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

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

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

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

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

§ 205.503 Applicant Information This section of the checklist should be completed only if conducting an initial assessment, annual update assessment, or renewal assessment. If during any onsite assessment there is objective evidence that required information was not submitted, then cite under the appropriate requirement.				
CHECKLIST SECTION VIII	**Complies[13]**			**Remarks[14]**
	Yes	**No**	**N/A**	
References: NOP 2000 Accreditation Policies and Procedures NOP Appeals Procedure: Adverse Action Appeal Process – Certified Operation or Applicant for Certification				
A private or governmental entity seeking accreditation as a certifier must submit the following information:				

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

§ 205.503 Applicant Information

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

CHECKLIST SECTION VIII	Complies[13]			Remarks[14]
	Yes	No	N/A	
§ 205.503(a) The business name, primary office location, mailing address, name of the person(s) responsible for the certifier's day-to-day operations, contact numbers (telephone, facsimile, and Internet address) of the applicant, and, for an applicant who is a private person, the entity's taxpayer identification number; Table of contents	X			
§ 205.503(b) The name, office location, mailing address, and contact numbers (telephone, facsimile, and Internet address) for each of its organizational units, such as chapters or subsidiary offices, and the name of a contact person for each unit; Table of contents	X			

§ 205.503 Applicant Information

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

CHECKLIST SECTION VIII	Complies[13]			Remarks[14]
	Yes	No	N/A	
§ 205.503(c) Each area of operation (crops, wild crops, livestock, or handling) for which accreditation is requested and the estimated number of each type of operation anticipated to be certified annually by the applicant along with a copy of the applicant's schedule of fees for all services to be provided under these regulations by the applicant; Table of contents	X			CDA will be removing the Wild Crop scope from their accreditation sometime in 2018. They have one operation certified to this scope currently and will notify the operation of this intention prior to their anniversary date. Once that operation obtains certification with another certifier, CDA will notify the NOP to remove this scope from accreditation.

§ 205.503 Applicant Information

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

CHECKLIST SECTION VIII	Complies[13]			Remarks[14]
	Yes	No	N/A	
§ 205.503(d)(1) The type of entity the applicant is (e.g., government agricultural office, for-profit business, not-for-profit membership association) and for: A governmental entity, a copy of the official's authority to conduct certification activities under the Act and the regulations in this part, Table of contents	X			
§ 205.503(d)(2) The type of entity the applicant is (e.g., government agricultural office, for-profit business, not-for-profit membership association) and for: A private entity, documentation showing the entity's status and organizational purpose, such as articles of incorporation and bylaws or ownership or membership provisions, and its date of establishment; Table of contents	X			

§ 205.503 Applicant Information

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

CHECKLIST SECTION VIII	Complies[13]			Remarks[14]
	Yes	No	N/A	
§ 205.503(e) A list of each State or foreign country in which the applicant currently certifies production and handling operations and a list of each State or foreign country in which the applicant intends to certify production or handling operations. Table of contents	X			

§ 205.504 Evidence of Expertise and Ability This section of the checklist should be completed only if conducting an initial assessment, annual update assessment, or renewal assessment. If during any onsite assessment there is objective evidence that required information was not submitted then cite under the appropriate requirement.				
CHECKLIST SECTION IX	**Complies[15]**			**Remarks[16]**
	Yes	**No**	**N/A**	
References: NOP 2000 Accreditation Policies and Procedures NOP 2609 Unannounced Inspections NOP Appeals Procedure: Adverse Action Appeal Process – Certified Operation or Applicant for Certification				
Personnel				
§ 205.504(a)(1) A copy of the applicant's policies and procedures for training, evaluating, and supervising personnel; Table of Contents	X			***Personnel Used in the Organic Program*** section of CDA's procedure manual outlines personnel requirmements.

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

§ 205.504 Evidence of Expertise and Ability

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

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

§ 205.504 Evidence of Expertise and Ability This section of the checklist should be completed only if conducting an initial assessment, annual update assessment, or renewal assessment. If during any onsite assessment there is objective evidence that required information was not submitted then cite under the appropriate requirement.				
CHECKLIST SECTION IX	**Complies[15]**			**Remarks[16]**
	Yes	**No**	**N/A**	
§ 205.504(a)(3)(ii) and for Each person to be designated by the applicant to review or evaluate applications for certification: Table of Contents Table 8 Table 8 Findings	X			Resumes were submitted for all staff
§ 205.504(a)(4) A description of any training that the applicant has provided or intends to provide to personnel to ensure that they comply with and implement the requirements of the Act and the regulations in this part. Table of Contents	X			CDA provided a Annual training matrix with tabs for each year.
Administrative Policies and Procedures				
§ 205.504(b)(1) A copy of the procedures to be used to evaluate certification applicants, make certification decisions, and issue certification certificates; Table of Contents	X			

§ 205.504 Evidence of Expertise and Ability

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

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

§ 205.504 Evidence of Expertise and Ability

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

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

§ 205.504 Evidence of Expertise and Ability This section of the checklist should be completed only if conducting an initial assessment, annual update assessment, or renewal assessment. If during any onsite assessment there is objective evidence that required information was not submitted then cite under the appropriate requirement.				
CHECKLIST SECTION IX	**Complies[15]**			**Remarks[16]**
	Yes	**No**	**N/A**	
§ 205.504(b)(6) A copy of the procedures to be used for sampling and residue testing pursuant to § 205.670. Table of Contents	X			

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

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

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

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

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

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

§ 205.510(f) Amendment to scope of an accreditation may be requested at any time. The application for amendment shall be sent to the Administrator and shall contain information applicable to the requested change in accreditation, a complete and accurate update of the information submitted pursuant to §§ 205.503 and 205.504, and the applicable fees required in § 205.640. Table of Contents	X			Wild Crop scope will be requested for removal by CDA sometime in 2018.

§ 205.642 Fee Schedule Document on Certification File Review Checklist and Certification File Review Worksheets.				
CHECKLIST SECTION XI	**Complies[19]**			**Remarks[20]**
	Yes	**No**	**N/A**	
§ 205.642 Are the fees charged reasonable?	X			
§205.642 Is the fee schedule that was submitted to applicants the same as the one provided to the Administrator? Table of contents	X			Yes – As documented on Table 3, the fee schedule provided to applicants was the same as the one provided to the Administrator.
§§ 205.501(a)(16) and 205.642	X			Yes – As

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

§ 205.642 Fee Schedule Document on Certification File Review Checklist and Certification File Review Worksheets.				
CHECKLIST SECTION XI	**Complies[19]**			**Remarks[20]**
	Yes	**No**	**N/A**	
Are the fees charged to operations for certification consistent with the fee schedule filed with the Administrator, to include any fees charged for unannounced inspections? Table of contents § 205.501(a)(16) NOP 2609 Unannounced Inspections				documented on Table 3, the fees charged to operations for certification were consistent with the fee schedule filed with the Administrator.
§ 205.642 Are all applicants provided with an estimate of the total cost of certification and an estimate of the annual cost of updating the certification? Table of contents	X			Yes – As documented on Table 3, all operations were provided an estimate.

§ 205.642 Fee Schedule Document on Certification File Review Checklist and Certification File Review Worksheets.				
CHECKLIST SECTION XI	**Complies[19]**			**Remarks[20]**
	Yes	**No**	**N/A**	
§ 205.642 Are the nonrefundable portions of certification fees and the stages at which they become nonrefundable explained in the fee schedule submitted to the Administrator? Table of contents	X			
§ 205.642 Does the certifier provide a copy of the fee schedule to anyone inquiring about the application process? Table of contents	X			

§ 205.661 Investigation of Certified Operations § 205.662 Noncompliance Procedure for Certified Operations Document on Certification File Review Worksheet, "Table 4 - Notice of Noncompliance/ Adverse Action Worksheet."				
CHECKLIST SECTION XII	**Complies[21]**			**Remarks[22]**
	Yes	**No**	**N/A**	
References: NOP 2607 Disclosure of Information Concerning Operations Certified Under the NOP NOP 4001 Complaint Handling Procedure NOP 4002 Enforcement of the USDA Organic Regulations by Accredited Certifying Agents NOP Appeals Procedure: Adverse Action Appeal Process – Certified Operation or Applicant for Certification				
§ 205.661(a) If the certifier conducts any investigations of complaints of noncompliance concerning production and handling operations certified as organic by the certifier, does the certifier notify the Program Manager of all compliance proceedings and actions taken? Table of Contents	X			

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

§ 205.661 Investigation of Certified Operations **§ 205.662 Noncompliance Procedure for Certified Operations** Document on Certification File Review Worksheet, "Table 4 - Notice of Noncompliance/ Adverse Action Worksheet."				
CHECKLIST SECTION XII	**Complies[21]**			**Remarks[22]**
	Yes	**No**	**N/A**	
§ 205.662(a) In all cases when an inspection, review, or investigation of a certified operation by the certifier or a State organic program reveals any noncompliance with the Act or regulations, is a written notification of noncompliance sent to the certified operation? Table of Contents § 205.406(c)	X			Yes – As documented on Table 4, written notifications of NCs were sent to certified operations as appropriate.

§ 205.661 Investigation of Certified Operations **§ 205.662 Noncompliance Procedure for Certified Operations** Document on Certification File Review Worksheet, "Table 4 - Notice of Noncompliance/ Adverse Action Worksheet."				
CHECKLIST SECTION XII	**Complies[21]**			**Remarks[22]**
	Yes	**No**	**N/A**	
§ 205.662(a)(1) – (3) Do all Notifications of Noncompliance include: a description of each noncompliance; the facts upon which the notification of noncompliance is based; and the date by which the certified operation must rebut or correct each noncompliance and submit supporting documentation? Table of Contents		X		No – As documented on Table 4 (Continuing) or Table 5 (Denial), written notifications of NCs did not include all required information. The option to rebut is not included in the NoNC.

§ 205.661 Investigation of Certified Operations **§ 205.662 Noncompliance Procedure for Certified Operations** Document on Certification File Review Worksheet, "Table 4 - Notice of Noncompliance/ Adverse Action Worksheet."				
CHECKLIST SECTION XII	**Complies[21]**			**Remarks[22]**
	Yes	**No**	**N/A**	
§ 205.662(b) Does the certifier send the certified operation a written notification of noncompliance **resolution** after the certified operation demonstrates that each noncompliance is resolved? Table of Contents	X			Yes – As documented on Table 4, a written notification of NC resolution was sent to certified operations after they demonstrated that each NC was resolved.

§ 205.661 Investigation of Certified Operations **§ 205.662 Noncompliance Procedure for Certified Operations** Document on Certification File Review Worksheet, "Table 4 - Notice of Noncompliance/ Adverse Action Worksheet."				
CHECKLIST SECTION XII	**Complies[21]**			**Remarks[22]**
	Yes	**No**	**N/A**	
§ 205.662(c) If rebuttal is unsuccessful or the correction of the noncompliance is not completed in the prescribed time period, does the certifier send the certified operation a written notice of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the noncompliance? Table of Contents	X			Yes – As documented on Table 4, a written notice of proposed suspension or revocation was sent to certified operations as appropriate.
§§ 205.662(c)(1) – (4) Do all Notifications of Proposed Suspension / Proposed Revocations include: the reasons for the	X			Yes – As documented on Table 4, all

§ 205.661 Investigation of Certified Operations **§ 205.662 Noncompliance Procedure for Certified Operations** Document on Certification File Review Worksheet, "Table 4 - Notice of Noncompliance/ Adverse Action Worksheet."				
CHECKLIST SECTION XII	**Complies[21]**			**Remarks[22]**
	Yes	**No**	**N/A**	
proposed suspension or revocation; the proposed effective date of such suspension or revocation; the impact of a suspension or revocation on future eligibility for certification; and the right to request mediation pursuant to § 205.663 or to file an appeal pursuant to § 205.681? Table of Contents				notifications of proposed suspension or revocation issued to certified operations contained the required information.
§ 205.662(d) If the certifier or State organic program has reason to believe that a certified operation willfully violated the Act or regulations, the certifier or State organic program shall send the certified operation a notification of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the noncompliance. Table of Contents			X	N/A – there were no willful violations identified by the certifier.
§ 205.662(e)(1) Does the certifier or State program send the certified operation a written notification of suspension or revocation in all cases that a certified operation	X			Yes – As documented on Table 4, a notification of

§ 205.661 Investigation of Certified Operations **§ 205.662 Noncompliance Procedure for Certified Operations** Document on Certification File Review Worksheet, "Table 4 - Notice of Noncompliance/ Adverse Action Worksheet."				
CHECKLIST SECTION XII	**Complies[21]**			**Remarks[22]**
	Yes	**No**	**N/A**	
failed to correct the noncompliance, to resolve the issue through rebuttal or mediation, or to file an appeal of the proposed suspension or revocation of certification? Table of Contents				suspension or revocation was sent to all certified operations which failed to: correct the NC; resolve the NC through rebuttal or mediation; or file an appeal.
§ 205.662(e)(2) Has the certifier or State program sent a notice of Suspension / Revocation during the time a final resolution of either mediation or appeal is pending for a certified operation which requested either one? Table of Contents		X		No **(certifier complies)** – As documented on Table 4, a notification of suspension or revocation was not sent to any certified operation during the time mediation and/or an appeal was pending.

§ 205.661 Investigation of Certified Operations **§ 205.662 Noncompliance Procedure for Certified Operations** Document on Certification File Review Worksheet, "Table 4 - Notice of Noncompliance/ Adverse Action Worksheet."				
CHECKLIST SECTION XII	**Complies[21]**			**Remarks[22]**
	Yes	**No**	**N/A**	
				N/A – there were no requests for mediation or appeals filed.
§ 205.662(g) Violations of Act Has the certifier fined operations as a result of any noncompliance issues? Table of Contents		X		

§ 205.661 Investigation of Certified Operations **§ 205.662 Noncompliance Procedure for Certified Operations** Document on Certification File Review Worksheet, "Table 4 - Notice of Noncompliance/ Adverse Action Worksheet."				
CHECKLIST SECTION XII	**Complies[21]**			**Remarks[22]**
	Yes	**No**	**N/A**	
§ 205.660(d) Are all notifications of noncompliance, rejections of mediation, noncompliance resolutions, proposed suspensions or revocations, and suspensions or revocations issued and each response to such notification sent to the recipient's place of business via a delivery service which provides dated return receipts? Table of Contents	X			Yes – As documented on Table 4, all notifications were sent to the recipient's place of business via a delivery service which provided dated return receipts.

