



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

AUDIT INFORMATION

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| Applicant Name: | Department of Plant Industry - Clemson University |
| Est. Number: | N/A |
| Physical Address: | 511 Westinghouse Road, Pendleton, SC 29670 |
| Mailing Address: | 511 Westinghouse Road, Pendleton, SC 29670 |
| Contact & Title: | Brad Stancil, Program Coordinator |
| E-mail Address: | bstanci@clemson.edu |
| Phone Number: | 864-646-2131 |
| Auditor(s): | David J. Hildreth |
| Program: | USDA National Organic Program (NOP) |
| Audit Date(s): | April 30-May 3, 2007 |
| Audit Identifier: | NP7120ACA |
| 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 in 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: | Department of Plant Industry's quality manual dated October 18, 2006, including personnel, processes, procedures, facilities, and related records. |
| Location(s) Audited: | Department of Plant Industry Office in Pendleton, SC; Park Seed in Greenwood, SC (processor); and Calhoun Fields in Anderson, SC (crop). |

Department of Plant Industry (DPI), Clemson University, Organic Certification Program was accredited as a certifying agent on April 29, 2002 to the National Organic Program (NOP) for crops, wild crop, livestock, and processors/handlers. DPI currently has 9 crops and 7 processor/handler operations certified to the NOP Standards in the State of South Carolina, North Carolina, and Georgia. DPI currently has no clients certified for wild crops or livestock.

The DPI Program Manager or the Asst. Program Manager conducts the initial application review and conducts the initial on-site evaluation and the file is sent to the Department Head, who is the accredited certifying agent (ACA), who makes the final decision for certification or denial of the clients. After the final decision, the file is then sent back to the Program Manager who completes the Certificate for the signature of the ACA.



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The audit included observations of two witness audits conducted by the Program Manager of DPI. The operations for the inspections included Park Seed, a processor and Calhoun Fields for crops.

FINDINGS

Observations made, interviews conducted, and procedures and records reviewed verified that DPI is currently operating in compliance to the audit criteria except as noted in the non-compliances below. Three non-compliances were identified during the audit. Two outstanding non-compliances from the 2005 and 2006 annual updates were reviewed for corrective actions. The NOP has not yet received the reply for the 2006 annual update from DPI; however, the documents relating to the non-compliances were observed and reviewed, therefore, the non-compliances were cleared.

NP6079ZZA.NC1 – Minor – Cleared - NOP§205.504 (d)(2) requires at least one client file (minimum of 3) from each area of accreditation that includes the inspection reports and certification evaluation documents. *The client files submitted by the Department of Plant Industries did not include the organic system plans.* **Corrective Action:** All client files were reviewed and found to contain current and past organic system plans.

NP6235BBA.NC1 - Minor – Cleared - NOP§205.504 (d)(2) requires at least one client file (minimum of 3) from each area of accreditation that includes the inspection reports and certification evaluation documents. *The client files submitted by the Department of Plant Industries did not include the organic certificates or the organic system plans.* **Corrective Action:** All client files were reviewed and found to contain current and past organic certificates and organic system plans.

NP7120ACA.NC1 – NOP §205.300 (c) states, “Products produced in a foreign country and exported for sale in the United States must be certified pursuant to subpart E of this part and labeled pursuant to this subpart D.” *Product received by a seed company received a certificate from a foreign supplier and the certificate stated the seeds were certified to IFOAM and the EU 2092/91 Standards not to the NOP Standards. The seed company had repacked this product and labeled it as organic.*

NP7120ACA.NC2 – NOP §205.303 (b)(2) states, “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 and may display the business address, Internet address, or telephone number of the certifying agent in such label.” *Seed packets produced by a seed company certified by DPI did not contain the statement “Certified organic by DPI, Clemson University”. Also the company had ads in their catalog advertising organic seeds and displaying the USDA Organic seal, which did not contain the required statement identifying the certifying agent.*

NP7120ACA.NC3 –NOP §205.403 (e)(2) states, “A copy of the on-site inspection report and any test results will be sent to the inspected operation by the certifying agent.” *The program manager stated that he does not send copies of the inspection report to the inspected operation.*