



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

AUDIT INFORMATION

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| Applicant Name: | Indiana Certified Organic (ICO), LLC |
| Est. Number: | N/A |
| Physical Address: | 8364 S SR 39, Clayton, IN 46118 |
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| Contact & Title: | Cecilia Bowman, CEO |
| E-mail Address: | icollcceo@earthlink.net |
| Phone Number: | 317 539 4317 |
| Auditor(s): | Darrell Wilson |
| Program: | USDA National Organic Program (NOP) |
| Audit Date(s): | April 1, 2008 |
| Audit Identifier: | NP7061OOA |
| Action Required: | No |
| Audit Type: | Corrective Action Audit |
| Audit Objective: | To verify that the corrective actions adequately address the non-compliances identified during the previous on-site Accreditation Renewal Audit. |
| Audit Criteria: | 7 CFR Part 205, National Organic Program; Final Rule, dated December 21, 2000; updated December 12, 2007. |
| Audit Scope: | ICO's submitted corrective actions. |
| Location(s) Audited: | Desk |

Indiana Certified Organic (ICO), LLC submitted corrective actions dated January 31, 2008.

FINDINGS

ICO submitted corrective actions and supporting documentation that adequately addressed the three non-compliances identified during the previous on-site Accreditation Renewal Audit (NP7061OOA).

NP7061OOA.NC1 – Adequately Addressed – NOP §205.403(c)(1) states “The on-site inspection of an operation must verify: The operations compliance or capability to comply with the Act and the regulations in this part.” *During the witness inspections it was observed that the two inspectors were not inspecting all buildings relating to the certified operation nor did they inspect any of the equipment used for field work. Also it was observed on September 20, 2007, during the farm inspection that the inspector did not verify all of the invoices for products purchased. T-22 was indicated to be used for seed treatment, but the label nor the invoice was requested for review. The inspector asked questions about the operation and accepted the clients answer without verifying the accuracy of the answer through records or*



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documents. During the inspection of the processing facility the same day, the inspector again asked about records, such as clean out records for the grain handling equipment between non-organic and organic grains, but did not request to look at any records. **Corrective Action:** The inspector has been notified of his lack of sufficient performance. His annual performance evaluation will also reflect the poor performance during the inspections. A repeat inspection was conducted in March of 2008. ICO is creating a new inspection form which will include a section that addresses the need to visit and report on all buildings during inspections. Guidance was written and distributed to the inspectors and a training session was conducted on January 29, 2008 for inspectors.

NP706100A.NC2 – Adequately Addressed – NOP §205.406 (a)(2) states, “To continue certification, a certified operation must pay the certification fees and submit the following information, as applicable, to the certifying agent: Any additions to or deletions from the information required pursuant to §205.401 (b).” During the review of client files, it was observed that one annual update was submitted indicating no changes. During the inspection, the inspector had indicated that there were additional inputs, which were not included in the annual update and were not a part of the initial organic system plan (OSP). The inspector had also submitted documentation supporting his finding, which was included in the inspection report. There was no indication found that the OSP has been updated to reflect these changes.

Corrective Action: Guidance was written and distributed to the inspectors and a training session was conducted on January 29, 2008 for inspectors addressing the requirements for all non-reported changes to the OSP. All certified operations as well as operations requesting information on certification will be receiving written guidance which includes information on the importance of and requirements for updating the OSP.

NP706100A.NC3 – Adequately Addressed – NOP §205.601 (j)(6) states, “Micronutrients – not to be used as a defoliant, herbicide, or desiccant. Those made from nitrates or chlorides are not allowed. Soil deficiency must be documented by testing.” During the review of client files, it was found that one of the certified operations had used an input which contained Boron. There was no documentation found to substantiate the deficiency. **Corrective Action:** The client was contacted and requested confirmation that soil testing was performed indicating a deficiency of Boron. A soil analysis was provided which does indicate a deficiency in Boron. A written guidance was distributed to the inspectors which included the importance of soil testing prior to using micronutrients. ICO contacted manufacturers for whom their materials are approved by ICO to remind them of the importance of soil testing prior to the use of micronutrients. These manufacturers were also sent updated ICO materials review information regarding ICO policies and procedures.