



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

**Applicant:** Utah Department of Agriculture and Food (UDAF)  
**Program :** National Organic Program/Accreditation for Organic Certification Organizations- Annual Update  
**Location(s):** Salt Lake City, Utah  
**Audit Date(s):** August 8, 2003  
**Audit File Number:** NP3220DA  
**Action Required:** Yes  
**Auditor(s):** Steve Ross  
**Contact & Title:** Seth Winterton  
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### AUDIT ACTIVITIES

On August 8, 2003, a representative of the USDA, AMS, LS Audit, Review, and Compliance (ARC) Branch conducted a review of annual update documents submitted by the Utah Department of Agriculture and Food, Organic Certification Program, Salt Lake City, Utah to verify continued compliance to the USDA, AMS 7 CFR Part 205, National Organic Program (NOP). Seth Winterton, Program Administrator, submitted requested information on July 7, 2003 that was received by the auditor on July 25, 2003. ARC Branch Checklist 1025C was used as a basis for determining compliance with the NOP Rule. Information submitted by GCIA included:

- Current Fee Schedule
- List of 22 certified operations including 18 crop, 2 livestock, and 2 handler/processors all located in the State of Utah
- New ethics training manual for all state employee
- Annual conflict of interest statements for all eleven (11) personnel involved with the certification decision dated 2003
- Three grower files, two livestock files and two processor files that included OSP, Inspection reports, certification decisions and copies of the certificate issued
- Annual evaluations of all 11 personnel involved in the certification decision
- UDAF Internal Audit

### FINDINGS

A review of the materials submitted by UDAF found that for the most part UDAF is in compliance with the NOP Rule; however there were two hold points and one continuous improvement point identified during the rule.

**NP3220DA.NC1 Hold Point.** 205.404 requires that the certifying agent issue certificate to an organic operation which specifies the: 1) Name and Address of the certified operation, 2) Effective date of certification, 3) Categories of organic operation, and 4) Name, address, and telephone number of the certifying agent. *The UDAF Certificate that is being issued was changed since the accreditation desk audit. The certificate that is now issued by UDAF does not have a date of issue, it only contains a year date (2003) and the certificate does not include the address and phone number of the certifying agent.*

**NP3220DA.NC2 Hold Point.** 205.506(b)(3) requires the certifying agent to correct minor

noncompliances found during the onsite audit. *UDAF was issued a nonconformance for the onsite audit NP2171DA.NC7 for a systematic way to determine that all requirements are met prior to issuance of the certificate. UDAF's corrective action dated April 7, 2003, was a checklist that addressed all relevant parts of the Rule in order to determine compliance of the client. This checklist was approved as corrective action on April 22, 2003 under report NP2171DA. CA Report. Client files submitted by UDAF found that this checklist was not being used for the decision making as indicated.*

**NP3220DA.NC3 Continuous Improvement Point.** 205.510(a)(4) requires the submission of an annual program review and a description of adjustments to the certifying agents operation and procedures implemented or to be implemented in response to the program review. *UDAF submitted a completed internal audit which identified that UDAF does not use an adequate number of trained personnel to comply with and implement the organic certification program. No comprehensive program review was submitted by UDAF that identified adjustments to be made or procedures that had been implemented in response to corrective actions.*

### **RECOMMENDATIONS**

I recommend that the GCIA accreditation be continued with corrective action submitted within a timeframe established by the NOP Program Manager. If corrective action is not submitted then I recommend that NOP begin the revocation process.