



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

AUDIT INFORMATION

Applicant Name:	Iowa Department of Agriculture & Land Stewardship (IDALS)
Est. Number:	N/A
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Auditor(s):	Rick Skinner, Lead Auditor & Alan Kohles, Auditor
Program:	USDA National Organic Program (NOP)
Audit Date(s):	April 23-26, 2007
Audit Identifier:	NP7113EEA
Action Required:	Yes
Audit Type:	Surveillance - Accreditation Renewal Audit
Audit Objective:	To verify continuing compliance to the audit criteria, and to verify the implementation and effectiveness of corrective actions addressing the previous non-compliances.
Audit Criteria:	7 CFR Part 205, National Organic Program, Final Rule, dated December 21, 2000, Updated September 11, 2006
Audit Scope:	IDALS's quality manual dated October 18, 2006, including personnel, processes, procedures, facilities, and related records.
Location(s) Audited:	<ul style="list-style-type: none">• Iowa Department of Agriculture & Land Stewardship (IDALS) office, Des Moines, IA;• TLJ Grain, Inc., Clermont, IA (processing/handling); and• Nick Weber Farm, Garreson, IA (livestock, crops).

IDALS is established under Iowa code chapter 159 and it is established as the certification body pursuant to Iowa code Sections 190C.4.2. and 190C 13.1. The Agricultural diversification and Market Development bureau of IDALS is responsible for the Administration of the Organic Certification Program. IDALS was accredited as a certifying agent on April 29, 2002, to the USDA National Organic Program (NOP) for crops, wild crops, livestock, and handling. Currently, IDALS has approximately 249 operations certified for crops, livestock, or handling. There are currently no clients certified for wild crops.

The Organic Certification Program is implemented by the Ag Diversification & Market Development Bureau of the IDALS. The Bureau Chief is also the Organic Program Administrator. In addition to the Organic Program Administrator, two full-time employees and one part-time employee work directly with



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applicants. Their functions include but are not limited to the development of forms and application materials, the distribution of application packets, the maintenance of organic operator databases, and the review of applicant files.

One full-time inspector and one part-time organic inspector conduct producer and processor inspections. The Organic Program Administrator conducts a final review of applicant documents and confers with program staff if necessary before making determination of operator's compliance with organic regulations. Approved certificates are provided to the Director of the Market Development and Administrative Division for signature. The Iowa Organic Advisory Council is in charge with the setting fees and the Department's auditor conducts an annual audit of the Organic Certification Program.

The Organic Advisory Council is an eleven member council established in Code of Iowa section 190C.2(a). The council may exercise only those duties as requested by the Department pursuant to this section.

FINDINGS

Observations made, interviews conducted, and procedures and records reviewed verified that IDALS is currently operating in compliance to the audit criteria except as noted in the con-compliances below. One non-compliance was identified during the audit. Three non-compliances from the 2006 annual update were reviewed for corrective actions. IDALS had not responded to the letter and report received from the NOP in January; however, the documents relating to the non-compliances were evaluated and verified and found to be effective; therefore, the non-compliances were cleared.

NP6306LLA.NC1 – Minor – Cleared - NOP §205.501(a) states, "A private or governmental entity accredited as a certifying agent under this subpart must: (11) Prevent conflicts of interest by: (v) Requiring all persons who review applications for certification, perform on-site inspections... to complete an annual conflict of interest disclosure report." *Current conflict of interest disclosure reports were not submitted for the Organic Program staff or for the inspectors.* **Corrective Action:** All staff and the one full-time and one part-time inspector had current and historical conflict of interest disclosures on record.

NP6306LLA.NC2 - Minor – Cleared - NOP §205.404(b) (3) states that the certifying agent must issue a certificate of organic operation which specifies the category of organic operation, including corps, livestock, or processed products produced by the certified operation. *Copies of the NOP certificates were not submitted with the certification evaluation documents for review.* **Corrective Action:** Certificates for the submitted client files for the 2006 annual update and certificates in other files were reviewed during the audit. All certificates reviewed were current. The requirement to submit copies of the appropriate certificates with the annual update was discussed.

NP6306LLA.NC3 - Minor – Cleared - NOP §205.504(b) (5) (ii) requires a list of producers and handlers whose operation it has certified, including for each the name of the operation, type (s) of operation, products produced, and the effective date of the certification, during the current and 3 preceding calendar years. *The producers list of clients did not identify the type (s) of operation, products produced, and the effective date of the certification.* **Corrective Action:** The current client database includes the type(s) of operations, products produced, and the effective date for which certification has



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been granted.

NP7113EEA.NC1 – NOP § 205.501(a)(15) states, “A private or governmental entity accredited as a certifying agent under this subpart must: . . . Submit to the Administrator a copy of: (i) Any notice of denial of certification issued pursuant to §205.405, notification of noncompliance, notification of noncompliance correction, notification of proposed suspension or revocation, and notification of suspension or revocation sent pursuant to §205.662 simultaneously with its issuance.” *Records show that a major noncompliance identified during the 2006 inspection of one farm was not forwarded to the Administrator as required. Additional records show that a major non-compliance identified during the inspection of another farm was not reported to the Administrator. The Notification of Certification was sent to the client on February 20, 2007.*