



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

**AUDIT INFORMATION**

<b>Applicant Name:</b>	California Certified Organic Farmers (CCOF)
<b>Est. Number:</b>	N/A
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<b>Auditor(s):</b>	Martin Friesenhahn, Lead Auditor and Nikki Adams, Auditor
<b>Program:</b>	USDA National Organic Program (NOP)
<b>Audit Date(s):</b>	March 8 - August 8, 2007
<b>Audit Identifier:</b>	NP7067BBA
<b>Action Required:</b>	No
<b>Audit Type:</b>	Surveillance - Accreditation Renewal Audit
<b>Audit Objective:</b>	To verify continuing compliance to the audit criteria; and to verify the implementation and effectiveness of corrective actions in addressing the previous non-compliances.
<b>Audit Criteria:</b>	7 CFR Part 205 National Organic Program, Final Rule, dated December 21, 2000; updated September 11, 2006
<b>Audit Scope:</b>	CCOF's quality manual dated March 30, 2007, including personnel, processes, procedures, facilities, and related records.
<b>Location(s) Audited:</b>	CCOF Office in Santa Cruz, CA; Sun Chai, Inc. in Santa Cruz, CA; Perry Farms in Fremont, CA; and Beretta Dairy in Santa Rosa, CA.

The California Certified Organic Farmers, LLC 5 Year Re-Accreditation Audit process started on March 8, 2007, with a review of the documents submitted by California Certified Organic Farmers and culminated with the on-site surveillance audit which was conducted on August 6–8, 2007.

California Certified Organic Farmers, LLC (CCOF) is a wholly owned subsidiary of CCOF, Inc. Both are distinct entities with CCOF, LLC as the organic certification agency and CCOF, Inc. as the organic advocacy foundation for providing educational and promotional outreach. CCOF, LLC is a non-profit organization accredited as a certifying agent on April 29, 2002 to the National Organic Program (NOP) for crops, livestock, and handling operations. The CCOF Client List as of January 1, 2007 has approximately 1700 certified clients with 1175 crop, 71 livestock, and 457 handling operations certified to the NOP Standards. CCOF is not listed as accredited to the NOP for Wild Crop Operations and currently has no clients certified for Wild Crops. During the audit, it was mentioned that it is CCOF's



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intention to have accreditation for Wild Crops and that CCOF would submit this increase in scope of operation to the NOP in the future. The majority of clients are certified in the State of California with additional clients in fourteen states and four countries.

CCOF is currently applying the NOP Standards to all clients and is offering certification to additional standards and requirements in the CCOF International Global Market Access (GMA) Program. There are approximately 588 clients in the GMA Program. The applications, checklists, and inspection reports for the International clients include the additional requirements from the NOP. A separate certificate is issued for the GMA Program which includes IFOAM and additional standards such as EU 2092/91 or others as applicable. The ISO Guide 65 audit was conducted along with the NOP re-accreditation audit.

CCOF has 15 personnel involved in various certification positions at the home office. CCOF has additional staff and contracted staff from home offices that are also involved in the certification process. The application and files for initial certification are primarily reviewed by the Certification Specialists at the home office but also from other CCOF staff. The annual updates are reviewed by Certification Specialists, Certification Supervisors, or other CCOF staff as based on qualifications. The inspections are conducted by CCOF Staff Inspectors or contract inspectors on a case by case basis. The inspections are scheduled by the Regional Service Representatives with the oversight of inspectors and inspections by the Inspections Director. The final decisions for certification are made by the Certification Supervisors, Certification Specialists, or other CCOF staff. The assignment of the files for the application review and the final certification decisions are based on the training and qualifications for the type of operation. The same applies to the assignment of inspections.

The audit included observations of three renewal inspections by CCOF. The inspection for the crop operation included various mixed organic fruits and vegetables and the producer for the livestock operation included a dairy for organic milk production. The processor included organic tea processing.

CCOF has a Material Review Contract and Recognition Agreement with the Organic Materials Review Institute (OMRI) and the Washington State Department of Agriculture Organic Food Program (WSDA). Both of these agreements were reviewed during the audit.

The first OMRI Agreement was dated January 18, 2007 and listed OMRI as a subcontractor. An additional Material Review Contract and Recognition Agreement between CCOF and OMRI were dated June 12 and 18, 2007. Portions of the latest OMRI agreement include Section 2, "USDA Accredited Certification Agency (ACA) recognizes the standing, qualifications and quality of the OMRI review process and therefore, has chosen to recognize OMRI decisions as an integral part of ACA's compliance process." Section 3.1 states, "OMRI shall publish the OMRI Products List, which contains products for organic production reviewed for compliance with NOP Standards." Section 3.2 states, "ACA will accept this list and use as a tool when verifying organic compliance within the ACA organic certification program." In addition the agreement mentions in Section 4, "The OMRI Products List will not function as the sole source of material review and inclusion on OMRI Products List will not automatically convey an operator's allowance to use any given product. Additionally, ACA reserves the right to perform its own additional material reviews and limit the use of listed materials when such limitations are required by the NOP or deemed necessary by ACA for compliance or other reasons."



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The WSDA Agreement was dated July 11 and 12, 2007. Portions of the agreement states, “WSDA Program evaluates and registers materials that are approved for use in organic production and handling.” The agreement also states, “WSDA registers brand name materials that have been evaluated for compliance to the US National Organic Standards and that CCOF will accept these registered materials as their own and utilize them as a standard and accepted tool when verifying organic compliance within the CCOF Organic Certification Program.” In addition the agreement mentions, “WSDA registered materials will not function as the sole source of material review and inclusion on WSDA Brand Name Material List will not automatically convey an operator’s allowance to use any given material. Additionally, CCOF reserves the right to perform its own additional material reviews and limit the use of listed materials when such limitations are required by the NOP or deemed necessary by CCOF for compliance or other reasons.”

During the audit and the observations of the inspections, CCOF at times used the OMRI Listing as a reference for acceptability to materials and brand names to the NOP. CCOF also mentioned that they were using the OMRI listing as guidance and were aware that the NOP National List was the approved list.

### **FINDINGS**

Observations made, interviews conducted, and procedures and records reviewed verified that CCOF is currently operating in compliance to the audit criteria. The corrective actions for the non-compliances from previous audits were verified and found to be implemented and effective. Therefore, the non-compliances were cleared. No non-compliances were identified during the audit.

**NP6005GGA.NC1 – Major – Cleared**  
**NP6005GGA.NC2 – Major – Cleared**  
**NP6005GGA.NC3 – Major – Cleared**  
**NP6005GGA.NC4 – Minor – Cleared**  
**NP6005GGA.NC5 – Minor – Cleared**  
**NP6005GGA.NC6 – Minor – Cleared**  
**NP6005GGA.NC7 – Minor – Cleared**  
**NP6144LLA.NC1 – Major – Cleared**  
**NP6144LLA.NC2 – Major – Cleared**  
**NP6144LLA.NC3 – Minor – Cleared**