:

EXLENTE COMPOSTA, NO SE DETECTARON MICROORGANISMOS PATÓGENOS EN CANTIDADES QUE PUDIERAN CAUSAR PROBLEMAS EN EL SUELO Y CULTIVO



C fepris

ING. ANTONIO GONZÁLEZ AYALA
DEPARTAMENTO QUÍMICO
CED. PROF.1452368

Análisis de metales pesados • Análisis de suelo • Análisis de extracto saturado • Análisis de compostas • Análisis de agua • Análisis de planta • Análisis de fertilizantes
Pedro de Tovar #5297, Rincón San Rafael • C.P. 80150 • Culiacán, Sinaloa • Tel: (667) 753 0793 • Cel: (b) (6) • Nextel: 92*10*3335
Correos: laboratorio_agricola@hotmail.com, laboratorios@scienzachemical.com.mx • www.scienzachemical.com.mx



19 de Junio del 2014.

HUMISOL ORGANICO S.A. DE C.V.
AT'N. LIC. ENRIQUE MUÑOZ

ANALISIS DE METALES PESADOS EN BIOHUMISOL GRANULADA

A continuación reportamos los resultados del análisis de metales pesados en una muestra de Biohumisol Granulada.

PARAMETROS	M-BIOHUMISOL GRANULADA LOTE 4 A Y 5 A	LIMITE MAXIMO PERMITIDO NOM-AS 4454-1999 Australian Standard Compost
FIERRO	2.06 %	3.00 %
COBRE	48.00 ppm	100.00 ppm
ZINC	219.00 ppm	200.00 ppm
MANGANESO	680.00 ppm	500.00 ppm
ARSENICO	10.60 ppm	20.00 ppm
BARIO	0.21 ppm	5.00 ppm
CADMIO	0.48 ppm	2.00 ppm
CROMO	5.88 ppm	120.00 ppm
COBALTO	1.96 ppm	5.00 ppm
MERCURIO	0.46 ppm	1.00 ppm
NIQUEL	8.16 ppm	20.00 ppm
PLOMO	15.80 ppm	100.00 ppm
SELENIO	5.21 ppm	12.00 ppm
TITANIO	0.39 ppm	1.00 ppm
MOLIBDENO	0.25 ppm	2.00 ppm

BIOHUMUS GRANULADA: PRODUCTO APTO PARA SER UTILIZADO EN CULTIVOS ORGANICOS Y TRADICIONALES SIN CAUSAR PROBLEMA ALGUNO POR SUS BAJOS CONTENIDOS TOTALES DE METALES PESADOS.

ATENTAMENTE

C fepris

ING. ANTONIO GONZALEZ AYALA
DEPARTAMENTO QUIMICO
CED. PROF. 1452368
REG. COFEPRIS:02029

19 de Junio del 2014.

HUMISOL ORGANICO
AT'N. LIC. ENRIQUE MUÑOZ

PERFIL FISICO – QUIMICO DE COMPOSTA HUMISOL

A continuación reportamos los resultados del análisis químico de una muestra de composta orgánica granulada.

PARAMETROS	M-COMPOSTA ORGANICA LOTE 4 A Y 5 A	NIVEL DE REFERENCIA DE PRODUCTOS ORGANICOS
HUMEDAD	20.41 %	20 - 30 %
CENIZAS	74.18 %	50-70 %
PORCIENTO DE SATURACION	67.00 %	60-80 %
CIC (Capacidad de Interc. Catiónico)	72 meq/100 gr.(cmol kg-1)	>40 meq/100 gr.(cmol kg-1)
pH (Extracto Saturado)	8.26	6.80 - 7.20
C.E. (Extracto Saturado)	39.40 dS/m	20.00 - 35.00 dS/m
RELACION C/N	7:1	8:1 - 15:1
MATERIAL ORGANICO TOTAL	25.82 %	25.00 – 50.00 %
CARBONO ORGANICO TOTAL	14.75 %	14.53 - 29.07 %
MATERIA ORGANICA DISPONIBLE	17.06 %	20.00 – 30.00 %
CARBONO ORGANICO DISPONIBLE	9.92 %	11.60 – 17.40
NITRÓGENO TOTAL	1.40 %	1.00 – 2.50 %
NITROGENO (N-NO ₃)	0.10 %	0.01 – 0.10 %
NITROGENO (N-NH ₄)	0.55 %	0.10 – 0.50 %
FÓSFORO (P ₂ O ₅)	1.66 %	0.25 – 2.00 %
AZUFRE (S-SO ₄)	0.46 %	0.50 – 2.00 %
POTASIO (K ₂ O)	2.96 %	1.00 – 2.00 %
CALCIO	3.45 %	3.00 – 5.00 %
SODIO	0.40 %	0.20 – 0.40 %
MAGNESIO	1.35 %	0.50 – 1.00 %
CLORUROS	0.33 %	0.10 – 0.30 %
FIERRO	2.06 %	0.80 – 1.50 %
COBRE	48.00 ppm	30 – 90 ppm
ZINC	219.00 ppm	150 – 400 ppm
MANGANESO	680.00 ppm	400 – 600 ppm
BORO	138.00 ppm	50 – 100 ppm

NOTA: La muestra fue recibida en laboratorio, en bolsa de plástica de 1 kg.

ATENTAMENTE

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DEPARTAMENTO QUIMICO
CED. PROF. 1452368
REG. COFEPRIS:02029



Culiacán, Sinaloa; 19 de Junio del 2014.

HUMISOL ORGANICO
AT'N. LIC. ENRIQUE MUÑOZ

ANALISIS DE ACIDOS HUMICOS EN BIOHUMISOL GRANULADO

A continuación reportamos los resultados del análisis de Ácidos Húmicos en una muestra de Humus Granulado.


PARAMETROS	BIOHUMISOL GRANULADO LOTE 4 A Y 5 A	NIVEL DE REFERENCIA DE PRODUCTOS ORGANICOS
ACIDOS HUMICOS TOTALES	6.26 %	5.00-8.00 %

METODOLOGIA

La muestra fue tratada con una solución de NaOH para extraer los ácidos húmicos totales, los cuales fueron cuantificados en un espectrofotómetro UV/VIS (Varian modelo Cary) a una longitud de onda de 450nm, utilizando una curva de calibración de estándares de ácido húmico (Merk) de concentración conocida. Se procedió a la determinación del porcentaje de ácidos húmicos siguiendo la metodología descrita por Beling y col. (1994).

ATENTAMENTE

C fepris >>>


ING. ANTONIO GONZALEZ AYALA
DEPARTAMENTO QUIMICO
CED. PROF. 1452368
REG. COFEPRIS:02029



OMRI Listed®

The following product is OMRI Listed. It may be used in certified organic production or food processing and handling according to the USDA National Organic Program Rule.

Product
Secure Organics 4-1-1

Company
BWF Banducci Inc
Brian Banducci
PO Box 81506
Bakersfield, CA 93380-1506

Status
Allowed

Category
NOP: Fish Products, Liquid – stabilized

Issue Date
17-Dec-09

Product number
bwf-1706

Class
Crop Fertilizers and Soil Amendments

Expiration Date
01-Mar-2015

Restrictions
Not Applicable

This liquid fertilizer has been inspected and approved for use in NOP organic production by OMRI

Peggy Mians
Executive Director

Product review is conducted according to the policies in the current OMRI Policy Manual and based on the standards in the current OMRI Standards Manual. To verify the current status of this OMRI Listed product, view the most current version of the OMRI Product List at www.omri.org. OMRI listing is not equivalent to organic certification and is not a product endorsement. It can only be construed as such if so decided on the acceptability of a product for use in certified organic systems are the responsibility of and to a USDA accredited certification agent. It is the operator's responsibility to properly use the product including following any restrictions.



Organic Materials Review Institute
P.O. Box 11558, Eugene, OR 97440-3758, USA
541.343.7600 • fax 541.343.8971 • info@omri.org • www.omri.org

SECURE ORGANICS

4-1-1 LIQUID FISH FERTILIZER

GUARANTEED ANALYSIS

***TOTAL NITROGEN (N).....4.0%
...0.50% AMMONIACAL NITROGEN
...3.5 % WATER SOLUBLE NITROGEN
AVAILABLE PHOSPHATE (P2O5)...1.0%
SOLUBLE POTASH (K2O)..... 1.0%***

***DERIVED FROM FRESH OCEAN GOING FISH
STABILIZED WITH FOOD GRADE SULFURIC ACID
AND IS DOLPHIN FREE***

PRODUCT INFORMATION

***SECURE ORGANICS IS SOLD AS A SPECIALTY LIQUID FERTILIZER.
SECURE ORGANICS PROVIDES THE GROWER WITH A READILY AVAILABLE
EASY TO USE FISH BASED NITROGEN SOURCE.***

APPLICATION RATES

***SOIL APPLIED USE: SECURE ORGANICS RECOMMENDS A MINIMUM OF FIVE
GALLONS PER ACRE OF SECURE ORGANICS A DILUTION RATE OF TWO PARTS
OF WATER TO ONE PART OF SECURE ORGANICS EVERY 2 TO 4 WEEKS.***

***FOR USE AS A FOLIAR APPLICATION: SECURE ORGANICS RECOMMENDS A
MINIMUM OF TWO GALLONS OF SECURE ORGANICS PER ACRE AT A DILUTION
OF TEN PARTS OF WATER TO ONE PART OF SECURE ORGANICS 2 TIMES PER
MONTH OR AS NEEDED.***

***WARNING: WHEN USED AS FOLIAR! TO AVOID POTENTIAL LEAF BURN,
APPLY FOLIAR SPRAYS IN THE EARLY MORNING OR LATE EVENING.***

NOTE OF WARRANTY

***B.W.F. BANDUCCI INC. MAKES NO WARRANTY OF SALABILITY FOR ANY
PURPOSES OR OTHERWISE, EXPRESS OR IMPLIED, CONCERNING NORMAL
CONDITIONS IN ACCORDANCE WITH THE STATEMENTS MADE ON THIS LABEL.***

Net_gallons and liters Weight 9.6 lbs/gallons at 68 degrees F.

1.2 Kg/liter at 20 degrees C.

Sold by B.W.F. Banducci Inc. P.O. Box 81506 Bakersfield, CA 93380-1506

Telephone (888) 620-9474

Information regarding contents and levels of metals in this product is available on the internet at:
www.aapfco.org/metals.htm

B.W.F. BANDUCCI
Farming L.L.C.
Land L.L.C.

B.W.F. Banducci Companies

MATERIALS SAFETY DATA SHEET
Secure Organics 4-1-1

B.W.F Banducci Inc.
P.O. Box 81506
Bakersfield, CA 93380

Emergency Phone No. (888) 620-9474
Information Phone No. (661) 328-9474
Preparation Date 25 Feb., 2009

B.W.F Banducci Inc. recommends the customer who receives the Materials Safety Data Sheet to study carefully to become aware of hazards, if any, in the product involved, in the interest of safety you should (1) notify your employees, agents and contractors of the information on this sheet, (2) Provide a copy to each of your customers for the product, and (3) request your customers to inform their employees and customers as well.

HAZARD CATEGORY IDENTIFICATION AND RATING

4. Extreme	Immediate -yes
3. High	Delayed -no
2. Moderate	Fire -0
1. Slight	Reactivity -1
0. Insignificant	Toxicity -0

IDENTIFICATION OF PRODUCT

Trade Name: Secure Organics 4-1-1

Chemical Name: Fish Concentrate

Formula: Fish

HAZARDOUS INGREDIENTS OF MIXTURES

Component	Percent of Component	Threshold Limit
Nitrogen at N	4%	None Established
Phosphorous at P2O5	1%	None Established
Potassium	1%	None Established

Complies with OSHA 29 CFR-1910.1200 Section (1) "Trade Secrets". Contains no other hazardous components under current OSHA definitions

Bakersfield California

P.O. Box 81506
93380-1506

PHYSICAL DATA

Boiling Point: (F) 212	Vapor Pressure (mm of hg): 16	Solubility in water: Completely
Specific gravity: 1.09 gm/cc At 18 degrees C	Vapor Density (air=1): N/A	Evap Rate: Butyl Acetate
Density: N/A	Percent Volatile (By Vol): NIL	Appearance: Brown Liquid
pH 3.5-4.5	Odor: Fish	

FIRE DATA

Flash Point (method F) Does not flash Non Combustible Flammability: Limits in Air: N/A

SPECIAL FIREFIGHTING PROCEDURES: None

UNUSUAL FIRE AND EXPLOSION HAZARDS: None

HEALTH HAZARD DATA

Effects of Overexposure MOST LIKELY ROUTE OF ENTRY: Ingestion
Route of Entry: Ingestion

May be harmful if swallowed or inhaled. May cause irritation of eyes, nasal passages, throat and skin

First Aide and Emergency Treatment: Call a Physician immediately to all cases of suspected poisoning

PHYSICAL AREA:

EYES

SYMPTOMS:

Tissues damage

PROCEDURES:

Flush with running water at least 5 min. If irritation persists get medical attention.

INGESTION

May cause vomiting

May be harmful if swallowed, Drink Water, and induce vomiting If irritation persists, get medical attention.

INHALATION

N/A

Remove to fresh air. If irritation persists, get medical attention

SKIN

N/A

Wash with soap and water. If irritation persists, get medical

attention.

MEDICAL CONDITIONS AGGRAVATED BY OVEREXPOSURE: None Known

POTENTIAL CARCINOGEN STATUS:

Not Known. None of the components in this product is listed by LARC, NIP, or OSHA as a carcinogen

REACTIVITY DATA

STABILITY: Stable
Known

CONDITIONS TO AVOID: None

HAZARDOUS POLYMERIZATION: Will not occur
bases

INCOMPATIBILITY: Strong

HAZARDOUS DECOMPOSITION PRODUCTS: None Known

SPILL OR LEAK PROCEDURES**STEPS TO BE TAKEN IN CASE OF MATERIAL IS RELEASED OR SPILLED**

Contain spill; absorb liquid by covering with clay soil or other absorbent natural material; vacuum, scoop or sweep up water and place in container for disposal. Wash down area.

WASTE DISPOSAL METHOD:

Material, which cannot be used at the site, should be disposed of in an approved waste disposal facility following all Federal, State and Local regulations. Triple rinse containers and other for recycling or reconditioning, or puncture and dispose of in an approved sanitary landfill. Do not contaminate water supplies by disposal of wastes or containers.

SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION: Not normally required. If vapors exceed acceptable levels, wear MSHA/NIOSH approved respirator or mask for protection against mists and vapors.

VENTILATION:

LOCAL EXHAUST: Not normally required.

SPECIAL: Not normally required.

MECHANICAL (GENERAL): Use if ventilation is not adequate.
ventilated area.

OTHER: Work in well-

PROTECTIVE GLOVES: Rubber or impervious gloves recommended.

EYE PROTECTION: Chemical goggles or shielded safety glasses recommended.

SPECIAL PRECAUTIONS**PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE:**

Store in cool, dry place away from children, food and feed products. Do not contaminate other stored products of the storage area by handling or storage of this product.

OTHER PRECAUTIONS:

Do not contaminate water supplies by handling or storage of product, cleaning or equipment or disposal of waste. Keep work area clean. Read and follow precautionary measures on product list.

DOT INFORMATION

CLASSIFICATION: Not regulated

DOT LEVEL: None required



OMRI Listed®

The following product is OMRI Listed. It may be used in certified organic production or food processing and handling according to the USDA National Organic Program Rule.

Product

Diamond K Premium 97 Solution Grade Gypsum

Company

Diamond K Gypsum

Mr. Kris Allred

1720 South Red Hills Drive

Richfield, UT 84701

Status

Allowed

Category

NOP: Gypsum – mined source

Issue Date

01-Mar-98

Product number

dkg-0532

Class

Crop Fertilizers and Soil Amendments

Expiration Date

01-Dec-2014

Restrictions

Not Applicable.

Peggy Mians

Executive Director

Product review is conducted according to the policies in the current OMRI Policy Manual and based on the standards in the current OMRI Standards Manual.

To verify the current status of this or any OMRI Listed product, view the most current version of the OMRI Products List at www.omri.org.

OMRI listing is not equivalent to organic certification and is not a product endorsement. It cannot be construed as such.

Final decisions on the acceptability of a product for use in a certified organic system are the responsibility of a USDA accredited certification agent.

It is the operator's responsibility to properly use the product, including following any restrictions.



Organic Materials Review Institute

P.O. Box 11558, Eugene, OR 97440-3758, USA

541.343.7600 • fax 541.343.8971 • info@omri.org • www.omri.org

Product Specifications

CAS #10101-41-4

Solution Grade Gypsum

For water application to land; sprinkler, drip, furrow or flood

Chemical Analysis	Guarantee	Typical
Gypsum ($\text{CaSO}_4 \cdot 2\text{H}_2\text{O}$)	97.0%	98.0%
Calcium (Ca)	22.5%	22.9%
Sulfate – Sulfur ($\text{SO}_4\text{-S}$)	18.0%	18.3%

Typical Screen Analysis

Sieve Sizes

Through 100 mesh	100.0%
Through 200 mesh	97.6%
Through 325 mesh	92.0%

**DIAMOND K****MATERIAL SAFETY DATA SHEET****DIAMOND K, INC.**

1720 SOUTH REDHILLS DRIVE
RICHFIELD, UTAH 84701
BUSINESS: 435-896-8870

24 - HOUR
EMERGENCY ASSISTANCE
CHEMTREC 1-800-424-9300

PRODUCT	GYPSUM	PRODUCT CODE	AB3A002
MANUFACTURER	DIAMOND K GYPSUM, INC.	ADDRESS	P.O. BOX 35 RICHFIELD, UTAH 84701
TRADE NAME	DKG TERRA ALBA DKG TURF & ORNAMENTAL DKG PREM 97 SOLUTION GRADE	GENERIC NAME	GYPSUM
CHEMICAL NAME	CALCIUM (II) SULFATE DIHYDRATE	CHEMICAL FAMILY	HYDRATED SULFATE NATURAL MINERAL
MSDS CODE NO.	A1980AB3A002	CAS REGISTRY NO.	10101 - 41 - 4
NIOHE REGISTRY	EW415000	CHEMICAL FORMULA	CAS04*(2)H2O M.P. 1450° C S.G. 2.3-2.9
HEALTH & PHYSICAL HAZARDS	THIS MINERAL IS NOT HAZARDOUS AS DEFINED BY OSHA, MATERIAL DUSTS ARE CLASSIFIED AS NUISANCE PARTICULATES. EXPOSURE TO THESE DUSTS MAY CAUSE IRRITATION TO THE EYES, EARS, NOSE, THROAT, AND UPPER RESPIRATORY TRACT. MATERIAL HAS NO KNOWN CARCINOGENIC INGREDIENTS OR EFFECTS.		
EXPOSURE LIMITS	NUISANCE PARTICULATES, 8-HR 10 mg/m3, AS PER ACGIH		
EYES	THIS MATERIAL MAY CAUSE EYE IRRITATION. CONTACT WITH THIS MATERIAL OR ITS DUST MAY CAUSE MECHANICAL ABRASION WITH BURNING, TEARING AND REDNESS. EYE PROTECTION (GOGGLES) MAY BE NEEDED TO AVOID PARTICULATE IRRITATION TO EYES.		
SKIN	THIS MINERAL MAY CAUSE MINOR SKIN IRRITATION. PROLONGED OR REPEATED CONTACT WITH THIS MATERIAL OR ITS DUSTS MAY CAUSE MECHANICAL ABRASION WITH ITCHING, BURNING AND REDNESS. GLOVES OR PROTECTIVE CLOTHING ARE USUALLY NOT NECESSARY BUT MAY BE DESIRABLE FOR SPECIFIC WORK CONDITIONS.		
RESPIRATORY	EXPOSURE TO EXCESSIVE CONCENTRATIONS OF DUST MAY CAUSE IRRITATION OF THE NOSE, THROAT AND UPPER RESPIRATORY TRACT. WHEN DUSTY CONDITIONS EXIST, WEAR AN APPROVED NIOSH DUST MASK TO GUARD AGAINST NUISANCE PARTICLES.		
SWALLOWING	ACCIDENTALLY SWALLOWING THIS MATERIAL CAN CAUSE MINOR UPSET STOMACH AND INTESTINAL IRRITATION.		
PHYSICIAN INFORMATION	THIS MATERIAL IS A NATURALLY OCCURRING MINERAL AND IS NOT TOXIC. EXPOSURE TO DUSTS CAN CAUSE ABRASION AND IRRITATION. PRIMARY ROUTE OF ENTRY IS INHALATION AND TARGET ORGANS ARE THE LUNGS.		
EMERGENCY AND FIRST AID PROCEDURES	EYES: FLUSH WITH WATER TO REMOVE PARTICLES. IF IRRITATION CONTINUES SEE A PHYSICIAN. SKIN: WASH WITH WATER INHALATION: REMOVE TO FRESH AIR INGESTION: NONE KNOWN		
COMBUSTION EXPLOSION	THIS MATERIAL IS NOT COMBUSTIBLE		
FIRE	THIS MATERIAL IS NOT COMBUSTIBLE		
SPECIAL PRECAUTIONS	KEEP OUT OF THE REACH OF CHILDREN		
SPILLS LEAKS DISPOSAL	WEAR RECOMMENDED PROTECTIVE EQUIPMENT AND CLOTHING AND PROVIDE ADEQUATE VENTILATION. SWEEP UP OR VACUUM SPILLS. THIS MATERIAL CAN BE DISPOSED OF AS AN INERT SOLID ACCORDING TO FEDERAL, STATE AND LOCAL REGULATIONS.		



OMRI Listed®

The following product is OMRI Listed. It may be used in certified organic production or food processing and handling according to the USDA National Organic Program Rule.

Product

Diamond K KMS 0-0-21.5 Solution Grade Potassium Magnesium Sulfate

Company

Diamond K Gypsum
Mr. Kris Allred
1720 South Red Hills Drive
Richfield, UT 84701

Status
Allowed

Category
NOP: Langbeinite

Issue Date
04-Oct-99

Product number
dkg-9132

Class
Crop Fertilizers and Soil Amendments

Expiration Date
01-Dec-2014

Restrictions

Not Applicable.

Peggy Mians

Executive Director

Product review is conducted according to the policies in the current OMRI Policy Manual and based on the standards in the current OMRI Standards Manual. To verify the current status of this or any OMRI Listed product, view the most current version of the OMRI Products List at www.omri.org.

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It is the operator's responsibility to properly use the product, including following any restrictions.



Organic Materials Review Institute

P.O. Box 11558, Eugene, OR 97440-3758, USA

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Product Specifications

KMS Potassium Magnesium Sulfate

Chemical Analysis:

Potassium Oxide (K_2O)

22%

Magnesium (Mg)

11%

Sulfur (S)

22%

Guarantee

Chemical Properties

Chemical Composition

Typical Analysis %

Range (%)

K_2O

22.1

22.0 – 22.4

S-P-M

97.2

95.5 – 98.7

K

18.3

Na

0.7

Ca

0.1

Mg

11.3

11.20 – 11.6

S

22.2

22.3 – 22.7

Cl

1.2

0.8 – 1.6

H_2O Insoluble

0.3

H_2O

0.05

0.04 – 0.15

Physical Properties

Bulk Density, loose

54

Angle of repose (degrees)

34

Screen Analysis

U.S. Standard

Tyler Standard

Typical %

Retained Range

100

100

2

0 - 5

200

200

20

0 - 30

270

270

60

30 - 70

325

325

85

70 - 95



DIAMOND K

MATERIAL SAFETY DATA SHEET

Section I. Chemical Product and Company Identification

Product Name: KMS

Supplier:

DIAMOND K, INC.
1720 SOUTH REDHILLS DRIVE
RICHFIELD, UTAH 84701
BUSINESS: 435-896-8870

24 - HOUR
EMERGENCY ASSISTANCE
CHEMTREC 1-800-424-9300

Synonym: Potassium magnesium sulfate, langbeinite, sulfate of potash magnesia, KMS

Chemical Name: Potassium magnesium sulfate

Chemical Family: Inorganic Salt

Chemical Formula: $K_2SO_4 \cdot 2MgSO_4$

Manufacturer: IMC Kalium

Material Uses: Fertilizer, Industrial applications

Section II. Composition and Information on Ingredients

Name	CAS#	Percent by Weight
Potassium magnesium sulfate	14977-37-8	97.0 - 98.8

Section III. Hazard Identification

Potential Acute Health Effect: Short term - This product may produce irritation of the eyes, skin, respiratory tract and digestive system. Due to its similarity to potassium sulfate and magnesium sulfate (Epsom Salts). It is possible that large oral doses of KMS may cause vomiting, severe gastrointestinal irritation and diarrhea.
Long term - None known.

Potential Chronic Health Effect: CARCINOGENIC EFFECTS: None Known
MUTAGENIC EFFECTS: None Known
TERATOGENIC EFFECTS: None Known
REPRODUCTION EFFECTS: None Known

To the best of our knowledge, the chemical and toxicological properties of the materials in this product have not been thoroughly investigated.

Section IV. First Aid Measures

Eye Contact: Check for and remove any contact lenses. Immediately flush eyes thoroughly with copious amounts of running water, holding eyelids open, for at least 15 minutes. If discomfort or irritation persists, seek medical attention.

Skin Contact: Remove any contaminated clothing, wash exposed area thoroughly with soap or mild detergent and copious amounts of running water.

Inhalation: No information.

Ingestion: Never give anything by mouth to an unconscious person. Get medical aid. DO NOT induce vomiting. If conscious, allow the victim to rinse his/her mouth, then drink 2-4 cups of water or milk and seek medical advice.

(CONTINUED)

Section V. Fire and Explosion Data

This Product Is:	Non-flammable.
Auto-Ignition Temperature:	Not applicable.
Flash Point:	Not applicable.
Flammable Limits (LEL, UEL):	Not applicable.
Products of Combustion:	Will not support combustion. When subjected to temperatures above 1,000°F it may release small amounts of sulfur oxides.
Fire Hazards in Presence of Various Substances:	Not applicable.
Explosion Hazards in Presence of Various Substances:	Risk of explosion of the product in presence of mechanical impact: Not applicable. Risk of explosion of the product in presence of static discharge: Not applicable.
Fire Fighting Media and Instructions:	Not applicable.
Special Remarks on Fire Hazards:	Wear appropriate protective clothing to prevent contact with skin and eyes. Wear a self-contained breathing apparatus (SCBA) to prevent inhalation of thermal decomposition products when fighting fires involving this product.
Special Remarks on Explosion Hazards:	Not available.

Section VI. Accidental Release Measures

Spills:	KMS is used as a plant food. However, large spills can kill vegetation. If uncontaminated sweep up or collect, and reuse as product. If contaminated with other materials collect in suitable containers.
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Section VII. Handling and Storage

Precautions:	DO NOT ingest. DO NOT breath dust. Avoid generating dust during handling and promote personal hygiene among workers.
Storage:	Store in a dry location away from incompatible substances, such as strong acids and intense heat.

Section VIII. Exposure Controls/Personal Protection

Exposure Limit:	There are currently no established OSHA Permissible Exposure Limits (PELs) or ACGIH Threshold Limit Values (TLVs) for these materials. We recommend using either the OSHA PEL for nuisance dusts (i.e., 15 mg/m ³) or the ACGIH TLV for nuisance dusts (10 mg/m ³), and the OSHA PEL for respirable dust (i.e, 5 mg/m ³) as eight hour time weighted averages.
Ventilation:	Local exhaust or other ventilation that will reduce dust concentrations to less than the recommended exposure limit.
Clothing:	Wear appropriate clothing to prevent repeated or prolonged skin contact. Gloves are recommended.
Eye Protection:	If high dust concentrations exist, tight-fitting goggles are recommended to reduce dust exposure to the eyes.
Respirator Protection:	If dust concentrates exceed recommended exposure limit, use NIOSH approved dust respirators, until feasible engineering controls are completed.

Section IX Physical and Chemical Properties

Physical (State & Appearance):	Solid	Odor:	Odorless
Molecular Weight:	415	Taste:	Saline
pH (5% soln/water):	7.04	Color:	White to Tan
Boiling Point:	Not available.		
Melting Point:	927°C (1700°F)		
Critical Temperature:	Not available.		
Specific Gravity:	2.83 (Water - 1)		
Vapor Pressure:	Not available.		
Vapor Density:	Not available.		
Volatility:	Not available.		
Odor Threshold:	Not available		
Water/Oil Dist. Coeff.	Not available.		
Toxicity (in Water):	Not available.		
Dispersion Properties:	See solubility in water.		
Solubility (in water):	24.4% at 77°F		
Bulk Density:	loose - 83 - 94 lbs/ft ³		

Section X. Composition and Information on Ingredients

Stability:	This product is stable.
Instability Temperature:	Not available.
Conditions of Instability:	No additional remarks.
Incompatibility with various substances:	(Material to avoid) - None
Corrosivity:	Similar to salt. Mildly corrosive to metals in the presence of moisture.
Special Remarks on Reactivity:	No additional remarks.
Special Remarks on Corrosivity:	No additional remarks.

Section XI. Toxicological Information

Routes of Entry:	Ingestion. Inhalation. Skin Contact.
Toxicity to Animals:	Not available.
Chronic Effects on Humans:	There are no ingredients in this product above 0.1% which are identified as carcinogens by NTP, IARC, or OSHA.
Other Toxic Effects on Humans:	As shipped this product does not present special health hazards. Conditions and work practices which generate dust or fumes should be avoided or controlled. Dust from this product is considered a "nuisance" dust and may cause irritation to skin, eyes, and respiratory tract.
Special Remarks on Toxicity to Animals:	No additional remarks.
Special Remarks on Chronic Effects on Humans:	No additional remarks.
Special Remarks on Other Toxic Effects on Humans:	No additional remarks.

(CONTINUED)

Section XII. Ecological Information

Ecotoxicity: None known.

BODS and COD: None known.

Products of Biodegradation: None known.

Toxicity of the Products of Biodegradation: None known.

Special Remarks on Environment: No additional remarks.

Section XIII. Disposal Considerations

Waste Disposal: Uncontaminated material can generally be disposed of by burial in an approved land disposal facility, in accordance with applicable federal, state, and local regulations. Depending upon type and extent of contamination, if any, other disposal methods may be required by environmental regulatory agencies.


Section XIV. Transport Information

DOT Classification: Not regulated by DOT

Section XV. Ecological Information

Other Regulations: The product is not listed as a dangerous or hazardous material.

Other Classifications: WHMIS (CDN) The product is not controlled under WHMIS (Canada)
 HCS (U.S.A.) Although there is insufficient scientific test data to determine if this material is regulated at this time, due to its similarity to potassium sulfate and magnesium sulfate (i.e. Epsom Salts), we recommend that it be treated as an irritant under HCS.
 DSCL (EEC) Not controlled under DSCL (Europe).

Hazardous Material	Health Hazard 1
Identification System	Fire Hazard 0
(NPCA. - U.S.A.)	Reactivity 0
	Personal Protection C
National Fire Protection Association (U.S.A.)	

WHMIS (CDN)
(Pictograms)DOT (U.S.A.)
(Pictograms)Protective Equipment
(Pictograms)**Section XVI. Other Information**

The information in this MSDS was obtained from sources which we believe are accurate and reliable. However, this information is provided without any representation or warranty expressed or implied, regarding the accuracy or correctness, and we assume no liability resulting from its use. Users should make their own investigations to determine the suitability of the information for their particular purposes.



OMRI Listed®

The following product is OMRI Listed. It may be used in certified organic production or food processing and handling according to the USDA National Organic Program Rule.

Product

NPKelp Liquid Organic Fertilizer

Company

Algas y Extractos del Pacifico Norte AEP S.A. de C.V.

David Lora

Prolongación Río Grijalva #1034

Col. Carlos Pacheco

Ensenada, Baja California 22890 - Mexico

Status

Allowed

Category

Aquatic Plant Products – synthetically extracted

Issue Date

27-Dec-12

Product number

aep-3586

Class

Crop Fertilizers and Soil Amendments

Expiration Date

01-Mar-2014

Restrictions

Not Applicable.

Peggy Mians

Executive Director

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HOJA TÉCNICA

NPKelp Extracto 100 % de Algas Marinas

NPKelp es un fertilizante orgánico obtenido a partir de dos algas marinas (*Macrocystis pyrifera* y *Gelidiaceae gelidium*). Su principal función es promover el crecimiento de las plantas, dar vigor y reducir el stress.

CARACTERÍSTICAS GENERALES

- Clasificación: Fertilizante Orgánico
- Uso: Agrícola
- Aspecto: Líquido
- Color: Café oscuro
- Olor: Característico de las algas
- Solubilidad: 100% soluble en agua
- pH: No menor a 2 ni mayor a 12.5, por lo tanto, no es corrosivo.

ANÁLISIS GARANTIZADO

Composición del extracto:

Materia prima:	
<i>Macrocystis pyrifera</i> y <i>Gelidiaceae gelidium</i>	59 %
Agua e ingredientes auxiliares para extracción y estabilización (Listados en OMRI):	41 %
	100 %

Determinación o Compuesto	Valor Obtenido Día Cero	Metodología Utilizada
Materia Orgánica (% P/V)	3.49	WALKED AND BLACK
Nitrógeno (% P/V)	0.1470	AOAC-955.04
Potasio (% P/V)	0.0770	AOAC-955.05
Magnesio (% P/V)	0.0136	AOAC-984.01
Fósforo (% P/V)	0.008	AOAC-958.01
Boro (% P/V)	0.00061	AOAC-949.02
Zinc (% P/V)	0.00013	AOAC-975.02
INERTES (% P/V)	96.24117	-----

RECOMENDACIONES DE USO Y MANEJO

Use el equipo y el calibre adecuado en las aplicaciones

Estas recomendaciones son generalizadas para los cultivos mencionados, sin embargo la empresa Algas Pacific tiene por regla personalizar el protocolo de aplicaciones según sea el cultivo.

CULTIVO	DOSIS	CUANDO APLICAR
HORTALIZAS Tomate, chile, pepinos, jitomate.	6 Lts/Ha	Cada 20 días después del trasplante hasta el término del cultivo.

EMBALAJE

Recipientes de plástico con las siguientes capacidades: 5, 20, 200 y 1000 Lts.

TIEMPO DE VIDA Y ALMACENAMIENTO

El producto tiene un tiempo de vida de 2 años. Una vez abierto el envase, el producto debe utilizarse.

INFORMACIÓN ADICIONAL

Una vez salido el producto de nuestra empresa, el transporte, almacenamiento, manejo, dosificación y aplicación esta fuera de nuestro alcance, por lo tanto Algas Pacific no asume responsabilidad alguna por daños y perjuicios de cualquier naturaleza, derivadas de un uso diferente indicado en la etiqueta.

HOJA DE SEGURIDAD

NPKelp Extracto 100 % de Algas Marinas

1. IDENTIFICACIÓN DEL PRODUCTO Y DE LA COMPAÑÍA

Nombre del producto: NPKelp
Nombre químico (IUPAC): Extracto de algas.
Sinónimo comúnmente utilizado: Algas marinas.
Uso del producto: Fertilizante orgánico para aplicación foliar.
Número de registro CAS: N/A

Productor: Algas y Extractos del Pacífico Norte AEP S.A. de C.V.
Dirección: Prolongación Río Grijalva #1034 Col. Carlos Pacheco. CP 22890. Ensenada, B. C., México.
Teléfono: (646) 172 20 91 / 120 79 84
Email: contacto@algaspacific.com

2. COMPOSICIÓN / INFORMACIÓN SOBRE INGREDIENTES

Composición del extracto:

Materia prima:	
<i>Macrocystis pyrifera</i> y <i>Gelidiaceae gelidium</i>	59 %
Agua e ingredientes auxiliares para extracción y estabilización (Listados en OMRI):	41 %
	100 %

Determinación o Compuesto	Valor Obtenido Día Cero	Metodología Utilizada
Materia Orgánica (% P/V)	3.49	WALKED AND BLACK
Nitrógeno (% P/V)	0.1470	AOAC-955.04
Potasio (% P/V)	0.0770	AOAC-955.05
Magnesio (% P/V)	0.0136	AOAC-984.01
Fósforo (% P/V)	0.008	AOAC-958.01
Boro (% P/V)	0.00061	AOAC-949.02
Zinc (% P/V)	0.00013	AOAC-975.02
INERTES (% P/V)	96.24117	-----

3. PROPIEDADES FÍSICAS Y QUÍMICAS

- Estado físico: Líquido
- Color: Café oscuro
- Olor: Característico de las algas
- pH: No menor a 2 ni mayor a 12.5, por lo tanto, no es corrosivo.
- Solubilidad: 100% soluble en agua

4. IDENTIFICACIÓN DE PELIGROS

El producto debe utilizarse con precaución, atendiendo a las recomendaciones de la presente hoja:

Reactividad

- Producto estable.
- No reactivo.
- Es incompatible con materiales altamente alcalinos o ácidos.

Peligros para la salud

- Contacto con la piel: El contacto prolongado puede causar irritación.
- Contacto con los ojos: Salpicadura en los ojos puede ocasionar fuertes irritaciones.
- Ingestión: Puede causar desórdenes en el tracto gastrointestinal.
- Inhalación: No irrita las vías respiratorias.

<u>Almacenamiento</u>	<ul style="list-style-type: none"> • Manténgase en un lugar fresco y seco, protegido de la luz solar directa por periodos prolongados. • No se almacene junto con productos alimenticios. • No se deje al alcance de los niños.
<u>Transporte</u>	<ul style="list-style-type: none"> • Transporte y almacénelo en su envase original con el sello de seguridad del tapón en su lugar, sin ser violado. • El producto no es considerado como material peligroso para ser transportado por avión, barco, automóvil y ferrocarril. • Es importante siempre adjuntar la hoja de seguridad para el transporte del producto.

9. CONTROL DE EXPOSICIÓN / PROTECCIÓN PERSONAL

Dado que el producto es orgánico, el manejo del producto no requiere de equipo especial de protección para su aplicación. En caso de mezclar el producto con otro agroquímico, se recomienda para su mayor seguridad realizar siempre pruebas previas de compatibilidad.

- Se sugiere el uso de guantes y lentes de seguridad.
- Para evitar salpicaduras usar ropa apropiada y botas de caucho para prevenir un contacto prolongado.

10. INFORMACIÓN ECOLÓGICA

- Usar el producto de acuerdo con la información del fabricante.
- No excederse de las cantidades máximas recomendadas en las aplicaciones del producto.

11. INFORMACIÓN TOXICOLÓGICA

- Producto no tóxico, no se conocen efectos a largo plazo.

12. CONSIDERACIONES PARA SU ELIMINACIÓN COMO RESIDUO

Se recomienda enjuagar con agua el envase cuando se vacíe. El remanente puede ser rociado en el mismo campo de cultivo para que contribuya en la restructuración orgánica del suelo aumentando la materia orgánica del mismo.

Maneje el envase vacío conforme a la ley general de Equilibrio Ecológico y Protección al Ambiente, desechándolo en lugares autorizados para tal propósito.

13. INFORMACIÓN ADICIONAL

Una vez salido el producto de nuestra empresa, el transporte, almacenamiento, manejo, dosificación y aplicación esta fuera de nuestro alcance, por lo tanto Algas Pacific no asume responsabilidad alguna por daños y perjuicios de cualquier naturaleza, derivadas de un uso diferente indicado en la etiqueta.



OMRI Listed®

The following product is OMRI Listed. It may be used in certified organic production or food processing and handling according to the USDA National Organic Program Rule.

Product
e-DALGIN Kelp Extract

Company
Sustainable Agro Solutions S.A.
Josep Maria Rosell
Ctra. N-240 km 110
Almacelles, Lleida 25100
Spain

Status
Allowed

Category
NOP: Aquatic Plant Products – synthetically extracted

Issue Date
07-Jan-10

Product number
sso-1636

Class
Crop Fertilizers and Soil Amendments

Expiration Date
01-Mar-2015

Restrictions
Not Applicable.

Peggy Mians
Executive Director

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1. FABRICANTE Y PAÍS DE ORIGEN.

Sustainable Agro Solutions S.A.

Ctra. N-240 km 110

25100 Almacelles (Lleida)

ESPAÑA

Fabricado en España



2. RIQUEZAS GARANTIZADAS.

Riquezas Garantizadas	%p/p
Extracto de algas	100

3. NOMBRE COMERCIAL

e-dalgin
EXTRACTO DE ALGAS

4. PROPIEDADES FÍSICAS Y QUÍMICAS

Aspecto	Solución oscura
Estado físico	Líquido
Color	Negro
CE (1%) (mS/cm)	—
Densidad (Kg/L)	1,09 ± 0,01
pH	8,8 ± 0,5
Solubilidad	Totalmente soluble en agua

5. PROPIEDADES.

e-dalgin es un producto líquido 100% de extracto de alga marina (s.m.s.), formulado a partir del *Ascophyllum nodosum*.

La especial composición de la alga *Ascophyllum nodosum* constituye una reserva natural de micro y macronutrientes, aminoácidos y carbohidratos que incrementan el rendimiento de los cultivos, su calidad y su vigor.

e-dalgin incluye promotores de crecimiento de origen natural como citoquininas, auxinas y giberelinas.

6. MODO DE APLICACIÓN Y DOSIS

e-dalgin es un fertilizante especialmente recomendado para aplicaciones foliares, aunque también puede usarse en fertirrigación.

Para una óptima actuación del producto, se recomienda distribuir las pulverizaciones incrementando la frecuencia de aplicación.

En las aplicaciones foliares, se recomienda utilizar las dosis más altas a medida que aumenta el follaje de los cultivos.

Aplicaciones foliares:

CULTIVOS	DOSIS	APLICACIONES
Frutales y cítricos	1,5 – 2 l/ha (200 – 250 cc/Hl)	En prefloración, caída de pétalos y engorde del fruto.
Olivo	1,5 – 2 l/ha (200 – 250 cc/Hl)	1 o 2 tratamientos en primavera y 1 en otoño.
Vid	1,5 – 2 l/ha (200 – 250 cc/Hl)	Iniciar en prefloración y realizar 2 o 3 aplicaciones durante el ciclo de cultivo.
Hortícolas	1 – 2 l/ha (200 – 250 cc/Hl)	Iniciar en estado de 4 a 6 hojas y continuar con aplicaciones cada 2 semanas.
Maíz	1 l/ha	Iniciar en estado de 4 a 6 hojas, segunda con altura de 50-75 cm.
Cereales	1 l/ha	Tratamientos conjuntos con los herbicidas.
Patatas	2 l/ha	Iniciar al salir el tubérculo y continuar cada 15 días.

Las dosis recomendadas son aproximadas, pueden depender de la región climática, tipo de suelo y fertilidad.

Aplicación en fertirrigación (riego por goteo):

3 a 4 l/ha por aplicación después del transplante o en estado de 4 a 6 hojas. Repetir al cabo de 1 o 2 semanas.