§ 205.663 Mediation Mediation procedures are applicable to certified operations that have received a denial of certification, a notification of proposed suspension, a notification of proposed revocation, or a notification of noncompliance that is combined with a denial, proposed suspension, or proposed revocation. Mediation procedures do not apply to operations that have received a notification of noncompliance with no adverse action.				
CHECKLIST SECTION XIII	**Complies[23]**			**Remarks[24]**
	Yes	**No**	**N/A**	
§ 205.663 In all instances where mediation is requested, is the request from the applicant or certified operation in writing? Table of Contents	X			
§ 205.663 If the certifier rejects the request, is the notification to reject the request of mediation sent to the operation in writing? Table of Contents	X			
§ 205.663 Does the notification to reject the request of mediation advise the operation of their right to request an appeal pursuant to § 205.681? Table of Contents	X			

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

§ 205.663 Mediation Mediation procedures are applicable to certified operations that have received a denial of certification, a notification of proposed suspension, a notification of proposed revocation, or a notification of noncompliance that is combined with a denial, proposed suspension, or proposed revocation. Mediation procedures do not apply to operations that have received a notification of noncompliance with no adverse action.				
CHECKLIST SECTION XIII	**Complies[23]**			**Remarks[24]**
	Yes	**No**	**N/A**	
§ 205.663 Does the notification to reject the request of mediation advise the operation that an appeal must be requested within 30 days of the date of the written rejection of mediation? Table of Contents	X			
§ 205.663 If the certifier accepted the mediation request, did the certifier send a settlement agreement to the operator for consideration with its mediation acceptance letter (informal mediation)? Table of Contents *(When a certifier accepts mediation, the certifier can send a settlement agreement to the operator for consideration with its mediation acceptance letter.)*		X		

§ 205.663 Mediation Mediation procedures are applicable to certified operations that have received a denial of certification, a notification of proposed suspension, a notification of proposed revocation, or a notification of noncompliance that is combined with a denial, proposed suspension, or proposed revocation. Mediation procedures do not apply to operations that have received a notification of noncompliance with no adverse action.				
CHECKLIST SECTION XIII	**Complies[23]**			**Remarks[24]**
	Yes	**No**	**N/A**	
§ 205.663 If the certifier accepted the mediation request and sent a settlement agreement to the operator for consideration with its mediation acceptance letter, was it clear that the operator was free to: accept or reject the settlement agreement; come back to the certifier for continued informal discussion; or request a more formal mediation process, to discuss terms that are agreeable to both parties (informal mediation)? Table of Contents *(The proposed settlement may be included as an alternative to an adverse action, but cannot be included in the adverse action notices.)*			X	Mediation has not taken place. One settlement agreement has been executed with an operation as requested by the NOP after review of an appeal.
§ 205.663 If the certifier accepted the mediation request, was the mediation conducted by a qualified mediator mutually agreed upon by the parties to the mediation? Table of Contents			X	

§ 205.663 Mediation Mediation procedures are applicable to certified operations that have received a denial of certification, a notification of proposed suspension, a notification of proposed revocation, or a notification of noncompliance that is combined with a denial, proposed suspension, or proposed revocation. Mediation procedures do not apply to operations that have received a notification of noncompliance with no adverse action.				
CHECKLIST SECTION XIII	**Complies[23]**			**Remarks[24]**
	Yes	**No**	**N/A**	
§ 205.663 Is an agreement reached no more than 30 days following the mediation session? Table of Contents			X	
§ 205.663 Any agreement reached during or as a result of the mediation process shall be in compliance with the Act and the regulations in this part: If a settlement agreement is reached, does it comply with the Act and the regulations in this part and include the NOP best practices for the agreement to include: the parties involved in the agreement (Name of certifier, operator, operation and responsibly connected party); corrective actions agreed to by the operator; the outcome; the timeframe by which the corrective actions will be completed; effective date the agreement will take effect; and signatures by the authorized representatives of the certifier and the certified operation ?	X			The USDA organic regulations section on mediation is included in the CDA Organic Policy and Procedure Manual but a work procedure for how the mediation is conducted is not part of CDA's current documentation.

§ 205.663 Mediation Mediation procedures are applicable to certified operations that have received a denial of certification, a notification of proposed suspension, a notification of proposed revocation, or a notification of noncompliance that is combined with a denial, proposed suspension, or proposed revocation. Mediation procedures do not apply to operations that have received a notification of noncompliance with no adverse action.				
CHECKLIST SECTION XIII	**Complies[23]**			**Remarks[24]**
	Yes	**No**	**N/A**	
Table of Contents				
§ 205.663 If mediation is unsuccessful, is the operation informed they have 30 days from termination of mediation to appeal the certifier's decision pursuant to § 205.681? Table of Contents			X	

§ 205.670 Inspection and Testing § 205.671 Exclusion from Organic Sale § 205.504(b)(6) requires that the certifier have procedures for sampling and residue testing. Procedures should address the requirements of § 205.670. Evaluate procedures under § 205.504(b)(6); Checklist Section IX.				
CHECKLIST SECTION XIV	**Complies[25]**			**Remarks[26]**
	Yes	**No**	**N/A**	

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

§ 205.670 Inspection and Testing § 205.671 Exclusion from Organic Sale § 205.504(b)(6) requires that the certifier have procedures for sampling and residue testing. Procedures should address the requirements of § 205.670. Evaluate procedures under § 205.504(b)(6); Checklist Section IX.				
CHECKLIST SECTION XIV	**Complies[25]**			**Remarks[26]**
	Yes	**No**	**N/A**	
References: NOP 2610 Sampling Procedures for Residue Testing NOP 2611 Laboratory Selection Criteria For Pesticide Residue Testing NOP 2611-1 Prohibited Pesticides for NOP Residue Testing NOP 2613 Responding to Results from Pesticide Residue Testing				
§ 205.403(e)(1) Does the inspector provide the operation with a receipt for the samples taken at the time of the inspection? Table 7b B Table of Contents	X			Yes – as documented on Table 7b, operations were provided receipts for samples taken. See Observation.
§ 205.403(e)(1) Is there any objective evidence that inspectors were charged for the samples taken?		X		

§ 205.670 Inspection and Testing
§ 205.671 Exclusion from Organic Sale

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

CHECKLIST SECTION XIV	Complies[25]			Remarks[26]
	Yes	No	N/A	
§§ 205.670(b) and (c) Was the testing paid for by the requesting official (Administrator or State) or the certifier? Table 7b H Table of contents	X			Yes – as documented on Table 7b, testing was paid for by the requesting official and not the charged to the operations.

§ 205.670(d) Were at least 5% of certified operations sampled and tested on an annual basis (or at least one operation annually if certifier has fewer than thirty operations)? Table 7a Table of contents		X		This was a finding in the June Compliance audit report.
§ 205.670(e) Are samples collected by an inspector representing the certifier, State, or Administrator as applicable? Table 7b A Table of contents	X			Yes – as documented on Table 7b, samples were collected by an inspector representing the certifier, State, or Administrator as applicable.
§ 205.670(e) Is chain of custody maintained? Table 7b C Table of contents	X	X		Chain of custody form is given to the operation as a receipt for sample taken, however, the operator does not sign this form. See observation.

§ 205.670(e) Is the sample submitted to an ISO 17025 accredited lab? Table 7b D Table of contents Or an alternate standard approved by the NOP? NOP 2611 – Table 7b D	X			Yes – as documented on Table 7b, samples were submitted to an accredited or NOP-approved lab.
§ 205.670(e) Is the sample tested in accordance with the methods described in the most current edition of the *Official Methods of Analysis of the AOAC International* or other current applicable validated methodology? Table 7b E Table of contents	X			Yes – as documented on Table 7b, samples were tested in accordance with an approved *AOAC* or other validated methodology.
§§ 205.670(f) Are test results available for public access, unless the testing is part of an ongoing compliance investigation? Table of contents		X		CDA was unaware that tests need to be made available for public access (205.670(f)). They thought that this would violate confidentiality. But nobody has ever requested them.

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

environmental contamination (UREC) level and is the product allowed to be represented as organic? Table 7b K Table of Contents				results verified there was a prohibited substance detected that was greater than 5% of the EPA tolerance or greater than the UREC level, the product was not allowed to be represented as organic. N/A – as documented on Table 7b, there were no test results where a prohibited substance was detected that was greater than 5% of the EPA tolerance or greater than the UREC level.
§ 205.671 Are investigations conducted to determine the cause of the prohibited substance? Table 7b P	X			

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

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

§ 205.672 Emergency Pest or Disease Treatment If there is no instance of a prohibited substance applied due to a Federal or State emergency pest or disease treatment program identify with an "X" in the N/A column, and include a statement in Remarks column. These requirements only apply in the United States and not in other countries.				
CHECKLIST SECTION XV	**Complies[27]**			**Remarks[28]**
	Yes	**No**	**N/A**	
§ 205.672(b) Any livestock that are treated with a prohibited substance or product derived from treated livestock, cannot be sold, labeled, or represented as organically produced. Table of Contents		X		
Except that:				
§ 205.672(b)(1) Milk or milk products may be sold, labeled, or represented as organically produced beginning 12 months following the last date that the dairy animal was treated with the prohibited substance; and Table of Contents			X	
§ 205.672(b)(2) The offspring of gestating mammalian breeder stock treated with a prohibited substance may be considered organic: *Provided that*, the breeder stock was not in the last third of gestation on the date that the breeder stock was treated with the prohibited substance. Table of Contents			X	

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

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

§ 205.500(c)(2) International Agreements For certifiers involved in any of the international agreements, please provide details of the review process in place and include a summary of the certifier's participation in the arrangements in the body of the audit report, under the heading "International Agreements."				
CHECKLIST SECTION XVI	**Complies[29]**			**Remarks[30]**
	Yes	**No**	**N/A**	
Does the certifier provide an EU Certificate of Inspection (EU Import Certificate) to certified operations wishing to export to the EU so that it is transferred with the product(s)? Table of Contents	X			
If applicable did the certifier verify that organic apples, pears, and organic ingredients from organic apples and pears were produced without the use of antibiotics (*streptomycin for fire blight control*) for at least three (3) years prior to the harvest of the organic apples and pears? Table of Contents			X	
If applicable did the certifier verify that wine exported to the EU was: 1) produced using organic varieties of grapes and organic ingredients; 2) contained only nonorganic substances allowed under § 205.605; and 3) produced only using the wine-making practices and substances detailed in the EU organic regulations? Table of Contents		X		

§ 205.500(c)(2) International Agreements For certifiers involved in any of the international agreements, please provide details of the review process in place and include a summary of the certifier's participation in the arrangements in the body of the audit report, under the heading "International Agreements."				
CHECKLIST SECTION XVI	**Complies[29]**			**Remarks[30]**
	Yes	**No**	**N/A**	
For retail products did the certifier verify general EU labeling requirements and that the labels contained the code assigned to them by the EU? EU Certifier Codes EU Labeling Requirements Table of Contents	X			
For bulk products did the certifier verify general EU labeling requirements and that there was a lot number present to allow for a complete audit trail and to verify the product's integrity? EU Labeling Requirements Table of Contents			X	
For certified operations that receive product(s) from the EU, did the certifier verify (either through file review and/or onsite inspection) that the NOP Import Certificate was received with the product(s) to provide verification that incoming product meets the terms of the arrangement and is, therefore, eligible for use as an ingredient or a product to repack or to be sold as is in the U.S.? Table of Contents		X		

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

§ 205.500(c)(2) International Agreements For certifiers involved in any of the international agreements, please provide details of the review process in place and include a summary of the certifier's participation in the arrangements in the body of the audit report, under the heading "International Agreements."				
CHECKLIST SECTION XVI	**Complies[29]**			**Remarks[30]**
	Yes	**No**	**N/A**	
If applicable did the certifier verify that wine exported to Switzerland was produced only using the wine-making practices and substances detailed in the Swiss organic ordinances? Table of Contents			X	
For retail products did the certifier verify general Swiss labeling requirements and that the labels contained the code assigned to them by the Swiss authority? Swiss Certifier Codes Swiss Labeling Requirements			X	
For bulk products did the certifier verify general Swiss labeling requirements and that there was a lot number present to allow for a complete audit trail and to verify the product's integrity? Swiss Labeling Requirements Table of Contents			X	

§ 205.500(c)(2) International Agreements For certifiers involved in any of the international agreements, please provide details of the review process in place and include a summary of the certifier's participation in the arrangements in the body of the audit report, under the heading "International Agreements."				
CHECKLIST SECTION XVI	**Complies[29]**			**Remarks[30]**
	Yes	**No**	**N/A**	
For certified operations that receive product(s) from Switzerland, did the certifier verify (either through file review and/or onsite inspection) that the NOP Import Certificate was received with the product(s) to provide verification that incoming product meets the terms of the arrangement and is, therefore, eligible for use as an ingredient or a product to repack or to be sold as is in the U.S.? Table of Contents			X	
U.S. – Canada Organic Equivalency Arrangement (USCOEA) Please mark "N/A" if the certifier does not have any current clients shipping to Canada or receiving product from Canada.				
Are the certifier and applicable staff aware of the requirements for exporting to Canada? Program requirements can be accessed on the NOP website. Table of Contents	X			CDA has a copy of the requirements.
Does the certifier have a system in place to review and verify the terms of the arrangement? Table of Contents		X		Modules lack the necessary question to verify compliance.

§ 205.500(c)(2) International Agreements For certifiers involved in any of the international agreements, please provide details of the review process in place and include a summary of the certifier's participation in the arrangements in the body of the audit report, under the heading "International Agreements."				
CHECKLIST SECTION XVI	**Complies[29]**			**Remarks[30]**
	Yes	**No**	**N/A**	
Did the certifier verify agricultural products exported to Canada were not produced with the use of sodium nitrate? Table of Contents	X			
Did the certifier verify agricultural products exported to Canada were not produced by hydroponic or aeroponic production methods? Table of Contents	X			
Did the certifier verify agricultural products derived from animals (with the exception of ruminants) were produced according to livestock stocking rates as set out in CAN /CGSB32.310-2006? Table of Contents		X		CDA doesn't certify hydroponic operations.

