



**Livestock and Seed Program  
Audit, Review, and Compliance Branch  
Quality System Audit Report**

**AUDIT INFORMATION**

<b>Applicant Name:</b>	Louisiana Department of Agriculture and Forestry (LDAF)
<b>Est. Number:</b>	N/A
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<b>Auditor(s):</b>	Steve Ross
<b>Program:</b>	USDA National Organic Program (NOP)
<b>Audit Date(s):</b>	May 4, 2006
<b>Audit Identifier:</b>	NP6032DDA
<b>Action Required:</b>	No
<b>Audit Type:</b>	Corrective Action Audit
<b>Audit Objective:</b>	To verify that corrective actions adequately address the non-compliances identified during the previous audit.
<b>Audit Criteria:</b>	<ul style="list-style-type: none"><li>• 7 CFR Part 205.510, National Organic Program; Final Rule, dated December 21, 2000; amended November 3, 2003.</li></ul>
<b>Audit Scope:</b>	Submitted corrective actions
<b>Location(s) Audited:</b>	Desk

Louisiana Department of Agriculture and Forestry (LDAF) submitted corrective actions to the NOP on April 7, 2006 and was received by the auditor of record on April 19, 2006. LDAF submitted conflict of interest reports, a revised Livestock Organic Plan Questionnaire, and information on organic client Vintage Farms.

**FINDINGS**

The submitted corrective actions adequately addressed the non-compliances identified during the 2005 Annual Update audit.

**NP6032DDA.NC1 – Major – Adequately Addressed** - NOP § 205.501(a)(11)(v) requires all persons who review applications for certification, perform on-site inspections, review certification documents...to complete an annual conflict of interest disclosure report. *LDAF submitted conflict of interest reports for 11 employees, 17 of 24 designated inspectors did not submit conflict of interest reports. The certification procedure submitted by LDAF requires that "LDAF will maintain a list of names and position*



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descriptions of all personnel to be used in the certification operation”. No list was supplied and the position descriptions for all jobs does not identify any as having NOP responsibility except for the NOP contact person, so it is impossible to know who else is responsible for NOP certification. **Corrective Action:** LDAF is in the process of revising the list of inspectors who are allowed to conduct audits but submitted 11 more conflict of interest reports for review. The LDAF Organic Certification Program is still in an infancy phase and when LDAF identifies the core group of organic certification inspectors, a list of names and positions will be submitted to the USDA NOP.

**NP6032DDA.NC2 – Minor – Adequately Addressed** - NOP § 205.501(a)(5) requires that the certifying agent must ensure that its responsibly connected persons, employees, and contractors with inspection, analysis, and decision-making responsibilities have sufficient expertise in organic production or handling techniques to successfully perform the duties assigned. *Craig Roussel, who makes the final decision for accreditation, has qualifications in Agriculture, but the documentation supplied does not show evidence that he had been trained or has expertise in organics. One inspector, Ann Giardina, was listed as available to do inspections and accompanied an inspection, did not have any evidence of organic training. Also, all training records show that all personnel received training on the NOP prior to LDAF being accredited and no further training has occurred.* **Corrective Action:** Both Craig Roussel and Ann Giardina have copies of the NOP Regulation and they have read and understood the organic rules and regulations. They attended two inspector training sessions held during the spring of 2005 and spring of 2006. The training covered all programs under LDAF responsibilities, which include an update on organic certification. Specific training is being planned for the summer of 2006 for the core group of inspectors.

**NP6032DDA.NC3 – Minor – Adequately Addressed** - NOP § 205.202(b) requires any field ... from which harvested crops are intended to be sold ... as “organic” must have had no prohibited substances, as listed in 205.105, applied to it for a period of 3 years immediately preceding harvest of the crop. *The Vintage Garden and Company client file submitted by LDAF showed that the land history form was completed only for the current year and stated that the other two years were on file in the office. The inspection report filed by LDAF did not verify that no prohibited substances had been applied for the 3 previous years and LDAF granted certification without any conditions.* **Corrective Action:** Vintage Garden had been involved in the LDAF organic certification program before LDAF received approval as an NOP accredited certifier. LDAF had historic files on Vintage Garden and used that history along with the current year land history form. (Note: This organic client was in the heart of New Orleans and Hurricane Katrina devastated this facility. LDAF has not been able to contact the representative.)

**NP6032DDA.NC4 – Minor – Adequately Addressed** - NOP § 205.203(c)(2)(i,ii) requires that composted plant and animal materials be produced through a process that establishes an initial CN ratio of between 25:1 and 40:1; and maintained a temperature of between 131°F and 170°F for 3 days using an in-vessel or static aerated pile system. *The Vintage Garden and Company client files submitted by LDAF showed that the client was claiming to use compost that had been made using a static aerated pile system. The client did not identify the CN ratio or temperature and days of composting. The LDAF inspection report did not verify whether or not the compost was done in accordance with the Rule.* **Corrective Action:** LDAF reviewed the records and did find that the records were lacking in how the compost was made. LDAF has informed the inspectors of this and will inform other clients of the composting



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requirements. (Note: This organic client was in the heart of New Orleans and Hurricane Katrina devastated this facility. LDAF has not been able to contact the representative.)

**NP6032DDA.NC5 – Minor – Adequately Addressed** - NOP § 205.403(d) requires the inspector to conduct an exit interview with an authorized representative of the operation...*The LDAF inspection checklist has a form for the exit interview and the signature of the inspector along with the date. The Vintage Garden and Company client file submitted did not have anything filled out on the form and the form was not signed or dated. Corrective Action:* LDAF failed to submit the signed exit interview with the original file. LDAF submitted the signed form, which showed compliance with the requirement.

**NP6032DDA.NC6 – Minor – Adequately Addressed** - NOP § 205.201(a) requires the producer or handler ... to develop an organic production or handling system plan that is agreed to by the producer and certifying agent. *LDAF supplies the producers with blank organics system plans to be filled out by the producer. The revised livestock OSP was reviewed and contains several statements attributed to the NOP Rule that are not accurate.*

1. *Section 2 pg 2 states that “the NOS require all livestock on a certified organic farm, and the products of such livestock that are to be sold labeled or represented as organically produced, shall have been under organic management from no later than the 2<sup>nd</sup> day of life.”*
2. *Section 6 pg 7 and Section 7 pg 8 states that “...Dairy livestock must have individual heard health records. All other livestock must have general flock or herd health records.”*
3. *Section 12 pg 13 states “Under the livestock production system, livestock meat operations are only allowed to sell meat live and “on the hoof””.*
4. *Section 13 pg 14 states “under livestock production system, milk operations are only allowed to handle and sell milk in bulk”*
5. *Section 14 pg 14 states “... Limited egg handling and packaging is allowed on the farm without further certification”*

*All statements are not in accordance to the NOP Rule. Corrective Action:* LDAF submitted a new livestock organic plan questionnaire. The new questionnaire had corrected all the above statements and the new questionnaire is now in compliance to the NOP Rule.