7. OBSERVACIONES

e-dalgin es un producto de uso agrícola que no está sujeto a ninguna consideración toxicológica tanto de transporte como de almacenamiento. Antes de utilizar el producto, léase detenidamente esta etiqueta.

No apilar más de tres envases o cinco cajas de altura.

Temperatura de almacenamiento entre 5-30°C. Consérvese en lugares frescos y secos.

e-dalgin es compatible con la mayoría de productos fitosanitarios. Se recomienda hacer una prueba previa de compatibilidad.

S2 Manténgase fuera del alcance de los niños.

S13 Manténgase lejos de alimentos, bebidas y piensos.



Producto apto para uso en Agricultura Ecológica. Confirmación de Compatibilidad emitida por BCS ÖKO Garantie según los requerimientos de las regulaciones UE 889/2008, Anexo I (Unión Europea) y USDA-NOP Final Rule (EEUU).



OMRI Listed®

The following product is OMRI Listed. It may be used in certified organic production or food processing and handling according to the USDA National Organic Program Rule.

Product

CODA•Fe•L® Iron complex solution

Company

Sustainable Agro Solutions S.A.

Josep Maria Rosell

Ctra. N-240 km 110

Almacelles, Lleida 25100

Spain

Status

Allowed with Restrictions

Category

NOP: Iron Products

Issue Date

07-Jan-10

Product number

sso-1634

Class

Crop Fertilizers and Soil Amendments

Expiration Date

01-Mar-2015

Restrictions

May be used as a plant or soil amendment only with a documented iron deficiency.

Executive Director

Product review is conducted according to the policies in the current OMRI Policy Manual and based on the standards in the current OMRI Standards Manual.

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1. FABRICANTE Y PAÍS DE ORIGEN.

Sustainable Agro Solutions S.A.

Ctra. N-240 km 110

25100 Almacelles (Lleida)

ESPAÑA

Fabricado en España



2. RIQUEZAS GARANTIZADAS.

Riquezas Garantizadas	%p/p ¹	% p/v
Hierro (Fe) complejoado y soluble en agua	5,00	6,10
Agente complejante: Lignosulfonatos.		

3. NOMBRE COMERCIAL

coda-Fe-L

SOLUCIÓN DE HIERRO (Fe) COMPLEJADO

4. PROPIEDADES FÍSICAS Y QUÍMICAS

Aspecto	Solución oscura
Estado físico	Líquido
Color	Marrón oscuro
CE (1%) (mS/cm)	Característico quelato
Densidad (Kg/L)	1,22 ± 0,01
pH	3,5 ± 0,5
Solubilidad	Totalmente soluble en agua

¹ Contenidos garantizados con las tolerancias establecidas en el Anexo III del RD 863/2008

5. PROPIEDADES.

coda-Fe-L es un complejo de hierro, especialmente recomendado para aplicar tanto por vía foliar como radicular (fertirrigación) para prevenir y corregir la deficiencia de hierro (clorosis). **coda-Fe-L** aporta el hierro necesario para la síntesis de proteínas, la realización de la fotosíntesis y la síntesis de clorofila.

coda-Fe-L contiene un elevado porcentaje de azufre, que con el agente complejante natural (lignosulfonato) confiere al complejo de hierro un gran poder de absorción y asimilación.

Además es un perfecto acidificante del pH del agua en la solución nutritiva o en el caldo pulverizador, mejorando su asimilación.

coda-Fe-L es un buen agente dispersante y mojante cuando se aplica conjuntamente con otros productos, siendo compatible con la mayoría de los insecticidas, fungicidas, herbicidas y abonos. Se recomienda hacer una prueba previa de compatibilidad.

6. MODO DE APLICACIÓN Y DOSIS

coda-Fe-L es un producto especialmente recomendado en: hortalizas, cítricos, frutales, ornamentales, flor cortada, cultivos hidropónicos, cereales, leguminosas, viña, cultivos tropicales...

Las dosis recomendadas son:

Aplicaciones	Dosis	Nº tratamientos
Foliales	250 – 400 cc/Hl	En función del estado carencial del cultivo

Césped - campos de golf: De 300 - 400 cc/Hl, aconsejable mezclar con un abono con alto contenido en nitrógeno (**codafol 14-6-5**: 300 cc/Hl). Aplicaciones cada 4 semanas aproximadamente.

En aplicaciones foliares se aconseja un mínimo de 600 litros de agua por hectárea en hortalizas en general, 1.000 litros de agua por hectárea en frutales y 1.500 litros en cítricos.

7. OBSERVACIONES

coda-Fe-L es compatible con la mayoría de agroquímicos, pero de todas maneras se recomienda hacer una prueba previa de compatibilidad.

Producto no sujeto a ninguna consideración toxicológica, tanto de transporte como de almacenamiento.

Temperatura óptima de almacenamiento entre 5 y 30°C.

No apilar más de 5 cajas de altura o 3 envases.

Utilícese en caso de reconocida necesidad. No sobrepasar las dosis indicadas.

Se recomienda su aplicación bajo asesoramiento técnico agronómico.

S2 Manténgase fuera del alcance de los niños.

S13 Manténgase lejos de alimentos, bebidas y piensos.



Producto apto para uso en Agricultura Ecológica. Confirmación de Compatibilidad emitida por BCS ÖKO Garantie según los requerimientos de las regulaciones UE 889/2008, Anexo I (Unión Europea) y USDA-NOP Final Rule (EEUU).



OMRI Listed®

The following product is OMRI Listed. It may be used in certified organic production or food processing and handling according to the USDA National Organic Program Rule.

Product

e-codahumus Humic Acids

Company

Sustainable Agro Solutions S.A.

Josep Maria Rosell

Ctra. N-240 km 110

Almacelles, Lleida 25100

Spain

Status

Allowed

Category

NOP: Humic Acids – alkali extracted

Issue Date

18-Mar-10

Product number

ss0-1637

Class

Crop Fertilizers and Soil Amendments

Expiration Date

01-Mar-2015

Restrictions

Not Applicable.

Peggy Mears

Executive Director

Product review is conducted according to the policies in the current OMRI Policy Manual and based on the standards in the current OMRI Standards Manual. To verify the current status of this or any OMRI Listed product, view the most current version of the OMRI Products List at www.omri.org. OMRI listing is not equivalent to organic certification and is not a product endorsement. It cannot be construed as such. Final decisions on the acceptability of a product for use in a certified organic system are the responsibility of a USDA accredited certification agent. It is the operator's responsibility to properly use the product, including following any restrictions.



Organic Materials Review Institute

P.O. Box 11558, Eugene, OR 97440-3758, USA

541.343.7600 • fax 541.343.8971 • info@omri.org • www.omri.org

1. FABRICANTE Y PAÍS DE ORIGEN.

Sustainable Agro Solutions S.A.

Ctra. N-240 km 110

25100 Almacelles (Lleida)

ESPAÑA

Fabricado en España



2. RIQUEZAS GARANTIZADAS.

Riquezas Garantizadas	%p/p ¹	% p/v
Extracto Húmico Total (EHT)	20,2	23,0
Ácidos Húmicos	10,0	11,4
Ácidos Fúlvicos	10,2	11,6
Óxido de Potasio (K ₂ O) soluble en agua	3,2	3,6

Extracto húmico procedente de Leonardita.

3. NOMBRE COMERCIAL

e-codahumus
ÁCIDOS HÚMICOS

4. PROPIEDADES FÍSICAS Y QUÍMICAS

Aspecto	Solución oscura
Estado físico	Líquido
Color	Negro
CE (1%) (mS/cm)	0,95 ± 0,1
Densidad (Kg/L)	1,14 ± 0,05
pH	12,8 ± 0,5
Solubilidad	Totalmente soluble en agua

¹ Contenidos garantizados con las tolerancias establecidas en el Anexo III del RD 863/2008

5. PROPIEDADES.

e-codahumus, es un corrector orgánico líquido con alto contenido en ácidos húmicos y fúlvicos, mejorador de las propiedades físicas, químicas y biológicas del suelo.

e-codahumus, favorece la estructura física del suelo y aumenta la CIC; también aumenta la fijación de macroelementos y microelementos disponibles en el suelo de manera natural.

6. MODO DE APLICACIÓN Y DOSIS

e-codahumus es un producto líquido completamente soluble en agua. Se recomienda su aplicación en todo tipo de cultivos, hortícolas, frutícolas, ornamentales, etc.

Las dosis recomendadas son:

Dosis

20 - 60 l/ha - ciclo

- Distribuir la dosis en 4 – 8 aplicaciones.
- En cultivos arbóreos (Frutales, cítricos, etc.) se recomienda de 4 a 5 tratamientos desde la brotación.
- En cultivos hortícolas y ornamentales cada 7-10 días.
- Aprovechar los momentos de aplicación de quelatos y microelementos.
- En riegos de superficie total incrementar las dosis un 50%.

7. OBSERVACIONES

e-codahumus es compatible con la mayoría de agroquímicos, pero de todas maneras se recomienda hacer una prueba previa de compatibilidad.

R36/38: Irrita los ojos y la piel.

S2: Manténgase fuera del alcance de los niños.

S13: Manténgase lejos de alimentos, bebidas y piensos.

S26/28: En caso de contacto con los ojos lávense inmediata y abundantemente con agua y acúdase a un médico.

S37/39: Úsense guantes adecuados y protección para los ojos / la cara.

S45: En caso de accidente o malestar acúdase inmediatamente al médico (si es posible muéstrela la etiqueta).

Temperatura óptima de almacenamiento: 5 - 30 °C.

No apilar más de tres envases de altura.

No mezclar con productos de pH ácido.



Producto apto para uso en Agricultura Ecológica. Confirmación de Compatibilidad emitida por BCS ÖKO Garantie según los requerimientos de la regulación USDA-NOP Final Rule (EEUU).



OMRI Listed®

The following product is OMRI Listed. It may be used in certified organic production or food processing and handling according to the USDA National Organic Program Rule.

Product
PHC® T-22®

Company
Plant Health Care de México, S. de R.L. de C.V.
Armando Cruz
Cadereyta #13-A
Col Hipódromo Condesa
Mexico City 06170 - Mexico

Status
Allowed with Restrictions

Category
NOP: Trichoderma spp.

Issue Date
13-Jul-10

Product number
pcm-2151

Class
Crop Pest, Weed, and Disease Control

Expiration Date
01-Dec-2014

Restrictions

May be used if the requirements of 205.206(e) are met, which requires the use of preventative, mechanical, physical, and other pest, weed, and disease management practices.

This product is not permitted for use as a pesticide in the USA.

Peggy Mears
Executive Director

Product review is conducted according to the policies in the current OMRI Policy Manual and based on the standards in the current OMRI Standards Manual. To verify the current status of this or any OMRI Listed product, view the most current version of the OMRI Products List at www.omri.org. OMRI listing is not equivalent to organic certification and is not a product endorsement. It cannot be construed as such. Final decisions on the acceptability of a product for use in a certified organic system are the responsibility of a USDA accredited certification agent. It is the operator's responsibility to properly use the product, including following any restrictions.



Organic Materials Review Institute
P.O. Box 11558, Eugene, OR 97440-3758, USA
541.343.7600 • fax 541.343.8971 • info@omri.org • www.omri.org

PHC® T-22®

Fungicida Biológico para la raíz

Especificaciones Técnicas



PHC® T-22® es un fungicida biológico preventivo para el control de enfermedades de un gran número de especies vegetales. El ingrediente activo es un microorganismo benéfico, *Trichoderma harzianum* Cepa T-22 (KRL-AG2). Al ser aplicado al suelo mediante sistema de goteo, drench y sprinkle, **PHC® T-22®** se desarrolla rápidamente, dando protección a la raíz contra patógenos como *Pythium*,

Rhizoctonia, *Fusarium*, *Cylindrocladium*, *Thielaviopsis*, *Verticillium* y *Sclerotinia sclerotiorum*.

PHC® T-22® puede utilizarse solo o en combinación con fungicidas químicos comerciales (ver Cuadro 2).

Figura 1. Cruza de 2 cepas *T. harzianum*, por fusión de protoplastos



La Cepa T-22 ha sido desarrollada por la Universidad de Cornell mediante una cruce de dos cepas de *Trichoderma harzianum* provenientes de regiones de climas y suelos contrastante (Figura 1), lo cual le confiere propiedades sobresalientes de adaptación a un amplio rango de especies (probada en más de 2000 especies de plantas silvestres y cultivadas), suelos (de arenosos a arcillosos), climas (fríos-templados y cálido húmedos) y pHs (4-8).

MODO DE ACCION

PHC® T-22® inhibe el crecimiento de hongos patógenos del suelo mediante procesos de competencia natural formando una coraza alrededor de la raíz de la planta (Fig. 2a) y procesos de micoparasitismo necrotrófico de hongos parásitos (Fig. 2b).

Colonización de raíz de maíz (Fig. 2a) y micoparasitismo necrotrófico de un hongo parásito por *T. harzianum* (Fig. 2b).



BENEFICIOS

- Previene patógenos de la raíz (*Pythium*, *Fusarium*, *Rhizoctonia*, *Cylindrocladium*, *Thielaviopsis* y *Sclerotinia sclerotiorum*).
- Previene enfermedades dando protección a la raíz.
- Promueve el crecimiento de pelos absorbentes y raíces alimenticias mejorando la nutrición y la absorción de agua.
- El ingrediente activo libera compuestos que incrementan la disponibilidad de nutrientes para la planta.
- Disminuye o elimina la dependencia de fumigantes químicos.
- Está exento de tolerancia por la EPA y no tiene restricciones en tiempo para reentrar a las superficies tratadas.
- Ideal para programas de producción orgánica ya que está citado en las listas de la Organic Materials Review Institute (OMRI).
- No se ha registrado ningún efecto fitotóxico.
- Puede combinarse con fungicidas químicos comerciales (ver cuadro 2).

RECOMENDACIONES

PHC® T-22® es un producto preventivo por lo que debe utilizarse antes del establecimiento de la enfermedad.

- Prevención de enfermedades fungosas de la raíz.
- Reducción de aplicaciones de fungicidas sintéticos de alto impacto a la salud, ambiental o en ambientes sensibles.
- Cuando los cultivos presentan resistencia a los químicos tradicionales.
- Sistemas de Manejo Integrado de Plagas y Enfermedades o de Producción Orgánica.

CONTENIDO

Conteo total aproximado en seco; cada gramo de **PHC® T-22®** contiene por lo menos 1×10^7 unidades formadoras de colonias (10^7 UFC/g) de *Trichoderma harzianum* Cepa T-22.

FORMA DE APLICACION Y DOSIFICACION

PHC® T-22® puede aplicarse como un fungicida biológico al suelo de acuerdo a las dosis especificadas en el Cuadro 1:

Cuadro 1. Dosis de aplicación de **PHC® T-22®**.

Tipo de Aplicación	Dosis
Césped (foliar)	300 g/1000 m ²
Drench	60-120 g/100 lts
Fertirriego ¹ (12-25 mil pl./ha)	300 g/400 lts (0.7 a 1.4 kg/ha)
Esquejes/raíz desnuda (Inmersión)	250-500 g/20 lts
Plántulas en vivero (foliar)	300 g/200 lts

¹ Las dosis se señalan para densidades de siembra de 12 a 25 mil plantas por ha. Para prevenir el atascamiento con el filtro, usa mallas de calibre 50-100.

Tabaco: Aplicar mezclado en el sustrato en seco o disuelto en agua para humedecerlo 1 lb por hectárea de planta. Posteriormente aplicar en Drench 1 lb más para reforzar la inoculación a los 60 días.

Tratamiento de semillas: **PHC® T-22®** puede aplicarse a semillas de mediano calibre (cacahuate, maíz, frijol, sorgo, trigo o cebada) antes de sembrar -utilizando un adherente comercial- a razón de 150 a 300 g por cada 100 kg de semilla. En papa, aplicar de 500-600 g por cada 100 kg de semilla. No se recomienda aplicar este tratamiento a semillas de menor tamaño (chile, tomate, etc). Para estos casos es preferible aplicar **PHC® T-22®** con una bomba aspersora o por el sistema de riego por goteo al momento de la siembra.

Propagación de hortalizas en charolas: Aplique el producto sobre las charolas a una concentración de 0.6 a 1.2 g/lit con bomba de aspersión utilizando una boquilla de abanico, mojando la semilla antes de cubrir, utilizando suficiente agua y asegurando una aspersión homogénea. Repita la aplicación a los 30-45 días o un día antes del trasplante.

Esquejes de frutales y ornamentales: Esquejes o trasplantes a raíz desnuda de fresa, zarzamora, vid, rosál o árboles frutales como aguacate, manzano, peral, ciruelo, cítricos y especies forestales en general, prepare una solución diluyendo 250-500 g de producto en 20 lts de agua y sumerja la raíz o esqueje antes de efectuar el trasplante (agite constantemente).

Césped y semilleros de plantas hortícolas, ornamentales y forestales: Aplique de 150 a 200 g por cada 1000 m² en suficiente agua, mojando bien la semilla o el terreno antes de cubrir con el suelo o pasto en rollo asegurando una aplicación uniforme.

Aplicaciones al suelo: **PHC® T-22®** puede aplicarse por drench, utilizando una aspersora de mochila, cualquier sistema de fertirriego, por inyección o en sistemas de cultivo hidropónico, de acuerdo a las dosis establecidas en el Cuadro 1.

Frecuencia de aplicación: Una aplicación de **PHC® T-22®** al suelo coloniza la raíz en un lapso de 24-72 horas formando un escudo protector contra el ataque de hongos patógenos (ver Fig. 2a) por un período de 8 a 12 semanas. Se recomienda hacer dos o tres aplicaciones adicionales a lo largo del ciclo de cultivo a intervalos de 60 a 45 días, reforzando su efecto. Para la segunda y tercera aplicaciones puede reducir la dosis al 50% de la dosis inicial.

COMPATIBILIDAD

PHC® T-22® es compatible con productos de control biológico registrados, insecticidas, herbicidas y cualquier fertilizante foliar, así como los fungicidas que se especifican en el Cuadro 2. Por ningún motivo deberán excederse las dosis y especificaciones técnicas establecidas por el fabricante. **PHC® T-22®** no debe mezclarse con productos que especifiquen en su etiqueta posibles efectos contra especies del género *Trichoderma*. **PHC® T-22®** tiene un amplio rango de tolerancia a pHs del suelo (4 a 8); sin embargo en soluciones excesivamente alcalinas o ácidas pierde su efectividad por lo que es conveniente utilizar una solución buffer manteniendo el pH en un rango de 6 a 7.

RECOMENDACIONES PARA SU USO

PHC® T-22® cuenta con registro EPA para un amplio rango de cultivos agrícolas, hortícolas y ornamentales, además de especies forestales y

césped. Tiene registro para uso en invernaderos con un tiempo de reentrada de 0 horas. El producto está listado por la Organic Material Review Institute y es recomendado para sistemas de producción orgánica y programas de manejo integrado de plagas y enfermedades.

Cuadro 2. Compatibilidad con fungicidas comerciales.

Ingrediente Activo	Nombre Comercial	Ingrediente Activo	Nombre Comercial
Azoxystrobina	Amistar	Mancozeb	Dithane y Manzate
Captán	Captán WP	Metalaxil	Apron y Subdue
Copper sulfate	Phyton-27		Pace 7W
Clorothalonil	Bravo y Daconil	Myclobutanil	Rally 40W/Eagle 40W
Etridiazole/thio-phanatemethyl	Banrot	Propamocarb	Banol
Fosetyl Al	Aliette	Quintozene	PCNB
Iprodione	Chipco 26019, Fungicide X y Rovral	Triadimefon	Bayleton
		Triadimenol	Baytan
		Vinclozolina	Ronilin DF

No se debe aplicar con químicos que contengan los siguientes ingredientes activos: Imazilil, Propiconazol (Tilt), Tebuconazol (Folicur) y Triflumizol.

Evite el uso de propagadores iónicos como: Latron, B-1956, Triton o alquil-aril polietoxilato como surfactante básico. Asee debidamente el equipo de aspersión antes de usarse.

MEDIDAS DE PROTECCION

PHC® T-22® ha sido probado en numerosas especies de plantas sin mostrar ningún tipo de fitotoxicidad. Al diluir el producto utilice siempre tapabocas, guantes y gafas. Evite fumar o comer durante la aplicación del producto. No utilice agua caliente o con cloro. Lave bien el equipo de mezclado y aspersión antes y después de cada aplicación. En caso de presentarse alergias cutáneas, respiratorias o ingestión accidental, consulte a su médico y muestre la etiqueta. Mantenga el producto alejado de los niños y animales domésticos.

ALMACENAMIENTO

Almacene el producto en un lugar fresco, seco y oscuro (temperaturas inferiores a 20°C). Si pretende almacenarlo por períodos largos, consérvelo bajo refrigeración. Bajo estas condiciones el producto conserva su viabilidad por un período de 24 meses.

PRESENTACION Y EMPAQUE

- Caja de cartón de 454 g.

ASISTENCIA TECNICA

Para cualquier consulta comercial ó técnica llamar a **PHC de México**.

US Patent No. 5,260,213 EPA Reg. No. 68539-4 EPA Est. No. 068539-NY-001

Distribuido en México en exclusiva por Plant Health Care de México, S. de R.L. de C.V.



¡La raíz de un excelente negocio se protege con PHC!



e-mail: phcmexico@mexis.com

Tels: 52.11.30.93 y 52.56.28.39

Fax: 52.56.42.21



b. Uso de Composta

1) ¿Se utiliza material animal o vegetal composteado en esta operación?

☐ No☒ Si

2) ¿Produce esta operación su propia composta?

☒ No☐ Si

En caso que si, describa detalladamente los materiales usados, el método de composteo usado, y el proceso de verificación de la información.

3) ¿Es la composta es comprada a una fuente externa?

☐ No☒ Si

En caso que si, ¿cómo se verifican y se documentan los materiales de la entrada y el método del composteo usado?

La Vermicomposta utilizada como base de la fertilización es el BIOTURNUSOC GRANULADO evaluado y autorizado por Primus Labs (ALCR 048-14). Anexamos al documento y los resultados microbiológicos por Primus Labs y Swinnza chemical.

c. Uso de abono

1) ¿Se utiliza abono de animal fresco en esta operación?

☒ No☐ Si

En caso que si, en que forma se usa:

2) ¿De donde es abastecido el abono?

☐ En la granja☐ Fuera de la granja

Si el abono es de una fuente externa a la granja, describa como verifica que no han sido utilizados materiales prohibidos:



3) Si es utilizado, describa el método de aplicación con respecto a la aplicación e incorporación antes de



From: Wilburn, Tammie - AMS
To: [Andrew Black \(andrewblack@tilth.org\)](mailto:andrewblack@tilth.org)
Cc: [Simonds, Roger - AMS](#)
Subject: FW: National Organic Program investigation of bell peppers
Date: Thursday, November 6, 2014 2:25:00 PM
Attachments: [Tracking, Track Parcels, Packages, Shipments DHL Express Tracking.pdf](#)
[05NOV14MUESTRAS.ZIP](#)

FYI. I will let you know as soon as I hear back.

From: Wilburn, Tammie - AMS
Sent: Thursday, November 06, 2014 2:24 PM
To: APHIS-PPQ Export Services
Cc: Corpuz, Joseph S - APHIS
Subject: National Organic Program investigation of bell peppers

Mr. Corpuz:

Jean Montague with Preclearance and Offshore Programs referred me to you. My name is Tammie Wilburn and I work with the National Organic Program, AMS. We are investigating peppers from Mexico for compliance with the USDA organic regulations. Our Science and Technical Laboratory, Gastonia, NC, has secured an APHIS permit to release bell pepper shipments from Mexico for the purpose of sampling. One of our sweet bell pepper shipments was recently denied at the Mexican Customs Center in Mexico City. It seems they were denied because they were believed to be chile peppers and prohibited for export. I believe this is a mistake as sweet bell peppers are distinctly different from chile peppers.

We would like to attempt sending the peppers again to get the peppers to the USDA lab as soon as possible. The boxes currently are located in cold storage at the point of original departure at the producer's facility.

Is this something that Export Services can assist us with?

The DHL tracking information and photos of the sample are attached. The client is:

Agroproductos del Cabo
Carr. Transpen. KM 125.5
Maneadero, Ensenada, Baja California Norte, Mexico
CP 22790

Many thanks in advance,

Tammie B. Wilburn, Compliance Officer
Compliance and Enforcement Division
National Organic Program, AMS, USDA
202-690-2624

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Track DHL Express Shipments

Here's the fastest way to check the status of your shipment. No need to call Customer Service – our online results give you real-time, detailed progress as your shipment speeds through the DHL network.

Result Summary

Waybill: 9281474580**Forwarded for delivery****Sign up for shipment notifications****Monday, November 03, 2014 at 15:12****Origin Service Area:**

TIJUANA - ENSENADA - MEXICO

Destination Service Area:

CHARLOTTE, NC - GASTONIA - USA

Monday, November 03, 2014		Location	Time
19	Forwarded for delivery	TIJUANA - MEXICO	15:12
18	Arrived at Delivery Facility in TIJUANA - MEXICO	TIJUANA - MEXICO	07:45
Thursday, October 30, 2014		Location	Time
17	Processed at MEXICO CITY HUB - MEXICO	MEXICO CITY HUB - MEXICO	23:42
16	Returned to shipper	SOR JUANA - MEXICO	23:34
15	Clearance processing complete at SOR JUANA - MEXICO	SOR JUANA - MEXICO	23:33
14	Arrived at Sort Facility MEXICO CITY HUB - MEXICO	MEXICO CITY HUB - MEXICO	23:31
13	Clearance event	MEXICO CITY - MEXICO	22:10
Wednesday, October 29, 2014		Location	Time
12	Clearance event	MEXICO CITY - MEXICO	21:32
11	Arrived at Sort Facility MEXICO CITY - MEXICO	MEXICO CITY - MEXICO	09:00
10	Departed Facility in MEXICO CITY HUB - MEXICO	MEXICO CITY HUB - MEXICO	07:29
9	Processed at MEXICO CITY HUB - MEXICO	MEXICO CITY HUB - MEXICO	06:48
8	Arrived at Sort Facility MEXICO CITY HUB - MEXICO	MEXICO CITY HUB - MEXICO	05:18
7	Departed Facility in QUERETARO - MEXICO	QUERETARO - MEXICO	02:53
6	Processed at QUERETARO - MEXICO	QUERETARO - MEXICO	01:10
5	Arrived at Sort Facility QUERETARO - MEXICO	QUERETARO - MEXICO	00:36
Tuesday, October 28, 2014		Location	Time
4	Departed Facility in TIJUANA - MEXICO	TIJUANA - MEXICO	18:57
3	Processed at TIJUANA - MEXICO	TIJUANA - MEXICO	16:35
Monday, October 27, 2014		Location	Time

Monday, November 03, 2014		Location	Time
2	Shipment picked up	TIJUANA - MEXICO	20:30
1	Shipment Accepted	TIJUANA - MEXICO	17:17

If you would prefer to speak to someone personally about the location of your shipment, please contact DHL Express Customer Service.

Terms & Conditions

Tracking FAQs



From: [Yang, RobertH - AMS](#)
To: [Wilburn, Tammie - AMS](#)
Subject: FW: NOP Investigation Report, bell peppers/MX
Date: Wednesday, September 16, 2015 2:55:12 PM
Attachments: [Investigation Report to NOP FINAL.pdf](#)
[Investigation Summary for NOP.pdf](#)

FYI ... I haven't read it yet, just wanted to keep you in the loop.

Robert Yang

Accreditation Manager
USDA National Organic Program
Office: (202) 690-4540

From: Jake Lewin [mailto:Jake@ccof.org]
Sent: Wednesday, September 16, 2015 11:20 AM
To: Yang, RobertH - AMS <RobertH.Yang@ams.usda.gov>
Cc: Michael, Matthew - AMS <Matthew.Michael@ams.usda.gov>; McEvoy, Miles - AMS <Miles.McEvoy@ams.usda.gov>
Subject: NOP Investigation Report, bell peppers/MX

Dear Robert,

As I mentioned previously, we have been working on a final report and summary of our Bell Peppers Investigation conducted on behalf of the NOP.

Please see the attached and contact me if you have any questions.

Thank you,

Jake Lewin

President
CCOF Certification Services, LLC
2155 Delaware Ave., Suite 150
Santa Cruz, CA 95060
(831) 423-2263, ext. 6288
direct (831) 346-6288
fax (831) 423-4528

jake@ccof.org

www.ccof.org

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Mexican Bell Pepper Investigation Report

September 14, 2015

NOP Directive

The NOP investigation directive issued to CCOF on August 26, 2014 required that CCOF conduct inspections of each organic bell pepper producer in line with USDA organic regulations. Before conducting these inspections, CCOF was to submit to the NOP the following:

- 1) An updated list of operations we certify in Mexico that are producing or handling bell peppers and
- 2) Submit our inspection plan for conducting unannounced onsite inspections and sampling, taking into account production volumes, harvest times, and other factors that may be a source of the residues. Audit trails and in/out balances were a required component of these inspections.

On September 8, 2014, CCOF responded to the NOP's request to submit the items in 1) and 2) above. In addition to committing to conducting unannounced inspections with sampling at the operations we certify in Mexico, CCOF indicated to the NOP that we planned to conduct additional unannounced inspections with sampling at bell pepper facilities that we certify in the United States (CCOF does not certify any handler operations with bell peppers in Mexico at this time).

Beginning in late 2014 and early 2015 CCOF performed the bulk of investigative inspections. As of June 1, 2015, CCOF forwarded all the inspection reports, sample results, and related correspondence to the NOP for the operations where we collected samples of organic bell peppers. The NOP had also indicated they were interested in gathering data on the trade pathways of this commodity. Where available, CCOF inspectors collected this information and recorded it in a separate list of inspection questions that accompanied each inspection report. CCOF forwarded these supplemental questions and answers to the NOP along with all the related inspection reports and sample results mentioned above.

CCOF conducted unannounced visits with sampling at all the operations on the list of producers we provided the NOP, with the exception of one operation, Negocio Agrícola San Enrique S.A de C.V. – Vizcaino. This operation indicated they no longer produce or plan to produce bell peppers. Out of the ten Mexico operations we initially inspected during unannounced visits, we collected bell pepper samples at six operations. At some operations we collected more than one sample from more than one growing location. Where organic bell peppers were not available, we sampled a different organic product and sent the sample to the lab we use, rather than the NOP's lab. At operations where bell peppers were not available to sample and we collected another crop to sample, the results of those sample collections were not included in the Investigation Summary table attached.

CCOF's Additional Efforts at US Handler Operations

CCOF collected sixteen samples of organic bell peppers at nine US handler sites. Out of those sixteen samples, five were positive, with four being below and one above the NOP threshold. In fact, most of the levels found were in parts per billion. These un-actionable trace levels were very unlikely due to drift, commingling, or direct application. While we considered them a low priority during our investigation, we followed NOP Instruction 2613 to address these results. When levels in parts per billion were detected, CCOF notified the operations of the positive results and asked the operator to provide more information on the potential cause(s) for contamination.





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Findings

Out of the eight organic bell peppers samples initially collected from six different producers in Mexico, seven were positive. Out of those positive results, four were above the NOP threshold. Two of these four tests were for one operation, therefore we had three total operations with positive results above the NOP threshold. We issued noncompliances with exclusion from sale notices to the operations with levels above the NOP threshold (b) (4)

Where levels were found above 0.01 ppm, the probable causes of contamination were attributed to the following: drift from neighboring aerial applications in areas the producer managed, mixed use equipment not cleaned properly before use on organic crops, and drift from neighboring field(s) that the operator did not manage. The bell peppers were predominantly grown in shade houses (i.e. greenhouses) in Mexico, some with open sides. This indicated to us that the pesticides being applied were likely drifting into the shade house through the open sides and getting trapped by the roof.

Where positive results were above the NOP threshold, CCOF conducted additional on-site inspections. At these inspections we collected additional (follow-up) samples of bell peppers at the same locations where our initial samples were collected. In some cases we collected samples from additional locations. These resampling events occurred after the operation indicated they had implemented preventative measures that appeared adequate to prevent future contamination. The bell pepper samples collected during these follow up inspections were all negative and were used to verify that their additional preventative measures appeared adequate. After confirming there were adequate preventative measures in place, and crops from the original sampling locations returned negative test results upon resampling, CCOF lifted the exclusions from sale and issued noncompliance correction letters to these operations.

Out of the twelve total (growers and handlers) positive results, five of the tests found residues below 0.01 ppm. Out of the five samples below 0.01 ppm, three were from handler operations, and two were from grower operations. These trace levels were very unlikely due to drift, commingling, or direct applications, and while we considered them a low priority during our investigation, we followed NOP Instruction 2613 when we responded to these results, as stated earlier. In cases where the levels were below 0.01 ppm, i.e. nonactionable levels, we were unable to determine the source of contamination.

Table 1: Sample Totals Based on Collection Event

Total samples (<i>not including follow-up samples</i>)	Positive Results	Above NOP Threshold	At or above 0.01 ppm but below NOP threshold	Below 0.01 ppm (parts per billion)
25	12	3	4	5

Table 2: Sample Totals Based on Material Hits

Total positive materials "hits"	Above NOP Threshold	At or above 0.01 ppm but below NOP threshold	Below 0.01 ppm (parts per billion)
26	7	5	14



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Summary & Recommendations

Since late August 2014 when the NOP first requested we investigate operations in Mexico producing organic bell peppers, CCOF has performed sampling and unannounced inspections at certified operations throughout the bell pepper supply chain. We have recorded all of the samples collected and the investigation steps and outcomes in the Investigation Summary table attached.

Overall, CCOF found higher than average positive results, and results that often included multiple different materials, compared to our periodic residue sampling program results. The levels of pesticides found in the samples collected from US operations were much lower than those found at the producer level in Mexico. This could be due to washing bell peppers prior to packing and/or degradation of pesticides as they move further down the supply chain.

We recommend that operations in Mexico who are producing bell peppers be notified of the risk that drift of prohibited materials presents to their operation. On May 18, 2015, CCOF issued a notice that addressed this issue to our certified operations in Mexico. CCOF recommended the following best practices in the notice:

- a) **Prevention is each operator's responsibility.** If the producer has control over neighboring land, they should take additional measures to ensure applications on the adjacent land will not affect their organic crops. They should ensure that equipment used to apply allowed materials is dedicated to organic use or cleaned thoroughly before use on organic crops. Operations with both organic and non-organic production must be extremely careful to minimize opportunities for contamination of organic crops by pesticides or fertilizers.
- b) **Implement appropriate buffers and borders.** Operations are required to assess risk from neighboring operations and implement buffers, borders and other measures to minimize risk of contamination. **They were reminded to implement physical barriers.** For greenhouses or shade houses, they should ensure that walls are in place and vents are not open during neighboring applications.
- c) **Keep Organic System Plans (OSP) updated.** OSPs must accurately reflect borders and buffers at organic parcels, neighboring land use, and measures implemented to prevent drift.
- d) **Notify CCOF immediately if an operator suspects their crops or land have been drifted upon.** This will enable the certifier to investigate in a timely matter and determine the source of the problem.

If producers are growing bell peppers in shade houses, the likelihood of contamination from drift appears higher than growing in open fields. Where aerial applications are occurring near these shade houses, we recommend producers work with the manager of those applications to get prior notice so they can close the shade house sides and vents during these applications.

In addition, all the operations that were included in our investigation were assigned to the highest risk category without our risk assessment system.

We will continue to monitor the operations in Mexico who produce bell peppers to ensure their preventative measures are adequate to prevent contamination. We recommend other certifiers do the same.

Respectfully Submitted,

CCOF Compliance Team



Operation Name	CCOF Code	CCOF Sample ID	Collection Date	Collection Location	Results	# of NOP results	EPA Tolerance	NOP Threshold	CCOF Action Taken	Operator Response	Resolution	Probable Cause
Agroproductos San Rafael S.A. de C.V.	al033	111214LL02	Nov-12-2014	CCOF parcel 01, Bell Pepper	Carbendazim (MBC) @ 0.006	None	None, no FDA Action level.	Per NOP 2613, use 0.01 as threshold.	11.12.14 Unannounced inspection with sampling. Sampled Bell Peppers at parcels 01 & 03. 12.9.15 - Noncompliance and Positive result notice (NNC) with stop sale sent. 1.23.15 Follow up inspection to sample at parcel 02 (other parcel where BPs are grown). 3.6.15 CCOF issued a Proposed Suspension with additional Noncompliances, based on their response to our 12.9.15 NNC. 5.14.15 CCOF issued a Proposed Suspension Correction letter with an additional follow up measure for the inspector to verify that their preventative measures are being followed at their upcoming annual inspection. This operation will also remain in the highest risk category in our risk assessment program. 1.13.15 - CCOF resampled bell peppers at CCOF parcel 02. No Detected results from these samples.	12.10.15 - Operator responded to 12.9.15 NNC indicating they had not sold any of the subject bell peppers as organic. Client indicated they had sprayed the neighboring cantaloupe fields that border 3 sides of the shadehouse due to a "mandatory" requirement. They also sprayed the wild area on the remaining border. 4.16.15 & 4.25.15 - Client responded to our Proposed Suspension with corrective actions that include the preventative measures they will take to prevent future contamination at CCOF parcels 01 and 03.	5.14.15 - CCOF issued a Proposed Suspension correction letter, and notified the client of the negative resampling results collected 1.13.15. Note: Additional information was requested for an add acreage parcel in this letter; this information was later received.	Drift from neighboring aerial applications to nonorganic fields and wild areas the grower also manages.
					Cypermethrin @ 0.015	1	0.2 (Vegetable, fruiting_group 8)	0.01				
Agroproductos San Rafael S.A. de C.V.	al033	111214LL03	same as above	CCOF parcel 03, Bell Pepper	Imidacloprid @ 0.001	1	0.05	1				
					Fipronil @ 0.044	None	None (not reg for use on BP)	Per NOP 2613, use 0.01 as threshold				
					Chlorantraniliprole @ 0.047		1.4	0.07				
					Cyromazine @ 0.061			1	0.05			
					Carbendazim (MBC) @ 0.195		None (not reg for use on BP)	Per NOP 2613, use 0.01 as threshold				
Agroproductos San Rafael S.A. de C.V. - Follow-up sample	al033	012315LL01	Jan-23-2015	parcel 02, Bell Pepper	ND				1.23.15 - Follow-up Sampling due to level > NOP Threshold.			
Alcema	al004	111114LL01/Field 12 A, B, C	Nov-11-2014	parcel 12, Bell Pepper	Azoxystrobin @ 0.003	1	3 (Pepper/eggplant subgroup 8-10B)	0.15	11.11.14 - CCOF conducted an unannounced inspection with bell pepper sampling. Samples were collected from parcel 12, Rancho Silverio. 12.16.14 - CCOF notified the operation of the test results and requested more information on why the residue was present.	12.19.14 - Client provided all the requested information including spray logs. The parcel is surrounded by organic production on all sides except for an equipment facility to the south. Wind comes from the south. This appears the only potential for contamination although they are not aware of any spraying being done in the equipment facility area.	2.25.15 - CCOF concluded its investigation into this contamination incident. The borders and boundaries appear to be sufficient to prevent contamination, and we were unable to determine the probable cause of this level of contamination. The level detected was 2% of the NOP threshold, and as such was well below the established threshold. In a 2.25.15 letter from CCOF to the operator, they were reminded to monitor the south border to ensure that no prohibited materials are being used in the equipment facility area. CCOF will continue to monitor this operator's practices to ensure their preventative measures are being followed adequately.	Unknown.
San Antonio Horticola S.A. de C.V.	al117	111214LL01	Nov-12-2014	parcel 12, Bell Pepper	Imidacloprid @ 0.028	1	1 (Vegetable, fruiting_group 8)	0.05	11.12.14 - CCOF conducted an unannounced inspection with bell pepper sampling. Samples were collected from parcel 12. 12.16.14 - CCOF notified the operation of the test results and requested more information on why the residue was present.	1.6.15 - Client provided all the requested information. Client identified the likely source of contamination came from an employee loaning out their sprayer to a neighboring conventional producer unbeknownst to the manager of the operation. They believe that the sprayer was not cleaned and that this caused the contamination. This result was for a single pesticide detected at a low level (below the NOP Threshold) so this explanation seems plausible.	Client has implemented training protocols to teach employees the NOP requirements regarding equipment use and cleaning. They will no longer be loaning equipment out to any other producers in order to maintain the integrity of their crop. 2/25/2015 - NC Correction letter issued, and Inspector Follow Up AI created to ensure they are following their training protocols.	Mixed use equipment not cleaned before use on organic crops.

