



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

**AUDIT INFORMATION**

<b>Applicant Name:</b>	Maharishi Vedic Organic Agriculture Institute (MVOAI)
<b>Est. Number:</b>	N/A
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<b>Phone Number:</b>	641-209-6578
<b>Auditor(s):</b>	Rick Skinner
<b>Program:</b>	USDA National Organic Program (NOP)
<b>Audit Date(s):</b>	July 30, 2007
<b>Audit Identifier:</b>	NP7108EEA
<b>Action Required:</b>	No
<b>Audit Type:</b>	Corrective Action Audit
<b>Audit Objective:</b>	To verify that corrective actions adequately address the non-compliances identified during the Surveillance-Accreditation Renewal Audit.
<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>	Submitted corrective actions
<b>Location(s) Audited:</b>	Desk

Maharishi Vedic Organic Agriculture Institute (MVOAI) submitted corrective actions to the NOP in a letter dated July 8, 2007. The proposal was submitted to the auditor by the NOP on July 27, 2007.

**FINDINGS**

The submitted corrective actions adequately addressed the four non-compliances identified during the previous audit.

**NP7108EEA.NC1 – Adequately Addressed** - NOP § 205.504 (4)(b) states, “A private or governmental entity seeking accreditation as a certifying agent must submit the following documents and information to demonstrate its expertise in organic production or handling techniques... (4)(b) Administrative policies and procedures. (1) a copy of the procedures to be used to evaluate certification applicants, make certification decisions, and issue certification certificates.” In addition, the company’s procedures require



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the use of a specified checklist in the label approval process. *The procedure outlined in the MVOAI Procedures Manual includes the Organic Labeling Checklist Version 1.0 – IC-F-062 Revision B – April 25, 2002, for use in the approval process for labels submitted to the Certification Committee. A review of all approved labels shows that this checklist was never used in the approval process. Corrective Action:* The labeling checklist has been made available to the members of the MVOAI Certification Committee, its use explained, and will be utilized in all deliberations regarding labeling of organic products. A field has been added to the client database to signify when appropriate that the labeling checklist has been used.

**NP7108EEA.NC2 – Adequately Addressed - NOP § 205.303 (b)** states, “Agricultural products in packages described in § 205.301 (a) and (b) must:... (2) On the information panel, below the information identifying the handler or distributor of the product and preceded by the statement, “Certified organic by \* \* \*,” or similar phrase, identifying the name of the certifying agent that certified the handler of the finished product...” *The inspection at MAPI found that “Organic Sesame Oil” was being bottled and labeled with a label that did not meet the requirements outlined in the rule, and that the label had never been submitted to the certifying agent for review. Corrective Action:* MVOAI explained that this was an oversight and misunderstanding on the client’s part. They were selling organic sesame oil as massage oil and not for food consumption. They were buying certified organic sesame oil and re-bottling it or merely re-labeling it. Since they were not processing it, not intending it for food consumption, they did not feel they needed to apply for certification. Therefore, MVOAI did not know about this product. The client never gave MVOAI any indication of this practice, nor had it involved MVOAI in any way in the processing of the oil. MVOAI properly certifies two products for the client – organic honey and organic ghee – but sesame oil is not among those products. The client has been informed that the product must be properly certified and labeled as an organic product, or labeled for massage use only.

**NP7108EEA.NC3 – Adequately Addressed - NOP § 205.501 (18)** states, “Provide the inspector, prior to each on-site inspection, with previous on-site inspection reports and notify the inspector of its decision regarding certification of the production or handling operation site inspected by the inspector and of any requirements for the correction of minor non-compliances.” *Records indicate that MVOAI is not currently notifying the contract inspectors of the certification decision or requirements associated with the correction of minor non-compliances. Corrective Action:* MVOAI has begun to send notification to the inspectors of the decisions or requirements associated with the correction of minor non-compliance. A field has been added to the client database recording the date that each notification was sent to the inspector for each client.

**NP7108EEA.NC4 – Adequately Addressed - NOP § 205.406 (a)** states, “To continue certification, a certified operation must annually pay the certification fees and submit the following information, as applicable to the certifying agent: (1) an updated organic production or handling system plan which includes: (ii) any additions or deletions to the previous year’s organic system plan, intended to be undertaken in the coming year, ... (3) An update on the correction of minor non-compliances previously identified by the certifying agent as requiring correction for continued certification.” *The review of the organic system plan (OSP) during the witness inspection at MAPI revealed that the seven non-*



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*compliances identified during the previous inspection had not been addressed in the new OSP. Records at the certifier shows the non-compliances were addressed, but the OSP did not identify how all past non-compliances were addressed. **Corrective Action:** MVOAI will continue to ask certified operations to address non-compliances quickly when it is felt it is warranted, but will ensure that certified operations identify in their OSP all non-compliances from the previous year and describe how the non-compliances were successfully addressed.*