



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

**AUDIT INFORMATION**

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|-----------------------------|--|
| <b>Applicant Name:</b>      | Nature’s International Certification Services (NICS)   |
| <b>Est. Number:</b>         | NA   |
| <b>Physical Address:</b>    | 224 State Hwy 56 East, Viroqua, WI 54665   |
| <b>Mailing Address:</b>     | P.O. Box 131, 224 State Hwy 56 East, Viroqua, WI 54665   |
| <b>Contact &amp; Title:</b> | David J. Engel, Executive Director   |
| <b>E-mail Address:</b>      | <a href="mailto:david.engel@naturesinternational.com">david.engel@naturesinternational.com</a>   |
| <b>Phone Number:</b>        | 608-637-7080   |
| <b>Auditor(s):</b>          | Miguel A. Caceres  |
| <b>Program:</b>             | USDA National Organic Program (NOP)  |
| <b>Audit Date(s):</b>       | September 28 and October 24 – 28, 2005   |
| <b>Audit Identifier:</b>    | NP5271MMA  |
| <b>Action Required:</b>     | No   |
| <b>Audit Type:</b>          | NOP Accreditation Desk Audit   |
| <b>Audit Objective:</b>     | To determine the compliance of the company’s quality manual to the audit criteria  |
| <b>Audit Criteria:</b>      | <ul style="list-style-type: none"> <li>• <i>USDA, AMS, 7 CFR Part 205, National Organic Program; Final Rule, dated December 21, 2000 and</i></li> <li>• <i>ARC 1025 Procedure, National Organic Program (NOP), Accreditation for Organic Certification Organizations, dated June 3, 2003.</i></li> </ul> |
| <b>Audit Scope:</b>         | NICS Quality Manual, dated August 2005; NICS Certification Manual, dated October 20, 2005  |
| <b>Location(s) Audited:</b> | Desk   |

NICS is a for-profit organization that was established June 15, 2005 as a Limited Liability Company in the state of Wisconsin. NICS consists of 1 office and is co-owned by David J. Engel and Marta W. Engel. The TM-10CG Application for Accreditation listed 150 crops, 200 livestock, 1 wild crop, and 22 handling operations as potential clients. The NICS website ([www.naturesinternational.com](http://www.naturesinternational.com)) states that certification is available to clients that fall within their declared field of operations worldwide. Services provided by NICS will be confined to organic certification. The NICS accreditation materials were received by the auditor on September 13th, 2005. The desk audit was started on September 28<sup>th</sup> and was completed on October 28, 2005. NICS has also applied for accreditation as an ISO Guide 65 organization with the USDA, AMS, LS, Audit, Review, and Compliance Branch.

Currently, NICS has 4 staff positions; an Executive Director, Administrative Director, Quality Systems Manager, and a Certification Decision Maker. In addition to the staff personnel, 2 sub-contracted



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inspectors will be utilized in the certification process. A description of the responsibilities and qualifications of all personnel is contained in the quality manual and indicates that they have the necessary experience, training, and knowledge to conduct their duties as assigned. The review of documents and phone interviews conducted during the audit verified that the Administrative Director has no actual experience in applying the NOP Rule in the certification process. Her experience and training consisted of being the editor of a monthly organic newsletter for 15 months; attending 5 organic clinics which were each 1 hour in duration; and reading the NOP Rule in order to answer client's questions when other staff personnel were not available. The confidentiality and conflict of interest disclosure reports were provided for a responsibly connected party and all personnel in the certification process.

When an applicant inquires about certification, a determination is made as to whether they qualify as an exempt or excluded operation. Applicants for certification are provided with an application packet which includes the NICS Certification Manual, an Organic Certification Affidavit, an organic system plan (application) along with applicable forms, the NOP standards verbatim, and a cost estimate. The fee schedule is contained in the certification manual and complies with §205.642 of the NOP Rule. The fee schedule will be accessible on the NICS website. The website will be fully operational once accreditation is granted.

A pre-review will be conducted on the applications to determine if the application is complete and the applicant appears to comply or may be able to comply with the requirements of the NOP. The on-site inspection will be conducted by a qualified sub-contracted inspector. Once the inspection report and other documents are returned to NICS, the file will be reviewed and a determination on whether to grant certification will be made. The pre-review will be conducted by the Executive Director or the Administrative Director, the inspection by sub-contracted personnel and the certification decision by the Certification Decision Maker. All 3 functions are separate and conducted by different individuals. The certification certificate to be issued is entitled "Profile of Organic Operations" and meets the requirements of §205.404(b). The effective date on the certificate is listed as the "Date of Certification Issuance".

NICS has procedures in place to address:

- Granting, denying, maintaining and withdrawing certification
- Minor and major non-compliances
- Investigations in response to complaints
- Additional announced and unannounced inspections
- Sampling and testing
- Mediations and appeals
- Annual performance evaluations
- Training
- Internal audits and management review (annual program review)
- Record keeping and retention
- Submitting the annual update report to the NOP



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**FINDINGS**

Procedures and records reviewed verified that Nature's International Certification Services is able to comply with the requirements of the audit criteria. All requests for additional documents and information were satisfied during the desk audit process and there were no non-compliances identified.