Operation Name	CCOF Code	CCOF Sample ID	Collection Date	Collection Location	Results	# of NOP results	EPA Tolerance	NOP Threshold	CCOF Action Taken	Operator Response	Resolution	Probable Cause
Vinedos Alta, S.A. de C.V.	al251								11.13.14 - CCOF conducted an unannounced inspection with sampling. Bell peppers were not available to sample. CCOF collected a sample of organic cucumbers instead and sent it to our lab. The inspector verified the operator did not produce bell peppers during the last growing season. 12.12.14 - (b) (4) was found at 0.015 on cucumbers, which is below the NOP threshold. CCOF issued a notice of noncompliance & positive results notice, requesting additional information on cause of contamination.	1.6.15 - Operator responded. Their response identified the cucumber contamination as a drift incident from excessive rain which caused a berm to fail. As a result, their greenhouse was flooded by rainwater coming off a neighboring nonorganic field. Ridomil had been applied to the neighboring parcel. This product's active ingredient is (b) (4). Operator's corrective actions: New berms were created and drainage ditches were put in place to prevent future rainwater drift into their greenhouse.	2.25.15 - CCOF issued a Noncompliance Correction letter based on the operation's response and corrective actions. We also plan to verify their measures to prevent future contamination at future inspections. Since it appears there are no plans to produce bell peppers at this operation in the near future, and they did not produce any during the 2013-2014 season, we will not revisit this operation as part of the NOP's request to investigate bell pepper growers in Mexico. We have confirmed with this operation that they have no plans to produce bell peppers at this time and this product will be removed from their CCOF Client Profile.	No bell pepper sample collected, however positive results from cucumber sample were attributed to drift from neighbor during excessive rain incident where a berm failed.
(b) (4)	al290	112414L01	Nov-24-2014	parcel 01, GH 124/bell pepper	Axoxystrobin @ 0.011	1	3 (Pepper/eggplant subgroup 8-108)	0.15	11.24.14 - Unannounced inspection with sampling. The sample had positive results for multiple residues, one of which was above the NOP threshold (Deltamethrin @ 0.087) 2.2.15 - CCOF issued a Notice of Noncompliance with Exclusion from Sale notice. 3.23.15 - CCOF conducted a follow up inspection with sampling. Samples were collected from parcels 01, shadehouses 124 and 127 (sample 1) and shadehouse 142 (sample 2). Both results were None Detected. CCOF created a follow-up action item for reviewer of 2015 annual to remind them to verify whether the preventative measures are adequate.	The client attributes the contamination to nearby non-organic corn fields that they do not manage. They do open greenhouse sides for airflow and the prevailing wind comes from the direction of the corn fields. The client does not use prohibited materials on their nonorganic fields either (only treated seed). They stopped sale of all bell peppers (from all of their greenhouses) after our notification. They have Primus Labs do monthly testing for pesticide residue and all have negative results. Client corrective actions: direct communication with aerial application operator, record logging of closing the greenhouse sides and tasking a field manager to coordinate closing sides when aerial applications are made.	Preventative measures accepted. 5.12.15 - CCOF sent NC Correction with reminder that we will verify their preventative measures at their next inspection. The annual inspection contains specific instructions for the inspector to follow up on these items and is scheduled to occur in June 2015, soon after the correction letter was issued.	Drift from neighboring nonorganic corn field that this operation does not manage.
					Deltamethrin @ 0.087	None	0.3 (Vegetable, fruiting_group 8)	0.015	See above.			
					Cypermethrin @ 0.006	1	0.2 (Vegetable, fruiting_group 8)	0.01	See above.			
					Heptachlor epoxide @ 0.007	None	0.01 (FDA Action Level for fruiting vegetables)	Below FDA Action Level	See above.			
					Pendimethalin @ 0.004	None	0.10 (Vegetable, fruiting_group 8)	0.005	See above.			
					Permethrin @ 0.015	None	0.50 (Pepper, bell)	0.025	See above.			
					Spinetoram @ 0.01	None	0.40 (Vegetable, fruiting_group 8)	0.02	See above.			
(b) (4) / Follow up sample	al290	15-023087-1	Mar-23-15	Parcel 01, Greenhouse 124 & 127	ND	N/A			3.23.15 - Follow-up sampling due to level > NOP threshold.			
(b) (4) / Follow up sample	al290	15-023087-2	Mar-23-15	Parcel 01, Greenhouse 142	ND	N/A			See above.			
Hortifresh S.A. de C.V. dba Hortifresh S.A. de C.V.	al295	112714L01	Nov-27-2014	Greenhouse #3, Bell pepper	ND	N/A			11.27.14 - CCOF conducted unannounced inspection with sampling. 2.2.15 - Issued notice of negative residue test results to client.			
Empresa Agrícola de Mexicali S.A. de C.V.	al059	None	NA						12.5.14 - CCOF conducted an unannounced inspection. Sampling was planned but not executed because the operator did not have any organic product to sample. They indicated they have no plans to grow bell peppers. All of their fields are currently fallow. Their CCOF Client Profile was updated to reflect this status.			

Operation Name	CCOF Code	CCOF Sample ID	Collection Date	Collection Location	Results	# of NOP results	EPA Tolerance	NOP Threshold	CCOF Action Taken	Operator Response	Resolution	Probable Cause
Negocio Agricola San Enrique S.A de C.V. - Vizcaino	al127								As of 10.6.14, this operation is no longer growing bell peppers and has no plans to do so. Their Client Profile was updated to reflect this information and they were removed from our investigation.			
Negocio Agricola San Enrique S.A de C.V. (NASE Meliton)	al310								11.14.14 - CCOF conducted an unannounced inspection, however no samples were collected as there was no crop to sample. This operation lost all crop in a hurricane. We returned in late March to resample any bell peppers, if grown. 3.30.15 - CCOF conducted a second unannounced sampling inspection. There were no bell peppers to sample, but we took a sample for grape tomatoes that was sent to CCOF's lab. The results were negative.			
SM Invernaderos S. de R.L. de C.V. (DSA)	al213	120614LL01	Dec-6-2014	packing house - 2 pallets in cold storage	Fluoxastrobin @ 0.007	None	1.0 (Vegetable, fruiting, group 8)	0.05	12.6.14 - CCOF conducted an unannounced inspection with sampling. 2.3.14 - Sent notice of positive results and request for information on the cause of contamination sent. 6.17.15 Additional request for information/clarification sent, because their initial response did not clearly address our original request.	7.6.15 - The operator indicated they do have nonorganic areas near the area where these peppers were harvested from, however in the nonorganic areas the materials are applied manually with back pack sprayers thus minimizing the risk of contamination by drift given their adequate boundaries and buffers. They have not used any products containing active ingredients Fluoxastrobin or Thiamethoxam in their nonorganic production.	9.2.15 - CCOF concluded its investigation into this contamination incident and issued the operator a resolution letter. The levels detected were below the established threshold. In CCOF's resolution letter, we reminded the operator to monitor borders with their nonorganic production for drift potential. CCOF will continue to monitor this operator's practices to ensure their preventative measures are being followed adequately. Since the samples were collected from the packing house after the peppers had been washed, we plan to collect another sample from the field during their 2015 annual inspection later this year. During our 12.6.14 inspection, the fields were visually inspected and the inspector indicated they appeared healthy with no evidence of prohibited material use, however a sample was collected from the packing house rather than the field. Borders and buffers also appeared compliant at this inspection, as well as at their 2014 annual inspection.	Unknown.
					Thiamethoxam @ 0.005	12	0.25 (Vegetable, fruiting, group 8)	0.0125				
Agropecuaria Blue Valley, S.P.R. de R.L. de C.V.	al297	100314LL1	Oct-3-2014	Modulo I & II, located on parcel 01	Acetamiprid @ 0.065	1	0.20 (Vegetable, fruiting, group 8-10)	0.01	10.3.14 - CCOF conducted an unannounced inspection with sampling. Sample ID 100314LL1 (sent to NSL) was positive for Acetamiprid @ 0.065. The levels were above the NOP Threshold. 10.28.14 - CCOF sent a Notice of Noncompliance with Positive Result & Stop Sale Notices.	10.29.14, 11.5.14, & 12.13.14 - Operator responded to the 10.28.14 notice. Operator confirmed they had stopped selling bell peppers as organic. The operation attributed the positive result to potential drift from a neighboring alfalfa or corn field. Bell peppers were sampled from shadehouses with the sides open. They cannot close the sides as that could create problems with mildew.	12.15.14 - CCOF notified the operator that they would need to undergo a follow-up inspection where we would sample current bell peppers, verify they have implemented adequate measures to prevent drift, demonstrate that peppers are being sold as nonorganic as of our 10.28.14 Notice of Noncompliance, and verify whether they currently have any peppers that flowered after the 10.3.14 sample was taken. 12.31.14 Investigation inspection to verify preventative measures have been taken and sampling of peppers that flowered after the last sample was taken. Results were sent to the lab CCOF uses (PAL) and were negative. 3.16.15 - Noncompliance Resolution & Notice of Negative Results letter was sent. Insp follow up AI created to verify no sales of organic bell peppers from Modulo I & II from 10.3.14 through 3.16.15 at next inspection.	Created Cert Staff follow-up AI for reviewer of 2015 annual to remind them to verify whether the nonorganic sales were audited for the date range specific in the Resolution column.

Operation Name	CCOF Code	CCOF Sample ID	Collection Date	Collection Location	Results	# of NOP results	EPA Tolerance	NOP Threshold	CCOF Action Taken	Operator Response	Resolution	Probable Cause
Agropecuaria Blue Valley, S.P.R. de R.L. de C.V. - Follow-up sampling	al297	123114LL01	De-31-2014	same as above	ND				12.31.14 - Follow-up sampling due to level > NOP threshold.			
Union de Productores de Guanajuato, S.P.R. de R.L. de C.V.	al257					N/A			11.5.14 - CCOF conducted an unannounced inspection with sampling. No bell peppers on site to sample and we collected a sample of cucumbers. The sample results were ND. 1.22.15 - CCOF issued notification of ND results. 3.30.15 - CCOF conducted another unannounced inspection where we planned to take another sample. There was no product to sample. The operation was delayed in production due to heavy rains. They may have bell pepper again by December 2015, but they are unsure. They were just planting cucumbers during our visit and no sample was collected during this second visit.	This operation had organic BP production between August 2013 - April 2014, and may have additional production in December 2015.	No further follow up planned, after 2 unannounced visits indicated no BPs present.	
US Handlers												
Agripacking Distributors	pr1207	100814DL1	Oct-08-2014	Organic bell peppers	ND				1.8.15 - CCOF notified the operator of the negative results.	N/A	N/A	
Pero Family Farms	pr631	Sample #2	Oct-15-2014	DelRay Beach Facility/Green Bell Peppers	ND				10.15.14 - CCOF conducted an unannounced inspection with sampling. Two samples of organic bell peppers were collected during this inspection. 12.2.14 CCOF issued a Notice of Positive Results and Request for Information regarding Sample #3	Re Sample #3 The operator indicated the line that handles the product sampled handles wrapped organic commodities. Any conentional wrapped commodities that are or would be handled on that line would be run after organic production. The line is cleaned at the end of every day. The grower/supplier of these peppers is (b) (4) indicated the residue found are not active ingredients in any products they use on site. The field where they were harvested from, #HP151 is surrounded by woodlands.	2.25.15 - CCOF issued a resolution letter. This operation had just received these peppers when the sample was collected. The peppers had not been handled or packaged by Pero prior to our sample collection.	Unknown. We believe contamination occurred prior to arrival at the facility as the sample was collected prior to this facility beginning to handle the product.
Pero Family Farms	pr631	Sample #3	Oct-15-2014	Del Ray Beach Facility/ bell peppers	Azoxystrobin 0.002	1	3 (Pepper/eggplant subgroup 8-10B)	0.15				
					Endosulfan II 0.001	0	2.0 (Pepper)	0.1				
Pero Family Farms	pr631	Sample #4	Oct-15-2014	Del Ray Beach Facility/ mini sweet peppers	ND							
DiMare Fresh Arlington TX dba DiMare Fresh	pr1317	101614KT1	Oct-16-2014	Arlington, TX/ organic red bell peppers	Clothiandin 0.001	2	0.8 (Pepper)	0.04	10.24.14 - CCOF conducted annual inspection with unannounced sampling. 12.15.14 - CCOF issued a Positive Results Notification and Request for Information letter regarding Sample 101614KT1. 3.4.15 CCOF sent a Request For Information letter to Oppenheimer Group, DiMare's supplier.	12.19.15 - DiMare indicted product CCOF collected at the operator's facility had not yet been handled by that facility as the samples were collected from incoming loads. The provided certificates from their two suppliers of organic bell peppers, Covilli Brand Organics (Primus certified) and Oppenheimer Group (CCOF certified). 4.3.15 - Oppenheimer Group indicated the peppers from the lot sampled were from Divimex, produced by Pimientos Selectos, S.A. de C.V., and were shipped via PDG Produce on 10.13.14. 4.6.15 - Oppenheimer Group provided CCOF with a response from the producer, Divimex. They indicated Clothiandin is not an active ingredient in any products they use on nonorganic production. Neighboring fields of sugar cane and corn production do not use aerial spraying applications, and the organic peppers are grown in greenhouses with plastic and polycarbonate walls, and the pack house is a sealed structure.	2.25.15 - CCOF issued a resolution letter to DiMare Fresh Arlington, TX. 5.14.15 - CCOF issued a resolution letter to Oppenheimer Group.	Unknown.

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DiMare Fresh Riverview, FL dba DiMare Fresh Inc	pr1320	Commodity code 51875 Shipped to Gastonia 10/8/14. NOP may have cancelled.	Oct-8-2014	Riverview FL facility/Nonorganic bell pepper					10.8.14 - CCOF conducted an unannounced inspection with sampling. The operator did not have any organic bell peppers to sample and CCOF sampled conventional bell peppers. It appears these samples were later cancelled by the NSL. 1.8.15 - CCOF notified the operator that the nonorganic sample was not tested.	NA - No sample		
Earl's Organic Produce	pr244	15-022544-1	Feb-11-2015	San Francisco facility/organic bell pepper (Covilli Brand)	ND				2.11.15 - CCOF conducted an unannounced inspection with sampling. Organic bell peppers from Covilli Brand Organics were sampled. The test results were negative, and CCOF issued them a notice of negative results on 6.2.14.	N/A - ND results		
The Produce Exchange	pr1330	None	Sep-22-2014	San Diego, CA/organic bell peppers	ND				9.23.14 - CCOF conducted sampling during the annual facility inspection. The samples collected had no residues. 10.23.14 - CCOF issued a notice of the negative results to the operator.	N/A - ND results		
Specialty Produce	pr716	Sample 1 20141028LF/1	Oct-28-2014	Organic bell peppers	ND				10.28.14 - CCOF conducted an unannounced inspection with sampling. Organic bell peppers from Mexico were not available during this inspection. CCOF sampled organic domestic bell peppers supplied by (b) (3), (b) (4). The results were negative. Nonorganic bell peppers from Mexico (supplier (b) (3)) were also sampled. We believe these samples were cancelled by the lab. 12.16.14 - CCOF notified this operation of the negative sample results for the organic bell peppers.	NA - No results detected.		
Oppenheimer Coquitlam (Vancouver)	pr1049	012715GK1	Jan-27-2015	Organic bell peppers	ND				1.27.15 - CCOF conducted an unannounced inspection with sampling. We collected samples of organic bell peppers that were produced by Selectos SA de CV (Divermex brand). Results were negative. This operation conducts limited handling of bell peppers. Box in is usually box out. They may recondition or repack occasionally, but there is no washing involved, none are there any actual food contact surfaces.	NA - No results detected.		
Heath & Lejeune, Inc.	pr234	031015LM1	Mar-10-2015	Organic bell peppers	ND				3.10.15 - CCOF conducted an unannounced inspection with sampling at their facility in Los Angeles, CA. The samples collected were of Mexican origin and the result were ND (note sample IDs 031015LM 1 & 031015LM 2 were combined when analyzed). Client notification of ND results is pending report review. On 4.22.15, CCOF notified this operator of the negative test results.			
Heath & Lejeune, Inc.	pr234	031015LM2	Mar-10-2015	Organic bell peppers	ND				See above.			
Sunny Valley Organics Inc.	al087	15-022542-1	Mar-3-2015	Organic bell peppers	ND							

Operation Name	CCOF Code	CCOF Sample ID	Collection Date	Collection Location	Results	# of NOP results	EPA Tolerance	NOP Threshold	CCOF Action Taken	Operator Response	Resolution	Probable Cause
Sunny Valley Organics Inc.	al087	15-022542-2	Mar-3-2015	Organic bell peppers	Piperonyl Butoxide @ 0.024	0	None for peppers, used tolerance level for tomatoes, 8 ppm	0.4	3.3.15 - CCOF conducted an unannounced sample collection during their annual inspection. We collected samples of organic bell peppers that originated with [REDACTED] were collected from two boxes with the same lot #. Product from sample -2 results showed 0.024 ppm of Piperonyl Butoxide, a material commonly used in facility fogging. 5.13.15 - CCOF issued a Notice of Noncompliance & Positive Results letter. The noncompliance action items focus on getting information on the probable cause of contamination. Note Since the sample was collected as part of an annual inspection, there is not an accompanying unannounced inspection report.	6.8.15 - Response received. They have investigated the potential cause of contamination both at their facility and with the grower. Their investigation did not uncover any issues or potential causes for contamination.	8.6.15 - Noncompliance correction letter issued. That letter stated we were unable to determine the specific source of this contamination. Their OSP and practices all appear compliant and sufficient to prevent contamination and commingling.	Unknown.
Melissa's World Variety Produce	pr1049								3.10.15 - CCOF conducted an unannounced with sampling inspection. Bell peppers were unavailable to sample at the time of the inspection. They typically handle bell peppers from Mexico between November and April, and handle bells from California in May and June. [REDACTED] is their main supplier.	NA - No sample collected.		
Veritable Vegetable	pr258	013015/JT1	Jan-30-2015	San Francisco facility/organic bell pepper	ND				1.30.15 - CCOF conducted sample collection at the operator's facility. Four different samples were collected, each from a different lot. 5.28.15 - CCOF issued a request for information letter regarding sample IDs with positive results.	5.13.15 - Operator response indicated all non-organic product is stored separately from organic product. No materials for pest control, or other reasons, was used while the peppers were being stored.	6.9.15 - Issue considered resolved and operator was issued a resolution letter.	Unknown.
Veritable Vegetable	pr258	013015/JT2	Jan-30-2015	same as above	Clothianidin 0.002	2	0.8	0.04				
Veritable Vegetable	pr258	013015/JT3	Jan-30-2015	same as above	Clothianidin 0.002	2	0.8	0.04				
					Thiacloprid 0.002	0		1	0.05			
Veritable Vegetable	pr258	013015/JT4	Jan-30-2015	same as above	ND							

37 Total

From: [Howley, JannaB - AMS](#)
To: [Wilburn, Tammie - AMS](#)
Subject: FW: organic bell pepper letter (MDA)
Date: Friday, December 12, 2014 3:16:38 PM

If you have not already, you should be hearing from Deanna soon.

From: Deanna Baldwin -MDA- [mailto:deanna.baldwin@maryland.gov]
Sent: Friday, December 12, 2014 1:50 PM
To: Howley, JannaB - AMS
Subject: Re: organic bell pepper letter (MDA)

The (b) (4) we are certifying is the kitchen only but I will give her a call

On Fri, Dec 12, 2014 at 11:20 AM, Howley, JannaB - AMS
<JannaB.Howley@ams.usda.gov> wrote:
Deanna:

Definitely give Tammie a call! She has a (b) (4) listed that is also shown as being certified by MDA, where peppers were distributed that had pesticide residue above the 5% limit. You can reach her at 202-690-4540.

Thanks!

Janna

From: Deanna Baldwin -MDA- [mailto:deanna.baldwin@maryland.gov]
Sent: Friday, December 12, 2014 10:28 AM
To: Howley, JannaB - AMS
Subject: Re: organic bell pepper letter (MDA)

One of our handlers at Jessup may be packing for Giant - I'll look into that - on the road today so will do it asap

On Fri, Dec 12, 2014 at 10:23 AM, Howley, JannaB - AMS
<JannaB.Howley@ams.usda.gov> wrote:
Do you certify Giant Foods in Maryland?

From: Deanna Baldwin -MDA- [mailto:deanna.baldwin@maryland.gov]
Sent: Friday, December 12, 2014 10:21 AM
To: Howley, JannaB - AMS
Subject: Re: organic bell pepper letter (MDA)

We wouldn't have any files at all for Giant in Doylestown, PA - we don't certify them?

On Fri, Dec 12, 2014 at 8:38 AM, Howley, JannaB - AMS <JannaB.Howley@ams.usda.gov>
wrote:
Deanna:

Good Morning! I wanted to follow up with you regarding Tammie's email of October 21st. This

Compliance and Enforcement case has high priority now with our Deputy Administrator, so if you would please check your files to determine whether Giant Foods, Doylestown, PA, is importing bell peppers from the Dominican Republic, we would really appreciate it. This is a multi-state case, with lots of moving parts, and Tammie needs this information ASAP. Thanks!

I don't have details about the case, beyond what I've mentioned above, so please follow up with Tammie with any detailed questions.

Take care and have a good weekend,

Janna

From: Wilburn, Tammie - AMS
Sent: Tuesday, October 21, 2014 7:12 AM
To: FGIS OA, Maryland
Cc: Howley, JannaB - AMS
Subject: RE: organic bell pepper letter (MDA)

Hi Deanna,

I have not received a response to my August 2014 request regarding organic bell peppers. Please take a moment to research if any of MDA's handlers purchases bell peppers from Mexico.

Thanks,
Tammie

From: Deanna Baldwin -MDA- [<mailto:deanna.baldwin@maryland.gov>]
Sent: Monday, September 22, 2014 4:21 PM
To: Wilburn, Tammie - AMS
Subject: Re: organic bell pepper letter

Yes I did receive it. I haven't had a chance to research any of the handlers we certify to see if they purchased peppers from Mexico. We do not certify anyone outside of the State of Maryland so we are definitely not certifying any pepper producers in Mexico. I will provide you with a more detailed response as soon as I have a chance to review our files.

On Mon, Sep 22, 2014 at 4:05 PM, Wilburn, Tammie - AMS
<Tammie.Wilburn@ams.usda.gov> wrote:
Please confirm that you received my September 16, 2014 letter, re: organic bell peppers.

Tammie B. Wilburn
Compliance and Enforcement Division
National Organic Program, USDA
202-690-2624

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Deanna Baldwin
Program Manager, Food Quality Assurance
Maryland Department of Agriculture
50 Harry S. Truman Parkway
Annapolis, MD 21401
410-841-5769

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410-841-5769

From: Wilburn, Tammie - AMS
To: [Howley, JannaB - AMS](#)
Cc: [Mann, Renee - AMS](#)
Subject: FW: organic bell pepper letter
Date: Thursday, December 11, 2014 12:55:00 PM

Hi Janna:

Please contact MDA to request that they immediately respond to my requests of September 16 & 22, and October 21, 2014. This is a priority for Miles.

Many thanks,

Tammie

From: Wilburn, Tammie - AMS
Sent: Tuesday, October 21, 2014 7:12 AM
To: FGIS OA, Maryland
Cc: Howley, JannaB - AMS
Subject: RE: organic bell pepper letter

Hi Deanna,

I have not received a response to my August 2014 request regarding organic bell peppers. Please take a moment to research if any of MDA's handlers purchases bell peppers from Mexico.

Thanks,
Tammie

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Sent: Monday, September 22, 2014 4:21 PM
To: Wilburn, Tammie - AMS
Subject: Re: organic bell pepper letter

Yes I did receive it. I haven't had a chance to research any of the handlers we certify to see if they purchased peppers from Mexico. We do not certify anyone outside of the State of Maryland so we are definitely not certifying any pepper producers in Mexico. I will provide you with a more detailed response as soon as I have a chance to review our files.

On Mon, Sep 22, 2014 at 4:05 PM, Wilburn, Tammie - AMS

<Tammie.Wilburn@ams.usda.gov> wrote:

Please confirm that you received my September 16, 2014 letter, re: organic bell peppers.

Tammie B. Wilburn
Compliance and Enforcement Division
National Organic Program, USDA
202-690-2624

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--

Deanna Baldwin
Program Manager, Food Quality Assurance
Maryland Department of Agriculture
50 Harry S. Truman Parkway
Annapolis, MD 21401
410-841-5769

From: Wilburn, Tammie - AMS
To: [Federica Nasi \(fnasi@ccpb.it\)](mailto:fnasi@ccpb.it)
Cc: rsetti@ccpb.it
Subject: FW: Organic pepper operations in the Netherlands
Date: Wednesday, September 17, 2014 1:00:00 PM
Attachments: [image001.jpg](#)
Importance: High

Federica:

Please research who can I refer this matter to under Control Union that is active in the Netherlands?

Thank you,

Tammie

From: Roberto Setti [mailto:rsetti@ccpb.it]
Sent: Wednesday, September 17, 2014 2:57 AM
To: Wilburn, Tammie - AMS; Federica Nasi
Cc: Michael, Matthew - AMS
Subject: Re: Organic pepper operations in the Netherlands
Importance: High

Dear Tammie,

sorry, I did not reply as CCPB is not active in Netherlands so we do not certify any Organic operation there.

Kind regards

rs

From: [Wilburn, Tammie - AMS](#)
Sent: Tuesday, September 16, 2014 9:39 PM
To: [Federica Nasi](#)
Cc: rsetti@ccpb.it ; [Michael, Matthew - AMS](#)
Subject: RE: Organic pepper operations in the Netherlands

Frederica,

Can you please confirm that Mr. Setti received our request? It looks like I sent it to the correct email address rsetti@ccpb.it. We have not received a response to our August 27, 2014 letter to him. I have copied him on this email.

Regards,

Tammie B. Wilburn
Compliance and Enforcement Division
National Organic Program, USDA
202-690-2624

From: Federica Nasi [<mailto:fnasi@ccpb.it>]
Sent: Thursday, August 28, 2014 3:13 AM
To: Wilburn, Tammie - AMS
Cc: Gebault King, ReneeA - AMS; Mann, Renee - AMS; roberto setti
Subject: R: Organic pepper operations in the Netherlands

Dear Mr. Wilburn,

at the moment Mr Setti is on holiday, I reply to you on behalf him.

Thanks for the alert but probably you have a wrong address because Mr Setti doesn't operate at Control Union in Netherlands but at CCPB in Italy.

The correct reference of Mr Setti is:

Roberto Setti
CCPB srl
Via J. Barozzi 8
(40126) Bologna Italy
rsetti@ccpb.it

Kind regards,

Federica Nasi

CCPB Srl



Via J. Barozzi 8
40126 Bologna (Italy)
☎ +39 051 6089811
📠 +39 051 254842
fnasi@ccpb.it
www.ccpb.it

Da: rsetti@ccpb.it [<mailto:rsetti@ccpb.it>]
Inviato: giovedì 28 agosto 2014 03:55
A: Mauro Panzani; Federica Nasi
Oggetto: I: Organic pepper operations in the Netherlands

TIM: la tua mail in mobilità con il BlackBerry®

From: "Wilburn, Tammie - AMS" <Tammie.Wilburn@ams.usda.gov>
Date: Wed, 27 Aug 2014 18:44:32 +0000
To: mailto:rsetti@ccpb.it%3crsetti@ccpb.it>
Cc: Gebault King, ReneeA - AMS<ReneeA.GebaultKing@ams.usda.gov>; Mann, Renee - AMS<Renee.Mann@ams.usda.gov>

Subject: Organic pepper operations in the Netherlands

Please see the attached request regarding organic pepper operations in the Netherlands. Questions, please call.

Regards,

Tammie B. Wilburn
Compliance and Enforcement Division
National Organic Program, USDA
202-690-2624 ---- please note new ph number

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From: Wilburn, Tammie - AMS
To: [Jake Lewin \(Jake@ccof.org\)](mailto:Jake.Lewin@ccof.org)
Cc: [CCOF kelly](#)
Subject: FW: REPORTS: NOP
Date: Friday, December 5, 2014 5:23:00 PM
Attachments: [120314_am05349;am05459-61_excel.xlsx](#)
[120314_am05461.pdf](#)
[120314_am05460.pdf](#)
[120314_am05459.pdf](#)
[120314_am05349.pdf](#)

Jake and Kelly,

Attached are four CCOF reports. Have a great weekend.

Tammie

[illegible]

Country of origin	US26	Producer/Distributor/Collection site	Collection site city
Import	Mexico	(b) (4)	Huatabampo
Import	Mexico		Obregon
Import	Mexico		Guaymas
Import	Mexico		Guaymas

Collection site state	Organic Certifier	US22	1-Naphthol	2,4 Dimethylphenyl formamide (DMPF)
Sonora	CCOF	20	N.D.	N.D.
Sonora	CCOF	25	N.D.	N.D.
Sonora	CCOF	13	N.D.	N.D.
Sonora	CCOF	22	N.D.	N.D.

3-Hydroxycarbofuran	4,4-Dibromobenzophenone	5-Hydroxythiabendazole	Acephate	Acetamiprid
N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.

Acetochlor	Aldicarb	Aldicarb sulfone	Aldicarb sulfoxide	Aldrin	Allethrin	Atrazine
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

[illegible]

Bromacil	Buprofezin	Captan	Carbaryl	Carbendazim (MBC)	Carbofuran	Carfentrazone ethyl
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	0.006	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	0.195	N.D.	N.D.

Chlorantraniliprole	Chlordane cis	Chlordane trans	Chlorfenapyr	Chlorothalonil
N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.
0.047	N.D.	N.D.	N.D.	N.D.

Chlorpropham (CIPC)	Chlorpyrifos	Chlorpyrifos methyl	Chlorthal (DCPA)	Clofentezine
N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.

Clothianidin	Coumaphos	Cyazofamid	Cycloate	Cyfluthrin	Cyhalothrin lambda	Cypermethrin
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	0.015
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Diazinon oxygen analog	Dichlorvos (DDVP)	Dicloran	Dicofol o,p	Dicofol p,p	Dieldrin
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Difenoconazole	Diflubenzuron	Dimethoate	Dimethomorph	Dinotefuran	Diphenamid
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Diphenylamine	Disulfoton sulfone	Diuron	Endosulfan I	Endosulfan II	Endosulfan sulfate	Endrin
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

[illegible]

Fenamidone	Fenamiphos	Fenamiphos sulfone	Fenamiphos sulfoxide	Fenarimol	Fenbuconazole
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Fenhexamid	Fenoxaprop ethyl	Fenpropathrin	Fenpyroximate	Fenthion	Fipronil	Flonicamid
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	0.044	N.D.

[illegible]

Heptachlor epoxide	Hexachlorobenzene	Hexaconazole	Hexythiazox	Hydroprene	Imazalil
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Imidacloprid	Indoxacarb	Iprodione	Lindane	Linuron	Malathion	Malathion oxygen analog
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
0.028	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
0.001	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Metalaxyl	Methamidophos	Methidathion	Methiocarb	Methomyl	Methoxychlor	Methoxyfenozide
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Metolachlor	Metribuzin	Mevinphos total	MGK-264	Myclobutanil	Naled	Napropamide
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Nonachlor cis	Nonachlor trans	Norflurazon	Norflurazon desmethyl	Omethoate	o-Phenylphenol
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Oxadixyl	Oxamyl	Oxamyl oxime	Oxydemeton methyl sulfone	Oxyfluorfen	Parathion methyl
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Pendimethalin	Pentachlorobenzene	Permethrin	Phenmedipham	Phorate sulfone
N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.

Phorate sulfoxide	Phosalone	Phosmet	Piperonyl butoxide	Pirimicarb	Prallethrin	Prochloraz
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

[illegible]

Propiconazole	Pymetrozine	Pyraclostrobin	Pyridaben	Pyrimethanil	Pyriproxyfen	Quinoxifen
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Quintozene	Resmethrin total	Simazine	Spinetoram	Spirodiclofen	Spiromesifen	Sulfentrazone
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Tebuconazole	Tebufenozide	Tefluthrin	Tetrachlorvinphos	Tetraconazole	Tetradifon
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Tetrahydrophthalimide (THPI)	Tetramethrin	Thiabendazole	Thiacloprid	Thiamethoxam	Thiodicarb
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Triadimefon	Triadimenol	Tribufos	Trifloxystrobin	Triflumizole	Trifluralin	Vinclozolin
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.



UNITED STATES DEPARTMENT OF AGRICULTURE
AGRICULTURAL MARKETING SERVICE
SCIENCE & TECHNOLOGY PROGRAMS
LABORATORY APPROVAL AND TESTING DIVISION

National Science Laboratories
801 Summit Crossing Place, Suite B
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Phone: (704) 867-3873
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Applicant Identifier:

Tammie Wilburn

Agri. Marketing Specialist Regulatory

USDA-AMS-NOP

1400 Independence Ave

Washington, DC 20500

Sample Description:

Organic Bell Pepper

Date Received: **11/17/2014**

Date Completed: **12/03/2014**

Date Issued: **12/03/2014**

P.O. #

Method:

MET-124

REPORT OF ANALYTICAL TEST RESULTS

Original Report

Applicant Sample ID: **111214LL03**

Laboratory ID: **AM05461**

Pesticide Residue	Result PPM	LOD PPM	Pesticide Residue	Result PPM	LOD PPM
1-Naphthol	N.D.	0.050	Cyhalothrin lambda	N.D.	0.001
2,4 Dimethylphenyl formamide (DMPF)	N.D.	0.004	Cypermethrin	N.D.	0.004
3-Hydroxycarbofuran	N.D.	0.004	Cyprodinil	N.D.	0.004
4,4-Dibromobenzophenone	N.D.	0.010	Cyromazine	0.061	0.050
5-Hydroxythiabendazole	N.D.	0.050	DDD o,p	N.D.	0.040
Acephate	N.D.	0.010	DDD p,p	N.D.	0.020
Acetamiprid	N.D.	0.004	DDE o,p	N.D.	0.020
Acetochlor	N.D.	0.025	DDE p,p	N.D.	0.002
Aldicarb	N.D.	0.004	DDT p,p	N.D.	0.040
Aldicarb sulfone	N.D.	0.003	Deltamethrin	N.D.	0.050
Aldicarb sulfoxide	N.D.	0.020	Diazinon	N.D.	0.001
Aldrin	N.D.	0.010	Diazinon oxygen analog	N.D.	0.010
Allethrin	N.D.	0.008	Dichlorvos (DDVP)	N.D.	0.011
Atrazine	N.D.	0.006	Dicloran	N.D.	0.003
Azinphos methyl	N.D.	0.015	Dicofol o,p	N.D.	0.004
Azoxystrobin	N.D.	0.001	Dicofol p,p	N.D.	0.003
Bendiocarb	N.D.	0.002	Dieldrin	N.D.	0.005
BHC alpha	N.D.	0.002	Difenoconazole	N.D.	0.050
Bifenazate	N.D.	0.100	Diffubenzuron	N.D.	0.020
Bifenthrin	N.D.	0.005	Dimethoate	N.D.	0.023
Biteranol	N.D.	0.025	Dimethomorph	N.D.	0.056
Boscalid	N.D.	0.020	Dinotefuran	N.D.	0.030
Bromacil	N.D.	0.025	Diphenamid	N.D.	0.001
Buprofezin	N.D.	0.100	Diphenylamine	N.D.	0.020
Captan	N.D.	0.010	Disulfoton sulfone	N.D.	0.025
Carbaryl	N.D.	0.003	Diuron	N.D.	0.025
Carbendazim (MBC)	0.195	0.005	Endosulfan I	N.D.	0.005
Carbofuran	N.D.	0.001	Endosulfan II	N.D.	0.001
Carfentrazone ethyl	N.D.	0.003	Endosulfan sulfate	N.D.	0.001
Chlorantraniliprole	0.047	0.010	Endrin	N.D.	0.020
Chlordane cis	N.D.	0.001	Epoxiconazole	N.D.	0.003
Chlordane trans	N.D.	0.005	Esfenvalerate	N.D.	0.010
Chlorfenapyr	N.D.	0.003	Ethion	N.D.	0.050
Chlorothalonil	N.D.	0.004	Ethoprop	N.D.	0.050
Chlorpropham (CIPC)	N.D.	0.050	Ethoxyquin	N.D.	0.025
Chlorpyrifos	N.D.	0.003	Etoxazole	N.D.	0.001
Chlorpyrifos methyl	N.D.	0.001	Etridiazole	N.D.	0.100
Chlorthal (DCPA)	N.D.	0.010	Famoxadone	N.D.	0.050
Clofentezine	N.D.	0.020	Fenamidone	N.D.	0.040
Clothianidin	N.D.	0.001	Fenamiphos	N.D.	0.006
Coumaphos	N.D.	0.001	Fenamiphos sulfone	N.D.	0.011
Cyazofamid	N.D.	0.002	Fenamiphos sulfoxide	N.D.	0.011
Cycloate	N.D.	0.025	Fenarimol	N.D.	0.010
Cyfluthrin	N.D.	0.008	Fenbuconazole	N.D.	0.002

LOD - Limit of Detection, N.A. - Not Analyzed, N.D. - Not Detected.

REPORT OF ANALYTICAL TEST RESULTS

Original Report

Applicant Sample ID: 111214LL03

Laboratory ID: AM05461

Pesticide Residue	Result PPM	LOD PPM	Pesticide Residue	Result PPM	LOD PPM
Fenhexamid	N.D.	0.003	Phenmedipham	N.D.	0.050
Fenoxaprop ethyl	N.D.	0.030	Phorate sulfone	N.D.	0.025
Fenpropathrin	N.D.	0.008	Phorate sulfoxide	N.D.	0.025
Fenpyroximate	N.D.	0.005	Phosalone	N.D.	0.025
Fenthion	N.D.	0.050	Phosmet	N.D.	0.025
Fipronil	0.044	0.020	Piperonyl butoxide	N.D.	0.050
Flonicamid	N.D.	0.008	Pirimicarb	N.D.	0.007
Fludioxonil	N.D.	0.020	Prallethrin	N.D.	0.010
Fluoxastrobin	N.D.	0.004	Prochloraz	N.D.	0.025
Fluridone	N.D.	0.030	Procymidone	N.D.	0.100
Flutolanil	N.D.	0.030	Profenofos	N.D.	0.008
Fluvalinate	N.D.	0.010	Prometryn	N.D.	0.005
Folpet	N.D.	0.008	Pronamide	N.D.	0.003
Fonofos	N.D.	0.100	Propanil	N.D.	0.050
Heptachlor	N.D.	0.002	Propargite	N.D.	0.030
Heptachlor epoxide	N.D.	0.005	Propetamphos	N.D.	0.040
Hexachlorobenzene	N.D.	0.001	Propham	N.D.	0.050
Hexaconazole	N.D.	0.025	Propiconazole	N.D.	0.100
Hexythiazox	N.D.	0.006	Pymetrozine	N.D.	0.015
Hydroprene	N.D.	0.050	Pyraclostrobin	N.D.	0.015
Imazalil	N.D.	0.005	Pyridaben	N.D.	0.001
Imidacloprid	0.001	0.001	Pyrimethanil	N.D.	0.003
Indoxacarb	N.D.	0.003	Pyriproxyfen	N.D.	0.001
Iprodione	N.D.	0.020	Quinoxifen	N.D.	0.020
Lindane	N.D.	0.004	Quintozene	N.D.	0.001
Linuron	N.D.	0.020	Resmethrin total	N.D.	0.100
Malathion	N.D.	0.010	Simazine	N.D.	0.010
Malathion oxygen analog	N.D.	0.010	Spinetoram	N.D.	0.010
Metalaxyl	N.D.	0.002	Spirodiclofen	N.D.	0.004
Methamidophos	N.D.	0.004	Spiromesifen	N.D.	0.020
Methidathion	N.D.	0.023	Sulfentrazone	N.D.	0.250
Methiocarb	N.D.	0.028	Tebuconazole	N.D.	0.008
Methomyl	N.D.	0.010	Tebufenozide	N.D.	0.005
Methoxychlor	N.D.	0.100	Tefluthrin	N.D.	0.001
Methoxyfenozide	N.D.	0.002	Tetrachlorvinphos	N.D.	0.020
Metolachlor	N.D.	0.030	Tetraconazole	N.D.	0.003
Metribuzin	N.D.	0.003	Tetradifon	N.D.	0.003
Mevinphos total	N.D.	0.011	Tetrahydrophthalimide (THPI)	N.D.	0.100
MGK-264	N.D.	0.040	Tetramethrin	N.D.	0.010
Myclobutanil	N.D.	0.005	Thiabendazole	N.D.	0.001
Naled	N.D.	0.011	Thiacloprid	N.D.	0.001
Napropamide	N.D.	0.025	Thiamethoxam	N.D.	0.004
Nonachlor cis	N.D.	0.005	Thiodicarb	N.D.	0.006
Nonachlor trans	N.D.	0.005	Triadimefon	N.D.	0.005
Norflurazon	N.D.	0.006	Triadimenol	N.D.	0.090
Norflurazon desmethyl	N.D.	0.025	Tribufos	N.D.	0.005
Omethoate	N.D.	0.023	Trifloxystrobin	N.D.	0.005
o-Phenylphenol	N.D.	0.050	Triflumizole	N.D.	0.008
Oxadixyl	N.D.	0.011	Trifluralin	N.D.	0.001
Oxamyl	N.D.	0.005	Vinclozolin	N.D.	0.001
Oxamyl oxime	N.D.	0.025			
Oxydemeton methyl sulfone	N.D.	0.010			
Oxyfluorfen	N.D.	0.003			
Parathion methyl	N.D.	0.002			
Pendimethalin	N.D.	0.003			
Pentachlorobenzene	N.D.	0.001			
Permethrin	N.D.	0.008			

LOD - Limit of Detection, N.A. - Not Analyzed, N.D. - Not Detected.

REPORT OF ANALYTICAL TEST RESULTS

Original Report

Applicant Sample ID: 111214LL03

Laboratory ID: AM05461

	Result	LOD		Result	LOD
Pesticide Residue	PPM	PPM	Pesticide Residue	PPM	PPM

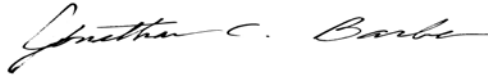
Comments:

The fee for the laboratory services provided above is \$415.00.

The information contained within this report of sample results is applicable only to the materials identified within and is, to the best of our ability and knowledge, accurate with regard to the client's specification. The laboratory shall not be responsible for errors due to the client's failure to provide information critical to the currency of contract specification and/or standards.

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Signature of Approving Official:



Jonathan C. Barber, Laboratory Supervisor



UNITED STATES DEPARTMENT OF AGRICULTURE
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Applicant Identifier:
Tammie Wilburn
Agri. Marketing Specialist Regulatory
USDA-AMS-NOP
1400 Independence Ave
Washington, DC 25050

Sample Description: **Organic Bell Pepper**
Date Received: **11/17/2014**
Date Completed: **12/03/2014**
Date Issued: **12/03/2014**
P.O. #
Method: **MET-124**

REPORT OF ANALYTICAL TEST RESULTS

Original Report

Applicant Sample ID: **111214LL01**

Laboratory ID: **AM05459**

Pesticide Residue	Result PPM	LOD PPM	Pesticide Residue	Result PPM	LOD PPM
1-Naphthol	N.D.	0.050	Cyhalothrin lambda	N.D.	0.001
2,4 Dimethylphenyl formamide (DMPF)	N.D.	0.004	Cypermethrin	N.D.	0.004
3-Hydroxycarbofuran	N.D.	0.004	Cyprodinil	N.D.	0.004
4,4-Dibromobenzophenone	N.D.	0.010	Cyromazine	N.D.	0.050
5-Hydroxythiabendazole	N.D.	0.050	DDD o,p	N.D.	0.040
Acephate	N.D.	0.010	DDD p,p	N.D.	0.020
Acetamiprid	N.D.	0.004	DDE o,p	N.D.	0.020
Acetochlor	N.D.	0.025	DDE p,p	N.D.	0.002
Aldicarb	N.D.	0.004	DDT p,p	N.D.	0.040
Aldicarb sulfone	N.D.	0.003	Deltamethrin	N.D.	0.050
Aldicarb sulfoxide	N.D.	0.020	Diazinon	N.D.	0.001
Aldrin	N.D.	0.010	Diazinon oxygen analog	N.D.	0.010
Allethrin	N.D.	0.008	Dichlorvos (DDVP)	N.D.	0.011
Atrazine	N.D.	0.006	Dicloran	N.D.	0.003
Azinphos methyl	N.D.	0.015	Dicofol o,p	N.D.	0.004
Azoxystrobin	N.D.	0.001	Dicofol p,p	N.D.	0.003
Bendiocarb	N.D.	0.002	Dieldrin	N.D.	0.005
BHC alpha	N.D.	0.002	Difenoconazole	N.D.	0.050
Bifenazate	N.D.	0.100	Diffubenzuron	N.D.	0.020
Bifenthrin	N.D.	0.005	Dimethoate	N.D.	0.023
Biteranol	N.D.	0.025	Dimethomorph	N.D.	0.056
Boscalid	N.D.	0.020	Dinotefuran	N.D.	0.030
Bromacil	N.D.	0.025	Diphenamid	N.D.	0.001
Buprofezin	N.D.	0.100	Diphenylamine	N.D.	0.020
Captan	N.D.	0.010	Disulfoton sulfone	N.D.	0.025
Carbaryl	N.D.	0.003	Diuron	N.D.	0.025
Carbendazim (MBC)	N.D.	0.005	Endosulfan I	N.D.	0.005
Carbofuran	N.D.	0.001	Endosulfan II	N.D.	0.001
Carfentrazone ethyl	N.D.	0.003	Endosulfan sulfate	N.D.	0.001
Chlorantraniliprole	N.D.	0.010	Endrin	N.D.	0.020
Chlordane cis	N.D.	0.001	Epoxiconazole	N.D.	0.003
Chlordane trans	N.D.	0.005	Esfenvalerate	N.D.	0.010
Chlorfenapyr	N.D.	0.003	Ethion	N.D.	0.050
Chlorothalonil	N.D.	0.004	Ethoprop	N.D.	0.050
Chlorpropham (CIPC)	N.D.	0.050	Ethoxyquin	N.D.	0.025
Chlorpyrifos	N.D.	0.003	Etoxazole	N.D.	0.001
Chlorpyrifos methyl	N.D.	0.001	Etridiazole	N.D.	0.100
Chlorthal (DCPA)	N.D.	0.010	Famoxadone	N.D.	0.050
Clofentezine	N.D.	0.020	Fenamidone	N.D.	0.040
Clothianidin	N.D.	0.001	Fenamiphos	N.D.	0.006
Coumaphos	N.D.	0.001	Fenamiphos sulfone	N.D.	0.011
Cyazofamid	N.D.	0.002	Fenamiphos sulfoxide	N.D.	0.011
Cycloate	N.D.	0.025	Fenarimol	N.D.	0.010
Cyfluthrin	N.D.	0.008	Fenbuconazole	N.D.	0.002

LOD - Limit of Detection, N.A. - Not Analyzed, N.D. - Not Detected.

