



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

AUDIT INFORMATION

Applicant Name:	NASAA Certified Organic Program (NASAA)
Est. Number:	NA
Physical Address:	Unit 7/3 Mount Baker Rd., Stirling, South Australia 5152
Mailing Address:	PO Box 768, Stirling, South Australia 5152
Contact & Title:	Lyn Austin Director and Brad Nott, Certification Officer
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Phone Number:	+61 08 8370 8455
Auditor(s):	Steve Ross
Program:	USDA National Organic Program (NOP)
Audit Date(s):	January 9-10, 2006
Audit Identifier:	NP6009DDA
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:	NASAA Certified Organic Program 2005 Annual Report
Location(s) Audited:	Desk

Information submitted by NASAA included:

- List of 44 certified clients located in the Australia, Papa New Guinea, Nepal, and Indonesia; including 8 crop, 18 livestock, and 18 processors/handlers;
- NASAA maintains a for-profit business;
- Three (3) crop operations files, three livestock, and three processor/handling files that included inspection reports, certification decisions;
- NOP Training material conducted by NASAA July 31, 2005;
- Audit report from Australian Quarantine and Inspection Services (Australian Government audit of NASAA for compliance to Australian Organic requirements);
- New Conflict of Interest and Confidentiality Policies for agents of NASAA;
- New Livestock Organic System Plan;
- List of NASAA staff members, review committee, and contracted inspectors;
- 2005 annual program review; and
- Completed ARC 1025C- Annual Update of NOP Accredited Certifying Agents Checklist.



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FINDINGS

Procedures and records reviewed verified that NASAA is currently operating in compliance to the requirements of the audit criteria except as noted below. As a result of the annual update review; four (4) non-compliances were cleared from the 2004 on-site audit. One (1) minor non-compliance from the 2004 annual update has been elevated to a major non-compliance for failure to send corrective action for both the 2004 update and 2005 update. One new major and two new minor non-compliances were identified during the review.

NP5345DDA.NC1 Cleared

NP5345DDA.NC2 Cleared

NP5345DDA.NC6 Cleared

NP5345DDA.NC7 Cleared

NP4335DDA.NC1 –Minor – Elevated to Major - The NOP Rule section 205.510(a)(4) requires the submission of the results of the most recent performance evaluations of personnel involved with the certification decisions. *NASSA did not include performance evaluations for the inspectors that the company uses for NOP certification audits. During the onsite audit, it was requested that these documents be sent to the auditor-of-record by January 01, 2005. As of this report date, the performance evaluations have not been sent. 2005 Annual Update: As of this report date, the performance evaluations for 2004 have not been submitted. In addition, NASAA did not submit performance evaluations with the 2005 annual update report.*

NP6009DDA.NC1 – Major – NOP §205.510(a)(1) requires “A complete and accurate update of information submitted pursuant to §205.503 and §205.504.” NOP §205.504(c)(2) requires the submission of a conflict of interest disclosure report for all persons who review applications, perform on-site inspections, and review certification documents. *NASAA did not include conflict of interest disclosure reports for any staff, inspection review committee, or contracted inspectors.*

NP6009DDA.NC2 – Minor – Section 205.403(d) requires the inspector to conduct an exit interview with an authorized representative of the operation. *A review of the Cootamundra Oilseeds Pty Ltd showed that the inspector did not complete the NASAA “confirmation and exit interview” form indicating that an exit interview was not completed.*

NP6009DDA.NC3 – Minor – Section 205.403(e)(2) requires a copy of the on-site inspection report and any test results will be sent to the inspected operation by the certifying agent. *The NASAA/JAS/NOP Checklists used by the inspectors requires the inspectors to determine if the operation wants a copy of the inspection report. There was no indication that NASAA sends the operation a copy of the inspection report and the checklist question indicates that an inspection report is not necessarily sent to the operation.*