



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

**AUDIT INFORMATION**

<b>Applicant Name:</b>	Scientific Certification Systems dba NutriClean Organic
<b>Est. Number:</b>	N/A
<b>Physical Address:</b>	2200 Powell Street Suite 725; Emeryville, CA 94608
<b>Mailing Address:</b>	Same As Above
<b>Contact &amp; Title:</b>	Heena Patel, Certification Manager
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<b>Phone Number:</b>	(510) 452-8000
<b>Auditor(s):</b>	Vickie Robertson
<b>Program:</b>	USDA National Organic Program (NOP)
<b>Audit Date(s):</b>	February 16 - May 3, 2007
<b>Audit Identifier:</b>	NP7047GGA
<b>Action Required:</b>	Yes
<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>	<ul style="list-style-type: none"><li>• 7 CFR Part 205, National Organic Program, Final Rule, dated December 21, 2000; Updated September 11, 2006</li></ul>
<b>Audit Scope:</b>	NutriClean's quality manual dated April 27, 2007, including personnel, processes, procedures, facilities, and related records.
<b>Location(s) Audited:</b>	NutriClean Office in Emeryville, CA; Produce Exchange in Livermore, CA; and Salad Cosmos in Dixon, CA.

Scientific Certification Systems dba NutriClean Organic was accredited as a certifying agent on April 29, 2002 to the National Organic Program (NOP) for crops, wild crops, livestock, and handling operations. Currently NutriClean has 4 crop, and 13 handling operations certified to the NOP Standards mostly in California. NutriClean does not currently have any clients certified for wild crops or livestock.

The 5 Year Accreditation Audit process started on February 16, 2007 with a review of the documents submitted by NutriClean and concluded with the on-site surveillance audit which was conducted on April 30 – May 3, 2007.

NutriClean currently applies the NOP Standards and the parent company Scientific Certification Systems (SCS) provides certification for sanitation standards. Neither SCS nor NutriClean are certified to ISO Guide 65 standards. The application, inspection and certification documents were



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revised in response to the recommendations identified during the internal audit performed in April 2007.

The Organic Program Manager conducts the initial application review to assure the application is complete and the applicant is able to comply with the NOP Regulation. The Organic Program Manager is also the primary inspector. The completed inspection report and certification documents are reviewed by the Director, Food and Agriculture Testing Services, who makes the final certification decision. NutriClean utilizes inspectors that are employees of the company.

The audit included observations of two inspections by NutriClean. The operations for the inspections included organic crop (sprouts) and a processing facility.

### FINDINGS

Observations made, interviews conducted, and procedures and records reviewed verified that NutriClean is currently operating in compliance to the audit criteria except as noted below. There were four non-compliances identified during the audit. One non-compliance from the 2006 Annual Update was reviewed for corrective action. The company has not yet received the final report from NOP; however, the documents relating to the non-compliance were observed and reviewed, and the non-compliance was cleared.

**NP6157FFA.NC1 - Major – Cleared** - NOP §205.510(a) (1) requires “a complete and accurate update of information submitted pursuant to §205.503 and §205.504” 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. *NCO submitted the summary of performance evaluations for employees and contractors. They also submitted inspector training evaluations. NCO did not submit a clear criteria on how employees are evaluated, and they did not submit performance evaluations for inspectors.* Corrective Action: Performance reviews for all certification personnel were provided, including inspectors. The quality manual, section 1.4, details the procedure for evaluations and the form used for the performance evaluation which details the criteria used for each area of the evaluation. The most current program review was performed on 4/27/06 by consultant Krista Wanser. All recommendations from that review have been completed.

**NP7047GGA.NC1**– NOP §205.103 (a) states, “A certified operation must maintain records concerning production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s))”. (b) Such records must: (3) Be maintained for not less than 5 years beyond their creation.” *Two of eight total files reviewed contained organic system plans that listed timeframes less than 5 years for required documents. Neither the organic system plan review nor the inspection indicated any need for a corrective action pertaining to this issue. The inspector for the two witness audits observed did not verify the information on the organic system plan, as the section for record retention was not completed to reflect the 5 year minimum required by NOP.*



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**NP7047GGA.NC2** – NOP §205.404(b) states, “The certifying agent must issue a certificate of organic operation which specifies the: (1) Name and address of the certified operation.” NOP §205.406(d) states, “If the certifying agent determines that the certified operation is complying with the Act and the regulations in this part and that any of the information specified on the certificate of organic operation has changed, the certifying agent must issue an updated certificate of organic operation pursuant to 205.404(b).” *The certificate currently being issued to growers contains only the name of the client and not the address. NutriClean does not issue certificates that indicate a revision of information on the certificate. A revision date is not included on the certificate, only an issue date and the effective date.*

**NP7047GGA.NC3** - NOP §205.642 states, “...A certifying agent shall charge applicants for certification and certified production and handling operations only those fees and charges that it has filed with the Administrator. The certifying agent shall provide each applicant with an estimate of the total cost of certification and an estimate of the annual cost of updating the certification.” *Four files were reviewed to determine the actual fees charged to clients and cost estimates. The travel-related expenses were itemized in computer expense sheets. The computer records of four clients were reviewed and one of four did not show the expenses as charged on the invoice for the client. The fees did not appear to be excessive for the travel incurred. Clients are provided a cost estimate (Work Order) for only the certification fees which do not include the travel related expenses for the inspection.*

**NP7047GGA.NC4** - The NutriClean Quality Manual (QS-01. V1.R6 04/27/07), Section 2.5 states, “At any time the client chooses to withdraw certification from NutriClean Organic, a written notification must be sent to the NutriClean Organic Coordinator.” *A client withdrew from certification and the written notification to the Organic Coordinator could not be provided. The written response from NutriClean to the company was sent as required by the procedure. Only one company has withdrawn to date.*