REPORT OF ANALYTICAL TEST RESULTS

Original Report

Applicant Sample ID: 111214LL01

Laboratory ID: AM05459

Pesticide Residue	Result PPM	LOD PPM	Pesticide Residue	Result PPM	LOD PPM
Fenhexamid	N.D.	0.003	Phenmedipham	N.D.	0.050
Fenoxaprop ethyl	N.D.	0.030	Phorate sulfone	N.D.	0.025
Fenpropathrin	N.D.	0.008	Phorate sulfoxide	N.D.	0.025
Fenpyroximate	N.D.	0.005	Phosalone	N.D.	0.025
Fenthion	N.D.	0.050	Phosmet	N.D.	0.025
Fipronil	N.D.	0.020	Piperonyl butoxide	N.D.	0.050
Flonicamid	N.D.	0.008	Pirimicarb	N.D.	0.007
Fludioxonil	N.D.	0.020	Prallethrin	N.D.	0.010
Fluoxastrobin	N.D.	0.004	Prochloraz	N.D.	0.025
Fluridone	N.D.	0.030	Procymidone	N.D.	0.100
Flutolanil	N.D.	0.030	Profenofos	N.D.	0.008
Fluvalinate	N.D.	0.010	Prometryn	N.D.	0.005
Folpet	N.D.	0.008	Pronamide	N.D.	0.003
Fonofos	N.D.	0.100	Propanil	N.D.	0.050
Heptachlor	N.D.	0.002	Propargite	N.D.	0.030
Heptachlor epoxide	N.D.	0.005	Propetamphos	N.D.	0.040
Hexachlorobenzene	N.D.	0.001	Propham	N.D.	0.050
Hexaconazole	N.D.	0.025	Propiconazole	N.D.	0.100
Hexythiazox	N.D.	0.006	Pymetrozine	N.D.	0.015
Hydroprene	N.D.	0.050	Pyraclostrobin	N.D.	0.015
Imazalil	N.D.	0.005	Pyridaben	N.D.	0.001
Imidacloprid	0.028	0.001	Pyrimethanil	N.D.	0.003
Indoxacarb	N.D.	0.003	Pyriproxyfen	N.D.	0.001
Iprodione	N.D.	0.020	Quinoxifen	N.D.	0.020
Lindane	N.D.	0.004	Quintozene	N.D.	0.001
Linuron	N.D.	0.020	Resmethrin total	N.D.	0.100
Malathion	N.D.	0.010	Simazine	N.D.	0.010
Malathion oxygen analog	N.D.	0.010	Spinetoram	N.D.	0.010
Metalaxyl	N.D.	0.002	Spirodiclofen	N.D.	0.004
Methamidophos	N.D.	0.004	Spiromesifen	N.D.	0.020
Methidathion	N.D.	0.023	Sulfentrazone	N.D.	0.250
Methiocarb	N.D.	0.028	Tebuconazole	N.D.	0.008
Methomyl	N.D.	0.010	Tebufenozide	N.D.	0.005
Methoxychlor	N.D.	0.100	Tefluthrin	N.D.	0.001
Methoxyfenozide	N.D.	0.002	Tetrachlorvinphos	N.D.	0.020
Metolachlor	N.D.	0.030	Tetraconazole	N.D.	0.003
Metribuzin	N.D.	0.003	Tetradifon	N.D.	0.003
Mevinphos total	N.D.	0.011	Tetrahydrophthalimide (THPI)	N.D.	0.100
MGK-264	N.D.	0.040	Tetramethrin	N.D.	0.010
Myclobutanil	N.D.	0.005	Thiabendazole	N.D.	0.001
Naled	N.D.	0.011	Thiacloprid	N.D.	0.001
Napropamide	N.D.	0.025	Thiamethoxam	N.D.	0.004
Nonachlor cis	N.D.	0.005	Thiodicarb	N.D.	0.006
Nonachlor trans	N.D.	0.005	Triadimefon	N.D.	0.005
Norflurazon	N.D.	0.006	Triadimenol	N.D.	0.090
Norflurazon desmethyl	N.D.	0.025	Tribufos	N.D.	0.005
Omethoate	N.D.	0.023	Trifloxystrobin	N.D.	0.005
o-Phenylphenol	N.D.	0.050	Triflumizole	N.D.	0.008
Oxadixyl	N.D.	0.011	Trifluralin	N.D.	0.001
Oxamyl	N.D.	0.005	Vinclozolin	N.D.	0.001
Oxamyl oxime	N.D.	0.025			
Oxydemeton methyl sulfone	N.D.	0.010			
Oxyfluorfen	N.D.	0.003			
Parathion methyl	N.D.	0.002			
Pendimethalin	N.D.	0.003			
Pentachlorobenzene	N.D.	0.001			
Permethrin	N.D.	0.008			

LOD - Limit of Detection, N.A. - Not Analyzed, N.D. - Not Detected.

REPORT OF ANALYTICAL TEST RESULTS

Original Report

Applicant Sample ID: 111214LL01

Laboratory ID: AM05459

	Result	LOD		Result	LOD
Pesticide Residue	PPM	PPM	Pesticide Residue	PPM	PPM

Comments:

The fee for the laboratory services provided above is \$415.00.

The information contained within this report of sample results is applicable only to the materials identified within and is, to the best of our ability and knowledge, accurate with regard to the client's specification. The laboratory shall not be responsible for errors due to the client's failure to provide information critical to the currency of contract specification and/or standards.

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Signature of Approving Official:



Jonathan C. Barber, Laboratory Supervisor



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Phone: (704) 867-3873
Fax: (704) 853-2800

Applicant Identifier:
Tammie Wilburn
Agri. Marketing Specialist Regulatory
USDA-AMS-NOP
1400 Independence Ave
Washington, DC 20500

Sample Description: **Organic Bell Pepper**
Date Received: **11/17/2014**
Date Completed: **12/03/2014**
Date Issued: **12/03/2014**
P.O. #
Method: **MET-124**

REPORT OF ANALYTICAL TEST RESULTS

Original Report

Applicant Sample ID: **111214LL02**

Laboratory ID: **AM05460**

Pesticide Residue	Result PPM	LOD PPM	Pesticide Residue	Result PPM	LOD PPM
1-Naphthol	N.D.	0.050	Cyhalothrin lambda	N.D.	0.001
2,4 Dimethylphenyl formamide (DMPF)	N.D.	0.004	Cypermethrin	0.015	0.004
3-Hydroxycarbofuran	N.D.	0.004	Cyprodinil	N.D.	0.004
4,4-Dibromobenzophenone	N.D.	0.010	Cyromazine	N.D.	0.050
5-Hydroxythiabendazole	N.D.	0.050	DDD o,p	N.D.	0.040
Acephate	N.D.	0.010	DDD p,p	N.D.	0.020
Acetamiprid	N.D.	0.004	DDE o,p	N.D.	0.020
Acetochlor	N.D.	0.025	DDE p,p	N.D.	0.002
Aldicarb	N.D.	0.004	DDT p,p	N.D.	0.040
Aldicarb sulfone	N.D.	0.003	Deltamethrin	N.D.	0.050
Aldicarb sulfoxide	N.D.	0.020	Diazinon	N.D.	0.001
Aldrin	N.D.	0.010	Diazinon oxygen analog	N.D.	0.010
Allethrin	N.D.	0.008	Dichlorvos (DDVP)	N.D.	0.011
Atrazine	N.D.	0.006	Dicloran	N.D.	0.003
Azinphos methyl	N.D.	0.015	Dicofol o,p	N.D.	0.004
Azoxystrobin	N.D.	0.001	Dicofol p,p	N.D.	0.003
Bendiocarb	N.D.	0.002	Dieldrin	N.D.	0.005
BHC alpha	N.D.	0.002	Difenoconazole	N.D.	0.050
Bifenazate	N.D.	0.100	Diffubenzuron	N.D.	0.020
Bifenthrin	N.D.	0.005	Dimethoate	N.D.	0.023
Biteranol	N.D.	0.025	Dimethomorph	N.D.	0.056
Boscalid	N.D.	0.020	Dinotefuran	N.D.	0.030
Bromacil	N.D.	0.025	Diphenamid	N.D.	0.001
Buprofezin	N.D.	0.100	Diphenylamine	N.D.	0.020
Captan	N.D.	0.010	Disulfoton sulfone	N.D.	0.025
Carbaryl	N.D.	0.003	Diuron	N.D.	0.025
Carbendazim (MBC)	0.006	0.005	Endosulfan I	N.D.	0.005
Carbofuran	N.D.	0.001	Endosulfan II	N.D.	0.001
Carfentrazone ethyl	N.D.	0.003	Endosulfan sulfate	N.D.	0.001
Chlorantraniliprole	N.D.	0.010	Endrin	N.D.	0.020
Chlordane cis	N.D.	0.001	Epoxiconazole	N.D.	0.003
Chlordane trans	N.D.	0.005	Esfenvalerate	N.D.	0.010
Chlorfenapyr	N.D.	0.003	Ethion	N.D.	0.050
Chlorothalonil	N.D.	0.004	Ethoprop	N.D.	0.050
Chlorpropham (CIPC)	N.D.	0.050	Ethoxyquin	N.D.	0.025
Chlorpyrifos	N.D.	0.003	Etoxazole	N.D.	0.001
Chlorpyrifos methyl	N.D.	0.001	Etridiazole	N.D.	0.100
Chlorthal (DCPA)	N.D.	0.010	Famoxadone	N.D.	0.050
Clofentezine	N.D.	0.020	Fenamidone	N.D.	0.040
Clothianidin	N.D.	0.001	Fenamiphos	N.D.	0.006
Coumaphos	N.D.	0.001	Fenamiphos sulfone	N.D.	0.011
Cyazofamid	N.D.	0.002	Fenamiphos sulfoxide	N.D.	0.011
Cycloate	N.D.	0.025	Fenarimol	N.D.	0.010
Cyfluthrin	N.D.	0.008	Fenbuconazole	N.D.	0.002

LOD - Limit of Detection, N.A. - Not Analyzed, N.D. - Not Detected.

REPORT OF ANALYTICAL TEST RESULTS

Original Report

Applicant Sample ID: 111214LL02

Laboratory ID: AM05460

Pesticide Residue	Result PPM	LOD PPM	Pesticide Residue	Result PPM	LOD PPM
Fenhexamid	N.D.	0.003	Phenmedipham	N.D.	0.050
Fenoxaprop ethyl	N.D.	0.030	Phorate sulfone	N.D.	0.025
Fenpropathrin	N.D.	0.008	Phorate sulfoxide	N.D.	0.025
Fenpyroximate	N.D.	0.005	Phosalone	N.D.	0.025
Fenthion	N.D.	0.050	Phosmet	N.D.	0.025
Fipronil	N.D.	0.020	Piperonyl butoxide	N.D.	0.050
Flonicamid	N.D.	0.008	Pirimicarb	N.D.	0.007
Fludioxonil	N.D.	0.020	Prallethrin	N.D.	0.010
Fluoxastrobin	N.D.	0.004	Prochloraz	N.D.	0.025
Fluridone	N.D.	0.030	Procymidone	N.D.	0.100
Flutolanil	N.D.	0.030	Profenofos	N.D.	0.008
Fluvalinate	N.D.	0.010	Prometryn	N.D.	0.005
Folpet	N.D.	0.008	Pronamide	N.D.	0.003
Fonofos	N.D.	0.100	Propanil	N.D.	0.050
Heptachlor	N.D.	0.002	Propargite	N.D.	0.030
Heptachlor epoxide	N.D.	0.005	Propetamphos	N.D.	0.040
Hexachlorobenzene	N.D.	0.001	Propham	N.D.	0.050
Hexaconazole	N.D.	0.025	Propiconazole	N.D.	0.100
Hexythiazox	N.D.	0.006	Pymetrozine	N.D.	0.015
Hydroprene	N.D.	0.050	Pyraclostrobin	N.D.	0.015
Imazalil	N.D.	0.005	Pyridaben	N.D.	0.001
Imidacloprid	N.D.	0.001	Pyrimethanil	N.D.	0.003
Indoxacarb	N.D.	0.003	Pyriproxyfen	N.D.	0.001
Iprodione	N.D.	0.020	Quinoxifen	N.D.	0.020
Lindane	N.D.	0.004	Quintozene	N.D.	0.001
Linuron	N.D.	0.020	Resmethrin total	N.D.	0.100
Malathion	N.D.	0.010	Simazine	N.D.	0.010
Malathion oxygen analog	N.D.	0.010	Spinetoram	N.D.	0.010
Metalaxyl	N.D.	0.002	Spirodiclofen	N.D.	0.004
Methamidophos	N.D.	0.004	Spiromesifen	N.D.	0.020
Methidathion	N.D.	0.023	Sulfentrazone	N.D.	0.250
Methiocarb	N.D.	0.028	Tebuconazole	N.D.	0.008
Methomyl	N.D.	0.010	Tebufenozide	N.D.	0.005
Methoxychlor	N.D.	0.100	Tefluthrin	N.D.	0.001
Methoxyfenozide	N.D.	0.002	Tetrachlorvinphos	N.D.	0.020
Metolachlor	N.D.	0.030	Tetraconazole	N.D.	0.003
Metribuzin	N.D.	0.003	Tetradifon	N.D.	0.003
Mevinphos total	N.D.	0.011	Tetrahydrophthalimide (THPI)	N.D.	0.100
MGK-264	N.D.	0.040	Tetramethrin	N.D.	0.010
Myclobutanil	N.D.	0.005	Thiabendazole	N.D.	0.001
Naled	N.D.	0.011	Thiacloprid	N.D.	0.001
Napropamide	N.D.	0.025	Thiamethoxam	N.D.	0.004
Nonachlor cis	N.D.	0.005	Thiodicarb	N.D.	0.006
Nonachlor trans	N.D.	0.005	Triadimefon	N.D.	0.005
Norflurazon	N.D.	0.006	Triadimenol	N.D.	0.090
Norflurazon desmethyl	N.D.	0.025	Tribufos	N.D.	0.005
Omethoate	N.D.	0.023	Trifloxystrobin	N.D.	0.005
o-Phenylphenol	N.D.	0.050	Triflumizole	N.D.	0.008
Oxadixyl	N.D.	0.011	Trifluralin	N.D.	0.001
Oxamyl	N.D.	0.005	Vinclozolin	N.D.	0.001
Oxamyl oxime	N.D.	0.025			
Oxydemeton methyl sulfone	N.D.	0.010			
Oxyfluorfen	N.D.	0.003			
Parathion methyl	N.D.	0.002			
Pendimethalin	N.D.	0.003			
Pentachlorobenzene	N.D.	0.001			
Permethrin	N.D.	0.008			

LOD - Limit of Detection, N.A. - Not Analyzed, N.D. - Not Detected.

REPORT OF ANALYTICAL TEST RESULTS

Original Report

Applicant Sample ID: 111214LL02

Laboratory ID: AM05460

	Result	LOD		Result	LOD
Pesticide Residue	PPM	PPM	Pesticide Residue	PPM	PPM


Comments:

The fee for the laboratory services provided above is \$415.00.

The information contained within this report of sample results is applicable only to the materials identified within and is, to the best of our ability and knowledge, accurate with regard to the client's specification. The laboratory shall not be responsible for errors due to the client's failure to provide information critical to the currency of contract specification and/or standards.

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Signature of Approving Official:



Jonathan C. Barber, Laboratory Supervisor



UNITED STATES DEPARTMENT OF AGRICULTURE
AGRICULTURAL MARKETING SERVICE
SCIENCE & TECHNOLOGY PROGRAMS
LABORATORY APPROVAL AND TESTING DIVISION

National Science Laboratories
801 Summit Crossing Place, Suite B
Gastonia, NC 28054
Phone: (704) 867-3873
Fax: (704) 853-2800

Applicant Identifier:
Tammie Wilburn
Agri. Marketing Specialist Regulatory
USDA-AMS-NOP
1400 Independence Ave
Washington, DC 25050

Sample Description: **Organic Bell Pepper**
Date Received: **11/13/2014**
Date Completed: **12/03/2014**
Date Issued: **12/03/2014**
P.O. #
Method: **MET-124**

REPORT OF ANALYTICAL TEST RESULTS

Original Report

Applicant Sample ID: **Field 12 A,B,C**

Laboratory ID: **AM05349**

Pesticide Residue	Result PPM	LOD PPM	Pesticide Residue	Result PPM	LOD PPM
1-Naphthol	N.D.	0.050	Cyhalothrin lambda	N.D.	0.001
2,4 Dimethylphenyl formamide (DMPF)	N.D.	0.004	Cypermethrin	N.D.	0.004
3-Hydroxycarbofuran	N.D.	0.004	Cyprodinil	N.D.	0.004
4,4-Dibromobenzophenone	N.D.	0.010	Cyromazine	N.D.	0.050
5-Hydroxythiabendazole	N.D.	0.050	DDD o,p	N.D.	0.040
Acephate	N.D.	0.010	DDD p,p	N.D.	0.020
Acetamiprid	N.D.	0.004	DDE o,p	N.D.	0.020
Acetochlor	N.D.	0.025	DDE p,p	N.D.	0.002
Aldicarb	N.D.	0.004	DDT p,p	N.D.	0.040
Aldicarb sulfone	N.D.	0.003	Deltamethrin	N.D.	0.050
Aldicarb sulfoxide	N.D.	0.020	Diazinon	N.D.	0.001
Aldrin	N.D.	0.010	Diazinon oxygen analog	N.D.	0.010
Allethrin	N.D.	0.008	Dichlorvos (DDVP)	N.D.	0.011
Atrazine	N.D.	0.006	Dicloran	N.D.	0.003
Azinphos methyl	N.D.	0.015	Dicofol o,p	N.D.	0.004
Azoxystrobin	0.003	0.001	Dicofol p,p	N.D.	0.003
Bendiocarb	N.D.	0.002	Dieldrin	N.D.	0.005
BHC alpha	N.D.	0.002	Difenoconazole	N.D.	0.050
Bifenazate	N.D.	0.100	Diffubenzuron	N.D.	0.020
Bifenthrin	N.D.	0.005	Dimethoate	N.D.	0.023
Biteranol	N.D.	0.025	Dimethomorph	N.D.	0.056
Boscalid	N.D.	0.020	Dinotefuran	N.D.	0.030
Bromacil	N.D.	0.025	Diphenamid	N.D.	0.001
Buprofezin	N.D.	0.100	Diphenylamine	N.D.	0.020
Captan	N.D.	0.010	Disulfoton sulfone	N.D.	0.025
Carbaryl	N.D.	0.003	Diuron	N.D.	0.025
Carbendazim (MBC)	N.D.	0.005	Endosulfan I	N.D.	0.005
Carbofuran	N.D.	0.001	Endosulfan II	N.D.	0.001
Carfentrazone ethyl	N.D.	0.003	Endosulfan sulfate	N.D.	0.001
Chlorantraniliprole	N.D.	0.010	Endrin	N.D.	0.020
Chlordane cis	N.D.	0.001	Epoxiconazole	N.D.	0.003
Chlordane trans	N.D.	0.005	Esfenvalerate	N.D.	0.010
Chlorfenapyr	N.D.	0.003	Ethion	N.D.	0.050
Chlorothalonil	N.D.	0.004	Ethoprop	N.D.	0.050
Chlorpropham (CIPC)	N.D.	0.050	Ethoxyquin	N.D.	0.025
Chlorpyrifos	N.D.	0.003	Etoxazole	N.D.	0.001
Chlorpyrifos methyl	N.D.	0.001	Etridiazole	N.D.	0.100
Chlorthal (DCPA)	N.D.	0.010	Famoxadone	N.D.	0.050
Clofentezine	N.D.	0.020	Fenamidone	N.D.	0.040
Clothianidin	N.D.	0.001	Fenamiphos	N.D.	0.006
Coumaphos	N.D.	0.001	Fenamiphos sulfone	N.D.	0.011
Cyazofamid	N.D.	0.002	Fenamiphos sulfoxide	N.D.	0.011
Cycloate	N.D.	0.025	Fenarimol	N.D.	0.010
Cyfluthrin	N.D.	0.008	Fenbuconazole	N.D.	0.002

LOD - Limit of Detection, N.A. - Not Analyzed, N.D. - Not Detected.

REPORT OF ANALYTICAL TEST RESULTS

Original Report

<i>Applicant Sample ID:</i>	<u>Field 12 A,B,C</u>		<i>Laboratory ID:</i>	<u>AM05349</u>	
	Result	LOD		Result	LOD
Pesticide Residue	PPM	PPM	Pesticide Residue	PPM	PPM
Fenhexamid	N.D.	0.003	Phenmedipham	N.D.	0.050
Fenoxaprop ethyl	N.D.	0.030	Phorate sulfone	N.D.	0.025
Fenpropathrin	N.D.	0.008	Phorate sulfoxide	N.D.	0.025
Fenpyroximate	N.D.	0.005	Phosalone	N.D.	0.025
Fenthion	N.D.	0.050	Phosmet	N.D.	0.025
Fipronil	N.D.	0.020	Piperonyl butoxide	N.D.	0.050
Flonicamid	N.D.	0.008	Pirimicarb	N.D.	0.007
Fludioxonil	N.D.	0.020	Prallethrin	N.D.	0.010
Fluoxastrobin	N.D.	0.004	Prochloraz	N.D.	0.025
Fluridone	N.D.	0.030	Procymidone	N.D.	0.100
Flutolanil	N.D.	0.030	Profenofos	N.D.	0.008
Fluvalinate	N.D.	0.010	Prometryn	N.D.	0.005
Folpet	N.D.	0.008	Pronamide	N.D.	0.003
Fonofos	N.D.	0.100	Propanil	N.D.	0.050
Heptachlor	N.D.	0.002	Propargite	N.D.	0.030
Heptachlor epoxide	N.D.	0.005	Propetamphos	N.D.	0.040
Hexachlorobenzene	N.D.	0.001	Propham	N.D.	0.050
Hexaconazole	N.D.	0.025	Propiconazole	N.D.	0.100
Hexythiazox	N.D.	0.006	Pymetrozine	N.D.	0.015
Hydroprene	N.D.	0.050	Pyraclostrobin	N.D.	0.015
Imazalil	N.D.	0.005	Pyridaben	N.D.	0.001
Imidacloprid	N.D.	0.001	Pyrimethanil	N.D.	0.003
Indoxacarb	N.D.	0.003	Pyriproxyfen	N.D.	0.001
Iprodione	N.D.	0.020	Quinoxifen	N.D.	0.020
Lindane	N.D.	0.004	Quintozene	N.D.	0.001
Linuron	N.D.	0.020	Resmethrin total	N.D.	0.100
Malathion	N.D.	0.010	Simazine	N.D.	0.010
Malathion oxygen analog	N.D.	0.010	Spinetoram	N.D.	0.010
Metalaxyl	N.D.	0.002	Spirodiclofen	N.D.	0.004
Methamidophos	N.D.	0.004	Spiromesifen	N.D.	0.020
Methidathion	N.D.	0.023	Sulfentrazone	N.D.	0.250
Methiocarb	N.D.	0.028	Tebuconazole	N.D.	0.008
Methomyl	N.D.	0.010	Tebufenozide	N.D.	0.005
Methoxychlor	N.D.	0.100	Tefluthrin	N.D.	0.001
Methoxyfenozide	N.D.	0.002	Tetrachlorvinphos	N.D.	0.020
Metolachlor	N.D.	0.030	Tetraconazole	N.D.	0.003
Metribuzin	N.D.	0.003	Tetradifon	N.D.	0.003
Mevinphos total	N.D.	0.011	Tetrahydrophthalimide (THPI)	N.D.	0.100
MGK-264	N.D.	0.040	Tetramethrin	N.D.	0.010
Myclobutanil	N.D.	0.005	Thiabendazole	N.D.	0.001
Naled	N.D.	0.011	Thiacloprid	N.D.	0.001
Napropamide	N.D.	0.025	Thiamethoxam	N.D.	0.004
Nonachlor cis	N.D.	0.005	Thiodicarb	N.D.	0.006
Nonachlor trans	N.D.	0.005	Triadimefon	N.D.	0.005
Norflurazon	N.D.	0.006	Triadimenol	N.D.	0.090
Norflurazon desmethyl	N.D.	0.025	Tribufos	N.D.	0.005
Omethoate	N.D.	0.023	Trifloxystrobin	N.D.	0.005
o-Phenylphenol	N.D.	0.050	Triflumizole	N.D.	0.008
Oxadixyl	N.D.	0.011	Trifluralin	N.D.	0.001
Oxamyl	N.D.	0.005	Vinclozolin	N.D.	0.001
Oxamyl oxime	N.D.	0.025			
Oxydemeton methyl sulfone	N.D.	0.010			
Oxyfluorfen	N.D.	0.003			
Parathion methyl	N.D.	0.002			
Pendimethalin	N.D.	0.003			
Pentachlorobenzene	N.D.	0.001			
Permethrin	N.D.	0.008			

LOD - Limit of Detection, N.A. - Not Analyzed, N.D. - Not Detected.

REPORT OF ANALYTICAL TEST RESULTS

Original Report

Applicant Sample ID:	Field 12 A,B,C			Laboratory ID:	AM05349
	Result	LOD		Result	LOD
Pesticide Residue	PPM	PPM	Pesticide Residue	PPM	PPM


Comments:

The fee for the laboratory services provided above is \$415.00.

The information contained within this report of sample results is applicable only to the materials identified within and is, to the best of our ability and knowledge, accurate with regard to the client's specification. The laboratory shall not be responsible for errors due to the client's failure to provide information critical to the currency of contract specification and/or standards.

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Signature of Approving Official:



Jonathan C. Barber, Laboratory Supervisor

From: Wilburn, Tammie - AMS
To: ["jackie@tilth.org"](mailto:jackie@tilth.org)
Cc: [Andrew Black \(andrewblack@tilth.org\)](mailto:andrewblack@tilth.org)
Subject: FW: U.S. Department of Agriculture bell pepper shipment
Date: Friday, March 27, 2015 1:45:00 PM

Andrew, please forward to Jackie Sleeper if I have gotten the wrong email address.

Jackie,

Here is a foreign agricultural contact person for Mexico. Please contact him directly and cc me, should you have an issue with the next shipment.

Eduardo Lozano Carreño
Agricultural Specialist
USDA/ATO-Monterrey
(52)81-8047-3318
Eduardo.Lozano@fas.usda.gov

Many thanks!

Tammie B. Wilburn
Compliance and Enforcement Division
National Organic Program, USDA
202-690-2624
<http://www.ams.usda.gov/AMSV1.0/NOP>

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From: Lozano, Eduardo F [<mailto:Eduardo.Lozano@fas.usda.gov>]
Sent: Friday, November 14, 2014 9:32 AM
To: Wilburn, Tammie - AMS
Cc: Manuel Velazquez; Murphy, Ann - FAS
Subject: RE: U.S. Department of Agriculture bell pepper shipment

Dear Ms. Wilburn,

I am trying to reach you to talk about your bell pepper issue.

Were the bell peppers exported from the U.S. to Mexico or from Mexico to the U.S.? Can you please call me at 52-81-8047-3318?

From: Wilburn, Tammie - AMS [<mailto:Tammie.Wilburn@ams.usda.gov>]

Sent: Wednesday, November 12, 2014 5:32 PM
To: Lozano, Eduardo F
Subject: FW: U.S. Department of Agriculture bell pepper shipment

Mr. Lozano:

Juan Manuel Velazquez referred me to you. My name is Tammie Wilburn and I work with the National Organic Program, AMS, U.S. Department of Agriculture. We are studying peppers from Mexico under the USDA organic regulations. We have an APHIS permit to release bell pepper shipments from Mexico into the United States. One of our sweet bell pepper shipments was recently denied at the Mexican Customs Center in Mexico City. It seems they were denied because they were believed to be chile peppers and prohibited for export. I believe this is a mistake as sweet bell peppers are distinctly different from chile peppers.

We would like to attempt sending the peppers again as soon as possible. The boxes currently are located in cold storage at the point of original departure at the producer's facility. Can you offer any assistance with getting this shipment through? The DHL tracking information and photos of the sample are attached. The client is:

Agroproductos del Cabo
Carr. Transpen. KM 125.5
Maneadero, Ensenada, Baja California Norte, Mexico
CP 22790

Many thanks in advance,

Tammie B. Wilburn, Compliance Officer
Compliance and Enforcement Division
National Organic Program, AMS, USDA
202-690-2624

From: [Josie Quevedo](#)
To: [Michael, Matthew - AMS](#)
Cc: [Wilburn, Tammie - AMS](#); [PrimusOrganic](#)
Subject: FW:Revised Response - Inspections of Organic Pepper Operations
Date: Thursday, November 6, 2014 3:46:19 PM
Attachments: [image002.jpg](#)
[image001.jpg](#)
[Revised Response ACA Request to Investigate-PL.pdf](#)

Hello Matthew,

I hope all is well with you. Please find attached the revised response letter with some changes. The letter was originally sent on September 18, 2014.

The changes were made on paragraphs 3. and 5. Due to product availability. .

If you have any questions or concerns please feel free to contact us at Primusorganic@primuslabs.com .

Kind regards,



Josie Quevedo

Audit Coordinator

Josie.Quevedo@PrimusLabs.com

Voice 805.922.0055 | Fax 805.352.1364

PrimusLabs | 1259 Furukawa Way | Santa Maria, CA

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From: Josie Quevedo
Sent: Thursday, September 18, 2014 4:47 PM
To: 'matthew.michael@ams.usda.gov'
Cc: 'Tammie.Wilburn@ams.usda.gov'; PrimusOrganic; Brian Mansfield
Subject: Response - Inspections of Organic Pepper Operations

September 18, 2014

Matthew Michael
Director, Compliance & Enforcement Division
National Organic Program
1400 Independence Avenue, S.W. Room 2648-S, Stop 0268, Washington D.C.20250-0268

RE: Inspection of Organic Pepper Operations, issued on August 27th, 2014 (received September 16th, 2014).

Dear Mr. Michael:

PrimusLabs received Tammie Wilburn's e-mail September 16, 2014 with your letter dated Aug 27th, 2014 with the request to cooperate with an open investigation. Specifically, PrimusLabs has been asked to conduct unannounced inspections and sampling of several certified operations by PrimusLabs in Mexico that have bell peppers listed in their certificate.

PrimusLabs has immediately started the actions to comply with this §205.403 request as follows:

1. The Audit Admin Department updated the list of operations in Mexico. As of today, have peppers listed in their crop or handling certificates. (Attachment list on page 3).
2. PrimusLabs will contact its clients in Mexico to verify which crops are currently standing in their fields in order to identify more precisely if the certified peppers are still being grown at this time of year.
3. Staff inspector Evelyn Ramírez will conduct these unannounced inspections and sampling.
4. PrimusLabs will contact Roger Simonds at the National Science Laboratory to get more clear instructions on how to take and ship the samples from Mexico into the U.S. both in terms of packing and shipping procedures as well as any entry permit needed.
5. PrimusLabs is preparing the schedule to conduct the unannounced inspections and sampling (NOP 2609) between October 10th to 25th, 2014.
6. Each farm's unannounced inspection will be allocated one full day of inspection. This will allow the following inspection approach/plan:
 - a) Verifying the Organic System Plan.
 - b) List of certified crops and maps with actual fields throughout physical observation.
 - c) Match OSP acreage and estimated yields.
 - d) Sample peppers and prepare sample for shipping including all necessary paperwork and chain of custody.
 - e) Verify input application records for last quarter, match with input inventory movements, and input purchase documentation.
 - f) Conduct a verification of harvest and sales of the last quarter (exact time frame dependent on operator's inventory system). List all sales and volumes per date and destination
 - g) Conduct one trace back exercise randomly selecting one shipment.
 - h) Conduct an in-out mass balance. The "in" is product harvested (matching volumes with harvested acreage) and "out" is shipping or sales.
7. Each handler's unannounced inspection, if not part of a farm, will be allocated one full day of inspection as well. This will allow the following inspection approach/plan:
 - a) Sample peppers (if any stored)
 - b) Conduct a verification of purchase and sales of the last quarter (exact time frame dependent on operator's inventory system).
 - c) List all sales and volumes per date and destination.
 - d) List all purchases by certified farm (supplier) and volumes.
 - e) Conduct one trace back exercise randomly selecting one shipment.

- f) Conduct an in-out mass balance. The “in” is product harvested (matching volumes with harvested acreage) and “out” is shipping or sales.

Do not hesitate to contact us if you have any questions.



Josie Quevedo

Audit Coordinator

Josie.Quevedo@PrimusLabs.com

Voice 805.922.0055 | Fax 805.352.1364

PrimusLabs | 1259 Furukawa Way | Santa Maria, CA

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PrimusLabs
2810 Industrial Parkway
Santa Maria, CA 93455

Direct 805.9322.0055
Fax 805.922.2462

Primus@PrimusLabs.com

PrimusLabs.com

November 6, 2014

Matthew Michael
Director, Compliance & Enforcement Division
National Organic Program
1400 Independence Avenue, S.W. Room 2648-S, Stop 0268, Washington,
D.C.20250-0268

RE: Inspection of Organic Pepper Operations issued on August 27th 2014
(received September 1, 2014)

Dear Mr. Michael:

PrimusLabs received your letter dated August 27, 2014 regarding the investigation. Specifically, PrimusLabs has been asked to conduct unannounced inspections and sampling of several certified operations by PrimusLabs in Mexico that have bell peppers listed in their certificate. PrimusLabs has made some changes to the original plan due to product availability and they are as follows:

PrimusLabs has immediately started the actions to comply with this §205.403 request as follows:

1. The Audit Admin Department updated the list of operations in Mexico. As of today, have peppers listed in their crop or handling certificates. (Attachment list on page 3).
2. PrimusLabs will contact its clients in Mexico to verify which crops are currently standing in their fields in order to identify more precisely if the certified peppers are still being grown at this time of year.
3. A Sub-contracted auditor Christian Thommen will conduct these unannounced inspections and sampling if the product is available at the time of inspection (Staff inspector Evelyn Ramírez will conduct these unannounced inspections and sampling. – Revised).
4. PrimusLabs will contact Roger Simonds at the National Science Laboratory to get more clear instructions on how to take and ship the samples from Mexico into the U.S. both in terms of packing and shipping procedures as well as any entry permit needed.

USA:

HQ Santa Maria,
CA

Salinas, CA

Yuma, AZ

Lakeland, FL

Mexico:

Tijuana, Baja

Culiacan, Sinaloa

Queretaro,
Queretaro

Costa Rica:

San Jose

Chile:

Santiago

5. PrimusLabs is preparing the schedule to conduct the unannounced inspections and sampling (NOP 2609) between (October 10th to 25th, 2014. – Revised due to product availability) November 17th to 21st, 2014 with open availability until all unannounced inspections are conducted.
6. Each farm's unannounced inspection will be allocated one full day of inspection. This will allow the following inspection approach/plan:
 - a) Verifying the Organic System Plan.
 - b) List of certified crops and maps with actual fields throughout physical observation
 - c) Match
 - d) Sample paper
 - e) Verify inventory
 - f) Conduct frame dependent on operator's inventory system). List all sales and volumes per date and destination
 - g) Conduct one trace back exercise randomly selecting one shipment.
 - h) Conduct an in-out mass balance. The "in" is product harvested (matching volumes with harvested acreage) and "out" is shipping or sales.
7. Each handler's unannounced inspection, if not part of a farm, will be allocated one full day of inspection as well. This will allow the following inspection approach/plan:
 - a) Sample peppers (if any stored)
 - b) Conduct a verification of purchase and sales of the last quarter (exact time frame dependent on operator's inventory system).
 - c) List all sales and volumes per date and destination.
 - d) List all purchases by certified farm (supplier) and volumes.
 - e) Conduct one trace back exercise randomly selecting one shipment.
 - f) Conduct an in-out mass balance. The "in" is product harvested (matching volumes with harvested acreage) and "out" is shipping or sales.

Do not hesitate to contact us if you have any questions.

Brian Mansfield
PrimusLabs 2810 Industrial Pkwy
Santa Maria CA 93455
Office 805.922.0055 | Fax 805.922.2462

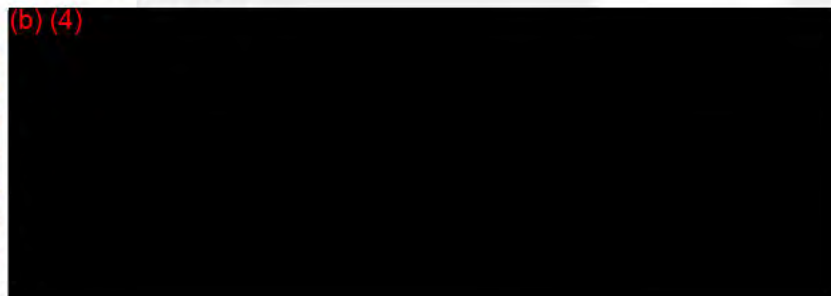
Inspections of organic Pepper Operations

Page 3

Attachment – List of Operations

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(b) (4)



From: [Roberto Guzman](#)
To: [Wilburn, Tammie - AMS](#)
Cc: [Michael, Matthew - AMS](#); [SETTORE EXPORT ICEA](#); [Mauricio Soberanes](#); [Miguel A. Chavez G.](#); [Jaime Enrique Hernandez Olivares](#)
Subject: Fwd: I: Inspections of Organic Bell Peppers - SHIPMENT LABELS and CHAIN OF CUSTODY FORM
Date: Friday, September 19, 2014 2:38:46 PM

Hola Mr. Tammie

I'm Roberto responsible of control for ICEA in Mexico. Besides that Cristina already gave you the address I confirm that we need 6 labels for laboratory, I hope they could be here on time because this tuesday the inspection will be done and the samples taken.

Best regards and thanks in advance

--

ATENTAMENTE
Lic. Roberto David Guzmán Chávez
-Metrocert- Mexico Tradición Organica
Oficina territorial de ICEA en Mexico
Academico de Letran No. 7, -nuevo domicilio-
Morelia, Mich.
Tel. (443) 340 77 44
(443) 324 61 77
Cel. (b) (6)

----- Forwarded message -----

From: **Cristina Baia / ICEA BOLOGNA** <nop@icea.info>
Date: 2014-09-19 1:19 GMT-05:00
Subject: I: Inspections of Organic Bell Peppers - SHIPMENT LABELS and CHAIN OF CUSTODY FORM
To: "Wilburn, Tammie - AMS" <Tammie.Wilburn@ams.usda.gov>
Cc: Roberto Guzman <rguzmanc@metrocert.com>, "Michael, Matthew - AMS" <Matthew.Michael@ams.usda.gov>

Dear Mr. Tammie,

we are planning to use Gastonia laboratory.

Please, could you send the label to our local office in Mexico?

Address is:

ICEA c/o METROCERT

Académico de Letrán No. 7

Col. Andrés Quintana Roo

C.P. 58088; Morelia, Michoacan Mexico

Tel: (+443) 340 7744

(+443) 353 2405

Fax (+443) 324 6177

Best regards,

Cristina

Cristina Baia

Export Office ICEA

Istituto per la Certificazione Etica Ambientale - ICEA

Bologna Office

Phone: +39.051.272986

Fax: +39.051.232011

www.icea.info

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Da: Wilburn, Tammie - AMS [mailto:Tammie.Wilburn@ams.usda.gov]

Inviato: giovedì 18 settembre 2014 22.01

A: Cristina Baia / ICEA BOLOGNA

Oggetto: FW: Inspections of Organic Bell Peppers - SHIPMENT LABELS and CHAIN OF CUSTODY FORM

From: Wilburn, Tammie - AMS

Sent: Thursday, September 18, 2014 3:58 PM

To: Michael, Matthew - AMS

Cc: Simonds, Roger - AMS; Barber, Jonathan - AMS

Subject: Inspections of Organic Bell Peppers - SHIPMENT LABELS and CHAIN OF CUSTODY FORM

Certifiers:

Firstly, thank you for your cooperation and quick responses to our request as we continue to work through the logistics of this project.

For those of you who are planning to use the Gastonia laboratory, you will need a permit label to affix to the sample prior to shipping it to the laboratory. This label will exempt the samples from routine U.S. Customs and phytosanitary requirements. Please do not send samples to the laboratory until you have received these labels. The number of

labels I send will be based on your inspection plans so please let me know if you need more or less.

I am also including a commodity fact sheet for bell peppers and the preferred Chain of Custody sample form to use.

Again, thanks.

Tammie B. Wilburn

Compliance and Enforcement Division

National Organic Program, USDA

202-690-2624

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Lab ID Number	Product Description	Country of origin	US26
AM01787	Organic Bell Pepper	Imported	Mexico

Producer/Distributor/Collection site	Collection site city	Collection site state	Organic Certifier
(b) (4)	San Miguel Allende	Guanajuato	Organic Certifiers

1-Naphthol	2,4 Dimethylphenyl formamide (DMPF)	3-Hydroxycarbofuran
N.D.	N.D.	N.D.

