



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

AUDIT INFORMATION

Applicant Name:	Louisiana Department of Agriculture and Forestry (LDAF)
Est. Number:	N/A
Physical Address:	5825 Florida Blvd., Baton Rouge, LA 70806
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Contact & Title:	Harry Schexnayder, Certification Program Administrator
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Phone Number:	225-925-3789
Auditor(s):	Steve Ross
Program:	USDA National Organic Program (NOP)
Audit Date(s):	February 1-2, 2006
Audit Identifier:	NP6032DDA
Action Required:	Yes
Audit Type:	Annual Update
Audit Objective:	To determine the compliance of the company's information to the requirements of the audit criteria
Audit Criteria:	<ul style="list-style-type: none">• 7 CFR Part 205.510, National Organic Program; Final Rule, dated December 21, 2000; amended November 3, 2003.
Audit Scope:	Louisiana Department of Agriculture and Forestry 2005 Annual Report
Location(s) Audited:	Desk

Information and supporting documentation submitted by LDAF for the NOP 2005 Annual Update was submitted on January 3, 2006. LDAF was accredited on September 23, 2004, for crops, wild crops, livestock and handling/processing operations and continues as such in the State of Louisiana. LDAF submitted:

- Certification for 2005: Crops = 10;
- List of all certified clients located in the Louisiana;
- LDAF continues as a State operated organic certifier;
- List of State employees involved in certification, Harry Schexnayder continues to be the contact and also conducts documentation review and inspections, Craig Roussel, Director of Horticulture and Quarantine Programs, makes the certification decisions, and inspectors to be used;
- Annual Conflict of Interest Reports for 11 personnel whom are State employees;
- Performances evaluations letter signed by the Program Administrator declaring all personnel involved in organic program performed adequately for the organic certification processes;



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- 2005 annual program review and declaration that no changes needed to be made to program;
- Revised OSP's and inspection checklists;
- Organizational chart;
- Fee Schedule;
- One client file for crops; and
- Completed NOP 2024A- NOP Annual Update Checklist.

FINDINGS

Procedures and records reviewed verified that LDAF is currently operating in compliance to the requirements of the audit criteria except as noted below. One major and five minor non-compliances were noted during the review.

NP6032DDA.NC1 – Major – 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 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.*

NP6032DDA.NC2 – Minor – 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.*

NP6032DDA.NC3 – Minor – 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.*



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NP6032DDA.NC4 – Minor – 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.*

NP6032DDA.NC5 – Minor – 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.*

NP6032DDA.NC6 – Minor – 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 2nd 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.