



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

AUDIT INFORMATION

Applicant Name:	Ohio Ecological Food and Farm Association (OEFFA)
Est. Number:	N/A
Physical Address:	9665 Kline Road, West Salem, OH 44287
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Contact & Title:	Stephen F. Sears, Certification Administrator
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Phone Number:	419-853-4060
Auditor(s):	Phil Frederick
Program:	USDA National Organic Program (NOP)
Audit Date(s):	May 31 & June 1, 2006
Audit Identifier:	NP6151FFA
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 (NOP), Final Rule, dated December 21, 2000; Amended November 3, 2003
Audit Scope:	OEFFA 2004 and 2005 NOP Annual Report
Location(s) Audited:	Desk

Information submitted by OEFFA included:

2004:

- Annual Update of NOP Accredited Certifying Agents Checklist
- Current list of OEFFA Ed Chapters
- Estimated numbers of each type of operation for 2004
- Current fee schedule
- List of Organic Certification Committee, OEFFA Certification Board of Trustees, OEFFA Growers & Handlers Advisory Group and Organic Certification Inspectors
- List of the current certified operations in the United States
- Current list of Board Members, Growers & Handlers Advisory Group and Organic Inspectors
- Updated administrative policies and procedures
- Current conflict of interest disclosure reports for Broad of Directors, Certification Board members, Inspectors, Administrative Staff and OEFFA Growers & Handlers Advisory Group
- A copy of the findings and OEFFA's response to these findings from accreditation site visit



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occurred in 2003

- Annual program review
- Current performance evaluation for staff members, inspectors and review committee members.

2005:

- Annual Update of NOP Accredited Certifying Agents Checklist
- Current list of OEFFA Ed Chapters
- Estimated numbers of each type of operation for 2005
- Current fee schedule
- List of Organic Certification Committee, OEFFA Certification Board of Trustees, OEFFA Growers & Handlers Advisory Group and Organic Certification Inspectors
- List of the current certified operations in the United States
- Current list of Board Members, Growers & Handlers Advisory Group and Organic Inspectors
- Current conflict of interest disclosure reports for Broad of Directors, Certification Board members, Inspectors, Administrative Staff and OEFFA Growers & Handlers Advisory Group
- Annual program review
- Current performance evaluation for staff members, inspectors and review committee members.

FINDINGS

Procedures and records reviewed verified that OEFFA is currently operating in compliance to the requirements of the audit criteria except as noted in the non-compliance. A major non-compliance was identified during the audit.

NP6151FFA. NC1 – Major – NOP §205.510(a) (1) requires “a complete and accurate update of information submitted pursuant to §205.503 and §205.504”.

a) NOP §205.504 (a) (2) states, “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 certifying agent.” *OEFFA did not submit a list of the Organic Certification Committee with the 2004 annual update for review.*

b) NOP §205.504 (3) states, “(3) A description of the qualifications, including experience, training, and education in agriculture, organic production, and organic handling” *OEFFA hired a new Director Ed Office (Carol Goland). The resume for the new director (Carol Goland) was not submitted with 2005 annual update.*

c) NOP §205.504 (c)(2) states, “A conflict of interest disclosure report for 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 all parties responsibly connected to the certifying agent. The report must identify any food- or agriculture-related business interests, including business interests of immediate family members that cause a conflict of interest.” *OEFFA did not submit conflict of interest (COI) disclosure reports for the certification committee members with the 2004 annual update. In addition, OEFFA did not submit COI*



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disclosure reports for certification committee member Ben Sippel and 2 board members (Lisa Oates-Campbell & Lydia Allen) with the 2005 annual update.

*d) NOP §205.504 (d)(2) states, “Copies of at least 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.” The certificate for each producer & processor showed that the effective date was updated. OEFFA is issuing a new certificate each year, but the new certificate being issued does not have the original issue date on the certificate. This issue was found in both the 2004 & 2005 annual updates. The files were – **2004**: crops – Evans Knob #887, Wild Crop – Charles Hambel #750 and livestock –Scott Stoller Farm # 798. **2005**: crops – Gilbert (Kip) Rondy #203, Wild Crop – Tom & Wendy Wiandt #800, livestock – David Kline #746 and handling – Gries Seed Farms, Inc #861.*

e) NOP § 205.510 (a)(4) requires submission of the results of the most recent performance evaluations and annual program review and a description of adjustments to the certifying agent's operation and procedures implemented or to be implemented in response to the performance evaluations and program review. A review of the Certification Committee member's performance evaluations for the annual update showed that 3 of the 4 were for Program Year 2003. Mark Griffith (Certification Committee member) performance evaluation was for program year 2002. No performance evaluations for the staff were submitted with the 2004 annual update and no performance evaluation for Ben Sippel was submitted with the 2005 annual update.