4,4-Dibromobenzophenone	5-Hydroxythiabendazole	Acephate	Acetamiprid	Acetochlor	Aldicarb
N.D.	N.D.	N.D.	0.024	N.D.	N.D.

Aldicarb sulfone	Aldicarb sulfoxide	Aldrin	Allethrin	Atrazine	Azinphos methyl	Azoxystrobin
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

[illegible]

Carbaryl	Carbendazim (MBC)	Carbofuran	Carfentrazone ethyl	Chlorantraniliprole	Chlordane cis
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Chlordane trans	Chlorfenapyr	Chlorothalonil	Chlorpropham (CIPC)	Chlorpyrifos
N.D.	.0.18	N.A.	N.D.	N.D.

Chlorpyrifos methyl	Chlorthal (DCPA)	Clofentezine	Clothianidin	Coumaphos	Cyazofamid	Cycloate
N.D.	N.D.	N.D.	0.003	N.D.	N.D.	N.D.

Cyfluthrin	Cyhalothrin lambda	Cypermethrin	Cyprodinil	Cyromazine	DDD o,p	DDD p,p	DDE o,p
N.D.	N.D.	0.034	N.D.	N.D.	N.D.	N.D.	N.D.

DDE p,p	DDT p,p	Deltamethrin	Diazinon	Diazinon oxygen analog	Dichlorvos (DDVP)	Dicloran
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Dicofol o,p	Dicofol p,p	Dieldrin	Difenoconazole	Diflubenzuron	Dimethoate	Dimethomorph
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Dinotefuran	Diphenamid	Diphenylamine	Disulfoton sulfone	Diuron	Endosulfan I	Endosulfan II
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

[illegible]

Etridiazole	Famoxadone	Fenamidone	Fenamiphos	Fenamiphos sulfone	Fenamiphos sulfoxide
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Fenarimol	Fenbuconazole	Fenhexamid	Fenoxaprop ethyl	Fenpropathrin	Fenpyroximate
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

[illegible]

Fonofos	Heptachlor	Heptachlor epoxide	Hexachlorobenzene	Hexaconazole	Hexythiazox
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Hydroprene	Imazalil	Imidacloprid	Indoxacarb	Iprodione	Lindane	Linuron	Malathion
N.D.	N.D.	0.03	N.D.	N.D.	N.D.	N.D.	N.D.

Malathion oxygen analog	Metalaxyl	Methamidophos	Methidathion	Methiocarb	Methomyl
N.D.	0.002	N.D.	N.D.	N.D.	N.D.

Methoxychlor	Methoxyfenozide	Metolachlor	Metribuzin	Mevinphos total	MGK-264
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Myclobutanil	Naled	Napropamide	Nonachlor cis	Nonachlor trans	Norflurazon
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Norflurazon desmethyl	Omethoate	o-Phenylphenol	Oxadixyl	Oxamyl	Oxamyl oxime
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Oxydemeton methyl sulfone	Oxyfluorfen	Parathion methyl	Pendimethalin	Pentachlorobenzene
N.D.	N.D.	N.D.	N.D.	N.D.

Permethrin	Phenmedipham	Phorate sulfone	Phorate sulfoxide	Phosalone	Phosmet
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Piperonyl butoxide	Pirimicarb	Prallethrin	Prochloraz	Procymidone	Profenofos	Prometryn
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Pronamide	Propanil	Propargite	Propetamphos	Propham	Propiconazole	Pymetrozine
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Pyraclostrobin	Pyridaben	Pyrimethanil	Pyriproxyfen	Quinoxifen	Quintozene	Resmethrin total
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Simazine	Spinetoram	Spirodiclofen	Spiromesifen	Sulfentrazone	Tebuconazole	Tebufoenozide
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Tefluthrin	Tetrachlorvinphos	Tetraconazole	Tetradifon	Tetrahydrophthalimide (THPI)
N.D.	N.D.	N.D.	N.D.	N.D.

Tetramethrin	Thiabendazole	Thiacloprid	Thiamethoxam	Thiodicarb	Triadimefon	Triadimenol
N.D.	N.D.	N.D.	0.006	N.D.	N.D.	N.D.

Tribufos	Trifloxystrobin	Triflumizole	Trifluralin	Vinclozolin
N.D.	N.D.	N.D.	N.D.	N.D.



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771513305738 4.6 LB (S) 85.57
Declared Value 100

Standard Small Filler
790363029700 1 (T) \$3.99

Shipment subtotal: \$85.57
Merchandise taxable subtotal: \$3.99
Tax(County2): 0.500% \$0.02
Tax(State): 6.500% \$0.26
Tax(County): 1.000% \$0.04

Total Due: \$89.88

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****(b) (4)

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October 15, 2014 7:43:13 PM

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Redemption Code: _____

*** Thank you ***

Laboratory Sample ID	Fee	Product description	Collection date
AM15601	\$415.00	Organic Bell Peppers	10-Mar-15

Certification Agency collecting sample	Collection site city	Collection site state
CCOF	Los Angeles	CA

Imported or Domestic?	Country of Origin	Handler/Producer
Import	Mexico	(b) (4)

Number of units in sample	Lot #/sample ID	1-Naphthol	2,4 Dimethylphenyl formamide (DMPF)
7	031015LM 1-2	N.D.	N.D.

3-Hydroxycarbofuran	4,4-Dibromobenzophenone	5-Hydroxythiabendazole	Acephate	Acetamiprid
N.D.	N.D.	N.D.	N.D.	N.D.

Acetochlor	Aldicarb	Aldicarb sulfone	Aldicarb sulfoxide	Aldrin	Allethrin	Atrazine
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

[illegible]

Bromacil	Buprofezin	Captan	Carbaryl	Carbendazim (MBC)	Carbofuran	Carfentrazone ethyl
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Chlorantraniliprole	Chlordane cis	Chlordane trans	Chlorfenapyr	Chlorothalonil
N.D.	N.D.	N.D.	N.D.	N.D.

Chlorpropham (CIPC)	Chlorpyrifos	Chlorpyrifos methyl	Chlorthal (DCPA)	Clofentezine
N.D.	N.D.	N.D.	N.D.	N.D.

Clothianidin	Coumaphos	Cyazofamid	Cycloate	Cyfluthrin	Cyhalothrin lambda	Cypermethrin
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

[illegible]

Diazinon oxygen analog	Dichlorvos (DDVP)	Dicloran	Dicofol o,p	Dicofol p,p	Dieldrin
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Difenoconazole	Diflubenzuron	Dimethoate	Dimethomorph	Dinotefuran	Diphenamid
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Diphenylamine	Disulfoton sulfone	Diuron	Endosulfan I	Endosulfan II	Endosulfan sulfate	Endrin
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

[illegible]

Fenamidone	Fenamiphos	Fenamiphos sulfone	Fenamiphos sulfoxide	Fenarimol	Fenbuconazole
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Fenhexamid	Fenoxaprop ethyl	Fenpropathrin	Fenpyroximate	Fenthion	Fipronil	Flonicamid
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

[illegible]

Heptachlor epoxide	Hexachlorobenzene	Hexaconazole	Hexythiazox	Hydroprene	Imazalil
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Imidacloprid	Indoxacarb	Iprodione	Lindane	Linuron	Malathion	Malathion oxygen analog
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Metalaxyl	Methamidophos	Methidathion	Methiocarb	Methomyl	Methoxychlor	Methoxyfenozide
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Metolachlor	Metribuzin	Mevinphos total	MGK-264	Myclobutanil	Naled	Napropamide
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Nonachlor cis	Nonachlor trans	Norflurazon	Norflurazon desmethyl	Omethoate	o-Phenylphenol
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Oxadixyl	Oxamyl	Oxamyl oxime	Oxydemeton methyl sulfone	Oxyfluorfen	Parathion methyl
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Pendimethalin	Pentachlorobenzene	Permethrin	Phenmedipham	Phorate sulfone
N.D.	N.D.	N.D.	N.D.	N.D.

Phorate sulfoxide	Phosalone	Phosmet	Piperonyl butoxide	Pirimicarb	Prallethrin	Prochloraz
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

[illegible]

Propiconazole	Pymetrozine	Pyraclostrobin	Pyridaben	Pyrimethanil	Pyriproxyfen	Quinoxyfen
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Quintozene	Resmethrin total	Simazine	Spinetoram	Spiroclufen	Spiromesifen	Sulfentrazone
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Tebuconazole	Tebufenozide	Tefluthrin	Tetrachlorvinphos	Tetraconazole	Tetradifon
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Tetrahydrophthalimide (THPI)	Tetramethrin	Thiabendazole	Thiacloprid	Thiamethoxam	Thiodicarb
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Triadimefon	Triadimenol	Tribufos	Trifloxystrobin	Triflumizole	Trifluralin	Vinclozolin
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

From: [Cristina Baia / ICEA BOLOGNA](#)
To: [Wilburn, Tammie - AMS](#)
Cc: [Howley, JannaB - AMS](#); ["Roberto Guzman"](#)
Subject: I: Inspections of Organic Bell Peppers - SHIPMENT LABELS and CHAIN OF CUSTODY FORM
Date: Wednesday, October 29, 2014 3:59:53 AM
Attachments: [PPO-587 permit for bell peppers from Mexico.pdf](#)
[Certification .htm](#)

Dear Mr. Tammie,

I would like to know if the results of analysis on organic peppers in Mexico will be summarized and made public.

Best regards,
Cristina

Cristina Baia
Export Office ICEA
Istituto per la Certificazione Etica Ambientale - ICEA
Bologna Office
Phone: +39.051.272986
Fax: +39.051.232011
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Da: Wilburn, Tammie - AMS [mailto:Tammie.Wilburn@ams.usda.gov]
Inviato: martedì 30 settembre 2014 20.24
A: Michael, Matthew - AMS
Cc: Wilburn, Tammie - AMS
Oggetto: Inspections of Organic Bell Peppers - SHIPMENT LABELS and CHAIN OF CUSTODY FORM

Certifiers:

I have been informed that we do *not* have to affix labels to your shipments to exempt them from phytosanitary requirements. Instead of using labels, please present the attached Permit to Import Plants with your bell pepper shipments, as necessary. The Chain of Custody form must still be used.

Feel free to call if you have questions.

Tammie
202-690-2624

From: Wilburn, Tammie - AMS
Sent: Thursday, September 18, 2014 3:58 PM
To: Michael, Matthew - AMS
Cc: Simonds, Roger - AMS; Barber, Jonathan - AMS
Subject: Inspections of Organic Bell Peppers - SHIPMENT LABELS and CHAIN OF CUSTODY FORM

Certifiers:

Firstly, thank you for your cooperation and quick responses to our request as we continue to work through the logistics of this project.

For those of you who are planning to use the Gastonia laboratory, you will need a permit label to affix to the sample prior to shipping it to the laboratory. This label will exempt the samples from routine U.S. Customs and phytosanitary requirements. Please do not send samples to the laboratory until you have received these labels. The number of labels I send will be based on your inspection plans so please let me know if you need more or less.

I am also including a commodity fact sheet for bell peppers and the preferred Chain of Custody sample form to use.

Again, thanks.

Tammie B. Wilburn
Compliance and Enforcement Division
National Organic Program, USDA
202-690-2624

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.

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Versione: 2014.0.4765 / Database dei virus: 4025/8294 - Data di rilascio: 29/09/2014

United States Department of Agriculture
Animal and Plant Health Inspection Service
4700 River Road
Riverdale, MD 20737

Permit to Import Plants and Plant Products
Regulated by 7 CFR 319.56

This permit was generated electronically via the ePermits system

PERMITTEE NAME:	Mr. Roger Simonds	PERMIT NUMBER:	P56-14-06969
ORGANIZATION:	USDA-AMS	APPLICATION NUMBER:	P587-140916-011
ADDRESS:	801 Summit Crossing Place, Suite B Gastonia, NC 28054	DATE ISSUED:	09/26/2014
MAILING ADDRESS:	801 Summit Crossing Place, Suite B Gastonia, NC 28054		
PHONE:	(704) 833-1525	EXPIRES:	09/26/2017
FAX:			

DESIGNATED PORTS: Various Ports of Entry Staffed by CBP-Agriculture Inspection

Under the conditions specified, this permit authorizes the following:			
<u>Article(s)</u>	<u>Countries of Origin</u>	<u>Plant Parts</u>	<u>Intended Use</u>
Pepper	Mexico	Fruit	Analytical testing of pesticide residues as part of a USDA-NOP investigation

SPECIAL INSTRUCTIONS TO INSPECTORS

See permit conditions below

PERMIT CONDITIONS

This APHIS-issued import permit only covers compliance with APHIS regulations and requirements. Therefore, this APHIS permit for the commodity to be imported does not reduce or eliminate the permittee's legal duty and responsibility to likewise comply with all other Federal and State regulatory requirements applicable to the commodity to be imported.

The applicant for a permit for the importation of regulated articles into the United States must designate the person who will be named as the permittee upon the permit's issuance. The applicant and the permittee may be the same person or different persons and the submission of this form affirms that the applicant is at least 18 years of age.

The permittee is the legal importer of an article and is responsible for complying with the permit conditions. The permittee must be at least 18 years of age and have and maintain an address in the United States that is specified on the permit and be physically present during normal business hours at that address during any periods when articles are being imported or moved interstate under the permit; or If another legal entity, maintain an address or business office in the United States with a designated individual for service of process; and serve as the contact for the purpose of communications associated with the movement of the regulated article for the duration of the permit. The PPQ Permit Unit must be informed of a change in contact information for the permittee within 10 business days of such change.

This permit authorizes the importation of the listed articles, under the conditions specified below. A copy of this permit (including all conditions) must accompany all shipments authorized under this permit.

Permit Number P56-14-06969

THIS PERMIT HAS BEEN APPROVED ELECTRONICALLY BY THE FOLLOWING PPQ HEADQUARTER OFFICIAL VIA EPERMITS.	DATE
Lillian Stewart	09/26/2014

WARNING: Any alteration, forgery or unauthorized use of this Federal Form is subject to civil penalties of up to \$250,000 (7 U.S.C. s 7734(b)) or punishable by a fine of not more than \$10,000, or imprisonment of not more than 5 years, or both (18 U.S.C. s 1001)

Please note that the import requirements and approved commodities listed below are subject to change at any time during the duration of this permit. Please refer to the USDA-PPQ Port Program Manuals at http://www.aphis.usda.gov/import_export/plants/manuals/ports/index.shtml for the current import requirements for the commodities you are importing.

If the official personnel find that the shipment requires treatment as a condition of entry, is contaminated with a quarantine plant pest or pests, is commingled with a prohibited plant material, or if required documentation is incomplete or missing, they will order the least drastic action, which could be approve treatment, re-exportation or destruction of a shipment, a portion of a shipment, or any other material associated with the shipment (i.e. pallets, packaging, means of conveyance...) Noncompliant shipments will be treated, re-exported or destroyed, at the consignee's expense.

Any person who violates the Plant Protection Act (PPA) of the United States, individuals or corporations who fail to comply with these conditions and authorizations, or who forge, counterfeit, or deface permits may be criminally or administratively prosecuted and found guilty of a misdemeanor which can result in penalties, a one-year prison term, or both. Additionally, any person violating the PPA may be assessed civil penalties of up to \$250,000 per violation or twice the gross gain or gross loss for a violation that results in the person deriving pecuniary gain or a pecuniary loss to another, whichever is greater. In addition, all current permits may be cancelled and future permit applications denied.

If fumigation is required and "Plastic wrappings such as cellophane, films, and shrink wrap, and papers that are waxed, laminated, or waterproofed are not readily permeable and must be perforated, removed, or opened before fumigation. If wrappings are perforated to facilitate fumigation, holes should be at least 3/16-inch in diameter every 3 square inches or 1/4-inch in diameter every 4 inches over the entire surface of the wrapping."

1. MEXICO (From all areas of Mexico):

Pepper (*Capsicum* spp.) (other than *Capsicum pubescens*) (Fruit) from Mexico into All Ports

2. MEXICO.

Pepper, manzano (Fruit) (*Capsicum pubescens*) from Mexico into All Ports.

Commercial Consignments Only.

Condition of Entry Treatment T105-a-1 :

If the irradiation treatment is applied outside the U.S., fruits must be irradiated and precleared in the country of origin. The fruit must be packed in insect proof boxes. The boxes must be marked with the following information:

Production Unit Code (PUC)
Treatment Facility Code (TFC)
Packing House Code (PHC)
Packing date
Lot number

Each pallet or box must also be marked with:

Treatment Facility Code (TFC)
Treatment Identification Number (TIN)
Treatment date

The boxes must be marked or stamped with the words "Treated by irradiation" or "Treated with irradiation" and display the international radura symbol.

The palletized cartons must be wrapped with polyethylene shrink wrap, net wrapping, or strapping (wrapping is not

Permit Number P56-14-06969

THIS PERMIT HAS BEEN APPROVED ELECTRONICALLY BY THE
FOLLOWING PPQ HEADQUARTER OFFICIAL VIA EPERMITS.

Lillian Stewart

DATE

09/26/2014

WARNING: Any alteration, forgery or unauthorized use of this Federal Form is subject to civil penalties of up to \$250,000 (7 U.S.C. § 7734(b)) or punishable by a fine of not more than \$10,000, or imprisonment of not more than 5 years, or both (18 U.S.C. § 1001)



required for air shipments because integrity is maintained by the container itself.)

When irradiated as described in 7 CFR 305.9, consignments must be accompanied by a phytosanitary certificate issued by the national plant protection organization in the country of origin.

The consignment must be precleared and accompanied by a completed PPQ Form 203 (yellow or white) or an electronic message, signed by the APHIS inspector in the country of origin confirming treatment.

Subject to Inspection : This commodity is subject to inspection at the port of entry and all general requirements of 7 CFR 319.56-3.

END OF PERMIT CONDITIONS

Permit Number P56-14-06969

THIS PERMIT HAS BEEN APPROVED ELECTRONICALLY BY THE FOLLOWING PPQ HEADQUARTER OFFICIAL VIA EPERMITS.	DATE
Lillian Stewart	09/26/2014

WARNING: Any alteration, forgery or unauthorized use of this Federal Form is subject to civil penalties of up to \$250,000 (7 U S C s 7734(b)) or punishable by a fine of not more than \$10,000, or imprisonment of not more than 5 years, or both (18 U S C s 1001)

From: [Kelly Lehman Goswamy](#)
To: [Wilburn, Tammie - AMS](#)
Subject: Inquiry re Sample results 031015LM1; 031015LM2; 15-023087-1; 15-023087-2
Date: Monday, April 20, 2015 4:47:04 PM
Attachments: [Inspection - Exit Interview and Attachments COC Heath.pdf 03_13_2015.pdf](#)
[Inspection - Report Addendum 4 COC AGRICOLA SACRAMENTO009.pdf 04_20_2015.pdf](#)

Hi Tammie,

We are waiting for some more sample results for samples sent to Gastonia (COCs attached). The CCOF Sample IDs will hopefully be on the test results.

Best,

Kelly Lehman Goswamy

Associate Quality System Manager

CCOF Certification Services, LLC

2155 Delaware Ave., Suite 150

Santa Cruz, CA 95060

(831) 423-2263, ext. 28

fax (831) 423-4528

kelly@ccof.org

www.ccof.org

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Assignment Overview

Operation Name & Code: Pero Family Farms Food Company, LLC - pr631
Address on file : 14095 State Road 7, Del Ray Beach, FL 33446
Programs: 1.2 NOP Handler
Inspection Type and Priority: 2014 Sampling, High
Inspection Date and Time: 10/15/14, 09:00 - 05:40
Inspector: John Bitter, (b) (6) 407-797-9691

Client Representative	Accompaniment type	Other functions
Angela Pero	Authorized Contact	President
Kenneth Hlatki	Authorized Contact	Director of Quality Assurance
Mike Raetzel	Authorized Contact	Agricultural Food Safety Compliance Coordinator
Tony Cecilia	Authorized Contact	ED of Operations

Inspector's Accompaniment	Accompaniment type	Other functions
---------------------------	--------------------	-----------------

Facilities Assigned

Client ID, Facility	Activities	Types
ph1831, Pero - Del Ray (Fresh Cut and Fresh Wrap)	Handling, Storage	Facility OSP On File (L8.0 or H)
pr631, Pero Family Farms Food Company, LLC	Cleaning	Certified Location (G6.1 C/G6.2 A or H2.5/H2.0)
pr631, Pero Family Farms Food Company, LLC	Cutting, Distributing, Packaging, Packing, Storage	Primary PR Facility

Introduction - brief profile of operation and relevant circumstances of the inspection

This is the Unannounced and Sample Inspection for Pero Family Farms facility and offices located in Delray Beach , FL. The inspector followed the protocol listed in "Instructions for Investigation and Sampling Bell Peppers from Handlers-Distributors". This completed document has been uploaded to myccof as "Inspector_Instructions_-_Handler". The inspector observed the processing of organic cucumbers and green beans at the time of the inspection as well as non-organic bell peppers and tomatoes. The inspector took 5 samples of mini sweet peppers and bell peppers, which are all detailed on the CoC and the Instructions document. The CoC can be found in Attachment B. The inspector shipped the samples immediately following the inspection to the USDA lab in Gastonia , NC.

Summary of Non-Compliant, More Information Needed and Compliant with Reminder Answers

Question	Answer & Notes
1.11 Handler Programs Checklist	
<p>2.1.01: Overall Compliance To the best of your professional judgment, are this operation's practices and products compliant? Describe key findings, issues, and uploaded photos/attachments in relevant checklist sections. NOP 205.200, 205.403; COR Compliance PM</p>	<p>More Information Needed: The inspector was able to complete the traceability audit for all five samples taken. Due to the significant time requirements of the mass balance audit, the inspector recommends that the data given in Attachments H & I be validated by the subsequent organic inspector. The inspector notes that this operation has a scheduled CCOF Annual Inspection in November 2014. The inspector recommends the next inspector budget at a minimum two days for the audit.</p> <p>While on-site the inspector observed multiple pallets of organic cucumbers, labeled (b) (4) [REDACTED]. The supplier label did not list the product as organic. The inspector observed organic stickers placed on the boxes adjacent to the supplier label. The inspector could not locate this supplier on the OSP and could not locate the supplier on the USDA's List of Certified Operations. Due to the nature of the inspection regarding peppers, the inspector did not have time to investigate this while on-site. The observation should have been listed on the Exit Interview. The inspector recommends the November CCOF inspection cover an audit of this supplier.</p> <p>While on-site the inspector observed multiple pallets of organic cucumbers, labeled (b) (4) [REDACTED] FL. The supplier label did not list the product as organic. The inspector observed organic stickers placed on the boxes adjacent to the supplier label. The inspector could not locate this supplier on the OSP and could not locate the supplier on the USDA's List of Certified Operations. Due to the nature of the inspection regarding peppers, the inspector did not have time to investigate this while on-site. The observation should have been listed on the Exit Interview. The inspector recommends the November CCOF inspection cover an audit of this supplier.</p>

Full Inspection Report Checklist

Answers: Compliant, Non-Compliant, More Information Needed, Compliant with Reminder, Not applicable

Question	Answer & Notes
1.11 Handler Programs Checklist	
1 Inspection Work Order Completion Inspection Work Order Completion	Compliant
1.3: Inspection Report Addendum An Inspection Report Addendum is attached.	Compliant; Please see the attached Inspection Addendum and Instructions for Investigation and Sampling Bell Peppers from Handlers-Distributors
2 Handler Compliance Handler Compliance	
2.01 General General	
2.1.01: Overall Compliance To the best of your professional judgment, are this operation's practices and products compliant? Describe key findings, issues, and uploaded photos/attachments in relevant checklist sections. NOP 205.200, 205.403; COR Compliance PM	<p>More Information Needed; The inspector was able to complete the traceability audit for all five samples taken. Due to the significant time requirements of the mass balance audit, the inspector recommends that the data given in Attachments H & I be validated by the subsequent organic inspector. The inspector notes that this operation has a scheduled CCOF Annual Inspection in November 2014. The inspector recommends the next inspector budget at a minimum two days for the audit.</p> <p>While on-site the inspector observed multiple pallets of organic cucumbers, labeled (b) (4). The supplier label did not list the product as organic. The inspector observed organic stickers placed on the boxes adjacent to the supplier label. The inspector could not locate this supplier on the OSP and could not locate the supplier on the USDA's List of Certified Operations. Due to the nature of the inspection regarding peppers, the inspector did not have time to investigate this while on-site. The observation should have been listed on the Exit Interview. The inspector recommends the November CCOF inspection cover an audit of this supplier.</p> <p>While on-site the inspector observed multiple pallets of organic cucumbers, labeled (b) (4). The supplier label did not list the product as organic. The inspector observed organic stickers placed on the boxes adjacent to the supplier label. The inspector could not locate this supplier on the OSP and could not locate the supplier on the USDA's List of Certified Operations. Due to the nature of the inspection regarding peppers, the inspector did not have time to investigate this while on-site. The observation should have been listed on the Exit Interview. The inspector recommends the November CCOF inspection cover an audit of this supplier.</p>
2.1.07: Samples Were all samples collected using proper procedure? NOP 205.403; COR Compliance PM	Compliant; Yes. The inspector verified that the package was received by the lab in Gastonia at 10:07AM the day following the inspection

Full Inspection Report Checklist

Answers: Compliant, Non-Compliant, More Information Needed, Compliant with Reminder, Not applicable

Question	Answer & Notes
	(10/16/14).
2.1.16: Contamination/Commingling Describe any nonorganic products processed on the same equipment as organic. Are contamination/commingling practices in place? Please describe any specific risks to organic products.	Not applicable; Please see Attachment J, a copy of the cleaning records for the mixed use equipment used on the production date of the two organic finished products sampled (organic mini sweet peppers, organic individual bell pepper).

Additional Documents & Attachments Available

Date	Status document	File type & File Name	Subject & Comment	Generated by
10/27/14	Active	Inspection - Exit Interview and Attachments: Attachments.pdf	Attachments.pdf	Bitter John
10/27/14	Active	Inspection - Report Addendum: Inspector_Instructions_-_Handler.docx	Inspector_Instructions_-_Handler.docx	Bitter John
10/27/14	Active	Inspection - Report Addendum: IR Addendum_Pero.docx	IR Addendum_Pero.docx	Bitter John
10/27/14	Active	Inspection - Work Order: IWO_Sampling.pdf	IWO_Sampling.pdf	Bitter John

Instructions for Investigation and Sampling Bell Peppers from Handlers-Distributors

CCOF 2014-2015

In most cases these samples will be taken as part of an unannounced inspection, with no prior notice to the client of the site visit. You will be assigned two inspection orders—one for the unannounced inspection and one for the sampling. Because the focus is sampling bell peppers, check “N/A” on any questions on the unannounced inspection checklist that are not needed for this focused purpose. For questions on the Sampling Inspection Checklist that you have answered on this form, check “N/A” and/or write in “see attached”. Upload this completed document to the inspection under “Addendum” file type.

If the sampling happens to be done as part of a regular scheduled inspection (not unannounced), such as an annual inspection, do not give prior notice to the client that the bell peppers will be sampled and traced back.

Take photos liberally to document sampling methodology, labels, lots, pallets, trucks, storage, etc., in order to document the context of the sample, and to provide information for potential follow up. Remember that a subsequent inspection may lead back to this operation.

Take up to four samples of bell peppers, depending on availability. In the following priority order:

1. Sample organic bell peppers grown in Mexico (MX).
 - a. Also if available take one sample of MX conventional bell peppers.
 - i. Also if available take one sample domestic organic bell peppers.
2. If no bell peppers are available, take one sample of organic Mexican origin peppers of any kind.
3. If no peppers are available, take one sample of any organic Mexican origin fresh product.
4. For non-organic or domestic origin product, only sample bell peppers.

In all cases, prioritize outgoing product; for example if there are organic bell peppers of Mx origin in various stages of bulk incoming, storage, repack, shipping pallets etc., then sample peppers that are closest to shipping out, whether packaged or unpackaged.

For all samples taken, obtain full source information as far back in chain of commerce as available: vendors, upstream co-packers, farm producer, certificates, lot information, shipping documents, invoices. Keep trace-back information clearly linked to each unique sample ID.

Sample Size: 3 lb.

Shipping: For the Gastonia Lab, samples must be shipped on Monday or Tuesday via next day delivery, for delivery no later than Wednesday. You may collect samples on other days, as long as samples are well refrigerated in the interim; contingent upon sufficient interim refrigeration.

Ship samples to National Science Laboratory in Gastonia, NC, unless otherwise instructed.

Ask Sean Feder for further information as needed, 530-219-1564, sean@ccof.org.

Please answer the following Inspection Questions to the best of your ability.

Please place your answers below each question

- 1) Summarize your inspection, observations, and process. Identify if you have identified potential

information that may support further investigative actions, decisions etc.

This is the UAI and Sample Inspection for Pero Family Farms' Delray Beach, FL facility. The inspector arrived at the facility at 9:00AM and was given access to the packaging areas and warehouse around 10:15AM. The inspector visited all packaging areas and storage areas and observed the packaging of organic cucumbers, organic green beans, non-organic bell peppers and non-organic mini sweet peppers. This operation handles, packages, and distributes non-organic and organic products including bell peppers, specialty peppers, green beans, squash (summer and winter), cucumbers, and a variety of other products not observed at the time of this inspection.

2) Do you have any specific or general recommendations for subsequent actions, next steps, additional inspections or inspections of other locations/operations?

Due to the significant time requirements of the mass balance audit, the inspector recommends that the data given in Attachments H & I be validated by the subsequent organic inspector. The inspector notes that this operation has a scheduled CCOF Annual Inspection in November 2014.

3) If samples were taken, please describe your selection criteria (random, available etc)?

Sample #1 – the inspector randomly selected approximately 3lbs of non-organic mini sweet peppers from a bulk bin staged for packaging in the mini sweet area.

Sample #2 – the inspector randomly selected approximately 3lbs of organic mini sweet peppers in 8oz finished product packaging, from 6 separate boxes on one pallet (TIN 2888427) in the Cooler #3 area.

Sample #3 – the inspector randomly selected approximately 3lbs of organic green bell peppers in individually wrapped packaging, from 10 separate boxes on one pallet (TIN 2888280) in the Cooler # 3 area.

Sample #4 – the inspector randomly selected approximately 3lbs of organic green bell peppers from 5 separate 1 1/9bu boxes on one pallet (TIN 2889396) in the Cooler # 5 area.

Sample #5 – the inspector randomly selected approximately 3lbs of non-organic green bell peppers from 5 separate #3 RPC's on one pallet (TIN 2887045) in the Cooler # 5 area.

4) Was there additional product that you did not sample, if so, from which vendors/suppliers (please explain)?

The inspector observed a significant amount of non-organic green bell peppers and mini sweet peppers on-site in both bulk and finished product packaging. The inspector did not observe any other pallets of bulk organic green bell peppers or bulk organic mini sweet peppers on-site. As this a large facility with a significant amount of product in storage, the inspector could not verify 100% of the organic products on-site at the time of the inspection.

5) Was this operation packing, shipping or handling organic bell peppers during, immediately before or after you inspection? Explain.

The operation had organic green bell, orange bell, and red bell peppers in bulk storage and finished product storage areas at the time of the inspection. No organic bell peppers were being packaged or sorted immediately prior to or at the inspection.

6) Where are their organic bell peppers sourced from?

Organic Green Bell Peppers – (b) (4)

7) Are organic bell peppers handled on any equipment or in any conditions that could result in contamination from surfaces or unintentional commingling?

Organic Bell Peppers – The inspector gathered the cleaning records for the 10/13/14 processing date for the two organic finished products gathered on-site (Sample #2 and Sample #3) – See Attachment J.

8) Is there any indication that commingling or sales of conventional peppers as organic could occur,

has occurred or is occurring?

The inspector did not observe any indications on-site that commingling/sales of conventional peppers as organic could occur, has occurred or is occurring.

9) Did you perform a comparison of organic and conventional purchases and sales of current or past production?

Yes. The inspector performed two mass balance audits – one for organic green bell peppers during the period of September 15th, 2014 through October 15th, 2014 (Attachment H) and one for all organic bell peppers during the period of August 1st, 2013 through September 30th, 2013 (Attachment I).

10) What is this operation's typical pepper sales/production period?

This facility sources and packages peppers year-round.

11) Identify if the operation was engaged in sales of organic bell peppers during the sampling times in 2013, particularly early production, in August/Sept etc.?

Yes. This operation was involved in sales of organic bell peppers during the sampling times in 2013.

12) If yes, please identify approximate quantities, what the sources were and where they were sold to, at least at a regional level. Who did this operation buy from and sell to in that period?

Please see the Attachment I. This report details all customers of organic bell pepper products during the August and September 2013.

13) Does the pattern of sourcing and or sales indicate that this operation could have supplied product that we previously tested?

Potentially – please see the sales report in Attachment I for organic sales during August and September 2013.

14) Did you observe bell peppers in sales or production during your inspection

Yes. The inspector performed two mass balance exercises during the inspection. Please see detailed information regarding these audits attached to the inspection report.

15) Additional observations:

Sample Questions and Context (please copy and complete for each sample):

Please answer the following questions to the best of your ability for each sample. This will allow CCOF and others to appropriately follow up with the operation or other vendors/suppliers, certifiers etc. if samples are found to be positive.

All applicable aspects of CCOF Sampling Program Guidelines apply, such as COC and Exit Interview processes and sample ID coding etc.

QUESTION/INFO	Inspector Answer
1. Sample ID:	Sample #1
2. Type/variety of Product:	Non-Organic Mini Sweet Peppers
3. Where was the product found at the facility/handler (back/front/which storage location/outbound pallets/inbound):	Pulled from bulk bin in Mini Sweet Packaging Room
a. If taken from a truck or pallet please, if possible, identify the truck of pallet number/id:	TIN 2889392
4. Identify quantity on hand of this same product from the same vendor:	36bins
5. Label/brand of product:	Pero Family Farms
6. Outgoing Lot Code:	n/a – ingredient
7. Outgoing, Incoming or ready to ship product (explain):	Incoming
8. Source of product:	See Attachment C
a. Supplier:	(b) (4)
b. Certifier:	n/a non-organic
c. Incoming lot code (if applicable):	PO # 266611847
d. Shipping documents:	Inbound BOL – PO # 266611847
e. Invoice:	Internal Purchase – no invoice issued
9. Has this product been handled, repacked or otherwise processed by this operation (explain):	Yes. This specific PO was being packaged at the time of the inspection in the Mini Sweet room.
10. Destination of product (if applicable) if outgoing:	8oz Pero Family Farms Mini Sweet Peppers

QUESTION/INFO	Inspector Answer
11. Sample ID:	Sample #2 (part 1 & part 2)
12. Type/variety of Product:	Organic Mini Sweet Peppers 8oz Finished Product
13. Where was the product found at the facility/handler (back/front/which storage location/outbound pallets/inbound):	6 x 8oz packages selected from 6 separate boxes on one pallet (TIN 2888427) in the Cooler #3 area.
a. If taken from a truck or pallet please, if possible, identify the truck of pallet number/id:	TIN 2888427
14. Identify quantity on hand of this same	27cases (12/8oz)

product from the same vendor:	
15. Label/brand of product:	Pero Family Farms Organic
16. Outgoing Lot Code:	Run # p81772EF
17. Outgoing, Incoming or ready to ship product (explain):	Lot # 26694135EF
18. Source of product:	See Attachment D
a. Supplier:	Pero Tennessee LLC
b. Certifier:	QCS
c. Incoming lot code (if applicable):	Lot # 26694135EF
d. Shipping documents:	Receiving Ticket – 76294
e. Invoice:	Internal Purchase – no invoice issued
19. Has this product been handled, repacked or otherwise processed by this operation (explain):	Yes. This product has been repackaged from bulk bin to 8oz retail packaging.
20. Destination of product (if applicable) if outgoing:	The product has not yet been sold.

QUESTION/INFO	Inspector Answer
21. Sample ID:	Sample #3 (part 1 & part 2)
22. Type/variety of Product:	Organic Green Bell Peppers, Individually Wrapped
23. Where was the product found at the facility/handler (back/front/which storage location/outbound pallets/inbound):	10ct boxes, currently in storage in Cooler #3
a. If taken from a truck or pallet please, if possible, identify the truck of pallet number/id:	TIN 2888280
24. Identify quantity on hand of this same product from the same vendor:	18cases (10ct boxes)
25. Label/brand of product:	Pero Family Farms Organic
26. Outgoing Lot Code:	
27. Outgoing, Incoming or ready to ship product (explain):	
28. Source of product:	See Attachment E
a. Supplier:	
b. Certifier:	
c. Incoming lot code (if applicable):	Lot # 74677EF
d. Shipping documents:	Inbound BOL (Order # 102024; PO # 74677EF)
e. Invoice:	Invoice – PO # 74677EF
29. Has this product been handled, repacked or otherwise processed by this operation (explain):	Yes. This product has been repacked from bulk cases into individually wrapped finished products, packed in a 10ct case.
30. Destination of product (if applicable) if outgoing:	N/A – the product has not yet been sold.

QUESTION/INFO	Inspector Answer
---------------	------------------

31. Sample ID:	Sample #4 (part 1 & part 2)
32. Type/variety of Product:	Organic Bell Peppers (bulk)
33. Where was the product found at the facility/handler (back/front/which storage location/outbound pallets/inbound):	The inspector sampled from 5 separate 1 1/9bu boxes, located in Cooler #5. The boxes were marked with the supplier's information - (b) (4)
a. If taken from a truck or pallet please, if possible, identify the truck of pallet number/id:	TIN 2889396
34. Identify quantity on hand of this same product from the same vendor:	52cases (1 1/9bu)
35. Label/brand of product:	(b) (4) 1 1/9bu cases (non-retail)
36. Outgoing Lot Code:	n/a
37. Outgoing, Incoming or ready to ship product (explain):	Incoming, awaiting repacking
38. Source of product:	See Attachment F
a. Supplier:	(b) (4)
b. Certifier:	QCS
c. Incoming lot code (if applicable):	PO # 74680EF
d. Shipping documents:	BOL (inbound) – BOL # 1552; Order # 74680EF
e. Invoice:	PO # 74680
39. Has this product been handled, repacked or otherwise processed by this operation (explain):	Yes. This product has only been handled by this operation as of the inspection date. The operation received the pallet of (b) (4) cases from the supplier and has stored the pallet in the Cooler #5, until repacking commences in the days following the inspection.
40. Destination of product (if applicable) if outgoing:	N/A – this is a bulk item that has not yet been repacked or sold.

QUESTION/INFO	Inspector Answer
41. Sample ID:	Sample # 5 (parts 1 & 2)
42. Type/variety of Product:	Non-Organic Green Bell Peppers (bulk)
43. Where was the product found at the facility/handler (back/front/which storage location/outbound pallets/inbound):	The inspector sampled from 5 separate #3 RPC's, located in Cooler #5
a. If taken from a truck or pallet please, if possible, identify the truck of pallet number/id:	TIN 2887045
44. Identify quantity on hand of this same product from the same vendor:	31 RPC (#3)
45. Label/brand of product:	n/a – bulk
46. Outgoing Lot Code:	n/a – bulk in inventory
47. Outgoing, Incoming or ready to ship product (explain):	Bulk in inventory, awaiting repackaging
48. Source of product:	See Attachment G

a. Supplier:	(b) (4)
b. Certifier:	n/a – nonorganic
c. Incoming lot code (if applicable):	PO# 72093
d. Shipping documents:	Inbound BOL – PO #72093
e. Invoice:	Invoice - PO #72093
49. Has this product been handled, repacked or otherwise processed by this operation (explain):	Yes. This product has only been handled by this operation as of the inspection date. The operation received the pallet of #3 RPC's from the supplier and has stored the pallet in the Cooler #5, until repacking requires the material on the inspection date or days following the inspection.
50. Destination of product (if applicable) if outgoing:	To be repackaged into non-organic green bell pepper or mixed bell pepper products.

Additional information/context or applicable sourcing or other information about the sample:

From: [Jake Lewin](#)
To: [Wilburn, Tammie - AMS](#)
Cc: [Kelly Lehman Goswamy](#)
Subject: RE: samples incoming
Date: Thursday, November 6, 2014 6:09:39 PM
Attachments: [Inspection - Exit Interview and Attachments Attachments.pdf_10_31_2014.pdf](#)
[Inspection - Inspection Report Inspection Report_10_31_2014.pdf](#)
[Inspection - Inspection Report Inspector Instructions - Handler.pdf_10_31_2014.pdf](#)
[Inspection - Report Addendum IR Addendum Pero.pdf_10_31_2014.pdf](#)

Ok, here you go...

You have the positive sample result. I'm attaching several items that pertain to sample #3 collected at Pero Family Farms.

- 1) Inspection report and Inspector Instructions. This includes sample, sourcing and documentation information, page 5, q's 21-30.
- 2) Report Addendum, includes sample information and trace back work. Section 3 bottom of page 1 and page 2. This is the report we ask inspectors to complete as part of this investigation.
- 3) Inspection report for the inspection
- 4) Exit interview, rehashes the samples and includes original paperwork for the traceback to the supplier, section e (bottom corner).

The bottom line is that these were individually wrapped green bells of reportedly US origin sold by Clemson University certified (b) (4) to Pero Family Farms. They were shipped on BOL order # 102024 against Pero PO number 74677EF and invoiced with invoice # 102024. Looks like 400 cartons. This information and potentially the paperwork should be provided to Clemson so they can audit the providence and production area(s) of these peppers.

At the time of the inspection the product had not been sold but it is likely in the market now. The analysis is very low but I have not yet researched how it compares to EPA tolerance.

Please let me know if you have any questions.

Jake Lewin

President
CCOF Certification Services, LLC
2155 Delaware Ave., Suite 150
Santa Cruz, CA 95060
(831) 423-2263, ext. 21
fax (831) 423-4528

jake@ccof.org

www.ccof.org

Visit CCOF on [Facebook](#) and [Twitter](#)

The 2014 Brimont Financial-Hardship Assistance Program is exclusively available to organic producers and processors/handlers who suffer losses due to extreme hardship. [Apply by November 12, 2014.](#)

From: Wilburn, Tammie - AMS [mailto:Tammie.Wilburn@ams.usda.gov]

Sent: Thursday, November 06, 2014 1:23 PM

To: Jake Lewin

Cc: Kelly Lehman Goswamy

Subject: RE: samples incoming

Hi Jake,

I spoke with Matthew re: positive test results for clients of other certifiers. We think it would be best if we notify the other certifier of the positive sample. Please send the pertinent information to me and I will contact and request the other certifier to investigate.

Thanks,

Tammie

From: Jake Lewin [<mailto:Jake@ccof.org>]

Sent: Wednesday, November 05, 2014 8:05 PM

To: Wilburn, Tammie - AMS

Cc: Kelly Lehman Goswamy; Sean Feder

Subject: RE: samples incoming

Thanks Tammie,

We have at least one more coming from this round.