§ 205.500(c)(2) International Agreements For certifiers involved in any of the international agreements, please provide details of the review process in place and include a summary of the certifier's participation in the arrangements in the body of the audit report, under the heading "International Agreements."				
CHECKLIST SECTION XVI	**Complies[29]**			**Remarks[30]**
	Yes	**No**	**N/A**	
Did the certifier verify agricultural products being sold or shipped to Canada and received from Canada under the arrangement are accompanied by an attestation statement (*Certified in compliance with the terms of the U.S.-Canada Organic Equivalency Arrangement*) per NOP PM 10-3? Include how the requirement is met. Did the certifier include "USCOEA compliant" or some variation on the certified operation's certificate, or did the certifier provide attestation statements to the operation rather than allowing the operation to do so themselves. Table of Contents		X		
Did the certifier verify that labels meet the requirements of the destination country, to include that for retail products? Labels or stickers must state the name of the U.S. or Canadian certifier (may use the USDA organic seal or the Canada Organic Biologique logo), and all product labels must be in English and French? U.S.-Canada Agreement labeling requirements Table of Contents		X		

§ 205.500(c)(2) International Agreements For certifiers involved in any of the international agreements, please provide details of the review process in place and include a summary of the certifier's participation in the arrangements in the body of the audit report, under the heading "International Agreements."				
CHECKLIST SECTION XVI	**Complies[29]**			**Remarks[30]**
	Yes	**No**	**N/A**	
Did the certifier verify that labels meet the requirements of the destination country, to include a lot number for wholesale products? U.S.-Canada Agreement labeling requirements Table of Contents		X		

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

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

Does the certifier have a system in place to review and verify the terms of the arrangement? Table of Contents		X		
Did the certifier assign a unique identification number to each export certificate? The unique identification number must begin with an acronym designating the certifier and the country code for the specific export arrangement. Table of Contents	X			
Does the certifier keep a paper-based or electronic control log that records and tracks the disposition of each export certificate? Table of Contents	X			
Did the certifier designate a staff person to authorize the issuance of the export certificate and attest to its authenticity by affixing his/her signature to the certificate, as well as who is responsible for all aspects of the issuance of the export certificate, including ensuring security of blank export certificates and oversight of the control log? Table of Contents	X			
Were export certificates issued for all organic plants, including fungi, and plant-based processed products that were exported to Japan? *Export certificates aren't required for products not regulated by the JAS law, such as meat, dairy products, honey, or alcoholic beverages. However, alcoholic beverages labeled with the word "organic" in Japanese must be accompanied by an export certificate that includes:* • *the name of the certified alcoholic beverage;*	X			

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

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

Does the certifier keep a paper-based or electronic control log that records and tracks the disposition of each export certificate including those issued, voided, or destroyed? Table of Contents			X	
Did the certifier designate a staff person to authorize the issuance of the export certificate and attest to its authenticity by affixing his/her signature to the Certificate, as well as who is responsible for all aspects of the issuance of the export certificate, including ensuring security of blank export certificates and oversight of the control log? Table of Contents			X	
Did all export certificates that were issued under the Taiwan arrangement for processed products and crops have the required statement, "*Organic agricultural products and organic processed products, accompanied by this certificate, were produced or processed using zero prohibited substances*"? Table of Contents			X	
Did all export certificates that were issued under the Taiwan arrangement for livestock and meat products have the required statement, "*Organic livestock products accompanied by this certificate, were managed and produced without the use of systemic pain killers or analgesics, including the use of Lidocaine or Procaine*?" Table of Contents			X	

1. CLOSING MEETING

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

- ✓ Sign out on the attendance list (see beginning of checklist).
- ✓ Present positive aspects of the certification program.
  - ✓ Positive Aspect (1) – Modules assist inspectors with verifying the OSP as required by the regulations
  - ✓ Positive Aspect (2) – Janice hired and organic experience
  - ✓ Positive Aspect (3) – Knowledgeable certification staff
- ✓ Present any items that require further guidance and consideration by the NOP.
  - ✓ Pending Item (1) –
  - ✓ Pending Item (2) –
- ✓ Present the assessment findings and conclusions in a manner so they are understood and acknowledged by the auditee. For each finding, cite the specific requirement of the assessment criteria and allow the auditee to ask questions on any findings.
- ✓ Discuss the next steps in the process:
  1) The report is written and sent to the NOP for review.
  2) The NOP reviews the report and determines the compliance / noncompliance of the program and makes all decisions concerning the accreditation. The NOP has the discretion to modify the assessment findings.
  3) The report is issued to the client by the NOP.
- ✓ Provide information about the NOP appeals process (§ 205.681(b)).
- ✓ Encourage feedback. Clients can submit feedback to AIAInBox@ams.usda.gov. *Provide the certifier with the NOP Auditor Evaluation form to complete.*

2. FINDINGS: Findings must be in NC report format prior to the auditor submitting the checklist to the NOP.

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

a. Noncompliances issued prior to this audit – Cleared (or remain Outstanding)

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

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

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

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

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

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

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

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

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

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

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

Verification of Corrective Action: The auditor verified during certification reviews and witness audits that the revised inspection cover sheet is currently being used.

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

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

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

Verification of Corrective Action: The witness inspection of a parallel operation verified the use of the revised modules.

NP5159RKA.NC5 – Cleared (Recommended). 7 CFR §205.402(a)(2) states that "Upon acceptance of an application for certification, a certifying agent must:.. Determine by a review of the application materials whether the applicant appears to comply or may be able to comply with the applicable requirements of subpart C of this part..."

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

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

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

NP5159RKA.NC6 – Cleared (Recommended). 7 CFR §205.403(e)(1) states that "At the time of the inspection, the inspector shall provide the operation's authorized representative with a receipt for any samples taken by the inspector."

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

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

Verification of Corrective Action: During a witness audit, the auditor verified two samples were obtained and receipts were given to the operator. Sampling form (as identified in corrective action) is not being used as the receipt. The chain of custoy form is now being used as the receipt. The inspector prints a copy of the form and provides the copy to the operation as the receipt.

Auditor Notes: CDA sampled three operations in 2016 and none of them were provided a receipt for the sample. There were no sampling forms on file for the 18 operations that were sampled so far this year, however, the chain of custody forms were on file.

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

2015 Comments: *The auditor reviewed three letters of Notice of Proposed Suspension (NoPS) issued to clients. Two of the three letters issued do not explain the impact of the NoPS as stated in 205.100(a) "each production or handling operation…that produces or handles crops, livestock, livestock products, or other agricultural products that are intended to be sold, labeled, or represented as*

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

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

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

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

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

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

Verification of Corrective Action: The auditor verified electronic copies of receipts are saved in the operations files on the server.

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

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

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

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

Verification of Corrective Action: The auditor verified the revised organic system plan is currently being used. The certification staff review companies website addresses as part of the intial review of the organic system plan.

CDA – NoNC combined NoPS was issued to the operation in December 2, 2015

Aloha Organic requested mediation.

Jan 6, 2016 - CDA replied to operator – rejecting their request. Aloha Appealed to the NOP.

NOP issued NC to CDA because they should've issued a NoNC, not a combined NoNC and NoPS.

Terms of settlement agreement – operation agrees to cease and desist use of organic on non-organic products.

Findings from Compliance Audit – Aurora Dairy:

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

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

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

8/7/17 CDA comments: already completed for 2017.

8/8/17 Auditor comments: Inspector collected samples during one witness audit. Two samples were collected. One from the field and one packaged finished product after processing.

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

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

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

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

NP7162PZA.F4 – 7 C.F.R. §205. 402(a)(2) states, "Determine by a review of the application materials whether the applicant appears to comply or may be able to comply with the applicable requirements of subpart C of this part;..." §205.206(e) states that an Organic System Plan must include, "Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations."

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

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

8/7/17 CDA comments: extracted all inputs from modules to create a master list of the inputs approved with date of approval so they can track when the re-review needs to take place in 5 years.

NP7162PZA.F5 – 7 C.F.R. §205.501(a)(21) states, "A private or governmental entity accredited as a certifying agent under this subpart must:…" Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary." NOP 2027, "Personnel Performance Evaluation," Section 3.2b states, "Inspectors should be evaluated during an onsite inspection by a supervisor or peer (another inspector) at least annually."

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

NP7162PZA.F6 – 7 C.F.R. §205.403(d) states, "The inspector must conduct an exit interview with an authorized representative of the operation who is knowledgeable about the inspected operation to confirm the accuracy and completeness of inspection observations and information gathered during the on-site inspection. The inspector must also address the need for any additional information as well as any issues of concern."

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

8/7/17 CDA comments: plan to include in Fall training.

NP7162PZA.F7 – 7 C.F.R. §205.501(a)(21) states, "A private or governmental entity accredited as a certifying agent under this subpart must:… Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary." NOP 2601 states, "If an operation plans to add new products, fields, operations, or labels to its OSP, then the certifier must first approve these changes and issue an updated certificate. A request to add new fields, animal species, or facilities would require an additional onsite inspection."

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

8/7/17 CDA comments: inspector did completed inspection report and sent copy to the operation. New certificate was issued.

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

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

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

Back to Closing Meeting process

b. Findings identified during current audit

NP7219PZA.F1 – 7 C.F.R. § 205.501(a)(21) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Demonstrate the ability to fully comply with the requirements for accreditation set forth in this subpart; Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary." The NOP website provides instructions and the terms of international trade arrangements.

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

NP7219PZA.F2 - 7 C.F.R. §205.403 (c)(1) and (2) states, "The on-site inspection of an operation must verify: The operation's compliance or capability to comply with the Act and the regulations of this part;… That the information, including the organic production or handling system plan, provided in accordance with §§205.401, 205.406, and 205.200, accurately reflects the practices used or to be used by the applicant for certification or by the certified operation."

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

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

NP7219PZA.F3 - 7 C.F.R. § 205.663 states, "Any dispute with respect to denial of certification or proposed suspension or revocation of certification under this part may be mediated at the request of the applicant for certification or certified operation and with acceptance by the certifying agent. Mediation shall be requested in writing to the applicable certifying agent…."

Comments: *CDA lacks mediation procedures.*

Notes from NOP Appeals: CDA denied (b) (4) *' request for mediation when the noncompliances were correctable and could be resolved through this mechanism. Furthermore, CDA issued a combined notice of noncompliance and proposed suspension to* (b) (4) *, which offered no option for the operation to rebut or explain their views to CDA. A noncompliance is being issued from Appeals requiring corrective action for issuing a combined NoNC and NoPS and re-issuing a NoNC to* (b) (4) (b) (4) *giving them the opportunity to submit corrective actions.*

Auditor Notes: Reviewed adverse action process for (b) (4) *.* (b) (4) *was issued a NoNC for not updating and paying fees. Did not respond and therefore issued a NoPS.* (b) (4) *filed an appeal to the NOP. NOP asked CDA to settle with* (b) (4) *by executing a settlement agreement. CDA has not conducted mediation with any operations.*

NP7219PZA.F4 – 7 C.F.R. §205.662(a)(3) states, "When an inspection, review, or investigation of a certified operation by a certifying agent or a State organic program's governing State official reveals any noncompliance with the Act or regulations in this part, a written notification of noncompliance shall be sent to the certified operation. Such notification shall provide: (1) A description of each noncompliance; (2) The facts upon which the notification of noncompliance is based; and (3) The date by which the certified operation must rebut or correct each noncompliance and submit supporting documentation of each such correction when correction is possible.

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

NP7219PZA.F5 – 7 C.F.R. §205.501(a)(9) states, "A private or governmental entity accredited as a certifying agent under this subpart must:… Maintain all records pursuant to §205.510(b) and make all such records available for inspection and copying during normal business hours by authorized representatives of the Secretary and the applicable State organic program's governing State official;…"

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

Notes: Auditor reviewed an operation files (b) (4) [redacted] and did not find evidience that the labels on file were reviewed and approved.

3. OBSERVATIONS

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

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

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

Back to Closing Meeting process

National Organic Program
File Review Worksheets

Table 1: General Certification File Review Information

Table of Contents Table 2 Table 3 Table 6a Table 6b Table 6c

File No.	Name of applicant/certified operation sampled	A Date application or annual update received	B Date of review § 205.402(b)(1) § 205.406(b)	C Review conducted by	D Inspection date § 205.403(b)(1) § 205.406(b)	E Inspection conducted by	F Date of final review (for applicants § 205.404(a))	G Final review conducted by	H Date certification decision made	I Certification decision made by	J Date findings sent to operation § 205.402(b)(1)
(b) (4)		3/28/2016	6/8/2016	A.Mack	6/30/2016	(b) (6), (b) (7)(C)	7/20/2016	A.Stafford	7/22/2016	A.Stafford	7/22/2016
		5/18/2016	6/21/2016	A.Mack	8/25/2016		11/10/2016	A.Stafford	11/13/2016	A.Stafford	11/13/2016
		12/11/2015	4/19/2016	A.Mack	5/17/2016		6/15/2016	A.Stafford	6/16/2016	A.Stafford	6/16/2016
		10/29/2013	11/20/2013	C.Palmer	1/21/2014		3/14/2014	A.Stafford	7/15/2014	A.Stafford	7/15/2014
		4/12/2016	8/11/2016	A.Mack	8/22/2016		12/8/2016	A.Stafford	12/11/2016	A.Stafford	12/11/2016
		4/12/2016	9/8/2016	A.Mack	9/21/2016		12/14/2016	A.Stafford	12/14/2016	A.Stafford	12/14/2016
		4/4/2016	9/12/2016	A.Stafford	10/10/2016		12/19/2016	A.Mack	12/19/2016	A.Mack	12/19/2016
		5/5/2016	8/29/2016	A.Stafford	9/19/2016		12/14/2016	A.Mack	12/14/2016	A.Mack	12/14/2016
		7/11/2016	9/21/2016	A.Mack	9/26/2016		12/12/2016	A.Stafford	12/12/2016	A.Stafford	12/12/2016
		3/14/2016	7/28/2016	A.Mack	8/12/2016		12/5/2016	A.Stafford	12/5/2016	A.Stafford	12/5/2016
11											
12											
13											
14											
15											

Instructions: Enter dates in the mm/dd/yy format. Must select the most recent complete certification cycle for continuing operations.

Remarks and Findings: Closing Meeting Findings § 205.501(a)(11)(vi)

Table 2: Summary of Certification File Review Information

Table of Contents Table 1 Table 3 Table 6a Table 6b Table 6c Table 7b

File No.	A Scopes (C,WC,L,H)	B Brief Description of Operation (See instructions below)	C IA/AU	D Sample (Y/N)	E Labels (Y/N)
1	C, H	Crops-Carrots, Split Production/Parallel Production: Handling. Single Ingredient – Carrots, washing, cutting, retail packaging.	IA	N	Y
2	L, H	Livestock – Eggs, chickens – nest run/bulk – no processing or packaging. Handling – process own feed	AU	N	N
3	H	Handling – multi and single ingredient processed products, wholesale and sale to retail. Split and parallel production	AU	N	Y
4	C, H	Crops – microgreens, seedlings/transplants. Handling – repackaging of small grains, Retail Sales	AU	N	Y
5	C	Crops – Alfalfa, hay, potatoes, cover crops. 100% Organic – no split or parallel.	AU	Y	N
6	C	Crops - Apricots, Apriums, Asian Pears, Cherries, English Walnuts, Nectarines, Peaches, Plums, Pluots. 100% organic – no split or parallel. Co-pack arrangement with Plum Daisy, LLC to process jams for Morton's.	AU	N	Y
7	C	Mixed vegetables/market farm/CSA. 100% Organic – no split or parallel.	AU	N	N
8	C, WC, H	Mixed Herbs – culinary and medicinal. Wild Crop – culinary and medicinal herbs and plants. 100% organic – no split or parallel production. Handling - Artemesia Smudge Stick, Floral Smudge Stick, Sweet Grass Braid, Lavender Bundle, Lavender Essential Oil, Lavender	AU	N	Y
9	C, L	Crops – pasture for livestock. 100% organic – no split or parallel. Livestock – dairy heifers, non-lactating	AU	N	N
10	C, L	Crops – Mixed vegetables/market farm/CSA. Livestock - Chickens, eggs. Both scopes 100% organic – no split/parallel.	AU	N	Y
11					
12					
13					

Table 2: Summary of Certification File Review Information

Table of Contents Table 1 Table 3 Table 6a Table 6b Table 6c Table 7b

File No.	A Scopes (C,WC,L,H)	B Brief Description of Operation (See instructions below)	C IA/AU	D Sample (Y/N)	E Labels (Y/N)
14					
15					

Instructions: For each requirement (A-E), enter the appropriate information into **Table 2**. Insert information for the most recent full certification cycle. Make sure the information provided in Table 2 is entered into the corresponding File No. in Table 1.

A. Scopes (L, C, WC, H)

B. Description of Operation: *For crop operations, include a description about the type of crop and operation such as single crop, parallel production, split production, etc. For livestock operations, include a description about the type of livestock and operation. For handling operations, include a description of the type of products and operation such as single ingredient product, multi ingredient products, trader, distributor, etc. For wild crop operations, include a description of the type of products and operation such as single products, organic and nonorganic of the same product in the collection area, single harvester or multiple harvesters, collection areas, staging areas, production areas, and management and oversight of harvester.*

C. Initial Application (IA) or Annual Update (AU)

D. Was a sample pulled during the inspection? (Y/N)
If samples were pulled, include information in Table 7b. Sampling Worksheet - Sample and Reporting Information.

E. Are any labels used by the operation? (Y/N)
If there are labels, include information in Table 6a, 6b, or 6c Label Review Worksheet.

