



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

**Applicant:** Guaranteed Organic Certification Agency (GOCA)  
**Program :** National Organic Program – 2003 Annual Update/Corrective Action Report  
**Location(s):** 5464 Eighth St., Fallbrook CA  
**Audit Date(s):** December 01, 2003  
**Audit File Number:** NP3276DA CA Report  
**Action Required:** Yes  
**Auditor(s):** Steve Ross  
**Contact & Title:** Charles Heermans, Owner and Administrator  
**E-mail Address:** Heermans@tfb.com

### **AUDIT ACTIVITIES**

On December 01, 2003, a representative of the USDA, AMS, LS Audit, Review, and Compliance (ARC) Branch conducted a review of corrective action documents submitted by the Guaranteed Organic Certification Agency (GOCA) Fallbrook, CA to verify continued compliance to the USDA, AMS 7 CFR Part 205, National Organic Program (NOP). Charles Heermans, owner and administrator of GOCA, submitted requested information on November 10, 2003. Information submitted by GOCA included a letter of explanation detailing each non-conformance cited in the October 7, 2003 report NP3276DA.

### **FINDINGS**

Corrective actions submitted were adequately sufficient to demonstrate continued compliance for the two hold points issued. However, the corrective action submitted for the one continuous improvement point was not adequate and will need further action by GOCA.

**NP3276DA.NC1 (HP) Adequately Addressed 205.201(a)(5).** Physical barriers established ...to prevent contact of organic production ...with prohibited substances. *The inspection of the Kelly Ranch found that the client had used the substance Roundup within ten (10) feet of the orchard trees. The conditions set by GOCA only requested the ranch to “fix the current contamination prevention plan since the plan of not using prohibited materials on the first rows of non-organic production appeared to not be working.” GOCA also only asked for the client to provide a copy of the pesticide user’s number and pesticide use permits. GOCA did not require removal of the land for organic production or the removal of any contaminated product. GOCA certified the ranch on September 19, 2002 after the ranch answered the conditions. The CA submitted by the ranch did not address the need for removal of the land or products.*  
**Corrective Action Submitted:** The GOCA inspector had been trained to measure from the drip line of citrus trees, so the usage of the Roundup would have been 10 feet from the root zone. In this district, citrus trees are normally planted on 20-foot centers. The root zone is commonly a 10-foot diameter around each tree trunk: therefore, the land and products were not contaminated.

**NP3276DA.NC2 HP Adequately Addressed 205.404 (a).** ...if the certifying agent determines that the organic system plan and all procedures and activities of the applicant are in compliance of this part... the agent shall grant certification. *GOCA has numerous conditions imposed on the client that are not in agreement with the Rule. GOCA’s inspection checklist automatically generates conditions based upon the finding in the checklist. GOCA has made these conditions requirements for certification. Examples are:*

- *Requiring soil and water tests from the client*
- *Complaint logs to be kept and identifies this as Guide 65 requirement. (GOCA indicates that they are in the process of Guide 65 application, but no indication that Guide 65 accreditation has been granted) All client files reviewed showed no indication that any client was requesting Guide 65 certification*
- *Requirements to meet the EU 2092/91 rule. Again no indication that clients were requesting certification to an international standard.*
- *Requirements for bathrooms and hygiene standards for applicants*
- *Requiring clients to have employees sign GOCA “highlights for certification standards”*

**Submitted Corrective Action:** GOCA will rework the questionnaires and conditions requirements in order to not make these examples conditions of certification. GOCA will submit the questionnaires and conditions for further review. *This is an adequate response in order to clear the Hold Point pending review of the questionnaires and conditions.*

**NP3276DA.NC3 CIP Insufficiently Addressed 205.642.** ...requires the certifying agent to supply the client with an estimation of costs for certification and the cost of continued certification. *The GOCA policy manual dated May 2003 states “at the request of the applicant, GOCA will provide a quotation for all services. This is documented on pg 14 and pg 23 of the manual. Submitted Corrective Action:* Until GOCA has received an application, it is sometimes impossible to know what the inspection fees will be ...The inspection fees vary depending on location and average travel fees. GOCA has included a chart to show applicants how GOCA calculates the inspection fees but many want us to fix these fees in quotations and contracts. **Auditor Response:** This corrective action does not show how GOCA will give the cost estimate to the clients for certification and continued certification. GOCA has to show how they will give all clients a total cost of certification and continued certification even though they are giving the clients the fee schedule and how GOCA calculates the inspection fees.

## **RECOMMENDATIONS**

I recommend that GOCA supply adequate corrective actions to NC 3 and also submit the revised questionnaires and condition requirements as soon as completed, preferably within 30 days.