I would like to get to a sample ID numbering system so Gastonia is not naming them by operation, particularly by supplier name collected at a different operation.

Sean will work on that with them. In the interim, if you keep a look out for other samples, that would be great.

We'll be dealing with the positive and moving that over to the other certifier most expeditiously.

Thank you,

Jake Lewin

President

CCOF Certification Services, LLC

2155 Delaware Ave., Suite 150

Santa Cruz, CA 95060

(831) 423-2263, ext. 21

fax (831) 423-4528

jake@ccof.org

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The 2014 Brimont Financial-Hardship Assistance Program is exclusively available to organic producers and processors/handlers who suffer losses due to extreme hardship. [Apply by November 12, 2014.](#)

From: Wilburn, Tammie - AMS [<mailto:Tammie.Wilburn@ams.usda.gov>]

Sent: Wednesday, November 05, 2014 12:21 PM

To: Jake Lewin
Subject: RE: samples incoming

Attached are reports for (b) (4) (b) (4) returned positive for azoxystrobin and endosulfan II.

Thanks Jake,
Tammie

From: Jake Lewin [<mailto:Jake@ccof.org>]
Sent: Tuesday, November 04, 2014 4:22 PM
To: Wilburn, Tammie - AMS
Subject: samples incoming

Hi Tammie,
Just dropping a note that you should be seeing sample results soon from Gastonia for a number of inspections we've done and sent in the last several weeks.
Clearly, we're anxious to jump on the results.

Thanks,

Jake Lewin
President
CCOF Certification Services, LLC
2155 Delaware Ave., Suite 150
Santa Cruz, CA 95060
(831) 423-2263, ext. 21
fax (831) 423-4528

jake@ccof.org

www.ccof.org

Visit CCOF on [Facebook](#) and [Twitter](#)

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United States Department of Agriculture Agricultural Marketing Service Science & Technology Laboratory Division Ship to: National Science Laboratory 801 Summit Crossing Place, Suite B Gastonia, NC 28054 (704) 867 - 3873 c/o Jonathan Barber	FRM - 24	
	FORM: AMS-S&T-LD Information Form For NOP Sample	
	Revision: 03	Replaces: 02 (09/28/2010)
	Effective: 07/29/2013	Pages 1 of 1
	Owner: <i>Chemistry Residue</i>	Approved by: <i>Lab Management</i>

1. Sample Identification Information

Collection date			Collector initials	Commodity Code (Organic Bell Pepper - BP)	USDA Organic Shield? (Y/N)
year	month	day			
15	01	23	LL	Organic Bell Peppers	Y
Comments/Explanation: <i>Sample ID 012315 LL01</i>					

2. Sample Type/Commodity Information

Origin:	<input type="checkbox"/> Domestic	<input checked="" type="checkbox"/> Imported	If Imported, Country of Origin	<i>MEXICO</i>
Cost:	<i>—</i>	Est. Weight:	<i>3Lbs</i>	Variety: <i>Green</i>
Certified Organic by: <i>CCOF</i>				

3. Collection Site Information

Collector:	<i>(b) (4)</i>
Address:	
City:	
Lot # or any other identification # on the box (if available): <i>Parcela 2 Azul Turquesa</i>	
Certified Organic Handler: <i>—</i>	
Certified Organic Producer: <i>Yes CCOF</i>	
Comments/Explanation: <i>Sample ID 012315 LL01</i>	

4. Shipping Information

Collector's Name:	<i>Luis Lopez</i>	CCOF contact for results and questions: samples@ccof.org
Signature:	<i>[Signature]</i>	Ship Date: <i>01/26/15</i>

5. Sample Receipt in Laboratory

Date Received:	Received By (initials):	Based on Condition Upon Arrival, Will the Sample be Analyzed? (Y/N)
If Not Analyzed, Why?	Rotten ___ Bruised ___ Miscoded ___ Other (Describe) ___	
Comments/Explanation:	No. of Units in Sample: ___	
Color of Sample:		

United States Department of Agriculture Agricultural Marketing Service Science & Technology Laboratory Division Ship to: National Science Laboratory 801 Summit Crossing Place, Suite B Gastonia, NC 28054 (704) 867-3873 c/o Jonathan Barber	FRM - 24	
	FORM: AMS-S&T-LD Information Form For NOP Sample	
	Revision: 03	Replaces: 02 (09/28/2010)
	Effective: 07/29/2013	Pages 1 of 1
	Owner: <i>Chemistry Residue</i>	Approved by: <i>Lab Management</i>

1. Sample Identification Information

Collection date			Collector initials	Commodity Code (Organic Bell Pepper - BP)	USDA Organic Shield? (Y/N)
year	month	day			
15	03	23	LL	Organic Bell Pepper	Y
Comments/Explanation: Put CCOF Sample ID here: # 15-023087-1					

2. Sample Type/Commodity Information

Origin:	<input type="checkbox"/> Domestic	<input checked="" type="checkbox"/> Imported	If Imported, Country of Origin	MEXICO
Cost:	NA	Est. Weight:	3Lbs	Variety: Bell Pepper
Certification Agency Collecting Sample: CCOF				

3. Collection Site Information

Collection Facility Name:	(b) (4)
Address:	(b) (4)
City:	(b) (4)
Lot # or any other identification # on the box (if available): Parcel 01 Shade house 124 and 127	
Certified Organic Handler: NA	
Certified Organic Producer: Yes, (b) (4)	
Comments/Explanation: Sample 10 15-023087-1	

4. Shipping Information

Collector's Name: Luis López	
Signature:	Ship Date: 03/23/15 03/27/15

5. Sample Receipt in Laboratory

Date Received:	Received By (initials):	Based on Condition Upon Arrival, Will the Sample be Analyzed? (Y/N)
If Not Analyzed, Why?	Rotten ___ Bruised ___ Miscoded ___ Other (Describe) ___	No. of Units in Sample: ___
Comments/Explanation:		
Color of Sample:		

United States Department of Agriculture Agricultural Marketing Service Science & Technology Laboratory Division Ship to: National Science Laboratory 801 Summit Crossing Place, Suite B Gastonia, NC 28054 (704) 867-3873 c/o Jonathan Barber	FRM - 24	
	FORM: AMS-S&T-LD Information Form For NOP Sample	
	Revision: 03	Replaces: 02 (09/28/2010)
	Effective: 07/29/2013	Pages 1 of 1
	Owner: <i>Chemistry Residue</i>	Approved by: <i>Lab Management</i>

1. Sample Identification Information

Collection date			Collector initials	Commodity Code (Organic Bell Pepper - BP)	USDA Organic Shield? (Y/N)
year	month	day			
15	03	23	LL	Organic Bell Peppers	Y
Comments/Explanation: Put CCOF Sample ID here: <i>15-023087-2</i>					

2. Sample Type/Commodity Information

Origin:	<input type="checkbox"/> Domestic	<input checked="" type="checkbox"/> Imported	If Imported, Country of Origin	<i>MEXICO</i>
Cost:	<i>NA</i>		Est. Weight:	<i>3lbs</i>
			Variety:	<i>Bell pepper</i>
Certification Agency Collecting Sample: CCOF				

3. Collection Site Information

Collector:	<i>(b) (4)</i>
Address:	
City:	
Lot # or any other identification # on the box (if available): <i>Parcel 01, Shadehouse 142</i>	
Certified Organic Handler: <i>NA</i>	
Certified Organic Producer: <i>Yes Exportadora Agricola Sacramento</i>	
Comments/Explanation: <i>Sample 10 15-023087-1</i>	

4. Shipping Information

Collector's Name:	<i>Luis Lopez</i>
Signature:	<i>[Signature]</i>
Ship Date:	<i>03/23/15</i> <i>03/27/15</i>

5. Sample Receipt in Laboratory

Date Received:	Received By (initials):	Based on Condition Upon Arrival, Will the Sample be Analyzed? (Y/N)
If Not Analyzed, Why?	Rotten ___ Bruised ___ Mismatched ___ Other (Describe) ___	No. of Units in Sample: ___
Comments/Explanation:		
Color of Sample:		

Inspection Report Addendum – Grower, Handler, Retail / Restaurant

Inspection Work Order #:	Sampling [#14-021088]; Unannounced [#14-021087]
Inspection Date:	October 15 th , 2014

Upload to inspection workflow Documents tab when completed. Please remove irrelevant tables. You may add rows to existing tables or create additional tables, as needed. Add rows by clicking Tab key while cursor is in the bottom right cell.

Client Action Items

- No Open Action Items.

Audit Trail Link Table for Handler Inspections: Trace Back Information for Samples Gathered at Inspection

DOCUMENT – SEE ATTACHMENT C	LINK	OTHER INFORMATION
1. Tag Inquiry (from tag on-site)	Tin 2889392; PO # 266611847;	The inspector selected Sample #1 from this bulk bin of non-organic mini sweet peppers staged for packaging in the Mini Sweets room at the time of the inspection.
2. Packout Report	Lot # 266611847; Grower: (b) (4), (b) (6) (b) (4)	
3. Receiving/Packing Inquiry	Lot # 266611847; Tin 2889385; Ref # 76299	
4. (2pages) Receiving Ticket/Harvesting Ticket	Rec # 76299; Field: 1008 (b) (4), (b) (6) (NOG)	
5. (C5-C10) PO Inquiry -> outbound NOG shipments		Please see the PO Inquiry attached for Pallet Tag #'s of outbound shipments of products of the same lot audited.

DOCUMENT – SEE ATTACHMENT D	LINK	OTHER INFORMATION
1. PO Inquiry (from pallet tag on-site)	Order # p81772EF; Lot # 26694135EF	The inspector selected Sample #2 from this pallet of finished product cases (12x8oz) of Pero Organic Mini Sweet Peppers. The pallet tag also contained the Tin 2888427 and Run # 1039346.
2. Packout Report	Lot # 26694135EF; Grower: Org Mini Sweets – (b) (4), (b) (6) (b) (4)	
3. Receiving/Packing Inquiry	(b) (4) Lot # 26694135E; Ref # 76299	
4. (2 pages) Receiving Ticket/Harvesting Ticket	Rec # 76294; Shipper: Pero Tennessee, Dayton, TN; Field # 1015, Block #2	Pero Organic, LLC Harvest Ticket. The inspector verified the parcel (b) (4), TN listed on the 7/18/13 QCS Certificate for Pero Tennessee Farms, LLC, which lists “Mini Sweet Peppers”.
5. (D5-D24) Tag Inquiry -> Sales Order Summary/documentation		Please see the Tin and SO inquiry attached verifying all shipments of product from the same lot audited.

DOCUMENT – SEE ATTACHMENT E	LINK	OTHER INFORMATION
1. PO Inquiry (from pallet tag on-site)	Order # 74677EF; Shipping Ref # 102024	The inspector selected Sample #3 from this pallet of finished product cases (10ct) of Pero Organic Individually wrapped Green Bell Peppers. The pallet tag also contained the Tin 2888280.

DOCUMENT – SEE ATTACHMENT E	LINK	OTHER INFORMATION
2. Purchase Order	PO # 74677EF; Ref # 102024	
3. Receiving Ticket	PO # 74677EF; Vendor: (b) (4) Product: Organic Green Bell Pepper RPC	
4. BOL (inbound)	Order # 102024; Cust PO # 74677EF; Shipper: (b) (4) (b) (4); Product: Bell Pepper RPC #3 Organic	
5. Invoice (purchase)	Invoice # 102024; Cust PO # 74677EF; Vendor: (b) (4);	The inspector verified a 9/5/13 Clemson University Certified Organic Certificate for (b) (4) SC which lists Bell Peppers, in the OSP.
6. (E6-E19) Tag Inquiry -> Sales Order Summary/documentation		Please see the Tin and SO inquiry attached verifying all shipments of product from the same lot audited.

DOCUMENT – SEE ATTACHMENT F	LINK	OTHER INFORMATION
1. Tag Inquiry (from pallet tag on-site)	Tin 2889396; Shipping Reference # 1039424; Lot # 74680EF	The inspector gathered Sample # 4 from this pallet of 1 1/9bu boxes of organic green bell peppers. The pallet tag also contained the PO #74680EF. The boxes/labels listed (b) (4) GA (QCS)
2. Purchase Order	PO # 74680EF; Ref # 1552	
3. Receiving Ticket	PO # 74680EF; Vendor: (b) (4); Product: Pepper Organic Green Bell 1 1/9	
4. BOL (inbound)	BOL # 1552; Order # 74680EF; Vendor: (b) (4); product: Green Bell Pepper 1 1/9 Organic	
5. Invoice (purchase)	Invoice # 1552; PO # 74680; Vendor: (b) (4); Product: Green Bell Pepper, Organic, 1 1/9bu	The inspector verified a 7/2/13 QCS certificate for (b) (4) GA, which lists “Peppers”.
6. (F6-F8) Tag Inquiry -> Sales Order Summary/documentation		Please see the Tin inquiry attached verifying all other inbound pallets that arrived with the shipment of the product audited.

DOCUMENT – SEE ATTACHMENT G	LINK	OTHER INFORMATION
1. Tag Inquiry (from pallet tag on-site)	Tin 2887045; Shipping Reference #1039431; PO # 72093	The inspector gathered Sample # 5 from this pallet of #3 RPC Non-Organic Green Bell Peppers. The pallet tag also contained PO # 72093.
2. Purchase Order	PO # 72093; Supplier: (b) (4); Ref # 7157	Due to time constraints the inspector did not gather further receiving/purchase information for this lot.
3. (G3-G20) Tag Inquiry (for outbound shipments)		Please see the Tin inquiry showing movements of product from the same lot audited.

From: Wilburn, Tammie - AMS
To: callen@nsf.org
Cc: [Hughes, Theresa \(thughes@nsf.org\)](mailto:thughes@nsf.org)
Subject: Inspections of Bell Pepper Operations
Date: Tuesday, September 16, 2014 3:55:00 PM
Attachments: [Quality Assurance International 9 16 2014.pdf](#)

Hi Carey,

Please respond to the attached letter by October 1, 2014. Feel free to call if you have questions.

Many thanks,

Tammie B. Wilburn
Compliance and Enforcement Division
National Organic Program, USDA
202-690-2624



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

SENT VIA EMAIL

September 16, 2014

Carey Allen
Quality Assurance International
9191 Towne Centre Drive, Suite 200
San Diego, California 92122
callen@nsf.org

Re: Inspections of Organic Bell Pepper Operations

Dear Ms. Allen:

Information received by the USDA National Organic Program (NOP) showed pesticide residues on organic bell peppers imported from Mexico. This information also indicated that some of the peppers sampled were certified by Quality Assurance International (QAI). Enclosed is a listing of the specific pesticides found with residue concentrations exceeding 5% of the Environmental Protection Agency tolerance (Enclosure). The information does not identify which farm(s) or handler(s) the residues are originating from so we are looking at all potential sources.

Pursuant to 7 CFR 205.403, you are directed to conduct onsite inspections of each organic bell pepper producer and handler certified by QAI in Mexico to assist in determining the source of the residues and to determine if each operation is compliant with the USDA organic regulations. Prior to conducting the inspections:

1. Please provide us with a list of operations that you certify who are producing organic bell peppers in Mexico or handling organic peppers from Mexico. If you certify no such operations, let us know;
2. If you certify operations producing or handling Mexican bell peppers, please submit an inspection plan for conducting unannounced onsite inspections and sampling, taking into account production volumes, harvest times, and other factors that may be a source of the residues. Please include plans for conducting audit trails and product in/product out audits as a component of the inspections.

Inspections of Organic Pepper Operations
Page 2

The NOP will cover the cost of sample analysis. You may contact the AMS National Science Laboratory directly should you have specific questions regarding sample submissions. Samples should be sent to:

USDA, AMS, National Science Laboratory
801 Summit Crossing Place, Suite B
Gastonia, North Carolina 28054
ATTN: Roger Simonds
Roger.Simonds@ams.usda.gov

Please respond to us with your inspection plan within 14 days of receipt of this letter. Upon review and approval of your plan, we will provide further direction as necessary for conducting inspections and sampling.

Please also note that this matter is being handled as an open investigation and all information associated with the investigation is confidential and may not be released. Should you have any questions regarding this matter, you may contact me at (202) 260-8657 or matthew.michael@ams.usda.gov.

Sincerely,



Matthew Michael
Director, Compliance & Enforcement Division
National Organic Program

Enclosure

cc: Director, Accreditation and International Activities Division, NOP, AMS
Roger Simonds, National Science Laboratories Chief, AMS

International Accreditation Service

CERTIFICATE OF ACCREDITATION

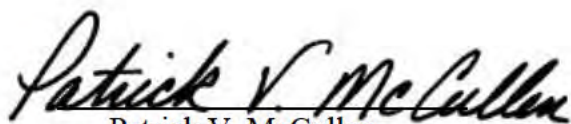
This is to signify that

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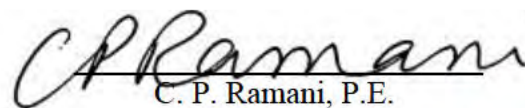
2451 EASTMAN AVENUE, SUITE 1
OXNARD, CALIFORNIA 93030

Testing Laboratory TL-509
(Revised April 8, 2014)

has met the requirements of the IAS Accreditation Criteria for Testing Laboratories (AC89), has demonstrated compliance with ISO/IEC Standard 17025:2005, *General requirements for the competence of testing and calibration laboratories*, and has been accredited, commencing August 9, 2013, for the test methods listed in the approved scope of accreditation.



Patrick V. McCullen
Vice President



C. P. Ramani, P.E.
President



Print Date: 4/9/2014

(see attached scope of accreditation for fields of testing and accredited test methods)

This accreditation certificate supersedes any IAS accreditation certificate bearing an earlier date. The certificate becomes invalid upon suspension, cancellation or revocation of accreditation.
See the IAS Accreditation Listings on the web at www.iasonline.org for current accreditation information, or contact IAS directly at (562) 364-8201.

Page 1 of 8

International Accreditation Service

SCOPE OF ACCREDITATION

AGQ USA TL-509
(Revised April 8, 2014)

AGQ USA
2451 Eastman Ave., Ste. 1
Oxnard, CA 93030

Jesse Lamas Calvillo
Laboratory Manager
(805) 981-2972

FIELDS OF TESTING	DETERMINANTS	METHOD REFERENCE
Metals by ICP-OES (Elemental Analysis)	Boron, Calcium, Copper, Magnesium, Manganese, Potassium, Sodium, Zinc, Sulfur, Phosphorus and Iron	PECUSA-009
Heavy Metals by ICP-OES (Elemental Analysis)	Aluminium, Arsenic, Cadmium, Chromium, Nickle, Lead, Tin Copper, Manganese, Iron and Zinc	PEUSA-2043
Metals by ICP-OES (Elemental Analysis)	Calcium, Magnesium, Sodium, Potassium, Iron, Manganese, Copper, Zinc, Sulfur, Phosphorus and Boron	PECUSA-009
Heavy Metals by ICP-OES (Elemental Analysis)	Aluminium (Total), Arsenic (Total), Cadmium (Total), Chromium (Total), Nickle (Total), Lead (Total), Tin (Total), Copper (Total), Manganese (Total), Iron (Total) and Zinc (Total)	PEUSA-2043
Heavy Metals by ICP-OES (Elemental Analysis)	Aluminium (Total), Arsenic (Total), Cadmium (Total), Chromium (Total), Nickle (Total), Lead (Total), Tin (Total), Copper (Total), Manganese (Total), Zinc (Total)	PEUSA-2043

August 9, 2013
Commencement Date



C. P. Ramani
C. P. Ramani, P.E.
President

Print Date: 4/9/2014

Page 2 of 8

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International Accreditation Service

SCOPE OF ACCREDITATION

AGQ USA TL-509
(Revised April 8, 2014)

FIELDS OF TESTING	MATERIAL	DETERMINANTS	METHOD REFERENCE
Heavy Metals by ICP-OES (Elemental Analysis)	(b) (4)	Arsenic, Cadmium, Chromium, Nickel, Lead, Copper, Manganese, Mercury, Iron and Zinc	PEUSA-2043
Elemental Analysis (LECO)		Total Nitrogen	PEUSA-034
Elemental Analysis (LECO)		Total Nitrogen	PEUSA-034
Continuous Flow Analysis (CFA) by UV/Vis Spectrophotometry		Chlorides, Ammonium, Alkalinity, Total Oxidized Nitrogen	PEUSA-336
Analysis by Automatic Titrator (Potentiometric, Conductometric, Volumetric)		pH, Electroconductivity and Alkalinity	PEUSA-001, PECUSA-002 and PECUSA-011
Analysis by Automatic Titrator (Potentiometric, Conductometric, Volumetric)		Oxidizable Organic Matter pH, Electroconductivity Active Limestone	PECUSA-013 PECUSA-002 and PECUSA-011
Analysis by Granulometry		Texture	PECUSA-018

August 9, 2013
Commencement Date



C. P. Ramani
C. P. Ramani, P.E.
President

Print Date: 4/9/2014

Page 3 of 8

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International Accreditation Service

SCOPE OF ACCREDITATION

AGQ USA TL-509
(Revised April 8, 2014)

FIELDS OF TESTING	MATERIAL	DETERMINANTS	METHOD REFERENCE
Pesticide Residue Analysis by GC-MS/MS	(b) (4)	Acrinathrin, Alachlor, Aldrin, Atrazine and Benalaxyl, Benfluralin, Bifenthrin, Bitertanol, Bromopropylate, Buprimate, Buprofezin, Carbaryl, Carbophenthion, Cyfluthrin, Cypermethrin, Cyproconazole, Cyprodinil, Chlorfenvinphos, Chlorpyrifos-ethyl, Chlorpyrifos-methyl, Chlorpropham, Chlorthal-dimethyl, Chlorothalonil, Lambda-cyhalothrin, Deltamethrin, Diazinon, Dichlofluanid, Dicloran, Dichlorvos, Dicofol, Difenconazole, Diflufenican, Diniconazole, Dinobuton, Diphenylamine, Diuron, Endosulfan (A+B+Sulphate), Endosulfan Alpha, Endosulfan Beta, Endosulfan Sulphate, Endrin, Ethalfluralin, Ethiofencarb, Ethion, Ethofumesate, Ethoprophos, Ethoxyquin, Etridiazole, Fenarimol, Fenazaquin, Fenoxycarb, Fenpropathrin, Fenthion, Phenthoate, Fenvalerate + Esfenvalerate, Fluzifop-Butyl, Flucythrinate, Fludioxonil, Fluquinconazole, Flusilazole, Fluvinate-tau, Phosalone, Phosmet,	PEUSA-614

August 9, 2013
Commencement Date



C. P. Ramani
C. P. Ramani, P.E.
President

Print Date: 4/9/2014

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International Accreditation Service

SCOPE OF ACCREDITATION

AGQ USA TL-509
(Revised April 8, 2014)

FIELDS OF TESTING	MATERIAL	DETERMINANTS	METHOD REFERENCE
Pesticide Residue Analysis by GC-MS/MS (continued)	(b) (4)	Heptachlor, Heptenophos, Hexaconazole, Imazalil, Iprodione, Isofenphos, Isofenphos-methyl, Kresoxim-methyl, Lindane, Malathion, Metalaxyl, Methidathion, Methiocarb, Methoxchlor, Myclobutanil, Nuarimol, Ofurace, Orthophenylphenol, Oxadiazon, Oxadixyl, Oxyfluorfen, Paclobutrazol, Parathion-ethyl, Parathion-methyl, Penconazol, Pendimethalin, Permethrin, Pyrazofos, Pyridaben, Pyridaphenthion, Pyrifeno, Pyrimethanil, Pirimicarb, Pirimiphos-ethyl, Pirimiphos-methyl, Pyriproxyfen, Procymidone, Profenofos, Prometryn, Propargite, Propiconazole, Propyzamida, Quinalphos, Chinomethionat, Simazine, Sulfotep, Tebuconazole, Tebufenyrad, Terbacil, Terbutylazine, Terbutryn, Tetraconazole, Tetradifon, Thiometon, Tolyfluamid, Triadimefon, Triadimenol, Triadimenol+Triadimefon (Total), Triazofos, Trifluralin, Vinclozolin, Zoxamide	PEUSA-614

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FIELDS OF TESTING	MATERIAL	DETERMINANTS	METHOD REFERENCE
Pesticide Residue Analysis by LC-MS/MS	(b) (4)	Abamectin, Acetamiprid, Azoxystrobin, Bendiocarb, Benomyl + Carbendazim + Thiophonate methyl, Benomyl + Carbendazim, Bentazone, Boscalid, Carbofuran, Cyazofamid, Cycloxydim, Clofentazine, Chloridazon, Clothianidin, Demeton-S-methyl, Desmidipham, Dichlormid, Dichlorprop (2,4-D-P), Diethofencarb, Diflubenzuron, Dimethomorph, Dinocap, Dodemorph, Emamectin Benzoate, Epoxiconazol, Spinosad (A+D), Spirodiclofen, Spiromesifen, Ethiprole, Etofenprox, Famoxadone, Fenbuconazole, Fenhexamid, Phenmidipham, Fenpyroximate, Fenpropidin, Fenpropimorph, Fipronil, Flazasulfuron, Flonicamid, Fluazinam, Flufenoxuron, Fluometuron, Flutolanil, Forchlorfenuron, Furathiocarb, Hexaflumuron, Hexythiazox, Imazamox, Imidacloprid, Iminoctadine, Indoxacarb, Loxinil, Lenacil, Linuron, Lufenuron, Mepanipyrim, Thiophanate methyl, Methomyl,	PEUSA-618

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FIELDS OF TESTING	MATERIAL	DETERMINANTS	METHOD REFERENCE
Pesticide Residue Analysis by LC-MS/MS (continued)	(b) (4)	Methoxyfenozide, Metoxuron, Monocrotophos, Nitenpyram, Oxamyl, Pencycuron, Pyraclostrobin, Propanil, Propoxur, Quinclorac, Quinmerac, Quinoxifen, Quizalofop, Tebufenozide, Teflubenzuron, Thiamethoxam (Total), Thiabenzazole, Thiacloprid, Thiamethoxam, Thiocyclam, Thiodicarb, Trifloxystrobin, Triflumizole, Triflumuron and Triforine	PEUSA-618
Pesticide Residue Analysis by GC-MS/MS	(b) (4)	Aldrin, Benalaxyl, Chlordane-cis, Chlordane-trans, Cypermethrin, 4,4'-DDD, 4,4'- DDE, 2,4'- DDT, 4,4'- DDT, Deltamethrin, Dieldrin, Endosulfan I, Endosulfan II, Endosulfan Sulfate, Endrin, Ethion, Fenamiphos, HCB, HCH-a, HCH-b, HCH-d, Heptachlor, Heptachlor epoxide A, Heptachlor epoxide B, Lindane, Mirex, Oxyfluorfen, Simazine; Trifluralin, Vinclozolin	PCUSA-225
UV/Vis Spectrophotometry	(b) (4)	Dithiocarbamates (as CS ₂)	PECUSA-032
Antibiotic by LC/ MS-MS	(b) (4)	Abamectin, Oxolinic Acid, Ciprofloxacin, Cloramfenicol, Diflubenzuron, Emamectin Benzoate, Enrofloxacin, Erythromycin, Spiramycin, Florfenicol, Flumequine, Ivermectin, Sarafloxacin, Trimethoprim	PCUSA-305

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FIELDS OF TESTING	MATERIAL	DETERMINANTS	METHOD REFERENCE
Nitrofurans by LC/ MS-MS	(b) (4)	AHD, AMOZ, AOZ, SEM	PCUSA-319
Penicillin/ Tetracyclins by LC/MS-MS		Amoxicillin, Chlortetracycline, Oxytetracycline, Tetracycline, Penicillin G	PCUSA-323
Colorants by LC/ MS-MS		Crystal Violet, Leuco-Crystal Violeta, Malachite Green, Leuco-Malachite Green, Brilliant Green	PCUSA-266
PCB by GC/ MS-MS		PCB 28, PCB 52, PCB 101, PCB 118, PCB 138, PCB 153, PCB 180	PCUSA-225

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From: Jacob via Dropbox <no-reply@dropbox.com>
Sent: Wednesday, January 07, 2015 6:09 PM
To: Wilburn, Tammie - AMS
Subject: Jacob Guth shared "Bell Pepper Files" with you

Follow Up Flag: Follow up
Flag Status: Flagged

From Jacob:

"Dear Tammie,

Here is a link to CCOF's updated Bell Pepper Investigation files for the NOP.

Currently, we are waiting on sample results for:

- 1) Hortifresh S.A. de C.V. dba Hortifresh S.A. de C.V. - sample ID 112714LL01
- 2) (b) (4) - sample ID 112414LL01
- 3) (b) (4) - sample ID 120614LL01

The chain of custody for each of these operations can be found in their file at this link.

Please let me know if you have any questions.

Kelly Lehman Goswamy
Associate Quality System Manager
CCOF Certification Services, LLC
2155 Delaware Ave., Suite 150
Santa Cruz, CA 95060
(831) 423-2263, ext. 28
fax (831) 423-4528
kelly@ccof.org
www.ccof.org"

[Click here to view Bell Pepper Files](#)

(Jacob shared these files using Dropbox. Enjoy!)

Lab ID Number	Product Description	Country of origin	State
AM01827	Organic Bell Pepper	Domestic	Florida
AM01828	Organic Bell Pepper	Domestic	Florida

Producer/Distributor/Collection site		Organic Certifier	1-Naphthol
(b) (4)		CCOF	N.D.
(b) (4)		CCOF	N.D.

2,4 Dimethylphenyl formamide (DMPF)	3-Hydroxycarbofuran	4,4-Dibromobenzophenone
N.D.	N.D.	N.D.
N.D.	N.D.	N.D.

5-Hydroxythiabendazole	Acephate	Acetamiprid	Acetochlor	Aldicarb	Aldicarb sulfone
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Aldicarb sulfoxide	Aldrin	Allethrin	Atrazine	Azinphos methyl	Azoxystrobin	Bendiocarb	BHC alpha
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	0.002	N.D.	N.D.

[illegible]

Carbendazim (MBC)	Carbofuran	Carfentrazone ethyl	Chlorantraniliprole	Chlordane cis
N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.

Chlordane trans	Chlorfenapyr	Chlorothalonil	Chlorpropham (CIPC)	Chlorpyrifos
N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.A.	N.D.	N.D.

Chlorpyrifos methyl	Chlorthal (DCPA)	Clofentezine	Clothianidin	Coumaphos	Cyazofamid	Cycloate
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

[illegible]

DDE p,p	DDT p,p	Deltamethrin	Diazinon	Diazinon oxygen analog	Dichlorvos (DDVP)	Dicloran
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Dicofol o,p	Dicofol p,p	Dieldrin	Difenoconazole	Diflubenzuron	Dimethoate	Dimethomorph
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Dinotefuran	Diphenamid	Diphenylamine	Disulfoton sulfone	Diuron	Endosulfan I	Endosulfan II
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	0.001

[illegible]

Etridiazole	Famoxadone	Fenamidone	Fenamiphos	Fenamiphos sulfone	Fenamiphos sulfoxide
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Fenarimol	Fenbuconazole	Fenhexamid	Fenoxaprop ethyl	Fenpropathrin	Fenpyroximate
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

[illegible]

Fonofos	Heptachlor	Heptachlor epoxide	Hexachlorobenzene	Hexaconazole	Hexythiazox
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

[illegible]

Malathion oxygen analog	Metalaxyl	Methamidophos	Methidathion	Methiocarb	Methomyl
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Methoxychlor	Methoxyfenozide	Metolachlor	Metribuzin	Mevinphos total	MGK-264
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Myclobutanil	Naled	Napropamide	Nonachlor cis	Nonachlor trans	Norflurazon
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Norflurazon desmethyl	Omethoate	o-Phenylphenol	Oxadixyl	Oxamyl	Oxamyl oxime
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Oxydemeton methyl sulfone	Oxyfluorfen	Parathion methyl	Pendimethalin	Pentachlorobenzene
N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.

Permethrin	Phenmedipham	Phorate sulfone	Phorate sulfoxide	Phosalone	Phosmet
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Piperonyl butoxide	Pirimicarb	Prallethrin	Prochloraz	Procymidone	Profenofos	Prometryn
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Pronamide	Propanil	Propargite	Propetamphos	Propham	Propiconazole	Pymetrozine
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Pyraclostrobin	Pyridaben	Pyrimethanil	Pyriproxyfen	Quinoxyfen	Quintozene	Resmethrin total
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Simazine	Spinetoram	Spirodiclofen	Spiromesifen	Sulfentrazone	Tebuconazole	Tebufozide
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Tefluthrin	Tetrachlorvinphos	Tetraconazole	Tetradifon	Tetrahydrophthalimide (THPI)
N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.

Tetramethrin	Thiabendazole	Thiacloprid	Thiamethoxam	Thiodicarb	Triadimefon	Triadimenol
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Tribufos	Trifloxystrobin	Triflumizole	Trifluralin	Vinclozolin
N.D.	N.D.	N.D.	N.D.	N.D.
N.D.	N.D.	N.D.	N.D.	N.D.



UNITED STATES DEPARTMENT OF AGRICULTURE
AGRICULTURAL MARKETING SERVICE
SCIENCE & TECHNOLOGY PROGRAMS
LABORATORY APPROVAL AND TESTING DIVISION

National Science Laboratories
801 Summit Crossing Place, Suite B
Gastonia, NC 28054
Phone: (704) 867-3873
Fax: (704) 853-2800

Applicant Identifier:
Tammie Wilburn
Agri. Marketing Specialist Regulatory
USDA-AMS-NOP
1400 Independence Ave
Washington, DC 25050

Sample Description: **Organic Bell Peppers**
Date Received: **10/16/2014**
Date Completed: **10/24/2014**
Date Issued: **10/24/2014**
P.O. #
Method: **MET-124**

REPORT OF ANALYTICAL TEST RESULTS

Original Report

<i>Applicant Sample ID:</i>	<u>Sample #3</u>			<i>Laboratory ID:</i>	<u>AM01828</u>
Pesticide Residue	Result PPM	LOD PPM	Pesticide Residue	Result PPM	LOD PPM
1-Naphthol	N.D.	0.050	Cyhalothrin lambda	N.D.	0.001
2,4 Dimethylphenyl formamide (DMPF)	N.D.	0.004	Cypermethrin	N.D.	0.004
3-Hydroxycarbofuran	N.D.	0.004	Cyprodinil	N.D.	0.004
4,4-Dibromobenzophenone	N.D.	0.010	Cyromazine	N.D.	0.050
5-Hydroxythiabendazole	N.D.	0.050	DDD o,p	N.D.	0.040
Acephate	N.D.	0.010	DDD p,p	N.D.	0.020
Acetamiprid	N.D.	0.004	DDE o,p	N.D.	0.020
Acetochlor	N.D.	0.025	DDE p,p	N.D.	0.002
Aldicarb	N.D.	0.004	DDT p,p	N.D.	0.040
Aldicarb sulfone	N.D.	0.003	Deltamethrin	N.D.	0.050
Aldicarb sulfoxide	N.D.	0.020	Diazinon	N.D.	0.001
Aldrin	N.D.	0.010	Diazinon oxygen analog	N.D.	0.010
Allethrin	N.D.	0.008	Dichlorvos (DDVP)	N.D.	0.011
Atrazine	N.D.	0.006	Dicloran	N.D.	0.003
Azinphos methyl	N.D.	0.015	Dicofol o,p	N.D.	0.004
Azoxystrobin	0.002	0.001	Dicofol p,p	N.D.	0.003
Bendiocarb	N.D.	0.002	Dieldrin	N.D.	0.005
BHC alpha	N.D.	0.002	Difenoconazole	N.D.	0.050
Bifenazate	N.D.	0.100	Diffubenzuron	N.D.	0.020
Bifenthrin	N.D.	0.005	Dimethoate	N.D.	0.023
Biteranol	N.D.	0.025	Dimethomorph	N.D.	0.056
Boscalid	N.D.	0.020	Dinotefuran	N.D.	0.030
Bromacil	N.D.	0.025	Diphenamid	N.D.	0.001
Buprofezin	N.D.	0.100	Diphenylamine	N.D.	0.020
Captan	N.D.	0.010	Disulfoton sulfone	N.D.	0.025
Carbaryl	N.D.	0.003	Diuron	N.D.	0.025
Carbendazim (MBC)	N.D.	0.005	Endosulfan I	N.D.	0.005
Carbofuran	N.D.	0.001	Endosulfan II	0.001	0.001
Carfentrazone ethyl	N.D.	0.003	Endosulfan sulfate	N.D.	0.001
Chlorantraniliprole	N.D.	0.010	Endrin	N.D.	0.020
Chlordane cis	N.D.	0.001	Epoxiconazole	N.D.	0.003
Chlordane trans	N.D.	0.005	Esfenvalerate	N.D.	0.010
Chlorfenapyr	N.D.	0.003	Ethion	N.D.	0.050
Chlorothalonil	N.D.	0.004	Ethoprop	N.D.	0.050
Chlorpropham (CIPC)	N.D.	0.050	Ethoxyquin	N.D.	0.025
Chlorpyrifos	N.D.	0.003	Etiozazole	N.D.	0.001
Chlorpyrifos methyl	N.D.	0.001	Etridiazole	N.D.	0.100
Chlorthal (DCPA)	N.D.	0.010	Famoxadone	N.D.	0.050
Clofentezine	N.D.	0.020	Fenamidone	N.D.	0.040
Clothianidin	N.D.	0.001	Fenamiphos	N.D.	0.006
Coumaphos	N.D.	0.001	Fenamiphos sulfone	N.D.	0.011
Cyazofamid	N.D.	0.002	Fenamiphos sulfoxide	N.D.	0.011
Cycloate	N.D.	0.025	Fenarimol	N.D.	0.010
Cyfluthrin	N.D.	0.008	Fenbuconazole	N.D.	0.002

LOD - Limit of Detection, N.A. - Not Analyzed, N.D. - Not Detected.

REPORT OF ANALYTICAL TEST RESULTS

Original Report

<i>Applicant Sample ID:</i>		<i>Sample #3</i>		<i>Laboratory ID:</i>		<i>AM01828</i>	
Pesticide Residue		Result PPM	LOD PPM	Pesticide Residue		Result PPM	LOD PPM
Fenhexamid		N.D.	0.003	Phenmedipham		N.D.	0.050
Fenoxaprop ethyl		N.D.	0.030	Phorate sulfone		N.D.	0.025
Fenpropathrin		N.D.	0.008	Phorate sulfoxide		N.D.	0.025
Fenpyroximate		N.D.	0.005	Phosalone		N.D.	0.025
Fenthion		N.D.	0.050	Phosmet		N.D.	0.025
Fipronil		N.D.	0.020	Piperonyl butoxide		N.D.	0.050
Flonicamid		N.D.	0.008	Pirimicarb		N.D.	0.007
Fludioxonil		N.D.	0.020	Prallethrin		N.D.	0.010
Fluoxastrobin		N.D.	0.004	Prochloraz		N.D.	0.025
Fluridone		N.D.	0.030	Procymidone		N.D.	0.100
Flutolanil		N.D.	0.030	Profenofos		N.D.	0.008
Fluvalinate		N.D.	0.010	Prometryn		N.D.	0.005
Folpet		N.D.	0.008	Pronamide		N.D.	0.003
Fonofos		N.D.	0.100	Propanil		N.D.	0.050
Heptachlor		N.D.	0.002	Propargite		N.D.	0.030
Heptachlor epoxide		N.D.	0.005	Propetamphos		N.D.	0.040
Hexachlorobenzene		N.D.	0.001	Propham		N.D.	0.050
Hexaconazole		N.D.	0.025	Propiconazole		N.D.	0.100
Hexythiazox		N.D.	0.006	Pymetrozine		N.D.	0.015
Hydroprene		N.D.	0.050	Pyraclostrobin		N.D.	0.015
Imazalil		N.D.	0.005	Pyridaben		N.D.	0.001
Imidacloprid		N.D.	0.001	Pirimethanil		N.D.	0.003
Indoxacarb		N.D.	0.003	Pyriproxyfen		N.D.	0.001
Iprodione		N.D.	0.020	Quinoxifen		N.D.	0.020
Lindane		N.D.	0.004	Quintozene		N.D.	0.001
Linuron		N.D.	0.020	Resmethrin total		N.D.	0.100
Malathion		N.D.	0.010	Simazine		N.D.	0.010
Malathion oxygen analog		N.D.	0.010	Spinetoram		N.D.	0.010
Metalaxyl		N.D.	0.002	Spirodiclofen		N.D.	0.004
Methamidophos		N.D.	0.004	Spiromesifen		N.D.	0.020
Methidathion		N.D.	0.023	Sulfentrazone		N.D.	0.250
Methiocarb		N.D.	0.028	Tebuconazole		N.D.	0.008
Methomyl		N.D.	0.010	Tebufenozide		N.D.	0.005
Methoxychlor		N.D.	0.100	Tefluthrin		N.D.	0.001
Methoxyfenozide		N.D.	0.002	Tetrachlorvinphos		N.D.	0.020
Metolachlor		N.D.	0.030	Tetraconazole		N.D.	0.003
Metribuzin		N.D.	0.003	Tetradifon		N.D.	0.003
Mevinphos total		N.D.	0.011	Tetrahydrophthalimide (THPI)		N.D.	0.100
MGK-264		N.D.	0.040	Tetramethrin		N.D.	0.010
Myclobutanil		N.D.	0.005	Thiabendazole		N.D.	0.001
Naled		N.D.	0.011	Thiacloprid		N.D.	0.001
Napropamide		N.D.	0.025	Thiamethoxam		N.D.	0.004
Nonachlor cis		N.D.	0.005	Thiodicarb		N.D.	0.006
Nonachlor trans		N.D.	0.005	Triadimefon		N.D.	0.005
Norflurazon		N.D.	0.006	Triadimenol		N.D.	0.090
Norflurazon desmethyl		N.D.	0.025	Tribufos		N.D.	0.005
Omethoate		N.D.	0.023	Trifloxystrobin		N.D.	0.005
o-Phenylphenol		N.D.	0.050	Triflumizole		N.D.	0.008
Oxadixyl		N.D.	0.011	Trifluralin		N.D.	0.001
Oxamyl		N.D.	0.005	Vinclozolin		N.D.	0.001
Oxamyl oxime		N.D.	0.025				
Oxydemeton methyl sulfone		N.D.	0.010				
Oxyfluorfen		N.D.	0.003				
Parathion methyl		N.D.	0.002				
Pendimethalin		N.D.	0.003				
Pentachlorobenzene		N.D.	0.001				
Permethrin		N.D.	0.008				

LOD - Limit of Detection, N.A. - Not Analyzed, N.D. - Not Detected.

REPORT OF ANALYTICAL TEST RESULTS

Original Report

<i>Applicant Sample ID:</i>	<u>Sample #3</u>			<i>Laboratory ID:</i>	<u>AM01828</u>
		Result	LOD	Result	LOD
Pesticide Residue		PPM	PPM	Pesticide Residue	PPM

Comments:

The fee for the laboratory services provided above is \$415.00.