Table 3 – Full File Review

Table 3: Summary of Full File Reviews Table of Contents			
Instructions: This Checklist is used in conjunction with Table 1 and Table 2. This Checklist is used only to record the overall evaluation of files where a full file review was conducted. Use the certification file number as recorded in the Certification File Review Worksheet to identify the certification file(s). If a requirement is not applicable, include relevant information in the "Remarks" for that section. This Checklist is not used to record the overall evaluation of full file reviews for Grower Groups. Instead, the Certification File Review Checklist—Supplement for Grower Groups must be used.			
Fees and other charges for certification § 205.642			
	Yes	**No**	**Certification File Number(s)**
Is the operation provided with an estimate? § 205.642	X		This is issued from the administrative office after annual update and basic fee are received by CDA.
Are the fees charged consistent with the Fee Schedule submitted to the Administrator? § 205.642 – same; § 205.642 – consistent; § 205.501(a)(16)	X		
Certificate § 205.404(b)			
Does the certificate include:	**Yes**	**No**	**Certification File Number(s)**
Name and address of the certified operation? § 205.404(b)(1)	X		
"Effective date of certification"? § 205.404(b)(2) (Date the operation was initially certified to the USDA organic regulations.)	X		

Scope – Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation? § 205.404(b)(3)	X		
Name, address, internet address, and telephone number of the certifier? § 205.404(b)(4)	X		
Issue date of the certificate? NOP 2603	X		
Anniversary date? NOP 2603 (Date when the certified operation is required to submit its next annual update.)	X		
Label classification for processed organic products? (100% Organic, Organic, or Made with Organic (specified ingredients or food groups)) NOP 2603	X		
The statement "Certified Organic under the U.S. National Organic Program 7 CFR Part 205"? NOP 2603	X		
The statement "Once certified, a production or handling operation's organic certification continues in effect until surrendered, suspended or revoked"? §205.404(c); NOP 2603	X		
Are certificates issued in English? NOP 2603	X		
Do certificates include more than one certified operation or an uncertified operation on them?		X	
Remarks and Findings: Closing Meeting Findings			

Application § 205.401 Table of Contents Table 1 Table 2			
Does the application include:	**Yes**	**No**	**Certification File Number(s)**
The name of person completing the application; The applicant's business name; The applicant's address; The applicant's telephone number; and If a corporation, the name, address, and telephone number of the person authorized to act on the applicant's behalf? § 205.401 – Application Requirement § 205.402(a)(1) – Review for completeness § 205.402(a)(2) – Review for compliance	X		

Information on previous certifications? §205.401(c) § 205.402(a)(3) – ACA review for compliance			
Other information deemed necessary by the ACA to determine compliance with the ACT? § 205.401(d)	X		
Remarks and Findings: Closing Meeting Findings			

Organic System Plan (OSP) § 205.401(a) and § 205.406(a)			
Does the OSP include (§§ 205.201(a)(1)-(6)):	**Yes**	**No**	**Certification File Number(s)**
A **description of practices and procedures** to be performed and maintained, including the frequency with which they will be performed? §§ 205.200; 205.202 - 205.207; 205.236 – 205.240; and 205.270 – 205.272	X		
A **list of each substance** to be used as a production input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable?	X		
A **description of the monitoring practices and procedures** to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented?	X		
A **description of the recordkeeping** system implemented to comply with the requirements established in § 205.103?	X		
Does the OSP include a description of the **management practices and physical barriers** established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and products with prohibited substances?	X		
Additional information deemed necessary by the certifier to evaluate compliance with the regulations?	X		
Allowing an uncertified operation to produce or handle agricultural products, under contract or other arrangement, on the uncertified operation's land or premises (i.e., at units, facilities, or sites not explicitly subject to inspection or compliance action by the NOP or a certifier)? NOP 4009 Instruction Who Needs to be Certified		X	
NOP 5031 –Certification Requirements for Handling Unpackaged Organic Products			
Does the OSP contain information on how organic product is transported to and from the organic operation as applicable?	X		
Does the company bringing in or shipping the product handle unpackaged organic product?		X	
If the company handles unpackaged organic product and they take ownership of the product, are they certified?			NA

If the company handles unpackaged organic product and they do not take ownership are they: 1) a certified operation; or 2) part of the OSP of the certified seller or buyer?			NA
If the company is part of the OSP of the seller or buyer, does the seller/buyer have adequate records to document compliance with the organic regulations?			NA
Remarks and Findings: Closing Meeting Findings			

Continuing Certification: Did the certified operation submit an updated OSP that includes: §§ 205.406(a)(1)-(4) Table of Contents General Information Section	**Yes**	**No**	**Certification File Number(s)**
A summary statement, supported by documentation detailing any deviations from, changes to, modifications to, or other amendments made to the previous year's organic system plan during the previous year?	X		
Any additions or deletions to the previous year's organic system plan, intended to be undertaken in the coming year, detailed pursuant to § 205.200?	X		
Any additions to or deletions from the information required pursuant to § 205.401(b)?	X		
An update on the correction of minor noncompliances previously identified by the certifier as requiring correction for continued certification?	X		
Other information as deemed necessary by the certifier to determine compliance with the Act and the regulations.	X		
Remarks and Findings: Closing Meeting Findings			

General Assessments:	**Yes**	**No**	**Certification File Number(s)**
Are the materials and inputs used in compliance with the NL and annotations? §§ 205.403(c)(3), 205.402(a)(2), 205.406(c)	X		
What is the certifier's process for conducting material reviews	X		OMRI, WSDA

and making determinations on allowable vs. prohibited substances for those substances that have not been reviewed and approved by another entity, i.e., certifier, EPA, ISO Guide 65 accredited material evaluation program? §§ 205.402(a)(2), 205.406(c) Policy Memo 11-4			
Does the staff conducting the material reviews have the appropriate training, experience, and/or education to conduct the reviews along with appropriate resources? §§ 205.501(a)(1), 205.501(a)(4), 205.501(a)(5)			
Is the application and OSP complete? §§ 205.402(a)(1), 205.406(c)	X		
Is there evidence that an exit interview was conducted? § 205.403(d)	X		
Was information or issues of concern identified by the inspector in the exit interview, as evidenced in the inspection report? § 205.403(d)	X		
Were there any notices of noncompliance or adverse actions by the certifier, and was the correct process followed? Table 4, Table 5	X		
If this was a continuation of certification review and any information on the certificate changed, did the certifier provide the operation with an updated certificate? § 205.406 (d)	X		
Remarks and Findings: Closing Meeting Findings			

Overall Determination Statement:

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

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

Table 4: Notice of Noncompliance/Adverse Action Worksheet

Table of Contents § 205.406(c) § 205.662(a) Table 3

Name of Client and Scope	Notification of Minor Issues (Enter Yes, No, or N/A as applicable)	Notification of Noncompliance (Enter Yes, No, or N/A as applicable)				Type of Proposed Adverse Action (Enter PS, PR, or N/A as applicable)	Notification of Proposed Adverse Action				Adverse Action Taken	Request for Mediation or Appeal, and Remarks
	• **Description of Minor Issue** • **Facts of Each Minor Issue** • **Date to Rebut or Correct** • **Resolution**	**Description of NC** § 205.662(a)(1)	**Facts of Each NC** § 205.662(a)(2)	**Date to Rebut or Correct** § 205.662(a)(3)	**Resolution Notice Sent** § 205.662(b)	• Proposed Suspension (PS) • Proposed Revocation (PR) • N/A – none sent § 205.662(c)	**Reasons for proposed action** § 205.662(c)(1)	**Proposed Eff. Date** § 205.662(c)(2)	**Impact of proposed action** § 205.662(c)(3)	**Right of mediation or appeal** § 205.662(c)(4)	Suspension (Susp) Revocation (Rev) § 205.662(e)(1) Enter Revocation or suspension if applicable	Did the certified operation request mediation or file an appeal? If so did the certifier or State send the notice of Suspension / Revocation while final resolution of either mediation or appeal was pending? § 205.662(e)(2) Enter remarks as appropriate. Document: 1) when Notices were submitted to the client and the method used (§ 205.660(d)); and 2) when and if the notices were sent to the Administrator (§205.501(a)(15(i)).
(b) (4) [redacted]	*N/A*	*Yes*	*Yes*	*Yes*	*Yes*							
	N/A	*Yes*	*Yes*	*Yes*	*No*	*NoPS*	*Yes*	*Yes*	*Yes*	*Yes*	*Susp*	*NoNC did not include the option to rebut.*
	N/A	*Yes*	*Yes*	*Yes*	*No*	*NoPS*	*Yes*	*Yes*	*Yes*	*Yes*	*Susp*	*NoNC did not include the option to rebut.*
	N/A	*Yes*	*Yes*	*Yes*	*Yes*	*N/A*						

Table 4: Notice of Noncompliance/Adverse Action Worksheet

Table of Contents § 205.406(c) § 205.662(a) Table 3

Name of Client and Scope	**Notification of Minor Issues** (Enter Yes, No, or N/A as applicable)	**Notification of Noncompliance** (Enter Yes, No, or N/A as applicable)				**Type of Proposed Adverse Action** (Enter PS, PR, or N/A as applicable)	**Notification of Proposed Adverse Action**				**Adverse Action Taken**	**Request for Mediation or Appeal, and Remarks**
	• **Description of Minor Issue** • **Facts of Each Minor Issue** • **Date to Rebut or Correct** • **Resolution**	**Description of NC** § 205.662(a)(1)	**Facts of Each NC** § 205.662(a)(2)	**Date to Rebut or Correct** § 205.662(a)(3)	**Resolution Notice Sent** § 205.662(b)	• Proposed Suspension (PS) • Proposed Revocation (PR) • N/A – none sent § 205.662(c)	**Reasons for proposed action** § 205.662(c)(1)	**Proposed Eff. Date** § 205.662(c)(2)	**Impact of proposed action** § 205.662(c)(3)	**Right of mediation or appeal** § 205.662(c)(4)	Suspension (Susp) Revocation (Rev) § 205.662(e)(1) Enter Revocation or suspension if applicable	Did the certified operation request mediation or file an appeal? If so did the certifier or State send the notice of Suspension / Revocation while final resolution of either mediation or appeal was pending? § 205.662(e)(2) Enter remarks as appropriate. Document: 1) when Notices were submitted to the client and the method used (§ 205.660(d)); and 2) when and if the notices were sent to the Administrator (§205.501(a)(15(i)).

Instructions:

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

Remarks and Findings: Closing Meeting Findings

Table 4: Notice of Noncompliance/Adverse Action Worksheet

Table of Contents § 205.406(c) § 205.662(a) Table 3

Name of Client and Scope	**Notification of Minor Issues** (Enter Yes, No, or N/A as applicable)	**Notification of Noncompliance** (Enter Yes, No, or N/A as applicable)				**Type of Proposed Adverse Action** (Enter PS, PR, or N/A as applicable)	**Notification of Proposed Adverse Action**				**Adverse Action Taken**	**Request for Mediation or Appeal, and Remarks**
	• **Description of Minor Issue** • **Facts of Each Minor Issue** • **Date to Rebut or Correct** • **Resolution**	**Description of NC** § 205.662(a)(1)	**Facts of Each NC** § 205.662(a)(2)	**Date to Rebut or Correct** § 205.662(a)(3)	**Resolution Notice Sent** § 205.662(b)	• Proposed Suspension (PS) • Proposed Revocation (PR) • N/A – none sent § 205.662(c)	**Reasons for proposed action** § 205.662(c)(1)	**Proposed Eff. Date** § 205.662(c)(2)	**Impact of proposed action** § 205.662(c)(3)	**Right of mediation or appeal** § 205.662(c)(4)	Suspension (Susp) Revocation (Rev) § 205.662(e)(1) Enter Revocation or suspension if applicable	Did the certified operation request mediation or file an appeal? If so did the certifier or State send the notice of Suspension / Revocation while final resolution of either mediation or appeal was pending? § 205.662(e)(2) Enter remarks as appropriate. Document: 1) when Notices were submitted to the client and the method used (§ 205.660(d)); and 2) when and if the notices were sent to the Administrator (§205.501(a)(15(i)).

Table 5: Notice of Noncompliance/Denial of Certification

Table of Contents § 205.405 Table 3

A. Name of Client	B. Scope	C. Notification of Noncompliance Included § 205.405(a)	D. Applicant Response § 205.405(b)	E. Certifier Action Taken § 205.405(c)(1) § 205.405(c)(2)	F. Denial of Certification Included § 205.405(d)	G. Identify whether either of the two denial methods were used and whether they were appropriate.
(b) (4) [redacted]	*Crops*	*Yes*	*CA submitted*	*CA not accepted*	*Yes*	*Yes*

Instructions:

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

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

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

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

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

Remarks and Findings: Closing Meeting Findings

Only one denial has been issued since 2015 (last audit) as described above, it was issued according to the USDA organic regulations.

Table 6a: Label Review Worksheet: "100% Organic" or "Organic" § 205.303

Table of Contents Table 1 Table 2 Table 4 Table 5

Client File	Product	1	2	3	4	5	6	7	8	9	10	11	12	13 Complies	
														Yes	No
(b) (4)	O Organics Carrots – co-packing	NA	NA	NA	N	Y	N	Y	Y	Y	N	Y	Y	X	
	Baby carrots	NA	NA	NA	N	Y	N	Y	Y	Y	N	Y	Y	X	
	Organic amber raw blue agave	NA	NA	NA	N	Y	N	Y	Y	N	NA	Y	Y	X	
	Organic honey	NA	NA	NA	N	Y	N	Y	Y	N	NA	Y	Y	X	
	Cassava Fructose Free Sweetner	N	N/A	N/A	N	Y	N	Y	Y	N	N/A	Y	Y	X	
	Vanilla Lavendar Flavored Honey	N	N/A	N/A	N	Y	N	Y	Y	N	N/A	Y	Y	X	
	Produce label	N/A	N/A	N/A	N	N/A	N	Y	Y	N	N/A	Y	Y	X	
	Egg label	N/A	N/A	N/A	N	N/A	N	Y	Y	N	N/A	Y	Y	X	

Instructions: For products labeled as "100% Organic" or "Organic," review against the requirements and record on the table using "Y," "N," or "N/A" as applicable (Y = Yes; N = No). Indicate for each label if it complied with the requirements. Insert more rows as needed.

1. For products labeled "Organic," do the labels contain the percentage of organic ingredients in the products? § 205.303(a)(2) (If no, use N/A for 2 and 3.)
2. Does the percentage statement exceed one half the size of the largest type size on the panel on which the statement is displayed? § 205.303(a)(2)
3. Does the percentage statement appear in its entirety in the same type size, style, and color without highlighting? § 205.303(a)(2)
4. Is this a multi-ingredient product labeled as 100% Organic? § 205.303(a)(3)
5. If the product is labeled "Organic," does it identify each organic ingredient in the ingredient statement? § 205.303(b)(1)
6. Does it identify water or salt as organic? § 205.303(b)(1)
7. Does the label (on the information panel) identify the name of the certifier that certified the handler of the finished product, preceded by the statement, "Certified organic by * * *," or a

similar phrase? § 205.303(b)(2)
8. Is the certifier identifying statement (no. 7 above) on the information panel and below the information identifying the handler or distributor of the product? § 205.303(b)(2)
9. Does the label display the certifier's seal or logo? § 205.303(a)(5)
10. Is the certifier's seal or logo individually displayed more prominently than the USDA organic seal? § 205.303(a)(5)
11. Does it display the USDA organic seal? § 205.311(a)
12. Does the seal replicate the form and design of figure 1, is printed legibly and conspicuously, and meets all requirements of § 205.311(b)?
13. Are the labels compliant? If 'No' and a NC was not issued, then see § 205.402(a)(2) or § 205.405(a) for applicants, and § 205.406(c) for certified operations.

