



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

AUDIT INFORMATION

Applicant Name:	Global Organic Alliance (GOA)
Est. Number:	N/A
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Auditor(s):	Vickie Robertson
Program:	USDA National Organic Program (NOP)
Audit Date(s):	September 24, 2007
Audit Identifier:	NP7025GGA
Action Required:	Yes
Audit Type:	Corrective Action Audit
Audit Objective:	To verify that the 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:	Global Organic Alliance’s submitted corrective actions
Location(s) Audited:	Desk

Global Organic Alliance (GOA) submitted corrective actions to address the non-compliances identified during the accreditation renewal audit performed on May 14 – 17, 2007. The corrective actions were received by NOP on July 19, 2007, and forwarded to the auditor of record and received on July 27, 2007.

GOA submitted the following supporting documents:

- ❖ Addendum A: Email from the inspector concerning the applicable date for calculating the 1 year of organic management for the dairy operation;
- ❖ Addendum B: 3 certificates showing a revision date;
- ❖ Addendum C: The client file for Jim Bailey poultry operation;
- ❖ Addendum D: 2007 New Member Cover Letter;
- ❖ Addendum E: Procedure P009 – Inspection and Testing Procedure Rev. 4 dated 5/16/07; and
- ❖ Addendum F: Global Organic Alliance Policy Manual rev. 21 dated 5/16/07.



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FINDINGS

The submitted corrective actions adequately addressed four of the six non-compliances resulting in one non-compliance being cleared. Two non-compliances were not adequately addressed and they remain outstanding.

NP7025GGA.NC6 – Cleared - NOP §205.670(b) states, “The Administrator, applicable State organic program’s governing State official, or the certifying agent may require pre-harvest or post-harvest testing of any agricultural input used or agricultural product to be sold, labeled, or represented as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food groups(s))” when there is reason to believe that the agricultural input or product has come into contact with a prohibited substance or has been produced using excluded methods. Such tests must be conducted by the applicable State organic program’s governing State official or the certifying agent at the official’s or certifying agent’s own expense.” *GOA’s policies and procedures do not clearly document that the certifying agent will perform the testing at the certifying agent’s expense.* **Corrective Action:** GOA provided addendum E, Procedure 009, Inspection and Testing Procedure (revision 4 dated 5/16/07), and addendum F, The GOA Policy Manual (revision 21 dated 5/16/07). The highlighted sections of both documents clearly state that any testing will be conducted by GOA and at GOA’s expense.

NP7025GGA.NC1 – Adequately Addressed - NOP §205.204(a)(1) states, “The producer must use organically grown seeds, annual seedlings, and planting stock: *Except*, That nonorganically produced, untreated seeds and planting stock may be used to produce an organic crop when the equivalent organically produced variety is not commercially available.” *GOA is not performing an adequate verification of attempts to procure organically produced seed by producers as evidenced in two of eight client files reviewed.* **Corrective Action:** GOA has a form that is required to be completed by clients for certification (F016B) that was in place during the on-site audit. As of May 18, 2007, GOA is holding the member/client file until the Organic Seed Search (F016B) is completed as required, prior to assigning the on-site visit.

NP7025GGA.NC2 – Adequately Addressed - NOP §205.236(a)(2)(i) states, “Livestock products that are to be sold labeled or represented as organic must be from livestock under continuous organic management from the last third of gestation or hatching: *Except*, That: *Dairy animals*. Milk or milk products must be from animals that have been under continuous organic management beginning no later than 1 year prior to the production of the milk or milk products that are to be sold, labeled or represented as organic.” *One of two livestock files reviewed revealed that six purchased conventional cows were assigned the date of October 1, 2006 as the date beginning the 1 year of continuous management; however, the decision for the date was not based on objective evidence per the information contained in the file.* **Corrective Action:** GOA provided addendum A, an email from the inspector of the operation further explaining his observation during the review of the milk production records that substantiates the date established for the beginning of the one year organic management requirement.



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NP7025GGA.NC3 – Adequately Addressed - 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).” *GOA does not issue revised certificates. The certificates have a certificate effective date and last inspection date, but do not reflect any changes of the information specified on the certificate.* **Corrective Action:** GOA’s indicated that the computer programmer had changed the certificate format to allow for the inclusion of a revision date. GOA provided three revised certificates that contained a revision date.

NP7025GGA.NC4 – Not Adequately Addressed - NOP §205.402 (a)(1) states, “Upon acceptance of an application for certification, a certifying agent must: Review the application to ensure completeness pursuant to 205.401.” *The review of two of eight files revealed that the organic system plans (OSP) were incomplete. One operation was a new poultry applicant and the OSP did not provide the production information such as anticipated capacity, feed purchase/supplier, etc.* **Corrective Action:** GOA provided the completed OSP for the new poultry client; however, this does not address the requirement of the cited clause of the regulation. GOA must ensure that an adequate review of the OSP is performed for completeness and ability to comply with the regulation for all applications and/or updates received.

NP7025GGA.NC5 – Not Adequately Addressed - NOP §205.642 states, “...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.” *GOA does not currently provide an estimate for the cost of certification or for the annual cost of updating the certification.* **Corrective Action:** GOA provided the 2007 New Member cover letter, and the second page of this document contains the cost estimate for the certification of the new applicant. The corrective action does not address the cost estimate for certification of continuing clients.