The information contained within this report of sample results is applicable only to the materials identified within and is, to the best of our ability and knowledge, accurate with regard to the client's specification. The laboratory shall not be responsible for errors due to the client's failure to provide information critical to the currency of contract specification and/or standards.

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Signature of Approving Official:



Jonathan C. Barber, Laboratory Supervisor

Josie Quevedo

From: Josie Quevedo
Sent: Thursday, April 02, 2015 6:39 PM
To: 'Wilburn, Tammie - AMS'
Cc: Regalado, Andrew - AMS; Yang, RobertH - AMS; Humberto Gonzalez
Subject: RE: La Campana Organic Produce- NOP Bell Peppers (1 of 3 e-mails)
Attachments: Annex 3 Example on aplication logs,clenaing logs and label of exported product cycle 13-14 La Campana.pdf; Audit Report (Crop) La Campana Organic Produce PLC-OR-116 112214.doc; NOP Cover sheet and NC Summary La Campana Produce Organic 2014-11.pdf; Anex 2 Packing facility for la Campana.pdf; Annex 1 Farm La Campana Produce Organic 2014-11.pdf

Tracking:

Recipient	Read
'Wilburn, Tammie - AMS'	
Regalado, Andrew - AMS	
Yang, RobertH - AMS	
Humberto Gonzalez	Read: 4/2/2015 10:07 PM

Hello Tammie,

Please find attached the information for La Campana Organic Produce.

Per our conversation; regarding La Campana Organic Produce. Our concern is that we have not been able to collect a sample from the client due to no product being available for bell peppers in the operation. We have had one of PrimusLabs sales representative stop by at the operation from time to time to check if there is any activity of any bell peppers being grown in the crop operation and none have been seen since the un-announced audit was conducted. We were also informed from an administrative employee from the company that they have not been active and that they are low on funds and maybe the organization will have to close down under the current business owner.

With these observations in mind we have proposed to conduct another un-announced audit to confirm if the statements and surveillances provided to be in fact what is happening with the certified operation.

We are coordinating to have the un-announced audit conducted for April 13, 2015. If any changes prevail I will be sure to contact you and give you an update.

If you have any questions or concerns please feel free to contact me.

Kind regards,



Josie Quevedo

Audit Coordinator

Josie.Quevedo@PrimusLabs.com

Voice 805.922.0055 | Fax 805.352.1364

View our training & events ...

PrimusLabs | 1259 Furukawa Way | Santa Maria, CA

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4/3/2015

From: Wilburn, Tammie - AMS [<mailto:Tammie.Wilburn@ams.usda.gov>]
Sent: Wednesday, April 01, 2015 7:29 AM
To: Josie Quevedo
Cc: Regalado, Andrew - AMS; Yang, RobertH - AMS
Subject: La Campana Organic Produce
Importance: High

Hi Josie:

Please send the inspection report from your initial inspection at La Campana, by Monday, April 6, 2015. Please also provide the exact dates of when you will re-visit and collect a sample from La Campana.

Tammie

From: Josie Quevedo [<mailto:josie.quevedo@primuslabs.com>]
Sent: Friday, February 06, 2015 3:48 PM
To: Wilburn, Tammie - AMS
Subject: RE: La Campana Organic Produce

Hello Tammie,

There was a unannounced audit conducted. I would like to apologize; I believe the file was a bit large to send. I will get that inspection report to you ASAP.

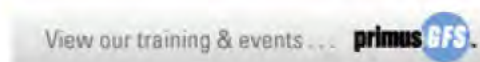
You are correct we did not collect a sample for La Campana Organic Produce due to the fact that there was no product available at the time of the inspection. I will get back to you and provide exact dates of when the sample will be collected.

Kind regards,



Josie Quevedo
 Audit Coordinator
Josie.Quevedo@PrimusLabs.com

Voice 805.922.0055 | Fax 805.352.1364



PrimusLabs | 1259 Furukawa Way | Santa Maria, CA

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From: Wilburn, Tammie - AMS [<mailto:Tammie.Wilburn@ams.usda.gov>]
Sent: Friday, February 06, 2015 12:36 PM
To: Josie Quevedo
Subject: La Campana Organic Produce

Josie,

Did Primus do an inspection of La Campana Organic Produce?

4/3/2015



UNITED STATES DEPARTMENT OF AGRICULTURE
AGRICULTURAL MARKETING SERVICE
SCIENCE & TECHNOLOGY PROGRAMS
LABORATORY APPROVAL AND TESTING DIVISION

National Science Laboratories
801 Summit Crossing Place, Suite B
Gastonia, NC 28054
Phone: (704) 867-3873
Fax: (704) 853-2800

Applicant Identifier:
Tammie Wilburn
Agri. Marketing Specialist Regulatory
USDA-AMS-NOP
1400 Independence Ave
Washington, DC 25050

Sample Description: **Organic Bell Pepper**
Date Received: **02/20/2015**
Date Completed: **03/10/2015**
Date Issued: **03/10/2015**
P.O. #
Method: **MET-124**

REPORT OF ANALYTICAL TEST RESULTS

Original Report

<i>Applicant Sample ID:</i>	<u>N/A</u>			<i>Laboratory ID:</i>	<u>AM13822</u>
Pesticide Residue	Result PPM	LOD PPM	Pesticide Residue	Result PPM	LOD PPM
1-Naphthol	N.D.	0.050	Cyhalothrin lambda	N.D.	0.001
2,4 Dimethylphenyl formamide (DMPF)	N.D.	0.004	Cypermethrin	N.D.	0.004
3-Hydroxycarbofuran	N.D.	0.004	Cyprodinil	N.D.	0.004
4,4-Dibromobenzophenone	N.D.	0.010	Cyromazine	N.D.	0.050
5-Hydroxythiabendazole	N.D.	0.050	DDD o,p	N.D.	0.040
Acephate	N.D.	0.010	DDD p,p	N.D.	0.020
Acetamiprid	N.D.	0.004	DDE o,p	N.D.	0.020
Acetochlor	N.D.	0.025	DDE p,p	N.D.	0.002
Aldicarb	N.D.	0.004	DDT p,p	N.D.	0.040
Aldicarb sulfone	N.D.	0.003	Deltamethrin	N.D.	0.050
Aldicarb sulfoxide	N.D.	0.020	Diazinon	N.D.	0.001
Aldrin	N.D.	0.010	Diazinon oxygen analog	N.D.	0.010
Allethrin	N.D.	0.008	Dichlorvos (DDVP)	N.D.	0.011
Atrazine	N.D.	0.006	Dicloran	N.D.	0.003
Azinphos methyl	N.D.	0.015	Dicofol o,p	N.D.	0.004
Azoxystrobin	N.D.	0.001	Dicofol p,p	N.D.	0.003
Bendiocarb	N.D.	0.002	Dieldrin	N.D.	0.005
BHC alpha	N.D.	0.002	Difenoconazole	N.D.	0.050
Bifenazate	N.D.	0.100	Diffubenzuron	N.D.	0.020
Bifenthrin	N.D.	0.005	Dimethoate	N.D.	0.023
Biteranol	N.D.	0.025	Dimethomorph	N.D.	0.056
Boscalid	N.D.	0.020	Dinotefuran	N.D.	0.030
Bromacil	N.D.	0.025	Diphenamid	N.D.	0.001
Buprofezin	N.D.	0.100	Diphenylamine	N.D.	0.020
Captan	N.D.	0.010	Disulfoton sulfone	N.D.	0.025
Carbaryl	N.D.	0.003	Diuron	N.D.	0.025
Carbendazim (MBC)	N.D.	0.005	Endosulfan I	N.D.	0.005
Carbofuran	N.D.	0.001	Endosulfan II	N.D.	0.001
Carfentrazone ethyl	N.D.	0.003	Endosulfan sulfate	N.D.	0.001
Chlorantraniliprole	N.D.	0.010	Endrin	N.D.	0.020
Chlordane cis	N.D.	0.001	Epoxiconazole	N.D.	0.003
Chlordane trans	N.D.	0.005	Esfenvalerate	N.D.	0.010
Chlorfenapyr	N.D.	0.003	Ethion	N.D.	0.050
Chlorothalonil	N.D.	0.004	Ethoprop	N.D.	0.050
Chlorpropham (CIPC)	N.D.	0.050	Ethoxyquin	N.A.	0.025
Chlorpyrifos	N.D.	0.003	Etoxazole	N.D.	0.001
Chlorpyrifos methyl	N.D.	0.001	Etridiazole	N.D.	0.100
Chlorthal (DCPA)	N.D.	0.010	Famoxadone	N.D.	0.050
Clofentezine	N.D.	0.020	Fenamidone	N.D.	0.040
Clothianidin	N.D.	0.001	Fenamiphos	N.D.	0.006
Coumaphos	N.D.	0.001	Fenamiphos sulfone	N.D.	0.011
Cyazofamid	N.D.	0.002	Fenamiphos sulfoxide	N.D.	0.011
Cycloate	N.D.	0.025	Fenarimol	N.D.	0.010
Cyfluthrin	N.D.	0.008	Fenbuconazole	N.D.	0.002

LOD - Limit of Detection, N.A. - Not Analyzed, N.D. - Not Detected.

REPORT OF ANALYTICAL TEST RESULTS

Original Report

Applicant Sample ID: N/A

Laboratory ID: AM13822

Pesticide Residue	Result PPM	LOD PPM	Pesticide Residue	Result PPM	LOD PPM
Fenhexamid	N.D.	0.003	Phenmedipham	N.D.	0.050
Fenoxaprop ethyl	N.D.	0.030	Phorate sulfone	N.D.	0.025
Fenpropathrin	N.D.	0.008	Phorate sulfoxide	N.D.	0.025
Fenpyroximate	N.D.	0.005	Phosalone	N.D.	0.025
Fenthion	N.D.	0.050	Phosmet	N.D.	0.025
Fipronil	N.D.	0.020	Piperonyl butoxide	N.D.	0.050
Flonicamid	N.D.	0.008	Pirimicarb	N.D.	0.007
Fludioxonil	N.D.	0.020	Prallethrin	N.D.	0.010
Fluoxastrobin	N.D.	0.004	Prochloraz	N.D.	0.025
Fluridone	N.D.	0.030	Procymidone	N.D.	0.100
Flutolanil	N.D.	0.030	Profenofos	N.D.	0.008
Fluvalinate	N.D.	0.010	Prometryn	N.D.	0.005
Folpet	N.D.	0.008	Pronamide	N.D.	0.003
Fonofos	N.D.	0.100	Propanil	N.D.	0.050
Heptachlor	N.D.	0.002	Propargite	N.D.	0.030
Heptachlor epoxide	N.D.	0.005	Propetamphos	N.D.	0.040
Hexachlorobenzene	N.D.	0.001	Propham	N.D.	0.050
Hexaconazole	N.D.	0.025	Propiconazole	N.D.	0.100
Hexythiazox	N.D.	0.006	Pymetrozine	N.D.	0.015
Hydroprene	N.D.	0.050	Pyraclostrobin	N.D.	0.015
Imazalil	N.D.	0.005	Pyridaben	N.D.	0.001
Imidacloprid	N.D.	0.001	Pyrimethanil	N.D.	0.003
Indoxacarb	N.D.	0.003	Pyriproxyfen	N.D.	0.001
Iprodione	N.D.	0.020	Quinoxifen	N.D.	0.020
Lindane	N.D.	0.004	Quintozene	N.D.	0.001
Linuron	N.D.	0.020	Resmethrin total	N.D.	0.100
Malathion	N.D.	0.010	Simazine	N.D.	0.010
Malathion oxygen analog	N.D.	0.010	Spinetoram	N.D.	0.010
Metalaxyl	N.D.	0.002	Spirodiclofen	N.D.	0.004
Methamidophos	N.D.	0.004	Spiromesifen	N.D.	0.020
Methidathion	N.D.	0.023	Sulfentrazone	N.D.	0.250
Methiocarb	N.D.	0.028	Tebuconazole	N.D.	0.008
Methomyl	N.D.	0.010	Tebufenozide	N.D.	0.005
Methoxychlor	N.D.	0.100	Tefluthrin	N.D.	0.001
Methoxyfenozide	N.D.	0.002	Tetrachlorvinphos	N.D.	0.020
Metolachlor	N.D.	0.030	Tetraconazole	N.D.	0.003
Metribuzin	N.D.	0.003	Tetradifon	N.D.	0.003
Mevinphos total	N.D.	0.011	Tetrahydrophthalimide (THPI)	N.D.	0.100
MGK-264	N.D.	0.040	Tetramethrin	N.D.	0.010
Myclobutanil	N.D.	0.005	Thiabendazole	N.D.	0.001
Naled	N.D.	0.011	Thiacloprid	N.D.	0.001
Napropamide	N.D.	0.025	Thiamethoxam	N.D.	0.004
Nonachlor cis	N.D.	0.005	Thiodicarb	N.D.	0.006
Nonachlor trans	N.D.	0.005	Triadimefon	N.D.	0.005
Norflurazon	N.D.	0.006	Triadimenol	N.D.	0.090
Norflurazon desmethyl	N.D.	0.025	Tribufos	N.D.	0.005
Omethoate	N.D.	0.023	Trifloxystrobin	N.D.	0.005
o-Phenylphenol	N.D.	0.050	Triflumizole	N.D.	0.008
Oxadixyl	N.D.	0.011	Trifluralin	N.D.	0.001
Oxamyl	N.D.	0.005	Vinclozolin	N.D.	0.001
Oxamyl oxime	N.D.	0.025			
Oxydemeton methyl sulfone	N.D.	0.010			
Oxyfluorfen	N.D.	0.003			
Parathion methyl	N.D.	0.002			
Pendimethalin	N.D.	0.003			
Pentachlorobenzene	N.D.	0.001			
Permethrin	N.D.	0.008			

LOD - Limit of Detection, N.A. - Not Analyzed, N.D. - Not Detected.

REPORT OF ANALYTICAL TEST RESULTS

Original Report

Applicant Sample ID: N/A

Laboratory ID: AM13822

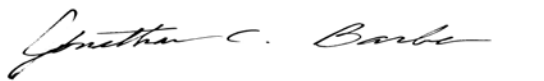
	Result	LOD		Result	LOD
Pesticide Residue	PPM	PPM	Pesticide Residue	PPM	PPM
<p>Comments:</p>					

The fee for the laboratory services provided above is \$415.00.

The information contained within this report of sample results is applicable only to the materials identified within and is, to the best of our ability and knowledge, accurate with regard to the client's specification. The laboratory shall not be responsible for errors due to the client's failure to provide information critical to the currency of contract specification and/or standards.

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Signature of Approving Official:



Jonathan C. Barber, Laboratory Supervisor

From: Wilburn, Tammie - AMS
To: [Andrew Black \(andrewblack@tilth.org\)](mailto:andrewblack@tilth.org)
Subject: Lab Results for Del Cabo
Date: Wednesday, March 11, 2015 2:47:00 PM
Attachments: [Lab Results for Del Cabo AM13822.pdf](#)
[Results for Del Cabo Califorganicos.xlsx](#)

Attached are results for the sample you sent in for Del Cabo. There were no detections.

Questions, please call.

Tammie B. Wilburn
Compliance and Enforcement Division
National Organic Program, USDA
202-690-2624
<http://www.ams.usda.gov/AMSv1.0/NOP>

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Lab ID Number	Product Description	Lot Number	Collector's name
AL36392	Organic Bell Pepper		Laura Murray

Collection date	Country of origin	US26
23-Sep-14	Imported	Mexico

Producer/Distributor/Collection site	Collection site city	Collection site state	Organic Certifier
The Produce Exchange	San Diego	CA	CCOF

US22	Fee	1-Naphthol	2,4 Dimethylphenyl formamide (DMPF)	3-Hydroxycarbofuran
4 lbs	\$415.00	N.D.	N.D.	N.D.

total= \$415.00

4,4-Dibromobenzophenone	5-Hydroxythiabendazole	Acephate	Acetamiprid	Acetochlor	Aldicarb
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Aldicarb sulfone	Aldicarb sulfoxide	Aldrin	Allethrin	Atrazine	Azinphos methyl	Azoxystrobin
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

[illegible]

Carbaryl	Carbendazim (MBC)	Carbofuran	Carfentrazone ethyl	Chlorantraniliprole	Chlordane cis
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Chlordane trans	Chlorfenapyr	Chlorothalonil	Chlorpropham (CIPC)	Chlorpyrifos
N.D.	N.D.	N.A.	N.D.	N.D.

Chlorpyrifos methyl	Chlorthal (DCPA)	Clofentezine	Clothianidin	Coumaphos	Cyazofamid	Cycloate
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

[illegible]

DDE p,p	DDT p,p	Deltamethrin	Diazinon	Diazinon oxygen analog	Dichlorvos (DDVP)	Dicloran
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Dicofol o,p	Dicofol p,p	Dieldrin	Difenoconazole	Diflubenzuron	Dimethoate	Dimethomorph
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Dinotefuran	Diphenamid	Diphenylamine	Disulfoton sulfone	Diuron	Endosulfan I	Endosulfan II
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

[illegible]

Etridiazole	Famoxadone	Fenamidone	Fenamiphos	Fenamiphos sulfone	Fenamiphos sulfoxide
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Fenarimol	Fenbuconazole	Fenhexamid	Fenoxaprop ethyl	Fenpropathrin	Fenpyroximate
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

[illegible]

Fonofos	Heptachlor	Heptachlor epoxide	Hexachlorobenzene	Hexaconazole	Hexythiazox
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

[illegible]

Malathion oxygen analog	Metalaxyl	Methamidophos	Methidathion	Methiocarb	Methomyl
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Methoxychlor	Methoxyfenozide	Metolachlor	Metribuzin	Mevinphos total	MGK-264
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Myclobutanil	Naled	Napropamide	Nonachlor cis	Nonachlor trans	Norflurazon
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Norflurazon desmethyl	Omethoate	o-Phenylphenol	Oxadixyl	Oxamyl	Oxamyl oxime
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Oxydemeton methyl sulfone	Oxyfluorfen	Parathion methyl	Pendimethalin	Pentachlorobenzene
N.D.	N.D.	N.D.	N.D.	N.D.

Permethrin	Phenmedipham	Phorate sulfone	Phorate sulfoxide	Phosalone	Phosmet
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Piperonyl butoxide	Pirimicarb	Prallethrin	Prochloraz	Procymidone	Profenofos	Prometryn
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Pronamide	Propanil	Propargite	Propetamphos	Propham	Propiconazole	Pymetrozine
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Pyraclostrobin	Pyridaben	Pyrimethanil	Pyriproxyfen	Quinoxifen	Quintozene	Resmethrin total
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Simazine	Spinetoram	Spirodiclofen	Spiromesifen	Sulfentrazone	Tebuconazole	Tebufoenozide
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Tefluthrin	Tetrachlorvinphos	Tetraconazole	Tetradifon	Tetrahydrophthalimide (THPI)
N.D.	N.D.	N.D.	N.D.	N.D.

Tetramethrin	Thiabendazole	Thiacloprid	Thiamethoxam	Thiodicarb	Triadimefon	Triadimenol
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Tribufos	Trifloxystrobin	Triflumizole	Trifluralin	Vinclozolin
N.D.	N.D.	N.D.	N.D.	N.D.

Lab ID Number	Product Description	Lot Number	Collector's name
AL36392	Organic Bell Pepper		Laura Murray

Collection date	Country of origin	US26
23-Sep-14	Imported	Mexico

Producer/Distributor/Collection site	Collection site city	Collection site state	Organic Certifier
The Produce Exchange	San Diego	CA	CCOF

US22	Fee	1-Naphthol	2,4 Dimethylphenyl formamide (DMPF)	3-Hydroxycarbofuran
4 lbs	\$415.00	N.D.	N.D.	N.D.

total= \$415.00

4,4-Dibromobenzophenone	5-Hydroxythiabendazole	Acephate	Acetamiprid	Acetochlor	Aldicarb
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Aldicarb sulfone	Aldicarb sulfoxide	Aldrin	Allethrin	Atrazine	Azinphos methyl	Azoxystrobin
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

[illegible]

Carbaryl	Carbendazim (MBC)	Carbofuran	Carfentrazone ethyl	Chlorantraniliprole	Chlordane cis
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Chlordane trans	Chlorfenapyr	Chlorothalonil	Chlorpropham (CIPC)	Chlorpyrifos
N.D.	N.D.	N.A.	N.D.	N.D.

Chlorpyrifos methyl	Chlorthal (DCPA)	Clofentezine	Clothianidin	Coumaphos	Cyazofamid	Cycloate
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

[illegible]

DDE p,p	DDT p,p	Deltamethrin	Diazinon	Diazinon oxygen analog	Dichlorvos (DDVP)	Dicloran
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Dicofol o,p	Dicofol p,p	Dieldrin	Difenoconazole	Diflubenzuron	Dimethoate	Dimethomorph
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Dinotefuran	Diphenamid	Diphenylamine	Disulfoton sulfone	Diuron	Endosulfan I	Endosulfan II
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

[illegible]

Etridiazole	Famoxadone	Fenamidone	Fenamiphos	Fenamiphos sulfone	Fenamiphos sulfoxide
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Fenarimol	Fenbuconazole	Fenhexamid	Fenoxaprop ethyl	Fenpropathrin	Fenpyroximate
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

[illegible]

Fonofos	Heptachlor	Heptachlor epoxide	Hexachlorobenzene	Hexaconazole	Hexythiazox
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

[illegible]

Malathion oxygen analog	Metalaxyl	Methamidophos	Methidathion	Methiocarb	Methomyl
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Methoxychlor	Methoxyfenozide	Metolachlor	Metribuzin	Mevinphos total	MGK-264
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Myclobutanil	Naled	Napropamide	Nonachlor cis	Nonachlor trans	Norflurazon
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Norflurazon desmethyl	Omethoate	o-Phenylphenol	Oxadixyl	Oxamyl	Oxamyl oxime
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Oxydemeton methyl sulfone	Oxyfluorfen	Parathion methyl	Pendimethalin	Pentachlorobenzene
N.D.	N.D.	N.D.	N.D.	N.D.

Permethrin	Phenmedipham	Phorate sulfone	Phorate sulfoxide	Phosalone	Phosmet
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Piperonyl butoxide	Pirimicarb	Prallethrin	Prochloraz	Procymidone	Profenofos	Prometryn
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Pronamide	Propanil	Propargite	Propetamphos	Propham	Propiconazole	Pymetrozine
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Pyraclostrobin	Pyridaben	Pyrimethanil	Pyriproxyfen	Quinoxifen	Quintozene	Resmethrin total
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Simazine	Spinetoram	Spirodiclofen	Spiromesifen	Sulfentrazone	Tebuconazole	Tebufoenozide
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Tefluthrin	Tetrachlorvinphos	Tetraconazole	Tetradifon	Tetrahydrophthalimide (THPI)
N.D.	N.D.	N.D.	N.D.	N.D.

Tetramethrin	Thiabendazole	Thiacloprid	Thiamethoxam	Thiodicarb	Triadimefon	Triadimenol
N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

Tribufos	Trifloxystrobin	Triflumizole	Trifluralin	Vinclozolin
N.D.	N.D.	N.D.	N.D.	N.D.

MDA Handler	Supplier's Name	Certified By
(b) (4)	(b) (4)	CCOF
		QAI
(b) (4)		A Bee Organic
		Primus Labs
		Primus Labs
		PCO
		QAI
		Skal Bio Controle Control Union Certifications
(b) (4)		QAI

From: Wilburn, Tammie - AMS
To: [FGIS OA, Maryland](#)
Cc: [Howley, JannaB - AMS](#)
Subject: Inspections of Bell Pepper Operations
Date: Tuesday, September 16, 2014 3:50:00 PM
Attachments: [Maryland Dept of Ag 9 16 2014.pdf](#)

Ms. Baldwin:

Please review and respond to the attached letter by October 1, 2014. Please call if you have questions.

Tammie B. Wilburn
Compliance and Enforcement Division
National Organic Program, USDA
202-690-2624



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

SENT VIA EMAIL

September 16, 2014

Deanna Baldwin
Program Manager, Organic Certification Program
Maryland Department of Agriculture (MDA)
50 Harry S. Truman Parkway
Annapolis, Maryland 21401

Re: Inspections of Organic Bell Pepper Operations

Dear Ms. Baldwin:

Information received by the USDA National Organic Program (NOP) showed pesticide residues on organic bell peppers imported from Mexico. This information also indicated that some of the peppers sampled were certified by the Maryland Department of Agriculture (MDA). Enclosed is a listing of the specific pesticides found with residue concentrations exceeding 5% of the Environmental Protection Agency tolerance (Enclosure). The information does not identify which farm(s) or handler(s) the residues are originating from so we are looking at all potential sources.

Pursuant to 7 CFR 205.403, you are directed to conduct onsite inspections of each organic bell pepper producer and handler certified by MDA in Mexico to assist in determining the source of the residues and to determine if each operation is compliant with the USDA organic regulations. Prior to conducting the inspections:

1. Please provide us with a list of operations that you certify who produce organic bell peppers in Mexico or handle organic bell peppers from Mexico. If you certify no such operations, let us know;
2. If you certify operations producing or handling Mexican bell peppers, please submit an inspection plan for conducting unannounced onsite inspections and sampling, taking into account production volumes, harvest times, and other factors that may be a source of the residues. Please include plans for conducting audit trails and product in/product out audits as a component of the inspections.

Inspections of Organic Pepper Operations
Page 2

The NOP will cover the cost of sample analysis. You may contact the AMS National Science Laboratory directly should you have specific questions regarding sample submissions.

Samples should be sent to:

USDA, AMS, National Science Laboratory
801 Summit Crossing Place, Suite B
Gastonia, North Carolina 28054
ATTN: Roger Simonds
Roger.Simonds@ams.usda.gov

Please respond to us with your inspection plan within 14 days of receipt of this letter. Upon review and approval of your plan, we will provide further direction as necessary for conducting inspections and sampling.

Please also note that this matter is being handled as an open investigation and all information associated with the investigation is confidential and may not be released. Should you have any questions regarding this matter, you may contact me at (202) 260-8657 or matthew.michael@ams.usda.gov.

Sincerely,



Matthew Michael
Director, Compliance & Enforcement Division
National Organic Program

Enclosure

cc: Director, Accreditation and International Activities Division, NOP, AMS
Roger Simonds, National Science Laboratories Chief, AMS

Sole, Dupe - AMS

From: Connie Karr <connie@tilth.org>
Sent: Wednesday, August 27, 2014 4:36 PM
To: Wilburn, Tammie - AMS
Cc: Gebault King, ReneeA - AMS; Mann, Renee - AMS; Andrew Black
Subject: Re: Inspections of organic pepper operations in Mexico
Attachments: ACA.Request.to.Investigate-OCTO.signed.pdf

Hi Tammie,

Thank you for the information. We are happy to conduct any necessary investigation and we will provide you with a plan in the next 14 days. As a point of reference I show that we have 19 different operations in Mexico that produce or handle "peppers" of some type. This is significantly different than the 1 listed on the attachment.

Questions I have for you as we just discussed on the phone:

1. Is there any further information that the NOP could provide us to assist us in our investigation? lot numbers, varieties of peppers, regionally in Mexico or anything? As you know, it is difficult to just do an unannounced on 19 different operations to find a potential source of contamination without knowing more about what we are looking at/for.
2. You mentioned we could conduct the sampling as part of the mandatory annual inspections, not just unannounced inspections as your letter implies. Please confirm.
3. You indicated that if our plan was to complete these investigations over a time period that would be acceptable. As I mentioned to you on the phone, Oregon Tilth budgets each year for the cost of unannounced inspections. We are almost complete with our unannounced inspections for 2014 and our budget is tight. So being able to spread this investigation across years - into 2015 would be helpful. Please confirm this would be acceptable part of the plan.

Thank you for your time and I apologize for so many questions.

Connie Karr >> *Certification Director*

Oregon Tilth 2525 SE 3rd Street, Corvallis, OR 97333

P 503-378-0690

C (b) (6)

F 541-753-4924

E connie@tilth.org

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On Aug 27, 2014, at 11:46 AM, "Wilburn, Tammie - AMS" <Tammie.Wilburn@ams.usda.gov> wrote:

Hi Connie:

Please see the attached request regarding organic pepper operations in Mexico. Questions, please call.

Thanks!

Tammie B. Wilburn
Compliance and Enforcement Division
National Organic Program, USDA
202-690-2624 ---- please note new ph number

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Sole, Dupe - AMS

From: Wilburn, Tammie - AMS
Sent: Friday, March 27, 2015 1:46 PM
To: 'jackie@tilth.org'
Cc: Andrew Black (andrewblack@tilth.org)
Subject: FW: U.S. Department of Agriculture bell pepper shipment

Andrew, please forward to Jackie Sleeper if I have gotten the wrong email address.

Jackie,

Here is a foreign agricultural contact person for Mexico. Please contact him directly and cc me, should you have an issue with the next shipment.

Eduardo Lozano Carreño
Agricultural Specialist
USDA/ATO-Monterrey
(52)81-8047-3318
Eduardo.Lozano@fas.usda.gov

Many thanks!

Tammie B. Wilburn
Compliance and Enforcement Division
National Organic Program, USDA
202-690-2624
<http://www.ams.usda.gov/AMSV1.0/NOP>

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From: Lozano, Eduardo F [mailto:Eduardo.Lozano@fas.usda.gov]
Sent: Friday, November 14, 2014 9:32 AM
To: Wilburn, Tammie - AMS
Cc: Manuel Velazquez; Murphy, Ann - FAS
Subject: RE: U.S. Department of Agriculture bell pepper shipment

Dear Ms. Wilburn,
I am trying to reach you to talk about your bell pepper issue.
Were the bell peppers exported from the U.S. to Mexico or from Mexico to the U.S.? Can you please call me at 52-81-8047-3318?

From: Wilburn, Tammie - AMS [mailto:Tammie.Wilburn@ams.usda.gov]
Sent: Wednesday, November 12, 2014 5:32 PM

To: Lozano, Eduardo F

Subject: FW: U.S. Department of Agriculture bell pepper shipment

Mr. Lozano:

Juan Manuel Velazquez referred me to you. My name is Tammie Wilburn and I work with the National Organic Program, AMS, U.S. Department of Agriculture. We are studying peppers from Mexico under the USDA organic regulations. We have an APHIS permit to release bell pepper shipments from Mexico into the United States. One of our sweet bell pepper shipments was recently denied at the Mexican Customs Center in Mexico City. It seems they were denied because they were believed to be chile peppers and prohibited for export. I believe this is a mistake as sweet bell peppers are distinctly different from chile peppers.

We would like to attempt sending the peppers again as soon as possible. The boxes currently are located in cold storage at the point of original departure at the producer's facility.

Can you offer any assistance with getting this shipment through? The DHL tracking information and photos of the sample are attached. The client is:

Agroproductos del Cabo
Carr. Transpen. KM 125.5
Manadero, Ensenada, Baja California Norte, Mexico
CP 22790

Many thanks in advance,

Tammie B. Wilburn, Compliance Officer
Compliance and Enforcement Division
National Organic Program, AMS, USDA
202-690-2624

Sole, Dupe - AMS

From: Wilburn, Tammie - AMS
Sent: Tuesday, September 16, 2014 3:21 PM
To: 'Connie Karr'
Cc: Michael, Matthew - AMS
Subject: RE: Inspections of organic pepper operations

This looks fine Connie. Please continue with your plan of inspections. Feel free to contact us should you have questions.

Regards,

Tammie B. Wilburn
Compliance and Enforcement Division
National Organic Program, USDA
202-690-2624

From: Connie Karr [mailto:connie@tilth.org]
Sent: Thursday, September 11, 2014 5:56 PM
To: Wilburn, Tammie - AMS
Subject: Re: Inspections of organic pepper operations

Dear Tammie,

Please see attached OTCO plan for testing of Bell Peppers from Mexico. The testing will occur over a period of time appropriate to the microclimate of the region of Mexico.

Please let me know if you have any questions. Once reviewed please confirm this is an acceptable plan so that OTCO may proceed.

.....
Connie Karr » *Certification Director*

Oregon Tilth 2525 SE 3rd Street, Corvallis, OR 97333

P 503-378-0690

C (b) (6)

F 541-753-4924

E connie@tilth.org

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On Sep 3, 2014, at 11:44 AM, Wilburn, Tammie - AMS <Tammie.Wilburn@ams.usda.gov> wrote:

Certifiers:

On August 26, 2014, we requested you validate our data for organic pepper producers and handlers certified by you, and provide a plan of conducting unannounced inspections of these operations. To assist in your inspections, please limit the type pepper to organic **bell pepper** producers and handlers only. Please also use the attached list of pesticide/insecticide type found on exported bell peppers, as necessary.

Feel free to contact me should you have other questions.

Regards,

Tammie B. Wilburn
Compliance and Enforcement Division
National Organic Program, USDA
202-690-2624

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Sole, Dupe - AMS

From: Andrew Black <andrewblack@tilth.org>
Sent: Wednesday, January 21, 2015 11:46 AM
To: Wilburn, Tammie - AMS
Subject: Re: pepper sampling - question

Not yet, we are going to try again though.
Just wanted to make sure we can get copies of the test results for our records.
Thanks
Andrew

On Jan 21, 2015, at 8:13 AM, "Wilburn, Tammie - AMS" <Tammie.Wilburn@ams.usda.gov> wrote:

Hi Andrew,

My apologies for the delay in answering your question. The lab sends the results to me and I will forward OTCO only results on to you. Sounds like you were able to get the shipments in?

Tammie

From: Andrew Black [mailto:andrewblack@[tilth.org](mailto:andrewblack@tilth.org)]
Sent: Wednesday, January 14, 2015 5:19 PM
To: Wilburn, Tammie - AMS
Subject: pepper sampling - question

Hello,
Tammie, will be able to get the test results back from the USDA Lab for the pepper samples?
Thanks
Andrew

.....
Andrew Black » *Latin American Specialist*

Oregon Tilth 2525 SE 3rd Street, Corvallis, OR 97333

P 503-378-0690

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E andrewblack@tilth.org

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Andrew Black » *Latin American Specialist*

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Sole, Dupe - AMS

From: Andrew Black <andrewblack@tilth.org>
Sent: Monday, December 22, 2014 6:27 PM
To: Wilburn, Tammie - AMS
Subject: Re: Pepper Sampling

Follow Up Flag: Follow up
Flag Status: Flagged

Hello,
We had to throw out the samples that were denied at the border. I never got a straight answer about why the peppers were denied.
I remain unsure if the Permit will work.
Our next round of sampling will not occur until 2015.
Andrew

On Dec 17, 2014, at 12:44 PM, "Wilburn, Tammie - AMS" <Tammie.Wilburn@ams.usda.gov> wrote:

Hi Andrew:
Please provide an update on this issue. Are your shipments coming in ok now?
Tammie

From: Andrew Black [mailto:andrewblack@tilth.org]
Sent: Monday, November 17, 2014 10:45 AM
To: Wilburn, Tammie - AMS
Subject: Pepper Sampling

Hello Tammie,

Oregon Tilth normally uses Pacific Agricultural Lab in Portland, Oregon for shipping samples from Mexico to the USA. I compared the export permit we normally use with the permit you sent us to use for the samples to be sent to the USDA lab, and noticed that the titles are different. Our permit says, "Permit to Import Prohibited Material For Research Purposes", while the USDA permit says, "Permit to Import Plants and Plant Products".
The USDA import permit was not accepted for the bell peppers, maybe because the title didn't include the word "prohibited"?

I only mention this detail so that perhaps the issue with the USDA permit can be remedied so further samples don't get denied by customs.

Thanks,
Andrew

Andrew Black >> *Latin American Specialist*

Oregon Tilth 2525 SE 3rd Street, Corvallis, OR 97333

P 503-378-0690

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F 541-753-4924

E andrewblack@tilth.org

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Sole, Dupe - AMS

From: Wilburn, Tammie - AMS
Sent: Tuesday, September 16, 2014 3:21 PM
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Cc: Michael, Matthew - AMS
Subject: RE: Inspections of organic pepper operations

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Regards,

Tammie B. Wilburn
Compliance and Enforcement Division
National Organic Program, USDA
202-690-2624

From: Connie Karr [mailto:connie@tilth.org]
Sent: Thursday, September 11, 2014 5:56 PM
To: Wilburn, Tammie - AMS
Subject: Re: Inspections of organic pepper operations

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Connie Karr » Certification Director

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On August 26, 2014, we requested you validate our data for organic pepper producers and handlers certified by you, and provide a plan of conducting unannounced inspections of these operations. To assist in your inspections, please limit the type pepper to organic **bell pepper** producers and handlers only. Please also use the attached list of pesticide/insecticide type found on exported bell peppers, as necessary.

Feel free to contact me should you have other questions.

Regards,

Tammie B. Wilburn
Compliance and Enforcement Division
National Organic Program, USDA
202-690-2624

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Sole, Dupe - AMS

From: Wilburn, Tammie - AMS
Sent: Thursday, November 6, 2014 4:16 PM
To: 'Josie Quevedo'; Michael, Matthew - AMS
Cc: PrimusOrganic
Subject: RE: Revised Response - Inspections of Organic Pepper Operations

Thank you Josie. The changes to your plan are fine. Feel free to contact me should have other questions or concerns.

Tammie
202-690-2624

From: Josie Quevedo [mailto:josie.quevedo@primuslabs.com]
Sent: Thursday, November 06, 2014 3:46 PM
To: Michael, Matthew - AMS
Cc: Wilburn, Tammie - AMS; PrimusOrganic
Subject: FW:Revised Response - Inspections of Organic Pepper Operations

Hello Matthew,

I hope all is well with you. Please find attached the revised response letter with some changes. The letter was originally sent on September 18, 2014.

The changes were made on paragraphs 3. and 5. Due to product availability. .

If you have any questions or concerns please feel free to contact us at Primusorganic@primuslabs.com .

Kind regards,



Josie Quevedo
Audit Coordinator
Josie.Quevedo@PrimusLabs.com

Voice 805.922.0055 | Fax 805.352.1364

PrimusLabs | 1259 Furukawa Way | Santa Maria, CA

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From: Josie Quevedo
Sent: Thursday, September 18, 2014 4:47 PM
To: 'matthew.michael@ams.usda.gov'
Cc: 'Tammie.Wilburn@ams.usda.gov'; PrimusOrganic; Brian Mansfield
Subject: Response - Inspections of Organic Pepper Operations

September 18, 2014

Matthew Michael
Director, Compliance & Enforcement Division
National Organic Program
1400 Independence Avenue, S.W. Room 2648-S, Stop 0268, Washington D.C. 20250-0268

RE: Inspection of Organic Pepper Operations, issued on August 27th, 2014 (received September 16th, 2014).

Dear Mr. Michael:

PrimusLabs received Tammie Wilburn's e-mail September 16, 2014 with your letter dated Aug 27th, 2014 with the request to cooperate with an open investigation. Specifically, PrimusLabs has been asked to conduct unannounced inspections and sampling of several certified operations by PrimusLabs in Mexico that have bell peppers listed in their certificate.

PrimusLabs has immediately started the actions to comply with this §205.403 request as follows:

1. The Audit Admin Department updated the list of operations in Mexico. As of today, have peppers listed in their crop or handling certificates. (Attachment list on page 3).
2. PrimusLabs will contact its clients in Mexico to verify which crops are currently standing in their fields in order to identify more precisely if the certified peppers are still being grown at this time of year.
3. Staff inspector Evelyn Ramírez will conduct these unannounced inspections and sampling.
4. PrimusLabs will contact Roger Simonds at the National Science Laboratory to get more clear instructions on how to take and ship the samples from Mexico into the U.S. both in terms of packing and shipping procedures as well as any entry permit needed.
5. PrimusLabs is preparing the schedule to conduct the unannounced inspections and sampling (NOP 2609) between October 10th to 25th, 2014.
6. Each farm's unannounced inspection will be allocated one full day of inspection. This will allow the following inspection approach/plan:
 - a) Verifying the Organic System Plan.
 - b) List of certified crops and maps with actual fields throughout physical observation.
 - c) Match OSP acreage and estimated yields.
 - d) Sample peppers and prepare sample for shipping including all necessary paperwork and chain of custody.
 - e) Verify input application records for last quarter, match with input inventory movements, and input purchase documentation.
 - f) Conduct a verification of harvest and sales of the last quarter (exact time frame dependent on operator's inventory system). List all sales and volumes per date and destination
 - g) Conduct one trace back exercise randomly selecting one shipment.
 - h) Conduct an in-out mass balance. The "in" is product harvested (matching volumes with harvested acreage) and "out" is shipping or sales.

7. Each handler's unannounced inspection, if not part of a farm, will be allocated one full day of inspection as well. This will allow the following inspection approach/plan:

- a) Sample peppers (if any stored)
- b) Conduct a verification of purchase and sales of the last quarter (exact time frame dependent on operator's inventory system).
- c) List all sales and volumes per date and destination.
- d) List all purchases by certified farm (supplier) and volumes.
- e) Conduct one trace back exercise randomly selecting one shipment.
- f) Conduct an in-out mass balance. The "in" is product harvested (matching volumes with harvested acreage) and "out" is shipping or sales.

Do not hesitate to contact us if you have any questions.

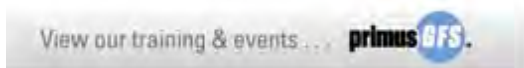


Josie Quevedo

Audit Coordinator

Josie.Quevedo@PrimusLabs.com

Voice 805.922.0055 | Fax 805.352.1364



PrimusLabs | 1259 Furukawa Way | Santa Maria, CA

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From: [Deanna Baldwin -MDA-](#)
To: [Wilburn, Tammie - AMS](#)
Cc: [Howley, JannaB - AMS](#)
Subject: Mexican Bell Peppers
Date: Tuesday, December 16, 2014 1:12:22 PM
Attachments: [Sources of bell peppers.docx](#)
[Pepper Products.xlsx](#)

Hello Tammy - I apologize for the delay in getting you informaton on the handlers we certify that may handle organic Bell Peppers originating from Mexico. Research of our files indicated three handlers we certifiy could potentially have purchased organic bell peppers that originated from Mexico. Prime Cuts and Lancaster Foods purchase from different suppliers dependent on the growing season. I have attached a complete list of their suppliers of organic bell peppers. The third handler (b) (4) is supplied by the (b) (4) certified by QAI. I have included the complete info on this distributor in the attached list. I have also attached a spreadsheet with the products and labeled brand for each of these handlers. The spreadsheet also lists the potential source of bell peppers originating from Mexico. Please let me know if you need additional information or would like any further action from MDA.

