



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

Applicant: Pennsylvania Certified Organic (PCO)
Program : National Organic Program – Accreditation for Organic Certification Organizations – 2004 Annual Update
Location(s): PCO Office – Centre Hall, PA
Audit Date(s): September 23 and October 13, 2004
Audit File Number: NP4267KKA
Action Required: Yes
Auditor(s): Lauren Kavanaugh
Contact & Title: Alison Jaenicke, Certification Assistant
E-mail Address: Alison@panorganic.org

AUDIT ACTIVITIES

On September 23 and October 13, 2004, a representative of the USDA, AMS, LS Audit, Review, and Compliance (ARC) Branch conducted a review of annual update documents submitted by the Pennsylvania Certified Organic (PCO) Certification Program in Centre Hall, PA, to verify continued compliance to the USDA, AMS 7 CFR Part 205, National Organic Program (NOP). The documents were submitted on April 29, 2004 by PCO Certification Assistant Alison Jaenicke. Additional information was submitted on October 12, 2004. The PCO Organic Certification program was accredited by the NOP on April 29, 2002. The ARC Branch Checklist 1025C was used as a basis for determination for compliance to the NOP Rule. The audit documentation is on record for review (**NP4267KKA Audit Documentation**).

Information submitted by PCO included:

- Completed ARC 1025C Checklist.
- Administrative Procedures Manual and Certification Manual (April 27, 2004)
- Part 20. Organization Summary and Personnel – Who Does What? Dated 04-27-04. This document contains the names of all personnel that are used in the certification process.

- Estimated certification for 2004: Crops = 240, Wild Crops = 7, Livestock = 120, Handling = 50
- Part 5 Certification Fees, dated 4-27-04, explaining which fees will be assessed and what the refundable and non-refundable fees are.
- Revised policies and procedures for training, evaluating, and supervising personnel.
- Updated position descriptions and qualification requirements.
- Qualifications & Training Report (4-26-04)
- Certification Policies & Procedures
- Revised Conflict of Interest Procedure.
- Conflict of Interest Disclosure Reports
- Growers, Processors and Handlers Certified by PCO (February 4, 2004)
Approximately 265 certified operations.
- 10 certification files entailing 3 wild crops, 5 crops, 4 handlers, and 3 livestock.
- ISO Guide 65 Certificate-USDA, and CAQ Conformity Recognition Attestation Certificate
- Minutes of Board Meeting conducted April 9, 2003

- Annual Internal Audit Report (May 23, 2003) completed by Patricia Kane (progress charts of corrective actions.
- Performance Evaluations - (Certification Director, 3 Certification Assistants)

FINDINGS

The review of the files and information submitted by PCO indicated that PCO was applying its organic certification program in compliance with 7 CFR Part 205, National Organic Program. One Minor non-compliance was identified during this audit.

NP4267KKA.NC1 – Minor – 205.501 (a) (6) requires that the certifying agent conduct an annual performance evaluation of all persons involved in the certification process and **205.510 (a) (4)** requires submission of the results of the most recent performance evaluations. *PCO submitted the performance evaluations for the Certification Director and 3 Certification Assistants. There were no performance evaluations submitted for the persons that perform on-site inspections.*

RECOMMENDATIONS

Based on the audit findings the auditor recommends that PCO's accreditation be continued with surveillance by appropriate members of the USDA. Responses to the non-compliances should be submitted within a time frame designated by the reviewing officials.