Remarks and Findings: Closing Meeting Findings

O Organics brand carrots have QAI listed as the certifier on the label. (b) (4) is producing and packing the carrots for Safeway.

There is no indication that (b) (4) labels were reviewed and approved. CDA indicates that Farmer's Market and Wholesale labels don't go through the formal label review process.

Table 6b: Label Review Worksheet: "Made with Organic" (specified ingredients or food group(s)) § 205.303

Table of Contents Table 1 Table 2 Table 4 Table 5

Client File	Product	1	2	3	4	5	6	7	8	9	10	11	12 Complies	
													Yes	No
(b) (4)		N	N	Y	NA	Y	Y	N	Y	Y	N	N	X	
		N	N	Y	NA	Y	Y	N	Y	Y	N	N	X	
		N	N	N	N/A	N/A	N	N	Y	Y	N	Y		X

Instructions: For products labeled as "Made with organic (specified ingredients or food groups)" review against the requirements and record on the table using "Y," "N," or "N/A" as applicable (Y = Yes; N = No). Indicate for each label if it complied with the requirements. Insert more rows as needed.

1. Does the "Made with organic (specified ingredients or food groups)" statement list more than three organically produced ingredients? § 205.304(a)(1)(i)
2. Does the "Made with organic (specified ingredients or food groups)" statement list more than three of the following food groups: beans, fish, fruits, grains, herbs, meats, nuts, oils, poultry, seeds, spices, sweeteners, and vegetables or processed milk products? § 205.304(a)(1)(ii)
3. Does the "Made with organic (specified ingredients or food groups)" statement appear in letters that do not exceed one half the size of the largest type size on the panel of which it appears and does it appear in its entirety in the same type size, style, and color without highlighting? § 205.304(a)(1)(iii)
4. Does the percentage of organic ingredients statement exceed one half the size of the largest type size on the panel on which the statement is displayed? § 205.304(a)(2)
5. Does the percentage of organic ingredients statement appear in its entirety in the same type size, style, and color without highlighting? § 205.304(a)(2)
6. Does the label identify each organic ingredient in the ingredient statement? § 205.304(b)(1)
7. Does it identify water or salt as organic? § 205.304(b)(1)
8. Does the label (on the information panel) identify the name of the certifier that certified the handler of the finished product, preceded by the statement, "Certified organic by * * *," or a similar phrase? § 205.304(b)(2)
9. Is the certifier identifying statement (no. 7 above) on the information panel and below the information identifying the handler or distributor of the product? § 205.304(b)(2)
10. Does the label display the certifier's seal or logo? § 205.304(a)(3)
11. Does it display the USDA organic seal? § 205.304(c)
12. Are the labels compliant? If 'No' and a NC was not issued, then see § 205.402(a)(2) or § 205.405(a) for applicants, or § 205.406(c) for certified operations.

Table 6b: Label Review Worksheet: "Made with Organic" (specified ingredients or food group(s)) § 205.303

Table of Contents Table 1 Table 2 Table 4 Table 5

Client File	Product	1	2	3	4	5	6	7	8	9	10	11	12 Complies	
													Yes	No

Remarks and Findings: Closing Meeting Findings

CDA issued a NoNC to (b) (4) for using product labels that have not been approved by the CDA. In addition, the labels themselves are in non-compliance as the ingredients section does not list certain items as organic when they should be. This product has been discontinued by (b) (4).

Table 6c: Label Review Worksheet: All other labels reviewed

Table of Contents Table 1 Table 2 Table 4 Table 5

Client File	Product Label Type	Requirements	Remarks	Complies	
				Yes	No

Instructions: For labels reviewed that are not "100% Organic", "Organic", or "Made with organic" enter review information below. Insert more rows as needed.
Requirements: Enter the NOP requirement (§205.305, etc.) being assessed.
Remarks: Enter general information regarding the review or specific information if label is noncompliant.
Complies: Are labels compliant? If 'No' and a NC was not issued, then §205.402(a)(2) or §205.405(a) for applicants, §205.406(c) for certified operations.

Remarks and Findings: Closing Meeting Findings

Table 7a: Sample Testing Worksheet: General Information Table of Contents Table 1 Table 2 Table 3 Table 4 Table 5	
Provide information on sampling conducted by the certifier since the previous assessment, i.e., number of certified operations; number of operations with samples pulled; number of samples pulled overall; types of samples (soil, tissue, product, water, etc.). Were 5% of the certified operations sampled and tested on an annual basis (or at least one operation annually if the certifier has fewer than thirty operations)? § 205.670(d)	*Samples taken since their Mid-term audit (8/18/15):* 2015- (b) (4) (9/2/15), (b) (4) (9/3/15), (b) (4) (9/10/15) 2016- (b) (4) (2/22/16), (b) (4) (2/22/16) , (b) (4) (2/22/15) 2017- 18 samples taken. Results not back from the lab Jan 2, 2016 204___5% = 10___ Jan 2, 2017 _203__5% = 10___ All of the samples taken were plant samples and tested for prohibited substances. PAL Lab ISO 17025:2005 #64422 114-268
Remarks and Findings: Closing Meeting Findings	
Only 3 samples taken in 2016 which is less than 5%. This was a finding from the June 2017 Compliance audit (NP7162PZA.F1). All 18 samples taken in 2017 were taken by CDA representatives and chain of custody was maintained. Receipts given to the operation for the sample taken were not on file. Sample results were not back from the lab to verify compliance.	

Table 7b – Sample Testing and Reporting Information

Table of Contents Table 2

File No.	Name of applicant / certified operation sampled	A	B	C	D	E	F	G	H	I	J	K	L Type of sample pulled	M What was the sample tested for?	N Why was the sample pulled?	O Provide info on the test results	P Provide info on the certifier decision and outcome	Complies Yes	Complies No
(b) (4)	[redacted]	Y		Y	Y	Y	Y	Y	N	N	N / A	N	Potato tubers	Chlorpropham	Complaint Investigation	NoNC issued	NoNC resolution letter sent to operation		
		Y		Y	Y	Y	Y	Y	N	N	N / A	N	Potato tubers	Chlorpropham	Complaint Investigation	No detect			
		Y		Y	Y	Y	Y	Y	N	N	N / A	N	Potato tubers	Chlorpropham	Complaint Investigation	No detect			
4																			
5																			
6																			
7																			
8																			
9																			
10																			

Instructions: Review the procedures and processes that describe how the sample was pulled and the reporting requirements. For requirements A – K, enter "Y" for "Yes" or "N" for "No," as appropriate. Make an assessment on whether or not the requirements were met by entering an "X" under the appropriate response of the "Complies" column. If any requirement is not met, identify on Checklist Section XIV (§§ 205.670 and 205.671). For requirements L – P, enter the appropriate response.

A. Was the sample collected by an inspector representing the certifier, Administrator, or State? § 205.670(e)
B. Did the inspector provide the operation with a receipt? § 205.403(e)(1)
C. Was the chain of custody maintained? § 205.670(e)
D. Was an ISO 17025 accredited lab used, or an alternate standard approved by the NOP? § 205.670(e) and NOP 2611
E. Was an approved AOAC or Validated Method used? § 205.670(e)

Table 7b – Sample Testing and Reporting Information

Table of Contents Table 2

File No.	Name of applicant / certified operation sampled	A	B	C	D	E	F	G	H	I	J	K	L Type of sample pulled	M What was the sample tested for?	N Why was the sample pulled?	O Provide info on the test results	P Provide info on the certifier decision and outcome	Complies Yes	Complies No

F. Were results sent to the operation? §§ 205.402(b)(3) and 205.403(e)(2)
G. Were test results available for review during the assessment? *If results are not available, assess why and if appropriate, identify a NC to § 205.501(a)(9). Availability of test results for review during assessments is also identified in NOP 2613.*
H. Was the operation charged for testing? § 205.670(b)(c)
I. Did the results exceed FDA or EPA tolerances? § 205.670(g)
J. Was the applicable agency notified if "I" above is "Yes"? § 205.670(g); see NOP 2613 for further guidance
K. Were any prohibited substances greater than 5% of the EPA tolerance or higher than UREC? § 205.671
L. What type of sample was pulled, i.e., soil, tissue, product, water, etc.?
M. What was the sample tested for? (Specific pesticide name or classification.)
N. Why was the sample pulled? (Directed by the certifier or NOP? Inspector decision?)
O. Provide information on test results. (Positive, negative, etc.) NOP 2613
P. Provide information on the certifier decision and outcome. (Was there an investigation?) § 205.671; see NOP 2613 for further guidance

Remarks and Findings: Closing Meeting Findings

Table 8 - Personnel Information Worksheet

Name	Status – Employee / Contractor / Responsibly connected individuals	Title / Position	Duration in the current position	Duration employed with Certifier	Certification Scopes Approved to inspect or evaluate	Education	Training	Experience	Job Description (or indicate section in Quality Manual)	Conflict of Interest Record Date	Confidentiality Record Date	Date of last Perf Evaluation?
Duane Sinning	Employee	Assistant Division Director	3 yrs	3 yrs	None	See Resume	See Resume	See Resume	See Resume	4/3/2017	4/3/2017	4/21/2016
Amy Stafford	Employee	Program Manager (Organic) Until 5/15/2017	4 yrs	4 yrs	Crop, Livestock, Handling	See Resume	See Resume	See Resume	See Resume	4/3/2017	4/3/2017	4/12/2016
Mitch Yergert	Employee	Division Director	12 yrs	30 yrs	Crops, Livestock, Handling	See Resume	See Resume	See Resume	See Resume	4/3/2017	4/3/2017	4/25/2017
Alyssa Mack	Employee	Agriculture Program Assistant (Organic)	2 yrs 4 mos	2 yrs 4 mos	Crop, Handling	See Resume	See Resume	See Resume	See Resume	4/3/2017	4/3/2017	4/30/2016
Barb Terry	Employee	Administrative Assistant II	1 yr 6 mos	1 yr 6 mos	None	See Resume	See Resume	See Resume	See Resume	4/3/2017	4/3/2017	4/28/2016
Barb Rosenbach	Employee	Program Assistant	21 yrs	12 yrs	None	See Resume	See Resume	See Resume	See Resume	4/3/2017	4/3/2017	4/20/2016
Don Brooks	Employee	Field Staff Supervisor	17 yrs	17 yrs	None	See Resume	See Resume	See Resume	See Resume	4/3/2017	4/3/2017	4/21/2016
(b) (6), (b) (7)(C)	Employee	Lead Inspector	5 yrs	29 yrs	Crop, Livestock, Handling	See Resume	See Resume	See Resume	See Resume	4/5/2017	4/5/2017	4/26/2016
	Employee	Lead Inspector	5 yrs	12 yrs, 6 mos	Crop, Livestock,	See Resume	See Resume	See Resume	See Resume	4/5/2017	4/5/2017	4/29/2016

					Handling							
(b) (6), (b) (7)(C)	Employee	Plant Industry Inspector III	9 yrs 9 mos	9 yrs 9 mos	Crop, Livestock, Handling	See Resume	See Resume	See Resume	See Resume	4/5/2017	4/5/2017	4/20/2016
	Employee	Plant Industry Inspector III	17 yrs 4 mos	17 yrs 4 mos	Crop, Handling	See Resume	See Resume	See Resume	See Resume	4/5/2017	4/5/2017	4/29/2016
	Employee	Plant Industry Inspector III	12 yrs 10 mos	12 yrs 10 mos	Crop, Livestock, Handling	See Resume	See Resume	See Resume	See Resume	4/5/2017	4/5/2017	4/21/2016
	Employee	Plant Industry Inspector III	9 yrs	9 yrs	Crop, Handling	See Resume	See Resume	See Resume	See Resume	4/5/2017	4/5/2017	4/20/2016
	Employee	Plant Industry Inspector III	19 Yrs	19 yrs	Crop, Handling	See Resume	See Resume	See Resume	See Resume	4/5/2017	4/5/2017	4/20/2016
	Employee	Plant Industry Inspector III	4 yrs 5 mos	6 mos	Crop	See Resume	See Resume	See Resume	See Resume	4/5/2017	4/5/2017	Not yet eval for OG program
	Employee	Plant Industry Inspector III	15 yrs 5 mos	5 yrs 1 month	Crop, Handling	See Resume	See Resume	See Resume	See Resume	4/5/2017	4/5/2017	4/26/2016
	Employee	Plant Industry Inspector III	4 yrs 10 mos	4 yrs 10 mos	Crop, Handling	See Resume	See Resume	See Resume	See Resume	4/5/2017	4/5/2017	4/27/2016
	Employee	Plant Industry Inspector III	27 yrs	27 yrs	Crop, Handling	See Resume	See Resume	See Resume	See Resume	4/5/2017	4/5/2017	4/22/2016
	Employee	Plant Industry Inspector III	5 yrs	5 yrs	Crop, Livestock, Handling	See Resume	See Resume	See Resume	See Resume	4/5/2017	4/5/2017	4/26/2016

Instructions: (1) Below please provide number of personnel, divided into categories and / or job titles. *EX: Administrative Staff (3), Technical Staff [including inspectors, reviewers] (7), etc.* **(2)** For the last three columns, i.e. COI, Confidentiality, and Perf Eval, indicate the dates these records were last completed. An employee or contractor resume may be used as a substitute for filling in the other columns (e.g. education, training, job description, etc…). If resumes or CVs are used, state: "See Resume or CV" in the appropriate column. Do not submit the resume or CV; please have those records available for the auditors review at your office.

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

Remarks and Findings:

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

Instructions – Table 9

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Remarks

National Organic Program
Witness Audit Checklist

Witness Audit - General Information	
This checklist is used in conjunction with Tables 1, 2, 3, 6a, 6b, 6c, and 7b of NOP 2005 Accreditation Assessment Checklist. This checklist is used to record evaluation information for each witness audit with the exception of grower groups. NOP 2005-5 Witness Audit Checklist for Grower Groups shall be used for witness audits of grower groups.	
Name of auditor(s):	Graham Davis
Inspection date; initial or annual?	8/9/2017 Annual Inspection
Name of operation:	(b) (4)
Location of operation:	(b) (4)
Scope(s) of certification requested:	Processing and Production
Inspector's name:	(b) (6), (b) (7)(C)
Inspector conflict of interest or confidentiality concerns:	Signed and on file
Operation representative (knowledgeable):	Violet Garcia, Shari Yaetts, Diane Waalks, Mike Kent, Luis Hernandez
Other inspection attendees:	
Time inspection started: 9am	Time inspection completed: 3:30pm
General information: **Crops** grown, acreage, fields and field location(s) (1 site or 2 or more); **Wild Crops:** products collected, harvest site locations, collector training; **Livestock** operation type, number of animals, identification methods, products; **Handling** operation, products processed, facilities, etc…	

(b) (4) is a feed processor and egg laying facility in (b) (4). Their feed mill is dedicated to producing organic feed although the operation is a split facility. They buy their laying hens from (b) (4) (certified by GOA) at 18 weeks. The facility houses (b) (4) organic chickens in (b) (4).

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

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

The operation added three cleaning products, 1. (b) (4) for flock change out, 2. (b) (4) used to clean the water lines in the houses, 3. (b) (4) for foot baths. The inspector recognized that the salt listed in their OSP wasn't the same as the salt on hand and required the operation to provide a label for the salt they are using.

