



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

Applicant: Louisiana Department of Agriculture and Forestry (LDAF)
Program : National Organic Program - Accreditation for Organic Certification
Organizations - Desk Audit
Location(s): Baton Rouge, LA
Audit Date(s): June 17 – August 13, 2004
Audit File Number: NP4169BA
Action Required: Yes
Auditor(s): Martin Friesenhahn
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AUDIT ACTIVITIES

On various days from June 17 – August 13, 2004, a representative of the USDA, AMS, LS, Audit, Review and Compliance (ARC) Branch conducted a review of documents submitted by the Louisiana Department of Agriculture and Forestry (LDAF) for accreditation as a certifying agent in accordance with requirements of the USDA, AMS 7 CFR Part 205, National Organic Program, Final Rule.

LDAF is a state government located in Baton Rouge, LA. LDAF originally applied for NOP accreditation on September 3, 2002. The application and accreditation materials were resubmitted on April 21, 2004. LDAF is applying for accreditation in crops, livestock, wild crop, and handling operations. The LDAF Application for Accreditation lists estimates of 20 crops, 2 livestock, 2 wild crop, and 5 handling operations. LDAF had certified organic production and handling operations in the state of Louisiana prior to October 2002 and intends to certify production and handling operations in Louisiana once accreditation is granted.

A Notice of Intent was provided to repeal the previous regulations, Sections 101-129, of the LDAF governing the organic certification program and state organic rules. The amended Sections 101 (Organic Certification) and 103 (Organic Certification Fees) were also included in the Notice of Intent. This proposed Rule allowed for interested persons to submit written comments through July 25, 2004. The LDAF Organic Administrative Coordinator mentioned that no comments had been received by the public.

LDAF will use the NOP Standards for certification of organic producers and processors. Applicants will be provided a packet that includes the applicable sections of 7 CFR Part 205 of the NOP Final Rule, appropriate organic plan questionnaires, forms, and the LDAF Organic Certification Fee Schedule. The certification fees appear reasonable and include information that the application fee is non-refundable.

The resumes, job descriptions and information provided for LDAF employees showed adequate experience to conduct organic certification in the areas requested for accreditation. Signed Conflict of Interest Disclosure Reports including confidentiality information were provided on LDAF inspectors and employees that will be involved in the organic certification program. In house training had been provided to the LDAF Inspectors on the LDAF Organic Certification Program and the NOP Standards.

The applications for organic certification will be reviewed by the LDAF Administrative Coordinator.

LDAF Inspectors will be assigned to conduct the inspections once the applications are complete. The LDAF Administrative Coordinator reviews the completed inspection report and applicable information and makes a recommendation on organic certification to the LDAF Director of Horticulture and Quarantine Programs. The LDAF Director of Horticulture and Quarantine Programs makes the decision to certify or not certify the organic operations. Upon certification, LDAF will issue a letter and certificate that includes the applicable information required by the NOP Rule.

LDAF has policies and procedures in place to address inspections, sampling of products, non-compliances, denial, and appeals. LDAF also has procedures for submitting the annual report and other information to the NOP as required by the NOP Rule.

FINDINGS

All areas of the NOP Rule were adequately addressed in the application by LDAF. One Continuous Improvement Point (CIP) was noted.

Observation

NP4168BA.CIP1 – The Notice of Intent was provided repealing the LDAF Organic Standards. However, this needs to be passed through Legislation for final approval.

RECOMMENDATIONS

I recommend that LDAF be granted initial approval to become an organic certifying agent under the NOP. An on-site audit should be conducted by the USDA for verification of NOP procedures and records. In addition, information should be provided to the NOP upon final passage of the legislation repealing the previous LDAF Organic Standards.