--

Deanna Baldwin
Program Manager, Food Quality Assurance
Maryland Department of Agriculture
50 Harry S. Truman Parkway
Annapolis, MD 21401
410-841-5769

<u>Operation</u>	<u>Scope</u>	<u>Location</u>	<u>Product</u>	<u>Last Inspected</u>	<u>Target Date for Unannounced and Sampling</u>	<u>Assigned Inspector</u>
Congeladora Ceuta SA de CV	Handling - IQF	Sinaloa, MX	Bell Peppers, Peppers (Poblano, Jalapeno)	1/10/2014	October, 2014	CH
Heaven Sent Organic S de RL de CV	Crop	Baja Norte, MX	Peppers, Mini Bell, Anaheim, Jalapeno, Serran	2/22/2014	October, 2014	EKS
Impulsora a Stiba (Agricola Organics)	Crop & Handling	Queretaro, MX	Bell Peppers, Peppers (Poblano, Jalapeno)	Assigned Now	October, 2014	CH
Natra Bay SA de CV	Crop & Handling	Loreto, MX	Peppers, Mixed	8/19/2014	October, 2014	EKS
Organic Farm S de PR de RL	Crop & Handling	Todos Santos, MX	Bell Peppers	12/30/2013	October, 2014	EKS

Name	Mixed v. All Organic	City (where Bells were grown)	State	Region	Notes
(b) (4)	Mixed	Guaymas	Sonora	Northwest	
	Mixed	Huatabampo	Sonora	Northwest	
	Mixed	Ciudad Obregon	Sonora	Northwest	
	Mixed	Pesqueira	Sonora	Northwest	
	Mixed	Guasave	Sinaloa	Northwest	This operation only grows "mini" bell peppers.
	Mixed	Culiacan	Sinaloa	Northwest	
	All Organic	Vizcaino	Baja California Sur	Northwest	This operation only grows "mini" bell peppers.
	Mixed	Todos Santos	Baja California Sur	Northwest	
	Mixed	San Quintin	Baja California	Northwest	
	Mixed	Dolores Hidalgo	Guanajuato	Central West	
	Mixed	San Luis de la Paz	Guanajuato	Central West	



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December 09, 2014

By Email (Delivery Confirmation)

Reference #: 485007-14

Action Item #: 094515-14

Yessica Fabiola Gomez Hernandez
Agroproductos San Rafael S.A. de C.V. (al033)
Malecon Malpica #189-2 Col Centro [REDACTED]
Guaymas, SO 85400
MEXICO

(b) (6) [REDACTED] 622-224-4501

Cc: Jose Antonio Barriga [REDACTED]
(jbarriga@agroproductossanrafael.com), Santiago Zaragoza
Gaxiola (szaragoza@agroproductossanrafael.com)

RE: Notice of Noncompliance – Response Required

Dear Yessica Fabiola Gomez Hernandez,

CCOF Certification Services has completed a review of your operation's 2014 sampling inspection, conducted by Luis Guillermo Lopez Moreno on November 12, 2014, for compliance to the USDA National Organic Program (NOP) standards. We have determined that your operation does not appear to be in compliance at this time. Therefore, we are issuing this Notice of Noncompliance pursuant to NOP § 205.662(a).

CCOF has received the results of pesticide residue testing performed on product samples collected from your operation. The results of the testing are as follows:

Date Collected: November 12, 2014

Product Sampled: Bell Peppers

Sample ID: 111214LL02

Location of Sample: Lote Azul Marino (CCOF parcel #01)

Pesticide	Amount detected	NOP Threshold	EPA Tolerance
Carbendazim (MBC)	0.006	0.01	None (Not registered for use in the US)
Cypermethrin	0.015 Above the NOP Threshold	0.01	0.2

Date Collected: November 12, 2014

Product Sampled: Bell P [REDACTED]

Sample ID: 111214LL03

Location of Sample: Lote Azul Rey (CCOF parcel #03)

Pesticide	Amount detected	NOP Threshold	EPA Tolerance
Imidacloprid	0.001	1.0	0.05
Fipronil	0.044 Above the NOP Threshold.	0.01	None (Not registered for use on bell peppers)
Chlorantraniliprole	0.047	0.07	1.4
Cyromazine	0.061 Above the	0.05	1.0



	NOP Threshold.		
Carbendazim (MBC)	0.195 Above the NOP Threshold.	0.01	None. (Not registered for use on bell peppers)

Because your product was found to have residues at levels greater than 5% of the EPA tolerance, per National Organic Program (NOP) regulation 205.671, **this product and any other products grown at the affected location are excluded from organic sale and therefore may not be sold as organic, effective immediately.** Please provide verification that you have stopped selling all products from these locations, Field Azul Marino and field Azul Rey (greenhouse), as organic.

Please submit the information requested on the following pages by December 29, 2014.

If you are unable to provide the information requested by this date, you must submit written notification as to the reason, or we may propose suspension or revocation of certification of your operation as outlined in NOP § 205.662 and charge a late fee per the CCOF Certification Services Program Manual. An additional inspection may be required to verify compliance at your expense.

You may send your response to the CCOF office via email (inbox@ccof.org), fax, or mail. After these issues are resolved, CCOF will issue new certificates to your operation if you have not already received them.

- You may surrender your certification at any time by written notification to CCOF Certification Services. *NOP § 205.404(c)*
- All fees are non-refundable, and you are responsible for all costs of services provided up to the time of your withdrawal. *NOP § 205.402(c)*
- If you surrender your certification and apply to another certification agency, you will be required to provide this Notice of Noncompliance and a description of the actions taken to correct the noncompliances with your application. *NOP § 205.401(c)*

We appreciate your participation in the CCOF Organic Certification Program.

Sincerely,

April Crittenden
Senior Quality & Compliance Supervisor
CCOF Certification Services, LLC

Encl: Noncompliance Action Items, sample results

CC: NOP Administrator via NOPACAAdverseActions@ams.usda.gov



NONCOMPLIANCE ACTION ITEMS:

The reason for the Notice of Noncompliance is that you have failed to comply with the section(s) of the NOP regulations noted below. Respond to the following by December 29, 2014. Keep a copy of your response for your records.

1. Stop selling bell peppers from your fields, Lote Azul Marino(CCOF #01) and Lote Azul Rey (greenhouse, CCOF parcel #03), as organic.

Because your product was found to have residues at levels greater than 5% of the EPA tolerance, per National Organic Program (NOP) regulation 205.671, **this product and any other products grown at the affected locations may not be sold as organic effective immediately. Send CCOF the following:**

- a. Confirm in writing that you have stopped selling all products from these locations as organic.
- b. Provide the quantity of bell peppers harvested and sold so far from these locations for the 2014 crop cycle.
- c. Estimate the quantity of bell peppers at this location that remain to be harvested; include any inventory you have in cold storage on-site.

You may only begin selling crop from these fields as organic once there are no residues or residues are under 5% of the EPA tolerance, unless it is found that the cause was from direct application. If the residues are found to be from a direct application, then the crop must continue to be excluded from organic sale regardless of the level found. CCOF will notify you when and if you are approved to begin selling organic product from this location.

NOP § 205.671

2. Provide the following information regarding the source of the contamination on bell peppers grown in your fields:

- a. Identify any and all management practices and implementation of your organic system plan that may have resulted in the materials present.
- b. A description of the material application practices used adjacent to the fields and surrounding parcels #01 and #03. Please determine whether prohibited materials are used anywhere adjacent to this location, and if so, how and when applications are made (i.e., time of day/season, use of spray rig/backpack sprayer/airplane, etc). Contact neighboring land managers as needed to obtain this information.
- c. Clarify whether you use any of the detected pesticides for any purpose.
- d. Any additional information on the possible source of the contamination.

NOP § 205.202(c); 205.400(f)

3. Submit harvest and sales records that show all bell peppers are sold as nonorganic from the date of receipt of this letter.

Bell Peppers grown on parcel #01 and parcel #03 are not eligible for sale as organic. CCOF must verify that these peppers are not represented as organic in any way. Provide these documents to CCOF as they are generated throughout the rest of this bell pepper production cycle or until otherwise instructed by CCOF. Records must be sufficient to track product back to the field and must include date of harvest, amount harvested, date of sale, crop, and amount sold and must be kept for a minimum of five years.

NOP § 205.103

4. Provide the following information regarding current and future organic bell pepper production on your operation:

- a. The location/parcel name for all bell peppers planned or currently growing for the 2014-2015 season.



- b. Provide the expected harvest dates for all planned or current bell pepper production. Based on the results found on samples taken at CCOF parcels 01 and 03, and depending on the probable cause of contamination, your current remaining and future organic bell pepper production may be subject to unannounced visits pre or post harvest, which may include sampling to ensure compliance with the NOP regulations.

NOP § 205.201; 205.670; 205.671

Send your response to CCOF by December 29, 2014 to avoid further adverse actions.

We want to help you resolve these issues quickly. Please contact us with any questions.

Organic System Plan (OSP) documents are available at: www.ccof.org/documents

The NOP Standards are available at: www.ccof.org/clients/standards

Your inspection report is available at MyCCOF. If you would like a paper copy, contact the CCOF Home Office.

Questions? Contact your Certification Service Specialist:

Stephanie Stenner

sstenner@ccof.org: Se habla español

831-423-2263 Ext. 82



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September 08, 2014

Miles McEvoy
National Organic Program (NOP) [REDACTED]
Room 2646-So. (Stop 0268), 1400 Independence
Washington, DC 202250-0268

RE: Inspections of Organic Bell Pepper Operations

Dear Miles McEvoy; [REDACTED]

Thank you for the opportunity to participate in addressing this important issue. CCOF is dedicated to upholding and enforcing organic integrity. We are addressing this matter with the utmost seriousness. In addition to the specific requests contained in your notification of August 26, 2014, CCOF is focusing our enforcement and investigative priorities on imported bell peppers as a high risk item within CCOF's internal risk analysis system. As a result we will focus additional discretionary unannounced and announced inspections and sampling on imported bell peppers certified by CCOF within the supply chain generally.

Further, we encourage the NOP to share this plan and approach with other certifiers involved to allow them the opportunity to contribute to an optimal outcome.

Please see below regarding the NOP's specific requests:

CCOF list of Organic Bell Pepper Operations

- CCOF updated the list of our certified operations that are producing organic bell peppers in Mexico (enclosed). This list also includes operations that have produced bell peppers during the 2012-2013 growing season, but that are not producing them at this time.
- This list includes the operations that produce "mini" bell peppers.

Inspection Plan

- CCOF will conduct unannounced onsite inspections that include sampling of the operations on the enclosed list that are engaged in bell pepper production. The NOP will confirm whether the mini bell pepper producers should be included, as well.
- CCOF will conduct these inspections of producers when they are growing and harvesting bell peppers during the next growing season, which lasts from late fall through winter (2 [REDACTED] would like to begin inspecting producers as soon as the next pepper production cycle starts, which may be as [REDACTED] as October or November, 2014. However, we will focus the timing of our sampling during the peak of the pepper production season, which is likely to occur after January 1, 2015.
- We will continue to research when the height of the growing season is and when the peppers are most likely to be sprayed. When we have more specific information as to when the height of the growing season will likely be for the upcoming season, we will target our inspections during this timeframe. CCOF is currently researching the materials from the NOP's list of pesticides/insecticides found on bell peppers to help us better



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understand their use, prevalence and other information that will support focusing our investigation. If appropriate, we will share this analysis.

- CCOF will include audit trails and product in/product out audits as a component of all of these inspections whenever possible [REDACTED]
- We are recognizing imported bell peppers, particularly from Mexico, as one of our highest risks. As such, we plan to include handlers of this commodity in the United States as part of our unannounced inspections, sampling, and other investigative measures. We will conduct unannounced onsite inspections that include sampling within our existing group of CCOF certified handler operations in the United States that sell bell peppers from Mexico. Alternatively, sampling of bell peppers may also occur during standard annual inspections. Those inspections will be targeted to occur soon after the sale of bell peppers from Mexico begins. In all cases, whenever possible, all samples will be collected with thorough audit trail information to support follow-up if necessary. It is likely that CCOF will implement some of these inspections early in the production season and require rush turnaround from our lab to provide greater insight into subsequent inspections by CCOF or others.
- We would like to take 20-40 samples total. This range allows for composite samples and samples of operations involved elsewhere in the supply chain. CCOF would like the option to send all samples from the enclosed list of operations to Gastonia Lab at the NOP's expense. We approximate the number of samples will be 11-20 (at least one test per operation in Mexico), however we would like the option to send additional samples if the Gastonia protocols and turnaround time meet CCOF's investigative needs. Otherwise, CCOF may use our own lab for rapid early investigation turnaround time, particularly for samples of US handlers certified by CCOF.

CCOF believes strongly in the role and importance of unannounced inspections. In fact, we advocated for the NOP's guidance in this regard addressing both protocols and minimum numbers to be performed by certifiers. As a general rule, CCOF will not operate in any area where our organization cannot afford or logistically complete unannounced inspections. In this case, the NOP's request is significant and vague as the sampling protocols utilized do not appear to provide substantive information to allow a more focused utilization of resources. As a result the NOP's sampling request creates an extreme challenge and broad investigative request.

In Mexico, unannounced inspections can be quite costly as they do not always work out as planned. At this point, we expect these inspections and sample shipment costs, in Mexico alone, to range between (b) (4) [REDACTED] in personnel, travel and other costs, not including sampling expenses. CCOF will likely expend an additional (b) (4) [REDACTED] on domestic efforts. This is approximately a full year's budgeted resources for unannounced inspections. CCOF has no intention of side stepping any responsibilities but this unexpected additional expense could force CCOF to reduce efforts in other areas of CCOF's organic certification program. Therefore, based on the broadness of the investigation and significant costs associated with it, CCOF asks that the NOP consider offsetting these costs so that CCOF's other far [REDACTED] or unannounced inspection efforts are not hindered [REDACTED]



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CCOF appreciates the opportunity to participate in investigations. We recognize the importance of our role in this regard. Please let us know if we can answer any questions about the inspection plan or the enclosed list.

Respectfully,

[Redacted signature]

Jake Lewin

President

CCOF Certification Services, LLC

[Redacted address line]

Encl: CCOF certified operations in Mexico producing bell peppers

[Redacted address line]

Refer to correspondence number: 465107-14

[Redacted signature]

[Redacted signature]

[Redacted signature]

[Redacted signature]

[Redacted signature]



From: [Kelly Lehman Goswamy](#)
To: [Wilburn, Tammie - AMS](#)
Cc: [Jake Lewin](#); [Michael, Matthew - AMS](#)
Subject: RE: CCOF inspections of organic pepper operations
Date: Tuesday, September 2, 2014 7:43:03 PM

Thank you Tammie.

Kelly Lehman Goswamy

Associate Quality System Manager
CCOF Certification Services, LLC
2155 Delaware Ave., Suite 150
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(831) 423-2263, ext. 28
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From: Wilburn, Tammie - AMS [mailto:Tammie.Wilburn@ams.usda.gov]
Sent: Tuesday, September 02, 2014 12:59 PM
To: Kelly Lehman Goswamy
Cc: Jake Lewin; Michael, Matthew - AMS
Subject: RE: CCOF inspections of organic pepper operations

Hi Kelly & Jake:

Attached is a listing of pesticides/insecticides found on exported bell peppers to Mexico. Please let me know if you need anything else.

Best,

Tammie B. Wilburn
Compliance and Enforcement Division
National Organic Program, USDA
202-690-2624

From: Kelly Lehman Goswamy [<mailto:kelly@ccof.org>]
Sent: Thursday, August 28, 2014 4:10 PM
To: Wilburn, Tammie - AMS
Cc: Jake Lewin
Subject: RE: CCOF inspections of organic pepper operationsHi

Thank you Tammi.

Best,

Kelly Lehman Goswamy

Associate Quality System Manager
CCOF Certification Services, LLC
2155 Delaware Ave., Suite 150
Santa Cruz, CA 95060
(831) 423-2263, ext. 28
fax (831) 423-4528

kelly@ccof.org

www.ccof.org

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From: Wilburn, Tammie - AMS [<mailto:Tammie.Wilburn@ams.usda.gov>]
Sent: Thursday, August 28, 2014 12:32 PM
To: Kelly Lehman Goswamy
Cc: Jake Lewin
Subject: RE: CCOF inspections of organic pepper operations

We are focusing on bell peppers only. I am going to send you a separate email listing all of pesticides/insecticides found. Will try to get to by tomorrow noon.

From: Kelly Lehman Goswamy [<mailto:kelly@ccof.org>]
Sent: Thursday, August 28, 2014 2:22 PM
To: Wilburn, Tammie - AMS
Cc: Jake Lewin
Subject: CCOF inspections of organic pepper operations

Hello Tammi,

We are reviewing the NOP's letter dated August 26, 2014 regarding the inspection of organic pepper producers and handlers in Mexico. Does the NOP want a current list of all operations in Mexico growing **any** type of pepper, or can we specify the search to a **particular** type of pepper?

Thank you,

Kelly Lehman Goswamy

Associate Quality System Manager

CCOF Certification Services, LLC

2155 Delaware Ave., Suite 150

Santa Cruz, CA 95060

[\(831\) 423-2263](tel:(831)423-2263), ext. 28

fax [\(831\) 423-4528](tel:(831)423-4528)

kelly@ccof.org

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From: [Kelly Lehman Goswamy](#)
To: [Wilburn, Tammie - AMS](#)
Subject: RE: CCOF request to test more samples
Date: Friday, January 30, 2015 2:36:51 PM

Yes, that is correct.

Best,

Kelly Lehman Goswamy
Associate Quality System Manager
CCOF Certification Services, LLC
2155 Delaware Ave., Suite 150
Santa Cruz, CA 95060
(831) 423-2263, ext. 28
fax (831) 423-4528
kelly@ccof.org
www.ccof.org
Visit CCOF on [Facebook](#) and [Twitter](#)

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From: Wilburn, Tammie - AMS [mailto:Tammie.Wilburn@ams.usda.gov]
Sent: Friday, January 30, 2015 11:33 AM
To: Kelly Lehman Goswamy
Subject: RE: CCOF request to test more samples

Kelly I assume that these ops are all handlers with the exception of Negocio Agricola San Enrique & Union de Productores de Guanajuato?

From: Kelly Lehman Goswamy [mailto:kelly@ccof.org]
Sent: Thursday, January 29, 2015 6:49 PM
To: Wilburn, Tammie - AMS
Subject: RE: CCOF request to test more samples

Hello Tammie,

We have a list of operations that we plan on sampling at, and would like to send these samples to Gastonia. Where dates have been solidified, I included them. Where we have an estimated date range for completion that's noted too. Please let me know if you have any questions about this list.

Operation Name	Inspection Date/Plan
(b) (4)	1.30.15
	1.30.15
	Feb or Mar
	Late Feb
	Late Feb

(b) (4)

Mar
Feb or Mar
Feb or Mar

Best,

Kelly Lehman Goswamy

Associate Quality System Manager

CCOF Certification Services, LLC

2155 Delaware Ave., Suite 150

Santa Cruz, CA 95060

[\(831\) 423-2263](tel:(831)423-2263), ext. 28

fax [\(831\) 423-4528](tel:(831)423-4528)

kelly@ccof.org

www.ccof.org

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From: Wilburn, Tammie - AMS [<mailto:Tammie.Wilburn@ams.usda.gov>]

Sent: Thursday, January 22, 2015 1:37 PM

To: Kelly Lehman Goswamy

Subject: RE: CCOF request to test more samples

Ok to send more samples. Please send me the names of the operations and dates you plan to visit.

From: Kelly Lehman Goswamy [<mailto:kelly@ccof.org>]

Sent: Wednesday, January 14, 2015 12:59 PM

To: Wilburn, Tammie - AMS; Sean Feder

Cc: Michael, Matthew - AMS; Lewin Jake-FASConatct

Subject: RE: COC for AMS 1563, AMS 1827 and AMS

Hi Tammie,

We'd like to send about 6-12 more samples to Gastonia. We have sent 17 samples to Gastonia thus far. This total does not include 3 conventional samples that we sent to Gastonia where we did not receive results. We believe these three conventional samples were cancelled by your lab.

We have identified additional handlers in the US that we would also like to sample, in addition to some re-sampling of producers in Mexico from the list submitted that did not have any bell peppers growing at the time of our first visit, but who have indicated they plan on growing bells in early 2015.

Apologies for the late reply. Let me know if you have any questions.

Best,

Kelly Lehman Goswamy

Associate Quality System Manager
CCOF Certification Services, LLC
2155 Delaware Ave., Suite 150
Santa Cruz, CA 95060

[\(831\) 423-2263](tel:(831)423-2263), ext. 28

fax [\(831\) 423-4528](tel:(831)423-4528)

kelly@ccof.org

www.ccof.org

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*Happy Holidays! CCOF is closed December 24-26 and January 1-2. **Please allow additional time for processing of requests.***

From: Wilburn, Tammie - AMS [<mailto:Tammie.Wilburn@ams.usda.gov>]

Sent: Wednesday, December 17, 2014 1:05 PM

To: Kelly Lehman Goswamy; Sean Feder

Cc: Michael, Matthew - AMS

Subject: RE: COC for AMS 1563, AMS 1827 and AMS

Hi Kelley,

I will check into this. Will the additional samples be for the operations already listed on your plan? Or, are you expanding the list to possibly include handlers?

Thanks,

Tammie

From: Kelly Lehman Goswamy [<mailto:kelly@ccof.org>]

Sent: Wednesday, December 17, 2014 3:55 PM

To: Wilburn, Tammie - AMS; Sean Feder

Subject: RE: COC for AMS 1563, AMS 1827 and AMS

Hi Tammie,

As of Monday, December 15, CCOF has sent 16 samples to Gastonia. We understand the NOP has approved our investigative plan of sending a total of 20 samples to your lab. It looks like we may end up needing to send more than 20 samples, and we'd like permission to send more than 20 samples to the NOP's lab. Is this possible?

Best,

Kelly Lehman Goswamy

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From: Wilburn, Tammie - AMS [<mailto:Tammie.Wilburn@ams.usda.gov>]

Sent: Friday, December 12, 2014 9:09 AM

To: Sean Feder

Cc: Kelly Lehman Goswamy

Subject: RE: COC for AMS 1563, AMS 1827 and AMS

Ok thanks Sean.

From: Sean Feder [<mailto:sean@ccof.org>]

Sent: Friday, December 12, 2014 12:09 PM

To: Wilburn, Tammie - AMS

Cc: Kelly Lehman Goswamy

Subject: RE: COC for AMS 1563, AMS 1827 and AMS

Tammie,

Thank you so much.

I am referring your question about total samples to Kelly, who has that tally.

Best,

Sean Feder

Director of Inspection Operations
CCOF Certification Services, LLC
2155 Delaware Ave., Suite 150
Santa Cruz, CA 95060
(530) 756-8518, ext. 111

sean@ccof.org

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From: Wilburn, Tammie - AMS [<mailto:Tammie.Wilburn@ams.usda.gov>]

Sent: Thursday, December 11, 2014 9:24 AM

To: Sean Feder

Subject: COC for AMS 1563, AMS 1827 and AMS

Attached are copies of the chain of custody for AMS 1563, 1827, 1828, 1829 and 03392. Three samples were noted on one form. Can you confirm Sean that, to date, a total of 12 samples have been tested by Gastonia for CCOF and that CCOF will send eight more samples in for testing.

Tammie
202-690-2624

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From: [Kelly Lehman Goswamy](#)
To: [Wilburn, Tammie - AMS](#)
Subject: RE: CCOF sample results and other questions
Date: Thursday, March 5, 2015 7:22:28 PM
Attachments: [COCs for 013015JT 1-4.pdf](#)
[Inspection - Report Addendum 3 COC SAN RAFAEL.pdf 03_05_2015.pdf](#)

Hi Tammie,

Attached are the Chains of Custody for the 4 samples taken at Veritable Vegetable, and for the 1 sample take at Agroproductos San Rafael.

Best,

Kelly Lehman Goswamy

Associate Quality System Manager

CCOF Certification Services, LLC

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From: Wilburn, Tammie - AMS [<mailto:Tammie.Wilburn@ams.usda.gov>]
Sent: Thursday, March 05, 2015 1:05 PM
To: Kelly Lehman Goswamy
Subject: RE: CCOF sample results and other questions

Sounds good, thanks Kelly.

From: Kelly Lehman Goswamy [<mailto:kelly@ccof.org>]
Sent: Thursday, March 05, 2015 4:04 PM
To: Wilburn, Tammie - AMS
Subject: RE: CCOF sample results and other questions

Hi Tammie,

2pm your time tomorrow works for me. I'll be working remotely from home, so it's easier for me to call you if you don't mind.

I'll assemble the rest of the information requested below asap.

Best,

Kelly Lehman Goswamy

Associate Quality System Manager

CCOF Certification Services, LLC

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fax (831) 423-4528

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From: Wilburn, Tammie - AMS [<mailto:Tammie.Wilburn@ams.usda.gov>]**Sent:** Thursday, March 05, 2015 11:18 AM**To:** Kelly Lehman Goswamy**Subject:** RE: CCOF sample results and other questions

Hi Kelly,

Thanks so much for following up. Let's talk tomorrow re: getting the folders to me using other means. How is 2pm my time?

Please provide the Chain of Custody forms for your outstanding samples so I can follow up with the lab.

We will follow-up with Primus re: (b) (4) . Would you also please provide documentation linking Covilli to the sample?

Tammie

From: Kelly Lehman Goswamy [<mailto:kelly@ccof.org>]**Sent:** Thursday, March 05, 2015 1:49 PM**To:** Wilburn, Tammie - AMS**Subject:** CCOF sample results and other questions

Hello Tammie,

I'm following up on some CCOF sample results that are outstanding, and some additional questions.

The sample results we are waiting for from NSL are as follows:

- Veritable Vegetable –Sample Inspection 1/30/2015 CCOF sample ID#s 013015JT1, 013015JT2, 013015JT3, 013015JT4
- Agroproductos San Rafael – Sample Inspection 1/23/2015 CCOF sample ID# 012315LL01

If you would like us to forward you the Chain of Custody forms for these samples, please let me

know.

We also were able to trace back one of the positives that we sampled at a handler operation CCOF certifies, (b) (4) TX dba (b) (4) is a service provider only and the peppers sampled were incoming product that had not yet been handled by our client. (b) (4) was able to provide us with full trace back to the grower, (b) (4) (certified by Primus).

Would the NOP like to notify the certifier of these positive results, or would you like CCOF to notify them? I am happy to provide any documentation the NOP needs.

We also are aware that the NOP still needs folders of each operation we've investigated so far. I'd like to talk to you about my thoughts on how to try providing this to you since Dropbox is not an option. **Do you have any time today or tomorrow to talk briefly?**

Best,

Kelly Lehman Goswamy

Associate Quality System Manager

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United States Department of Agriculture Agricultural Marketing Service Science & Technology Laboratory Division Ship to: National Science Laboratory 801 Summit Crossing Place, Suite B Gastonia, NC 28054 (704) 867-3873 c/o Jonathan Barber	FRM - 24	
	FORM: AMS-S&T-LD Information Form For NOP Sample	
	Revision: 03	Replaces: 02 (09/28/2010)
	Effective: 07/29/2013	Pages 1 of 1
	Owner: <i>Chemistry Residue</i>	Approved by: <i>Lab Management</i>

1. Sample Identification Information

Collection date			Collector initials	Commodity Code (Organic Bell Pepper - BP)	USDA Organic Shield? (Y/N)
year	month	day			
<i>2015</i>	<i>01</i>	<i>30</i>	<i>JT</i>	<i>BP MINI BELL PEPPER MEDLEY</i>	<i>NO</i>
Comments/Explanation: Put CCOF Sample ID here: <i>013015JT1 - 1 BAG</i>					

2. Sample Type/Commodity Information

Origin:	<input type="checkbox"/> Domestic	<input checked="" type="checkbox"/> Imported	If Imported, Country of Origin	<i>MEXICO</i>
<i>(b) (4)</i>	<i>/pound</i>	Est. Weight:	<i>3 POUNDS</i>	Variety: <i>ORG. MINI BELL PEPPER MEDLEY</i>
Certification Agency Collecting Sample: CCOF				

3. Collection Site Information

Collection Facility:	<i>(b) (4)</i>
Address:	<i>(b) (4)</i>
City:	<i>(b) (4)</i>
Lot # or any other identification # on the box (if available): <i>NONE</i>	
Certified Organic Handler:	<i>(b) (4)</i>
Certified Organic Producer:	<i>(b) (4)</i>
Comments/Explanation:	

4. Shipping Information

Collector's Name:	<i>JOHN R. TRINTER</i>	
Signature:	<i>John R. Trinter</i>	Ship Date: <i>4/2/15</i>

5. Sample Receipt in Laboratory

Date Received: _____	Received By (initials): _____	Based on Condition Upon Arrival, Will the Sample be Analyzed? (Y/N) _____
If Not Analyzed, Why? _____	Rotten ___ Bruised ___ Miscoded ___ Other (Describe) _____	
Comments/Explanation: _____	No. of Units in Sample: _____	
Color of Sample: _____		

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	Effective: 07/29/2013	Pages 1 of 1
	Owner: <i>Chemistry Residue</i>	Approved by: <i>Lab Management</i>

1. Sample Identification Information

Collection date			Collector initials	Commodity Code (Organic Bell Pepper - BP)	USDA Organic Shield? (Y/N)
year	month	day			
<i>2015</i>	<i>01</i>	<i>30</i>	<i>JT</i>	<i>BP YELLOW BELL</i>	<i>YES</i>
Comments/Explanation: Put CCOF Sample ID here: <i>013015JT2 - 2 BAGS</i>					

2. Sample Type/Commodity Information

Origin:	<input type="checkbox"/> Domestic	<input checked="" type="checkbox"/> Imported	If Imported, Country of Origin	<i>MEXICO</i>
<i>(b) (4)</i>	<i>1 POUND</i>	Est. Weight:	<i>3 POUNDS</i>	Variety: <i>ORG. YELLOW BELL CHOICE</i>
Certification Agency Collecting Sample: CCOF				

3. Collection Site Information

Collection Facility Name:	<i>(b) (4)</i>
Address:	<i>(b) (4)</i>
City:	<i>(b) (4)</i>
Lot # or any other identification # on the box (if available): <i>NONE</i>	
Certified Organic Handler:	<i>(b) (4)</i>
Certified Organic Producer:	<i>(b) (4)</i>
Comments/Explanation:	

4. Shipping Information

Collector's Name:	<i>JOHN R. TRINTER</i>	
Signature:	<i>John R. Trinter</i>	Ship Date: <i>4/2/15</i>

5. Sample Receipt in Laboratory

Date Received: _____	Received By (initials): _____	Based on Condition Upon Arrival, Will the Sample be Analyzed? (Y/N) _____
If Not Analyzed, Why? _____	Rotten ___ Bruised ___ Miscoded ___ Other (Describe) _____	
Comments/Explanation: _____	No. of Units in Sample: _____	
Color of Sample: _____		

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	FORM: AMS-S&T-LD Information Form For NOP Sample	
	Revision: 03	Replaces: 02 (09/28/2010)
	Effective: 07/29/2013	Pages 1 of 1
	Owner: <i>Chemistry Residue</i>	Approved by: <i>Lab Management</i>

1. Sample Identification Information

Collection date			Collector initials	Commodity Code (Organic Bell Pepper - <i>BP</i>)	USDA Organic Shield? (Y/N)
year	month	day			
<i>2015</i>	<i>01</i>	<i>30</i>	<i>JT</i>	<i>BP ORANGE BELL MEDIUM</i>	<i>Y/ES</i>
Comments/Explanation: Put CCOF Sample ID here: <i>013015JT3 -2 BAGS</i>					

2. Sample Type/Commodity Information

Origin:	<input type="checkbox"/> Domestic	<input checked="" type="checkbox"/> Imported	If Imported, Country of Origin	<i>MEXICO</i>
<i>(b) (4)</i>	<i>1 POUND</i>	Est. Weight:	<i>3 POUNDS</i>	Variety: <i>ORG. ORANGE BELL MEDIUM</i>
Certification Agency Collecting Sample: <i>CCOF</i>				

3. Collection Site Information

Collection	<i>(b) (4)</i>
Address:	<i>(b) (4)</i>
City:	<i>(b) (4)</i>
Lot # or any other identification # on the box (if available): <i>NONE</i>	
Certified Organic Handler:	<i>(b) (4)</i> <i>(CCOF)</i>
Certified Organic Producer:	<i>(b) (4)</i> <i>(CCOF)</i>
Comments/Explanation:	

4. Shipping Information

Collector's Name:	<i>JOHN R. TRINTERUD</i>	
Signature:	<i>John R. Trinterud</i>	Ship Date: <i>4/2/15</i>

5. Sample Receipt in Laboratory

Date Received:	Received By (initials):	Based on Condition Upon Arrival, Will the Sample be Analyzed? (Y/N)
If Not Analyzed, Why?	Rotten ___ Bruised ___ Miscoded ___ Other (Describe) _____	
Comments/Explanation:	No. of Units in Sample: _____	
Color of Sample:		

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	Effective: 07/29/2013	Pages 1 of 1
	Owner: <i>Chemistry Residue</i>	Approved by: <i>Lab Management</i>

1. Sample Identification Information

Collection date			Collector initials	Commodity Code (Organic Bell Pepper - <i>BP</i>)	USDA Organic Shield? (Y/N)
year	month	day			
<i>2015</i>	<i>01</i>	<i>30</i>	<i>JT</i>	<i>BP RED BELL</i>	<i>YES</i>
Comments/Explanation: Put CCOF Sample ID here: <i>013015JT4</i>					

2. Sample Type/Commodity Information

Origin:	<input type="checkbox"/> Domestic	<input checked="" type="checkbox"/> Imported	If Imported, Country of Origin	<i>MEXICO</i>
<i>(b) (4)</i>	<i>/POUND</i>	Est. Weight:	<i>3 POUNDS</i>	Variety: <i>ORG. RED BELL CHOICE</i>
Certification Agency Collecting Sample: <i>CCOF</i>				

3. Collection Site Information

Collection Facility Name:	<i>(b) (4)</i>
Address:	<i>(b) (4)</i>
City:	<i>(b) (4)</i>
Lot # or any other identification # on the box (if available): <i>NONE</i>	
Certified Organic Handler:	<i>(b) (4)</i>
Certified Organic Producer:	<i>(b) (4)</i>
Comments/Explanation:	

4. Shipping Information

Collector's Name:	<i>JOHN P. TRINTERWD</i>	
Signature:	<i>John P. Trinterwd</i>	Ship Date: <i>4/2/15</i>

5. Sample Receipt in Laboratory

Date Received: _____	Received By (initials): _____	Based on Condition Upon Arrival, Will the Sample be Analyzed? (Y/N) _____
If Not Analyzed, Why? _____	Rotten ___ Bruised ___ Miscoded ___ Other (Describe) _____	
Comments/Explanation: _____	No. of Units in Sample: _____	
Color of Sample: _____		

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	Owner: <i>Chemistry Residue</i>	Approved by: <i>Lab Management</i>

1. Sample Identification Information

Collection date			Collector initials	Commodity Code (Organic Bell Pepper - BP)	USDA Organic Shield? (Y/N)
year	month	day			
15	01	23	LL	Organic Bell Peppers	Y
Comments/Explanation: <i>Sample ID 012315 LL01</i>					

2. Sample Type/Commodity Information

Origin:	<input type="checkbox"/> Domestic	<input checked="" type="checkbox"/> Imported	If Imported, Country of Origin	<i>MEXICO</i>
Cost:	<i>—</i>	Est. Weight:	<i>3Lbs</i>	Variety: <i>Green</i>
Certified Organic by: <i>CCOF</i>				

3. Collection Site Information

Collector:	<i>(b) (4)</i>
Address:	
City:	
Lot # or any other identification # on the box (if available): <i>Parcela 2 Azul Turquesa</i>	
Certified Organic Handler: <i>—</i>	
Certified Organic Producer: <i>Yes CCOF</i>	
Comments/Explanation: <i>Sample ID 012315 LL01</i>	

4. Shipping Information

Collector's Name:	<i>Luis Lopez</i>	CCOF contact for results and questions: samples@ccof.org
Signature:	<i>[Signature]</i>	Ship Date: <i>01/26/15</i>

5. Sample Receipt in Laboratory

Date Received:	Received By (initials):	Based on Condition Upon Arrival, Will the Sample be Analyzed? (Y/N) <i>—</i>
If Not Analyzed, Why?	Rotten <i>—</i> Bruised <i>—</i> Miscoded <i>—</i> Other (Describe) <i>—</i>	
Comments/Explanation:	No. of Units in Sample: <i>—</i>	
Color of Sample:	<i>—</i>	

From: [Kelly Lehman Goswamy](#)
To: [Wilburn, Tammie - AMS](#); [Sean Feder](#)
Subject: RE: COC for AMS 1563, AMS 1827 and AMS
Date: Wednesday, December 17, 2014 3:55:09 PM

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Best,

Kelly Lehman Goswamy

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Cc: Kelly Lehman Goswamy
Subject: RE: COC for AMS 1563, AMS 1827 and AMS

Ok thanks Sean.

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Sent: Friday, December 12, 2014 12:09 PM
To: Wilburn, Tammie - AMS
Cc: Kelly Lehman Goswamy
Subject: RE: COC for AMS 1563, AMS 1827 and AMS

Tammie,
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Best,

Sean Feder

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Sent: Thursday, December 11, 2014 9:24 AM

To: Sean Feder

Subject: COC for AMS 1563, AMS 1827 and AMS

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Tammie

202-690-2624

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From: [Hughes Theresa](#)
To: [Wilburn Tammie - AMS](#)
Subject: RE: Enclosure for the request of Organic Bell Pepper Letter
Date: Wednesday, September 17, 2014 1:09:10 PM
Attachments: [image002.png](#)
Importance: High

Thank you, Tammie. After reading through the attached letter you sent, we were wondering if you could clarify something for us.

In the letter you state:

cid:image001.png@01CFD25D.748BBC60



In the first paragraph, we are asked to conduct inspections of operations producing or handling bell peppers in Mexico. However, in point #1, we are asked to provide a list of operators producing bell peppers in Mexico or handling bell peppers from Mexico. In the second point, it just says operations producing or handling Mexican bell peppers.

Could you please clarify whether we are expected to inspect only operations in Mexico, or operations both in Mexico AND handling bell peppers from Mexico?

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: Wilburn, Tammie - AMS [mailto:Tammie.Wilburn@ams.usda.gov]
Sent: Wednesday, September 17, 2014 9:32 AM
To: Wilburn, Tammie - AMS
Subject: Enclosure for the request of Organic Bell Pepper Letter

My apologies I did not include the attachment with the letter.

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From: [Stafford - CDA, Amy](#)
To: [Wilburn, Tammie - AMS](#)
Cc: [Gebault King, ReneeA - AMS](#)
Subject: Re: Huron Produce
Date: Monday, February 2, 2015 6:33:45 PM
Attachments: [image001.jpg](#)
[Huron Produce Inspection Documentation.zip](#)

Hi, Tammie,

Attached please find the inspection documents for Huron Produce of Frederick, CO. Samples collected at both Huron Produce and at King Sooper have been sent to the USDA lab in North Carolina; the sampling documentation is also included.

Please let me know if there is anything else we could do for you!

Best regards,

Amy

Amy Stafford
Organic Program Manager



P 303.869.9074 | F 303.466-2860
305 Interlocken Parkway, Broomfield, CO 80021
amy.stafford@state.co.us | www.colorado.gov/ag

On Tue, Jan 6, 2015 at 12:33 PM, Wilburn, Tammie - AMS
<Tammie.Wilburn@ams.usda.gov> wrote:

Sorry Amy. Here it is.

From: Stafford - CDA, Amy [mailto:amy.stafford@state.co.us]
Sent: Tuesday, January 06, 2015 2:29 PM
To: Wilburn, Tammie - AMS
Subject: Re: Huron Produce

Tammie,

The pepper sampling sheet was not included in the attachments. Could you please advise me as to the sample size that will be necessary for collection at Huron Produce? We will be collecting the sample on Thursday of this week, and sending the sample to the lab in Gastonia. Per your request, this will be conducted as an unannounced inspection, and will also be Huron Produce's full annual inspection, so there will be quite a bit of information I'll be sending as soon as the inspection is complete.

Best regards,

Amy

Amy Stafford
Organic Program Manager

Image removed by sender.



P [303.869.9074](tel:303.869.9074) | F [303.466-2860](tel:303.466-2860)

305 Interlocken Parkway, Broomfield, CO 80021

amy.stafford@state.co.us | www.colorado.gov/ag

On Thu, Dec 18, 2014 at 10:35 AM, Wilburn, Tammie - AMS
<Tammie.Wilburn@ams.usda.gov> wrote:

Hi Amy,

Attached is:

(1) The initial letter to CDA incorrectly sent to Casey Palmer;

- (2) Chain of Custody Form to use to send samples to the USDA lab, and
- (3) a Pepper Sampling Fact sheet that might be helpful

Please forward a copy of the inspection report or associated paperwork to me once you have completed the visit. If you haven't already, please don't announce your visit to collect the sample(s). I will notify you of the sample results once I receive them from the lab. If by chance, the results are positive, please follow NOP Instruction 2613 Responding to Results from Pesticide Residue Testing to interpret and further investigate the findings, as necessary.

Amy, if it's not too much trouble, you might collect a sample from King Soopers. Their name also appeared in our data.

Feel free to call if you have questions.

Many thanks!

Tammie B. Wilburn

Compliance and Enforcement Division

National Organic Program, USDA

[202-690-2624](tel:202-690-2624)

<http://www.ams.usda.gov/AMSv1.0/NOP>

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From: Stafford - CDA, Amy [mailto:amy.stafford@state.co.us]
Sent: Thursday, December 18, 2014 11:50 AM
To: Wilburn, Tammie - AMS
Subject: Huron Produce

Hi, Tammie,

We spoke earlier this week (late last week?) regarding collecting a bell pepper sample from Huron Produce. You asked if we could send it to the USDA labs in Gastonia, and you'd send me more information and documentation for this. I haven't received anything yet; we have everything ready to go for this. If you could send me the information, or if it was sent snail mail (if you're using multiple copy 3-ply forms as we do or something) could you let me know so we can get an inspector assigned for the sample collection?

Thanks much, and happy to help out with this!

Amy

Amy Stafford
Organic Program Manager

Image removed by sender.



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Pursuant to 7 CFR 205.403, you are directed to conduct onsite inspections of each organic bell pepper producer and handler certified by QAI in Mexico to assist in determining the source of the residues and to determine if each operation is compliant with the USDA organic regulations. Prior to conducting the inspections:

1. Please provide us with a list of operations that you certify who are producing organic bell peppers in Mexico or handling organic peppers from Mexico. If you certify no such operations, let us know;
2. If you certify operations producing or handling Mexican bell peppers, please submit an inspection plan for conducting unannounced onsite inspections and sampling, taking into account production volumes, harvest times, and other factors that may be a source of the residues. Please include plans for conducting audit trails and product in/product out audits as a component of the inspections.