Did the inspector and the on-site inspection verify that the organic system plan (OSP) complies with the USDA organic regulations for: (§ 205.403(c))	
General	
Maintain or improve natural resources (§ 205.200)	Yes
Crops	**Section N/A N/A**
Land requirements (§ 205.202)	
Soil fertility and crop nutrient management practice standard (§ 205.203)	
Seeds and planting stock practice standard (§ 205.204)	
Crop rotation practice standard (§ 205.205)	
Crop pest, weed, and disease management practice standard (§ 205.206)	
Approved temporary variance practices? (§ 205.290)	
Wild Crops	**Section N/A N/A**
Wild-crop harvesting practice standard (§ 205.207)	
Livestock	**Section N/A**
Origin of livestock (§ 205.236)	Yes
Livestock feed (§ 205.237)	Yes
Livestock health care practice standard (§ 205.238)	Yes

Livestock living conditions (§ 205.239)	Yes
Pasture practice standard (§ 205.240)	Yes
Approved temporary variance practices? (§ 205.290)	N/A
Handler	**Section N/A**
Organic handling requirements (§ 205.270)	Yes
Facility pest management practice standard (§ 205.271)	Yes (b) (4) [redacted]
Commingling and contact with prohibited substance prevention practice standard (§ 205.272)	Yes ((b) (4) [redacted] system in place, all feed is organic)
Did the inspector verify product composition for all products? (§ 205.301)	Yes
Approved temporary variance practices? (§ 205.290)	N/A

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

Exit Interview (§ 205.403(d))
Document information addressed or requested by the inspector during the exit interview: Salt label.

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

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

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

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

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

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

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

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

Table 10 - Material Narrative

For a description of the Material Review System see Section 1

Describe the auditor's process for verification of material inputs (e.g. Certification personnel interviewed, documents or records reviewed, etc...) Describe what type of samples were selected and why they were selected.		CDA utilizes the OrganicMaterials Review Institute (OMRI) and Washington State Department of Arriculutre (WSDA) Products List and Generic Materials List. CDA will ONLY review input materials in conjunction with an applicant for organic certification or a certified organic operation as part of an operation s OSP. CDA does not review input materials on behalf of input manufacturers or for general identification as approved by CDA. Certifier creates a Material Review list for each operation. Certified operations will be provided annually with a list of materials nearing renewal dates and required documentation that must be submitted for renewal; as noted above, input material reviews must be renewed every 5 years for continued acceptance as a part of an operation s OSP.
§205.501(a)(8)	Does the Organic Systems Plan template section for materials comply with 205.201(a)(2)	Yes
§205.403(c)(2)	Does the Inspection Report template adequately record verification of allowed materials?	Yes
§205.501(a)(9)	Are there adequate records that demonstrate the request, review, decision, and notification for material inputs?	Yes
§§205.501(a)(1), 205.501(a)(4), 205.501(a)(5)	Does the staff conducting the material reviews have the appropriate training, experience, and/or education to conduct the reviews along with appropriate resources?	CDA allows their inspectors to review and approve materials if they are on OMRI or WSDA's lists. CDA relies heavily on OMRI, WSDA's lists of approved products but will review and approval non-listed materials. Only the Program Manager or Assistant Manager can approve materials that aren't on OMRI or WSDA lists.
Auditor's assessment of the material review and recording system.		CDA has a good system of tracking materials. CDA has a material input review policy. CDA uses OMRI and WSDA's lists of approved materials. CDA has detailed instructions in their Input Materials Review Policy for how reviews are to be conducted when a material is not OMRI or WSDA approved. Lists for each operation are reviewed annually. In June of 2017, CDA started a master list of approved materials for all of the materials CDA has approved and reevaluated.

Material Review Sampled Events

Client File, Internal List, Other (or N/A)	Boulder Altan Alma	Boulder Altan	Monroe Organic Farm	Twisted Root		
Material (name)	Black Gold Potting Soil	Planet Ultra Dishwashing Liquid	Neptune Harvest Fish and Seaweed	Dipel DF		
Material Use	potting soil	cleaning product	fertilizer	insecticide		
Certifier Determination (approved/unapproved)	approved	approved	approved	approved		
Regulation:	**Question:**	**Indicate: y = "yes" or n = "no" with compliance to the regulations**					
§205.501(a)(9)	Certifier Determination basis (e.g. OMRI, Other Certifier, Certifier Review, National List, NOP Guidance, etc...)	**OMRI**	**Certifier Review**	**OMRI**	**OMRI**		
§205.501(a)(9)	Decision recorded and Decision maker identified?	**Yes (Amy Stafford)**	**Yes (Amy Stafford)**	**Yes (Alyssa Mack)**	**Yes (Alyssa Mack)**		
§205.501(a)(9)	Operator was notified of Decision?	**Yes**	**Yes**	**Yes**	**Yes**		
§205.501(a)(3)	Approval Decision was issued with appropriate conditions or restrictions? E.g. annotations, etc...	**N/A**	**Yes restricted, must have water rinse**	**N/A**	**Yes restricted 205.206**		
§205.501(a)(1) and (4), §205.105(a)	Are all synthetic substances and ingredients listed in §205.601 or §205.603?	**Yes**	**Yes**	**Yes**	**Yes**		
§205.501(a)(1) and (4)), §205.105(b)	Is the material free of nonsyntheic substances prohibited in §205.602 or §205.604?	**Yes**	**Yes**	**Yes**	**Yes**		
§205.501(a)(1) and (4), §205.105(c)	Are the nonag substances used in/on processed products in §205.605	**N/A**	**N/A**	**N/A**	**N/A**		
§205.501(a)(1) and (4), §205.105(d)	Are the ag substances used in/on processed products in §205.606?	**N/A**	**N/A**	**N/A**	**N/A**		
§205.501(a)(1) and (4), §205.105(e)	Is the material and its ingredients produced without Excluded Methods (except for vaccines)?	**Yes**	**Yes**	**Yes**	**N/A**		
§205.501(a)(1) and (4), §205.105(f)	Is the material and its ingredients produced without Ionizing radiation?	**Yes**	**Yes**	**Yes**	**N/A**		
§205.501(a)(1) and (4), §205.105(g)	Is the material and its ingredients produced without sewage sludge?	**Yes**	**Yes**	**Yes**	**N/A**		
§§ 205.403(c)(3), 205.402(a)(2), 205.406(c)	Are the materials and inputs used in compliance with the NL and annotations?	**Yes**	**Yes**	**Yes**	**N/A**		
Comments (Provide comments for any "no" responses):							
If the material/review is compliant with all questions, then mark a y = "yes" in this row only.		**Yes**	**Yes**	**Yes**	**Yes**		

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

July 12, 2017

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

Dear Mr. Yergert:

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

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

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

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

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

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

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

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

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

1. Complete the attached Table 8. For the last three columns, i.e. COI, Confidentiality, and Perf Eval, indicate the dates these records were last completed. An employee or contractor resume may be used as a substitute for filling in the other columns (e.g. education, training, job description, etc…). If resumes or CVs are used, state: "See Resume or CV" in the appropriate column. Do not submit the resume or CV; please have those records available for the auditors review at your office.
2. Complete or update attached Table 9 for all locations where certification and accreditation activities occur.
3. Complete the attached Section I table. If procedures are detailed in CDA's Quality Manual, Certification Program Manual, and/or work instructions, please indicate the Section I table the reference number and section or page number.
4. A list of all quality control documents for USDA organic certification. Please indicate the control number (if applicable), title of the document, description of the document, and language.
5. A current edition of the CDA Quality Manual and/or NOP Certification Manual with all Standard Operating Procedures, Work Instructions, and certification templates (e.g. OSP, Inspection Report, Notice of Noncompliance, etc...).
6. The following certification files (a-j):

(b) (4)

[redacted]

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

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

g. Internal Control System (ICS) quality manual(s) or document(s) (only for grower groups)

7. Complete the attached NOP 2005 Table 1 and Table 2 using the files in #6, a-j

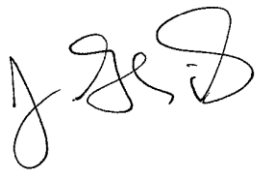
8. For all proposed witness or review audits conducted during this onsite assessment, please send the following documents for each operation:
   - **a.** Organic System Plan
   - **b.** Internal Control System (ICS) quality manual(s) or document(s) (only for grower groups)
   - **c.** Most recent Inspection Report
   - **d.** All notifications to the operation since the last inspection.
   - **e.** Organic certificate
   - **f.** Inspector's resume or CV (for Witness Audits only)
   - **g.** Inspector's current contact information (for Witness Audits only)
   - **h.** Inspector instructions.

9. Please be prepared to provide an update on all corrective actions accepted by the NOP for prior issued noncompliances

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

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

Sincerely,



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

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

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

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

Attachment 1: Payment Options

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

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

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

Overnight Mailing Address:
U.S. Bank
Attn: Government Lock Box 790304
1005 Convention Plaza
St. Louis, MO 63101

Regular Mail Address:
USDA, AMS, LPS, QAD
PO Box 790304
St. Louis, MO 63179-0304

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

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

Credit Card:

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

Be advised of the following Pay.Gov payment limits:

Credit Cards

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

Debit Cards

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

Bank Accounts

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

To submit payment, follow these steps:

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

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

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

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

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

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

ABA:	(b) (6)
Name on Account:	USDA, Marketing and Regulatory Programs (MRP), Agricultural Marketing Service (AMS)
Account Number:	(b) (6)

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

ABA:	(b) (6)
Name on Account:	USDA, Agricultural Marketing Service (AMS)
Account Number:	(b) (6)

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

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

Audit Objectives:

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

Audit Scope:

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

Audit Criteria & Reference Documents:

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

Company Name: Colorado Department of Agriculture (CDA)

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

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

Company Name: Colorado Department of Agriculture (CDA)

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

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

Colorado Dept. of Agriculture
Mitchell Yetgert — Mitchell Yetgert — 7/14/17

Client (Auditee) Name: Client (Auditee) Signature: Date:

P. Zuk — 7/7/2017

Lead Auditor Signature: Date:

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

REPRODUCE LOCALLY. *Include form number and edition date on all reproductions.*

OMB APPROVED: NO. 0581-0128

U.S. DEPARTMENT OF AGRICULTURE
AGRICULTURAL MARKETING SERVICE
Livestock, Poultry, and Seed Program
Quality Assessment Division

APPLICATION FOR SERVICE

Submit Completed Form to: USDA, MRP, AMS, LPS, QAD
Business Operations Branch
10809 Executive Center Drive, Suite 318
Little Rock, AR 72211-6022

Email: QAD.BusinessOps@ams.usda.gov
Telephone: 501-312-2962
Fax: 501-312-2968

☐ New Application
☐ Change of Address
☐ Revision

In accordance with the applicable provisions of the regulation issued by the Agricultural Marketing Service, U.S. Department of Agriculture, application is hereby made for the furnishing of the service(s) checked below to be performed at the plant specified:

COMMODITY	TYPE	SERVICES	AUDIT SERVICES
☐ Beef	☐ Commitment	☐ Grading	☐ Export Verification
☐ Lamb	☐ Non-Commitment	☐ Further Processing	☑ National Organic Program
☐ Pork	☐ Resident	☐ Processing	☐ Non-Hormone Treated Cattle
☐ Poultry	☐ Non-Resident	☐ Product Certification	☐ Pork for the European Union
☐ Rabbit	☐ Temporary	☐ Temperature Verification	☐ Process Verified Program
☐ **Shell Egg	☐ Fee	☐ Test Weight	☐ Seed Accreditation Programs (ASL,AFIP,ASSP)
☐ Veal/Calf	☐ _____	☐ Product Examination	☐ Quality System Assessment Program
☑ Certification Agent		☑ Organic Accreditation	☐ USDA ISO Guide 65 Program
			☐ _____

REGULATIONS APPLICABLE TO REQUESTED SERVICE(S):

☐ Grading of Shell Eggs (7 CFR Part 56)
☐ Grading of Poultry Products and Rabbit Products (7 CFR Part 70)
☐ Meats, Prepared Meats, and Meat Products (Grading, Certification, and Standards) (7 CFR Part 54)
☐ Livestock, Meat, and other Agricultural Commodities (Quality Systems Verification Programs) (7 CFR Part 62)

APPLICANT INFORMATION

NAME OF APPLICANT (*As shown on your income tax return*)
Colorado Department of Agriculture

Tax ID Number: 84-0644739
This is the Corporate Tax ID number unless the entity submitting the application is an individual, then the Social Security Number is Required. (Required by IRS).

BILLING ADDRESS OF APPLICANT (*Street and No., City, State, and ZIP Code*)
305 Interlocken Parkway
Broomfield, CO 80021

PLANT NUMBER:

FSIS or NFI Est. NUMBER:

NAME & PHYSICAL ADDRESS WHERE SERVICE(S) WILL BE PERFORMED (*Street and No., city, State, and ZIP Code*)
305 Interlocken Parkway
Broomfield, CO 80021

E-MAIL ADDRESS:
amy.stafford@state.co.us

☑ **CERTIFICATION: I agree to comply with the terms and conditions of the regulations applicable to the service(s) requested (*including but not limited to such instructions governing such service as may be issued, from time to time, by the Agricultural Marketing Service).* I also agree to notify the Agricultural Marketing Service of any contaminated or adulterated (chemical, physical, or biological agents) shell eggs in the processing plant and to assure identification and segregation of such product. This notification includes shell eggs that have tested positive for *Salmonella Enteritidis* (SE) or shell eggs from houses determined positive for the presence of SE, or any shell eggs that have been recalled or subject to any recall. I also agree to provide the AMS grader detailed information pertaining to the method of identification and segregation required of any shell eggs that have been determined to be contaminated, or adulterated, including eggs from an identified layer flock that tests positive for the presence of SE. I hereby acknowledge receipt of a copy of Public Law 84-272 (7 U.S.C. 1622(h)) and the regulations under which this application is made.

☑ I (We) agree to:

1. To comply with all applicable provisions of the Code of Federal Regulations (CFR) identified under "Regulations Applicable to Service(s) Requested," a copy of which has been received and read.
2. To notify the Business Operations Branch immediately when a change occurs in the legal status of the applicant, see contact information above.
3. To notify the Business Operations Branch, in advance and in writing, of cancellation of this application, see contact information above.
4. Any service requested via this application may be denied or withdrawn at any time as provided in the applicable CFR, program policies & procedures.

PRINT NAME & TITLE OF APPLICANT: Amy Stafford, Organic Program Manager

SIGNATURE OF APPLICANT: Amy Stafford

DATE: 4/12/2017

FOR OFFICIAL USE ONLY

DATE:	APPROVED BY (*Signature*)	TITLE

*No member of or delegate to Congress, or Resident Commissioner, shall be admitted to any benefit that may arise from this service unless derived through service rendered a corporation for its general benefit.

