



**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
Physical Address:	1111 Washington Street, 2 nd Floor, Olympia, WA 98504-2560
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Auditor(s):	Miguel A. Caceres, Lead Auditor and Edith Adams, Auditor
Program:	USDA National Organic Program (NOP)
Audit Date(s):	January 30 – August 2, 2007
Audit Identifier:	NP7030MMC
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:	WSDA's quality manual dated October 2, 2006, including personnel, processes, procedures, facilities, and related records.
Location(s) Audited:	WSDA office located in Olympia, WA; Jay Gordon Dairy, in Elma, WA; Phillippi Fruit, in Wenatchee, WA; and Richard Smithson, in Peshastin, WA.

The Washington State Department of Agriculture (WSDA) – Organic Food Program 5 Year Re-Accreditation Audit process started on January 30, 2007 with a review of the documents submitted by WSDA and culminated with the on-site surveillance audit which was conducted on July 30 – August 2, 2007. The annual USDA ISO Guide 65 program audit was conducted concurrently with the NOP on-site audit. Information reviewed during the audit indicated WSDA had 681 crops, 1 wild crop (located in Alaska), 109 livestock, and 336 handlers in their organic certification program.

The WSDA organic certification program is operated with a staff of twenty-one: 1 Assistant Director, 1 Program Manager, 1 Filed Inspector Supervisor, 1 Program Assistant, 1 Program Secretary Supervisor, 1 Customer Service Specialist, 3 Organic Certification Coordinators, 3 Organic Program Specialists/Reviewers, and 9 Inspectors. Certification services are provided in the following states and country: Alaska, California, Georgia, Illinois, Minnesota, Missouri, Oregon, Washington, and Canada.



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WSDA also conducts inspections for two Japanese recognized organizations; International Certification Services – Japan (ICS-Japan) & Japan Organic and Natural Foods Association (JONA).

The certification file is first reviewed by an Organic Program Specialist (OPS) or a Certification Coordinator (CC) to determine whether service can be provided, whether the application is complete, and whether the applicant complies or can comply with the Final Rule. After the review, an inspector is assigned by the Field Inspector Supervisor and an inspection conducted. Once the inspection report is submitted, the file is once again distributed to the appropriate OPS/CC who conducted the initial review. Once this review is completed the file is distributed to the assigned QAC person who will make the certification decision (see findings).

There were three witness inspections conducted which covered three of the four certification categories of accreditation: crops, livestock, and handlers. The category of wild crop was not reviewed with a witness inspection because WSDA had only one wild crop which was located in Alaska. The review of the organic system plans, the witness inspections, review of certification procedures, and interviews conducted revealed the following:

- Applicants seeking certification are provided with the *2005 Organic Food Program Organic Certification Guide*, N/1/05 which includes as appendixes: the NOP Rule verbatim; Chapter 16 157 WAC Organic Food Standards and Certification; ATTRA Suppliers of Seed for Certified Organic Production; and the WSDA Brand Name Material List.
- Labels are required to be submitted with applications and are reviewed prior to, during, and after the inspection.
- Organic system plans (OSP) had sufficient information on buffer zones and crop rotation.
- The inspector's utilized for the witness inspections covered the areas of §205.403(c) as required.
- Certification was granted or denied based on the NOP standards.
- Certificates issued met the NOP requirements.
- Fees charged to applicants were in accordance with the standards. However, estimates are not provided to all applicants as required (see findings).
- There were sixteen complaints received in 2007 with three still in the process of being reviewed. All other complaints had follow-up action.
- Livestock operations were certified and converted in accordance with the requirements.
- No grower groups are certified by WSDA.



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FINDINGS

Observations made, interviews conducted, and procedures and records reviewed verified that WSDA is currently operating in compliance to the audit criteria except as noted below. The corrective actions for the four non-compliances from the 2006 Annual Update were verified and found to be implemented and effective. Therefore the non-compliances were cleared. There were four non-compliances identified during the audit.

NP6153GGA.NC1 – Major – Cleared

NP6153GGA.NC2 – Minor – Cleared

NP6153GGA.NC3 – Minor – Cleared

NP6153GGA.NC4 – Minor – Cleared

NP7030MMC.NC1 –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.*

NP7030MMC.NC2 – 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.*

NP7030MMC.NC3 – 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.*

NP7030MMC.NC4 – 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.*