



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

AUDIT INFORMATION

Applicant Name:	Washington State Department of Agriculture (WSDA) – Organic Food Program
Est. Number:	N/A
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Auditor(s):	Miguel A. Caceres
Program:	USDA National Organic Program (NOP)
Audit Date(s):	May 1 – 22, 2008
Audit Identifier:	NP7030MMC
Action Required:	No
Audit Type:	Corrective Action Audit
Audit Objective:	To verify that corrective actions adequately address the non-compliances identified the during the previous on-site Accreditation Renewal Audit
Audit Criteria:	<ul style="list-style-type: none">• 7 CFR Part 205, National Organic Program, Final Rule, dated December 21, 2000; updated December 12, 2007
Audit Scope:	The company's submitted corrective actions.
Location(s) Audited:	Desk

The corrective actions were received by the auditor on February 8, 2008. The review of the Washington State Department of Agriculture (WSDA) submitted corrective actions started on May 1, 2008. An email was sent to WSDA on May 20, 2008 requesting additional information and documents, all of which were promptly provided on May 21, 2008. The review and desk audit report were completed on May 22, 2008.

FINDINGS

The corrective actions submitted by WSDA adequately addressed the four non-compliances identified during the previous on-site Accreditation Renewal Audit which was conducted July 30 – August, 2, 2007.

NP7030MMC.NC1 – Adequately Addressed – NOP §205.404 (b)(2) “The certification agent must issue a certificate of organic operation which specifies the: (2) Effective date of certification. *One of the files reviewed did not have the effective date on two of the certificates in the file.* **Corrective Action:** WSDA stated a new database was being developed which would automatically input the effective date to be consistent with the date that the first NOP Organic Certificate was issued to the operation. The new



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database was scheduled to be implemented in the fall of 2008. Until the implementation of the database program personnel have manually inputted the date on newly issued certificates. An example of the certificates was provided and contained a “Current Certificate Issue Date” and an “NOP Effective Date.”

NP7030MMC.NC2 – Adequately Addressed – NOP §205.501(a)(10) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Maintain strict confidentiality with respect to its clients under the applicable organic certification program and not disclose to third parties... except as provided for in § 205.504(b)(5).” *During the witness inspections on at least two occasions the inspector discussed the operations of other applicants with the client being inspected. Confidentiality with third parties is not addressed in the program policies. Personnel from the State of Alaska Dept. of Natural Resources have traveled with WSDA on past audits for training purposes and have not signed confidentiality agreements with WSDA.* **Corrective Action:** WSDA POL-OFP-023 Public Access to Information and Confidentiality Policy was revised (dated October 25, 2007) to require any individuals accompanying WSDA inspectors during inspections to complete a confidentiality agreement prior to the inspection. Confidentiality training was conducted during the WSDA January 2008 All Team Meeting. The meeting agenda for the training and the attendance roster was provided which included the inspector utilized during the witness inspections.

NP7030MMC.NC3 – Adequately Addressed – NOP §205.504(b)(1) states, “A private or governmental entity seeking accreditation as a certifying agent must submit... A copy of the procedures to be used to evaluate certification applicants, make certification decisions, and issue certification certificates.” *The certification procedures do not adequately identify who makes the certification decision. The procedure PRO-OFP 010 Reviewing Organic Food Inspection Reports states that the file is submitted to the “assigned QAC person” for approval of the certificate. None of the procedures, organizational chart, or the job descriptions identifies who are the QAC individuals. During the audit these individuals were identified as the program manager, inspection supervisor, organic program specialists, and certification coordinators.* **Corrective Action:** POL-OFP-041 Quality Assurance Control Personnel and Responsibilities, October 25, 2007 was developed and explains the roles and responsibilities of the QAC personnel. The new policy was added to Section E of the WSDA Organic Food Program Manual (OFPM). A “Responsible Authorized Personnel” roster was added to Section O of the WSDA-OFPM to identify the qualified QAC personnel; and policies PRO-OFP 005 and PRO-OFP 010 were revised to reference the new policy.

NP7030MMC.NC4 – 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.” *Livestock and crop operations are not being provided with a fee estimate. Handlers and out of state operations are provided with the estimate. Livestock and crop operations are provided a form to calculate their own estimates.* **Corrective Action:** WSDA POL-OFP 037 Cost Estimate Policy was revised March 28, 2008 to include providing all new and continuing certification applicants with a cost estimate for certification. An example of the cost estimate was provided for review.