LPS- 109 (02/2015)

REPRODUCE LOCALLY. *Include form number and edition date on all reproductions.* FORM APPROVED – OMB NO. 0581-0191

U.S. DEPARTMENT OF AGRICULTURE
AGRICULTURAL MARKETING SERVICE

APPLICATION FOR ACCREDITATION

Please fax to (202) 205-7808 – mail original to:
Associate Deputy Administrator, National Organic Program
USDA, AMS, TM, NOP
1400 Independence Ave., SW, Room 4008 So..,Ag Stop 0268
Washington, DC 20250

NOTE: The following statements are made in accordance with the Privacy Act of 1974 (U.S.C. 522a) and the Paperwork Reduction Act of 1995, as amended. The authority for requesting this information to be supplied on this form is the Agricultural Marketing Agreement Act of 1937, Secs. 1-19, 48 Stat. 31, as amended, (7 U.S.C. 601-674). Furnishing the requested information is necessary for the administration of this program. Submission of the Tax identification Number (TIN) or Employer Identification Number (EIN) is mandatory, and will be used to determine affiliation or entity identity. Please note that background statements will not become invalid if a TIN or EIN is not disclosed. According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0581-0191. The time required to complete this information collection is estimated to average 93 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or because all or part of an individual's income is derived from any public assistance program (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at (202) 720-2600 (voice and TDD). To file a complaint of discrimination, write to USDA, Director, Office of Civil Rights, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, or call (800) 795-3272 (voice) or (202) 720-6382 (TDD). USDA is an equal opportunity provider and employer.

The undersigned hereby applies for accreditation to the National Organic Program, U.S. Department of Agriculture.

Business Name, Mailing Address, and Primary Office Location *(if different)*	**Name of person responsible for day-to-day operations:** Amy Stafford
Colorado Department of Agriculture 305 Interlocken Parkway Broomfield, CO 80021	**Title of person responsible for day-to-day operations:** Organic Program Manager
	Tax ID# 84-0644739
Telephone Number: 303-869-9074 **Fax Number:** 303-466-2860	**EMail address:** amy.stafford@state.co.us

PLEASE ESTIMATE THE ANNUAL ANTICIPATED NUMBER OF CERTIFICATIONS FOR EACH TYPE OF ACCREDITATION

141	**CROPS**	10	**LIVESTOCK**	0	**WILD CROP**	86	**HANDLING**

LEGAL STATUS *(Check one)*

✓	**GOVERNMENT**		**FOR-PROFIT BUSINESS**		**NOT FOR PROFIT BUSINESS**		**OTHER** *(Specify)*

I, (We), affirm that, if granted accreditation, I (we) will carry out the provisions of 7 CFR Part 205 including:

1. Accepting the certification decisions made by another certifying agent accredited or accepted by USDA;
2. Refraining from making false or misleading claims about my (our) accreditation status, the USDA accreditation program for certifying agents, or the nature or qualities of products labeled as organically produced;
3. Conducting an annual performance evaluation of all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and implement measures to correct any deficiencies in certification services;
4. Having an annual internal program review conducted of my (our) certification activities by myself, my (our) staff, an outside auditor, or a consultant who has the expertise to conduct such reviews and implement measures to correct any noncompliance's with the Organic Foods Production Act of 1990 (Act) and the provisions of 7 CFR Part 205;
5. Paying and submitting fees to AMS;
6. Complying with, implementing, and carrying out any other terms and conditions determined by the Administrator to be necessary;
7. *(Items 7, 8, and 9 apply only to private entities)*
   Holding the Secretary harmless for any failure on my (our) part to carry out the provisions of the Act and 7 CFR Part 205;
8. Furnishing reasonable security, in an amount and according to such terms as the Administrator may by regulation prescribe, for the purpose of protecting the rights of production and handling operations that I (we) certify under the Act and 7 CFR Part 205;
9. Transferring to USDA and making available to the applicable State organic program's governing State official all records or copies of records concerning my (our) certification activities in the event that I (we) dissolve or lose my (our) accreditation.
   Such transfer does not apply to a merger, sale, or other transfer of ownership of a certifying agent.

SIGNATURE OF APPLICANT OR REPRESENTATIVE	**PRINT OR TYPE NAME OF SIGNEE** Amy Stafford
TITLE OF APPLICANT OR REPRESENTATIVE Organic Program Manager	**DATE** 4/12/2017

PLEASE ATTACH:

1) A list of each organizational unit, such as chapters or a subsidiary office including the name, office location, mailing address, and contact numbers (telephone, facsimile, and Internet address), and the name of a contact person for each unit; 2) A copy of the fee schedule for all services to be provided under these regulations by the applicant; 3) For a government entity, a copy of the official's authority to conduct certification services under 7 CFR Part 205; 4) For a private entity, documentation showing the entity's status and organizational purpose, such as articles of incorporation and by-laws or ownership or membership provisions, and it's date of establishment; 5) A list of each State or foreign country in which the applicant currently certifies production and handling operations and a list of each State or foreign country in which the applicant intends to certify production and handling operations; 6) The requirements of 7 CFR Part 205, § 205.504, Evidence of expertise and ability.

FOR USE BY USDA

DATE OF RECEIPT	**NAME OF RECIPIENT**	**SIGNATURE OF RECIPIENT**

TM-10CG (12-07) Replaces 08/08/01 version. Form designed by AMS using Microsoft Word.

National Organic Program: Auditor Special Instructions

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

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

Date:__7/10/17__

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

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

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

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

Section 3: Noncompliance Corrective Action Verification (Completed by AM)

Completed by the AM Date: _____

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

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

		2015 Corrective Action: CDA updated the Crop OSP Module 10 Soil.Ferility Inputs and Module 12 Weed.Pest.Disease Inputs to require the operation to include product names and manufacturers, to ensure full information (rather than just generic names) are included in the OSP. CDA also provided training on June 26, 2015, to inspectors regarding identifying issues of concern during inspections. **NP5159RKA.NC5** - 7 CFR §205.402(a)(2) states that "Upon acceptance of an application for certification, a certifying agent must:.. Determine by a review of the application materials whether the applicant appears to comply or may be able to comply with the applicable requirements of subpart C of this part..." **2015 Comments**: *The certifier approved a "Made with Organic ***" granola cereal label that displayed the word "organic" on the front panel with no "Made with Organic" phrase.* **2015 Corrective Action:** CDA issued a notice of noncompliance to the operation for the noncompliant cereal label. CDA updated the Organic System Plan Review Procedures Rev B 6.7 manual stating that the CDA logo, and USDA seal may not be used on the label of products certified to the "Made with Organic ***" labeling category. Training on label review is planned for June 17, 2016. **NP5159RKA.NC6** – **Accepted**. 7 CFR §205.403(e)(1) states that "At the time of the inspection, the inspector shall provide the operation's authorized representative with a receipt for any samples taken by the inspector." **2015 Comments**: *During a witness audit, a pesticide residue sample was obtained and proper sampling procedures were followed, with the exception that the operator was not provided a receipt*. **2015 Corrective Action:** CDA updated the Sampling Form to clearly indicate that the pink sheet stays with the operation when samples are taken to serve as a receipt. Training was conducted on June 26, 2015, for all organic inspectors. The proper use of sampling forms, including leaving a copy with the operation as a receipt, was presented during the training. **NP1595RKA.NC7** – **Accepted**. 7 CFR §205.662(c) states, "Proposed suspension or revocation. The notification of a proposed suspension…shall state: (3) The impact of a suspension…" **2015 Comments**: *The auditor reviewed three letters of Notice of Proposed Suspension (NoPS) issued to clients. Two of the three letters issued do not explain the impact of the NoPS as stated in 205.100(a) "each production or handling operation…that produces or handles crops, livestock, livestock products, or other agricultural*

		products that are intended to be sold, labeled, or represented as "100 percent organic,' "organic," or "made with organic (specified ingredients or food group(s))" must be certified…" The auditor noted a discrepancy between the letters issued to clients and the CDA NoPS template, which actually does include language stating that "the operation will be unable to sell, or label its product as organic." **2015 Corrective Action:** The notice of proposed suspension and combined notice of noncompliance and proposed suspension letter templates were updated to specifically state the impact of suspension. CDA created a document control system to ensure only the most current version of documents and letter templates are used in the future. Inspectors were trained on document control during the April 7, 2016 training. **NP1595RKA.NC8** – **Accepted**. 7 CFR §205.510(b)(2) states, "Records created by the certifying agent regarding applicants for certification and certified operations must be maintained for not less than 10 years beyond their creation." **2015 Comments**: *In at least 3 files that were reviewed, the records of registered e-mails sent to the clients were not available during the audit. Currently, CDA sends registered e-mails from individual employee accounts and the delivery receipt required per 7 CFR §205.660(d) is not always retained (either electronically or as a hard copy).* **2015 Corrective Action:** CDA adjusted the Policy and Procedures Manual to clearly outline the current process for issuance of notices, and created a new requirement to save the documentation that the noncompliance was received by the operation. A copy of the documentation is saved electronically in the operation's Company Specific Information folder in the shared organic folder on the CDA server. Training was provided to the Program Manager and Certification Specialist on May 19, 2016.
AIA16120RK		**AIA16120RK.NC1 –Rebutted and accepted** **AIA16120RK.NC2 –Accepted—** 7 CFR § 205.501(a)(3) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670." **2016 Comments:** *CDA did not conduct adequate surveillance of a crop operation including its website to ensure compliance with the USDA organic regulations. The following issues were identified:* • *CDA did not issue a noncompliance to the operation for its use of the word "organic" in the company name and labels on uncertified products.*

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

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

Discussed with C&E Division staff: _____Date:_____

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

Section 5: NOP Appeals Input (Completed by AM)

Discussed with NOP Appeals staff: ____Shannon Nally Yanessa____Date:__7/10/2017__

Case ID	Description of issue, hyperlink, and specific request
	One active appeal with CDA. The appellant is (b) (4) . P:\Appeals\17-022 (b) (4)
	Also from Shannon, *"I also wanted to pass along a general observation regarding CDA appeals. We have received several appeals involving CDA where mediation would be a good option to resolve a proposed adverse action. However, CDA has declined such mediation requests. I can be more specific if needed."*

Section 6: Other AM Notes (Completed by AM)

Date:_____

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

	NP7162PZA.F2 – 7 C.F.R. §205.662 (e)(1) states, "If the operation fails to correct the noncompliance, to resolve the issue through rebuttal or mediation, or to file an appeal of the proposed suspension …, the certifying agent ... shall send the certified operation a written notification of suspension …." **Comments:** CDA accepted corrective actions from one operation it had issued a Notice of Proposed Suspension to in 2016. CDA also allowed three operations to voluntarily surrender after being issued a Notice of Proposed Suspension. **NP7162PZA.F3** – 7 C.F.R. §205.663 states, "Any dispute with respect to denial of certification or proposed suspension or revocation of certification under this part may be mediated at the request of the applicant for certification or certified operation and with acceptance by the certifying agent. Mediation shall be requested in writing to the applicable certifying agent." **Comments:** CDA issued a settlement agreement to an operation they had sent a Notice of Proposed Suspension without receiving arequest for mediation in writing. **NP7162PZA.F4** – 7 C.F.R. §205. 402(a)(2) states, "Determine by a review of the application materials whether the applicant appears to comply or may be able to comply with the applicable requirements of subpart C of this part;..." §205.206(e) states that an Organic System Plan must include, "Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations." **Comments:** For the witness audit, the auditors reviewed the operation's records maintained by CDA. The file contained a list of inputs, however CDA did not record the review of the materials and if they were allowed. **Auditor Observations:** While reviewing the C&C file, a new electrolyte was asked for at IR and inspector said it was submitted, and it was added to the material list. There was no indication it was evaluated by CDA. The pending material review was not communicated to the operation at final review. The electrolyte currently being used was not on the current 2016 materials list, but was found in the 2015 file. No issues were listed in the exit interview. **NP7162PZA.F5** – 7 C.F.R. §205.501(a)(21) states, "A private or governmental entity accredited as a certifying agent under this subpart must:…" Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary." NOP 2027, "Personnel Performance Evaluation," Section 3.2b states, "Inspectors should be evaluated during an onsite inspection by a supervisor or peer (another inspector) at least annually." **Comments:** CDA did not conduct field evaluations of all inspectors in 2016. Five of the twelve inspectors did not receive field evaluations. **NP7162PZA.F6** – 7 C.F.R. §205.403(d) states, "The inspector must conduct an exit interview with an authorized representative of the operation who is knowledgeable about the inspected operation to confirm the accuracy and completeness of inspection observations and information gathered during the on-

	site inspection. The inspector must also address the need for any additional information as well as any issues of concern." **Comments:** During the witness audit the inspectors did not note items of concern and additional information requested of the operation in the exit interview. The inspectors verbally communicated concerns and additional information needed, but did not note the items in the exit interview. **NP7162PZA.F7** – 7 C.F.R. §205.501(a)(21) states, "A private or governmental entity accredited as a certifying agent under this subpart must:… Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary." NOP 2601 states, "If an operation plans to add new products, fields, operations, or labels to its OSP, then the certifier must first approve these changes and issue an updated certificate. A request to add new fields, animal species, or facilities would require an additional onsite inspection." **Comments:** A CDA inspector conducted the inspection of a new facility to be added to a certified operation's certification, however, an inspection report was not processed or reviewed by CDA and a decision was not issued to the certified operation. **NP7162PZA.F8** – 7 C.F.R. §205.403(b)(2) states, "All on-site inspections must be conducted … when land, facilities, and activities that demonstrate the operation's compliance with or capability to comply with the applicable provisions of subpart C of this part can be observed, except that this requirement does not apply to unannounced on-site inspections. **Comments:** CDA conducted the annual inspection of a dairy operation during the non-grazing season. No additional inspections were conducted during the grazing season.
Annual Reports	P:\AIA\ACA-Active\CDA-CO\Ann Repts\2016\AnnualReportChecklist 2016 Update NOP 2024 GD.pdf P:\AIA\ACA-Active\CDA-CO\Ann Repts\2015\Ann Rpt docs\CDA Annual Report Checklist JL.pdf ..\..\Ann Repts\2014\CDA Annual Report Checklist RGKreviewed.pdf

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

Purpose of Planning Worksheet:

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

National Organic Program: Auditor Special Instructions

This document will:

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

Instructions:

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

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

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

Date	Day	Location	Hours	Review Activity	Participants	Lodging
Aug 7, 2017	Mon	• Depart Washington • Broomfield, CO	20	• Travel from DC to CO – UA403(IAD →DEN) Depart: 08:33, Arrive: 10:24 • Drive to Broomfield, CO • Opening Meeting – 1:00 PM	NOP: Graham Davis / Penny Zuck	Aloft Broomfield/Denver 8300 Arista Place Broomfield, Co 80021 303.635.2000 $178/$69
Aug 8, 2017	Tues	• Broomfield, CO • Greeley, CO	16	• Conduct Office Audit (GD) • Witness Audit Crops/Handling – (b) (4) , Inc. (PZ) – 8 AM • Meet inspector @ farm location	NOP: Graham Davis / Penny Zuck Mark Kalpperch	Aloft Broomfield/Denver 8300 Arista Place Broomfield, Co 80021 303.635.2000
Aug 9, 2017	Wed	• Fort Lupton, CO • Longmont, CO	16	• Witness Audit Livestock/Handling - (b) (4) – 9 AM • Witness Audit Processing – (b) (4) – 8:30 AM	NOP: Graham Davis / Penny Zuck Becky Mandy	Aloft Broomfield/Denver 8300 Arista Place Broomfield, Co 80021 303.635.2000
Aug 10, 2017	Thurs	• CDA Office Broomfield, CO	16	• Continue Office Audit • Closing Meeting - PM	NOP: Graham Davis / Penny Zuck	Aloft Broomfield/Denver 8300 Arista Place Broomfield, Co 80021 303.635.2000
Aug 11, 2017	Fri	• Travel from CO to DC	12	• Travel from CO to DC – UA712 (IAD →DEN) Depart: 11:05, Arrive: 16:25	NOP: Graham Davis / Penny Zuck	NA

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

From:	Courtney, Cheri - AMS
To:	Zuck, Penelope - AMS; Davis, Graham - AMS; Reid, John - AMS
Subject:	RE: NoNC for CDA re combined notice
Date:	Friday, August 18, 2017 12:22:33 PM
Attachments:	image001.png

I believe John sent it out.

