



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

Applicant: Department of Fertilizer and Seed Certification Services (FSCS) (Name change to Department of Plant Industry)
Program : National Organic Program - Accreditation for Organic Certification Organizations - 2004 Annual Update
Location(s): Desk Audit
Audit Date(s): November 30 – December 3, 2004
Audit File Number: NP4335BBA
Action Required: Yes
Auditor(s): Martin Friesenhahn
Contact & Title: Kelly Spring – Certification Specialist
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AUDIT ACTIVITIES

On December 3, 2004, a representative of the USDA, AMS, LS Audit, Review, and Compliance (ARC) Branch completed a review of annual update documents submitted by the Department of Fertilizer and Seed Certification Services (FSCS) Organic Certification Program in Pendleton, SC, to verify continued compliance to the USDA, AMS 7 CFR Part 205, National Organic Program (NOP). Audit documentation is on record for review.

The following information was provided for the review:

- The Department of FSCS has merged with the Department of Plant Industry and has requested the **name change** from FSCS to **Department of Plant Industry**.
- Updated fee schedule (Rev. 8/21/03) – added charges for greenhouses
- NOP and organic training information
- NOP Certified Organic Operations – 11 clients (6/16/04, crop - 10, and processing – 2)
- Performance Evaluations – (4)
- Certification documents – (3 crop operations)
- Conflict of Interest and Confidentiality Agreements (7)
- Annual Program Review (7/6/04)

FINDINGS

The files and information submitted by FSCS for the annual update complied with NOP requirements except as noted in the non-compliances. Three minor non-compliances were identified during the review.

Non-compliances

NP4335BBA.NC1 - Minor -205.510(a)(4)/205.501(a)(6) - Annual report, recordkeeping, and renewal of accreditation- The results of the most recent performance evaluations..... *A performance evaluation was not submitted for the Department Head, David Howle.*

NP4335BBA.NC2 – Minor – 205.504(c)(2)/205.501(11)(v) – Evidence of expertise and ability – Conflicts of interest/and General requirements for accreditation - For all persons who review applications, perform on-site inspections....to complete annual conflict of interest disclosure reports.....
Two inspectors and three reviewers did not have updated conflict of interest disclosure reports for 2004.

NP4335BBA.NC3 – Minor – 205.504(d)(2) – Evidence of expertise and ability – Current certification activities – Copies of at least 3 different inspection reports and certification evaluation documents...for each area of operation for which accreditation is requested. *FSCS did not submit any reports or certification evaluation documents for the processor/handler operations (2 clients).*

RECOMMENDATIONS

Based on the audit findings, the auditor recommends that FSCS's accreditation be continued with surveillance by appropriate members of the USDA with the condition that the non-compliances are addressed by FSCS in a timeframe specified by the NOP. Additionally, the requested name change from FSCS to Department of Plant Industry should be made to the listing on the NOP website.