



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

AUDIT INFORMATION

Applicant Name:	International Certification Services, Inc. (ICS)
Est. Number:	N/A
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Auditor(s):	Vickie Robertson
Program:	USDA National Organic Program (NOP)
Audit Date(s):	September 25, 2007
Audit Identifier:	NP7040GGA
Action Required:	Yes
Audit Type:	Corrective Action Audit
Audit Objective:	To verify that corrective actions adequately address the non-compliances identified during the Surveillance - Accreditation Renewal Audit.
Audit Criteria:	7 CFR Part 205, National Organic Program; Final Rule, dated December 21, 2000; and updated September 11, 2006
Audit Scope:	International Certification Services' submitted corrective actions
Location(s) Audited:	Desk

International Certification Services (ICS) submitted corrective actions via email dated July 26, 2007, to the USDA National Organic Program (NOP) to address the non-compliances identified during the accreditation renewal audit. The corrective actions were forwarded to the auditor of record and received on August 10, 2007.

ICS provided the following supporting documents:
Modules 25: Sanitation and Clean Out Procedures, dated 11/20/06;
Module 26: Structural Pest Control, dated 11/20/06;
Soil Building articles (2);
Procedure 5.06 C Making Certification Decisions; and
Module 3 Production Agreement, date 7/25/2007.



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FINDINGS

The submitted corrective actions adequately addressed one of the five non-compliances identified during the accreditation renewal audit. However, four non-compliances were not adequately addressed and they remain outstanding.

NP7040GGA.NC6 – Adequately Addressed - NOP §205.600 states, “The following criteria will be utilized in the evaluation of substances or ingredients for organic production and handling sections of the National List: (a)-(c).” *The certifying agent advises clients to verify inputs using the OMRI list in the Production Agreement #1. Other documents refer the client to the OMRI list, but advise the client to verify the inputs with the certifying agent prior to use. Inspectors reference the use of the OMRI list in the inspection report, which was evident in the review of client files.* **Corrective Action:** ICS submitted the revised Module 3: Production Agreement, dated 7/25/07. While Production Agreement #1 does not state the OMRI list should not be used for compliance to the NOP, it does clearly state the operator agrees to submit materials to ICS prior to use. In addition, this issue will be added to the inspector training list to ensure inspectors are aware of the reference to OMRI.

NP7040GGA.NC1 -- Not Adequately Addressed - NOP §205.271 (a) states, “The producer or handler of an organic facility must use management practices to prevent pests, including but not limited to: (1-3)”. *The ICS organic system plan modules 25 Sanitation and Clean Out and 26 Structural Pests do not reflect the requirement of management practices to prevent pests prior to using the other methods detailed in the other sections of this clause. The review and inspection of processing operations do not stress management practices.* **Corrective Action:** ICS provided Modules 25 and 26, dated 11/20/2006 that were not made available during the on-site audit. The referenced questions in the modules noted in the corrective actions refer to cleaning of equipment and residues/commingling (Module 25) and pest management as related to use of “materials” (Module 26). Module 26, question 2, does ask for the “main strategies employed to combat” pests; however, ICS did not address the inspection aspect of the review of management practices required for pest control in processing facilities.

NP7040GGA.NC3 – Not Adequately Addressed - NOP §205.403 (c)(1-3) states, “The on-site inspection of an operation must verify: The operation’s compliance or capability to comply with the Act and the regulations in this part. That the information, including the organic production or handling system plan, provided in accordance with §§205.401, 205.406 and 205.200, accurately reflects the practices used or to be used by the applicant for certification or by the certified operation. That prohibited substances have not been and are not being applied to the operation...” *During two of the witness audits, it was observed that the inspectors did not have a current copy of the NOP Standards. The livestock inspector was not provided with module 16 to account for the livestock reported by the applicant so that the number could be verified by the inspector. The packet was also missing module 16C.* **Corrective Action:** ICS states that a clerical error resulted in the missing documents being placed in the auditor’s folder. ICS states that the staff has been made aware of the situation and will be double checking for completeness of folders. In addition, ICS will add to the inspector training list to ensure that the inspectors carry a copy of the NOP and/or request a copy of



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the regulation from ICS. However, ICS did not provide a copy of the inspector training list or documentation of the reminder to the staff to verify folders are complete.

NP7040GGA.NC4 – Not Adequately Addressed - NOP §205.501 (a)(11)(iv) states, A private or governmental entity accredited as a certifying agent under this subpart must: Prevent conflicts of interest by: Not giving advice or providing consultancy services, to certification applicants or certified operations, for overcoming identified barriers to certification.” *The notes observed in the review process of two client files provided consultancy to clients for soil building and pest weed management. The packet sent to crop producers with application materials provided an article written by a member of the board of directors that provided consultancy on soil building and pest weed management.* **Corrective Action:** ICS adequately explained the use and distribution of the soil building articles, so that consulting as related to these articles is not an issue. The Certification Committee has been made aware of these situations in providing consultancy during the review process. However, documentation of the communication with the Certification Committee was not provided.

NP7040GGA.NC5 – Not Adequately Addressed - NOP §205.501 (a)(11)(vi) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Prevent conflicts of interest by: Ensuring that the decision to certify an operation is made by a person different from those who conducted the review of documents and on-site inspection.” *One of six files reviewed indicate that the certification committee member that performed the initial review for ability to comply also made the final certification decision. The ICS certification procedure does not prevent this situation from occurring.* **Corrective Action:** ICS provided a revised section of the Administrative Manual, Procedure 5.06 C (no revision number or date), which clearly details the final certification must be made by someone other than the person performing the initial review of documents; however, it is not clear from the corrective action when the procedure will be implemented.