Cheri

From: Nally Yanessa, Shannon - AMS
Sent: Friday, August 18, 2017 11:14 AM
To: Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>; Zuck, Penelope - AMS <Penelope.Zuck@ams.usda.gov>; Davis, Graham - AMS <Graham.Davis@ams.usda.gov>
Subject: RE: NoNC for CDA re combined notice

Thank you all for reviewing. Penny – thank you for catching those errors!

I spoke with Graham and he will send it out today.

Shannon

From: Courtney, Cheri - AMS
Sent: Thursday, August 17, 2017 7:52 AM
To: Zuck, Penelope - AMS <Penelope.Zuck@ams.usda.gov>; Nally Yanessa, Shannon - AMS <Shannon.NallyYanessa@ams.usda.gov>
Cc: Davis, Graham - AMS <Graham.Davis@ams.usda.gov>
Subject: RE: NoNC for CDA re combined notice

Hi Shannon, I can sign the notice.
Thanks
Cheri

From: Zuck, Penelope - AMS
Sent: Wednesday, August 16, 2017 11:24 AM
To: Nally Yanessa, Shannon - AMS <Shannon.NallyYanessa@ams.usda.gov>; Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>
Cc: Davis, Graham - AMS <Graham.Davis@ams.usda.gov>
Subject: RE: NoNC for CDA re combined notice

Hi Shannon,
The revised NoNC looks good to me. There are a couple of small edits (misspellings & font size) I entered in tracked changes.
Thanks,
Penny

PENNY ZUCK | USDA-NATIONAL ORGANIC PROGRAM | ACCREDITATION MANAGER|
USDA ▪ AMS ▪ NOP | 1400 Independence Ave SW | 2649-S | Washington DC 20250
☎ 202.260.9444 | Fax 202.205.7808 | Cell (b) (6) | ✉ Penelope.Zuck@ams.usda.gov
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From: Nally Yanessa, Shannon - AMS
Sent: Wednesday, August 16, 2017 11:05 AM
To: Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>
Cc: Zuck, Penelope - AMS <Penelope.Zuck@ams.usda.gov>; Davis, Graham - AMS <Graham.Davis@ams.usda.gov>
Subject: NoNC for CDA re combined notice

Hi All,

The draft Notice of Noncompliance to CDA has been revised based on feedback from Penny and Graham. (b) (5) . Please let me know if you are okay with the current draft. Feel free to insert additional edits into the file.

Cheri – do you want to sign this or have Jenny sign it on your behalf? In a prior appeal case where a Notice of Noncompliance was issued to the certifier, Jenny signed the notice on your behalf.

Thank you!
Shannon

Shannon Nally Yanessa
Assistant Director, Standards Division
National Organic Program
U.S. Department of Agriculture
(202) 260-9285 (direct)

From:	Courtney, Cheri - AMS
To:	Reid, John - AMS
Subject:	RE: NoNC for CDA re combined notice
Date:	Friday, August 18, 2017 12:21:28 PM
Attachments:	image002.png

Thank you for take in care of that.

Cheri

From: Reid, John - AMS
Sent: Friday, August 18, 2017 12:20 PM
To: Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>
Subject: RE: NoNC for CDA re combined notice

Yes. The link to the Notice you signed was 'locked for editing' by Shannon and it still had the 'DRAFT' watermark on it. So I just wanted her to know to close the document, so I can print and issue it.

John

From: Courtney, Cheri - AMS
Sent: Friday, August 18, 2017 12:16 PM
To: Reid, John - AMS <John.Reid@ams.usda.gov>
Subject: RE: NoNC for CDA re combined notice

John – I am confusing by this email – I approve this to be sent in ecert.

Cheri

From: Reid, John - AMS
Sent: Friday, August 18, 2017 12:01 PM
To: Nally Yanessa, Shannon - AMS <Shannon.NallyYanessa@ams.usda.gov>
Cc: Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>; Davis, Graham - AMS <Graham.Davis@ams.usda.gov>
Subject: RE: NoNC for CDA re combined notice

Ok. Thanks Shannon!

John

From: Nally Yanessa, Shannon - AMS
Sent: Friday, August 18, 2017 11:38 AM
To: Reid, John - AMS <John.Reid@ams.usda.gov>
Cc: Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>; Davis, Graham - AMS <Graham.Davis@ams.usda.gov>

Subject: RE: NoNC for CDA re combined notice

Hi John,

I don't have any further edits and this letter is ready to be issued today.

Thanks,
Shannon

From: Reid, John - AMS
Sent: Friday, August 18, 2017 11:29 AM
To: Nally Yanessa, Shannon - AMS <Shannon.NallyYanessa@ams.usda.gov>
Cc: Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>
Subject: FW: NoNC for CDA re combined notice

Hello Nally

Just wanted to know if you were finished with revisions to the CDA Notice of Noncompliance? Just wanted to see if the document is ready to be issued today.
Thanks

Respectfully,

John A. Reid

Program/Operations Analyst
USDA | National Organic Program
1400 Independence Avenue SW | 2649-S | Washington DC 20250
Main: (202) 260-9452 | **Cell:** (b) (6)

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☎ 202.260.9444 | Fax 202.205.7808 | Cell (b) (6) | ✉ Penelope.Zuck@ams.usda.gov
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To: Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>
Cc: Zuck, Penelope - AMS <Penelope.Zuck@ams.usda.gov>; Davis, Graham - AMS

<Graham.Davis@ams.usda.gov>
Subject: NoNC for CDA re combined notice

Hi All,

The draft Notice of Noncompliance to CDA has been revised based on feedback from Penny and Graham. (b) (5) [redacted]. Please let me know if you are okay with the current draft. Feel free to insert additional edits into the file.

Cheri – do you want to sign this or have Jenny sign it on your behalf? In a prior appeal case where a Notice of Noncompliance was issued to the certifier, Jenny signed the notice on your behalf.

Thank you!
Shannon

Shannon Nally Yanessa
Assistant Director, Standards Division
National Organic Program
U.S. Department of Agriculture
(202) 260-9285 (direct)

From: Davis, Graham - AMS
To: Reid, John - AMS
Subject: RE: NoNC for CDA re combined notice
Date: Friday, August 18, 2017 12:02:25 PM
Attachments: image005.png

Thanks for following up and sending out the NoNC

Graham

Graham Davis
Accreditation Manager
USDA | NATIONAL ORGANIC PROGRAM
1400 Independence Ave SW| 2649-S | Washington DC 20250
Desk: 202-692-0047 | Cell: (b) (6) [redacted]

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From: Reid, John - AMS
Sent: Friday, August 18, 2017 12:01 PM
To: Nally Yanessa, Shannon - AMS <Shannon.NallyYanessa@ams.usda.gov>
Cc: Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>; Davis, Graham - AMS <Graham.Davis@ams.usda.gov>
Subject: RE: NoNC for CDA re combined notice

Ok. Thanks Shannon!

John

From: Nally Yanessa, Shannon - AMS
Sent: Friday, August 18, 2017 11:38 AM
To: Reid, John - AMS <John.Reid@ams.usda.gov>
Cc: Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>; Davis, Graham - AMS <Graham.Davis@ams.usda.gov>
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Subject: FW: NoNC for CDA re combined notice

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Respectfully,

John A. Reid

Program/Operations Analyst
USDA | National Organic Program
1400 Independence Avenue SW | 2649-S | Washington DC 20250
Main: (202) 260-9452 | **Cell:** (b) (6) [redacted]

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USDA ▪ AMS ▪ NOP | 1400 Independence Ave SW | 2649-S | Washington DC 20250
☎ 202.260.9444 | Fax 202.205.7808 | Cell (b) (6) [redacted] | ✉ Penelope.Zuck@ams.usda.gov
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From: Nally Yanessa, Shannon - AMS
Sent: Wednesday, August 16, 2017 11:05 AM
To: Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>
Cc: Zuck, Penelope - AMS <Penelope.Zuck@ams.usda.gov>; Davis, Graham - AMS <Graham.Davis@ams.usda.gov>
Subject: NoNC for CDA re combined notice

Hi All,

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Cheri – do you want to sign this or have Jenny sign it on your behalf? In a prior appeal case where a Notice of Noncompliance was issued to the certifier, Jenny signed the notice on your behalf.

Thank you!
Shannon

Shannon Nally Yanessa
Assistant Director, Standards Division
National Organic Program
U.S. Department of Agriculture
(202) 260-9285 (direct)

From: Reid, John - AMS
To: Zuck, Penelope - AMS; Davis, Graham - AMS
Cc: AMS - AIAinbox; Crail, Lars - AMS
Subject: NOP Audit Checklist Submission Reminder - CDA
Date: Monday, August 21, 2017 12:03:23 PM

Hello Penny and Graham:

Thank you for conducting a USDA audit on behalf of the NOP. This is a friendly reminder. Please submit the audit checklists for CDA's Renewal audit to QAD within 10 business days of the audit's end date of **11 AUG 2017**. Also, keep in mind that the checklists are due to AIA on 30 DAY DEADLINE.

If there is a reason why the report may be delayed please let me know. For example, some audits are not completed until witness or review audits occur a month or so after the office audit.

As a reminder, domestic audit checklists are to be submitted to QAD 10 business days from the conclusion of the final on-site audit activity. Foreign audit checklists are to be submitted 15 business days from the conclusion of the final on-site audit activity. All audit checklists are due to AIA within 30 calendar days of completing the audit (See NOP 2000 section 9).

The following documents constitute a complete submission when submitting to QAD:

- All completed and applicable NOP 2005, Auditor Checklists. (MSWord and PDF)
- Signed Engagement Letter
- Signed QAD 1415
- Signed LPS-109 (if applicable)
- Signed TM-10CG (if applicable)

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

Respectfully,

John A. Reid

Program/Operations Analyst
USDA | National Organic Program
1400 Independence Avenue SW | 2649-S | Washington DC 20250
Main: (202) 260-9452 | **Cell:** (b) (6) [redacted]

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From: Reid, John - AMS
To: Yang, RobertH - AMS
Cc: Courtney, Cheri - AMS
Subject: RE: Re: Other Project CDA - NC From Appeal
Date: Wednesday, August 23, 2017 8:52:49 AM

Hello Robert,

Ok, looks like the information needs to be converted over from 'Other Project' to 'Compliance Review' Project. I take a look in the shared drive to see if the NoNC word version was in there.

John

From: Yang, RobertH - AMS
Sent: Tuesday, August 22, 2017 6:16 PM
To: Reid, John - AMS <John.Reid@ams.usda.gov>
Cc: Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>
Subject: Re: Other Project CDA - NC From Appeal

Hi John:

It looks like an Other project instead of a Compliance Review project has been created and completed for the NoNC (AIA17288GD) recently issued to CDA. The NC appears to be one that was passed on to us from Standards.

As the project currently stands, the process has concluded with the issuance of a NoNC, which means we would not be able to continue on in TASKS with receiving CA's and ultimately issuing a NoNC Resolution.

Also, the MS Word version of the NoNC cannot be found in FILES. Without that file, the AM will need to re-type the NC for the NoNC Resolution document.

Regards,

Robert

From:	Sonja Tuitele
To:	SLT; Jim Abraham; Sonja Tuitele; John Beutler; Craig Edwards
Bcc:	McEvoy, Miles - AMS
Subject:	Aurora Organic Dairy on track to surpass several of its Corporate Citizenship Goals
Date:	Wednesday, September 13, 2017 11:28:22 AM
Attachments:	Aurora Organic Dairy Press Release 2017 CCR FINAL.pdf

Dear friends of Aurora Organic Dairy,

We are pleased to announce the publication of our 2017 Corporate Citizenship Report, which can be found here: http://www.auroraorganic.com/corporate-responsibility/

Please find our press release, attached, which is being sent out via national news and CSR wires today.

As always, if you have any questions about this announcement you can contact any of us at AOD. We look forward to continuing our journey to support animals, people and the planet with you, our stakeholders.

Best,

Craig Edwards
Director of Corporate Services

Sonja Tuitele
Director of Communications

FOR IMMEDIATE RELEASE
Sept. 13, 2017

CONTACT
Sonja Tuitele
(303) 222-0637
stuitele@aodmilk.com

Aurora Organic Dairy on Track to Surpass Several of its Corporate Citizenship Goals

2017 Corporate Citizenship Report demonstrates how deep commitment to Animals, People and the Planet drives Company's cow-to-carton model

BOULDER, Colo. (Sept. 13, 2017) – With its support of more than 75,000 acres of organic farmland operated by 100 independent farmers, and 12,000 organic pasture acres surrounding its dairy farms, the leading producer of organic milk for store brand retailers has the scale to positively impact more animals, people and the environment with its keen focus on animal welfare, employee care and environmental stewardship.

Aurora Organic Dairy today announced its progress toward corporate citizenship goals. As of the end of 2016, the Company was on track to surpass several of its five-year goals, established in 2012.

- Water reduction and efficiency goals for its milk processing operations were exceeded, with a 19% reduction in plant water use per half gallon of milk processed.
- 90% of irrigation pivots at Aurora Organic's dairy farms are now equipped with smart technology to make the most efficient use of irrigation water. GPS technology investments made to improve soil health.
- The Company's dairy farms made significant strides in improving animal welfare, including a 31% reduction in lameness in the overall herd, exceeding its 2017 goal of a 20% reduction.
- Aurora Organic's farms are certified for the highest standards of animal care and employee care by Validus.
- In the People goal area, Aurora Organic Dairy reported a 28% reduction in plant worker injuries and an 11% reduction in farm worker injuries.
- Employee benefits were bolstered to provide a shorter work week for all farm employees, and paid parental leave for all employees.

"Throughout our 40-year history, we have learned that doing things more sustainably for our animals, people and the planet, is good business," said Marc Peperzak, Founder and CEO. "We continue to demonstrate that, through this focus, our ability to grow responsibly brings the benefits of organic dairy products to more people in more places."

(-more-)

Aurora Organic Dairy's 2017 Corporate Citizenship Report details its commitment to Animals, People and the Planet, and outlines each of the Company's corporate citizenship goal areas. The Company transparently communicates its successes, highlighted above, as well as those areas where more improvement is needed.

Even with the early achievement of some of its goals, Company management recognizes there is more work to be done, and looks forward to establishing new long-term goals in 2018.

ABOUT AURORA ORGANIC DAIRY

Aurora Organic Dairy is the leading producer of store-brand organic milk and butter for U.S. retailers. Based in Boulder, Colorado, it operates a heifer farm and organic dairy farms in Colorado and Texas, as well as an organic dairy processing plant in Platteville, Colorado. Organic agriculture, animal care and sustainable production are the cornerstones of Aurora Organic Dairy's business. Its processing facility and each of its farms are certified organic by USDA National Organic Program accredited certifiers and certified by Validus, a leading independent animal welfare auditor.

Aurora Organic Dairy is involved in overseeing organic standards from cow to carton. It monitors the entire product lifecycle, to ensure quality from its farms to its processing facility. For more information, visit www.aodmilk.com.

(-###-)