



National Organic Program
1400 Independence Avenue, SW.
Room 2642-South, STOP 0268
Washington, DC 20250-0268

Accreditation Status Confirmation

January 13, 2021

To Whom This May Concern:

Ecoglobe is a United States Department of Agriculture (USDA), National Organic Program (NOP) accredited certifying agent. Furthermore, Ecoglobe is authorized to issue USDA NOP organic certification to agriculture producer and processor operations that comply with Title 7 Code of Federal Regulations (CFR) Part 205.

Ecoglobe's accreditation certificate indicates a renewal date of June 19, 2019; however, its accreditation is in good standing and continues to be valid. USDA NOP granted Ecoglobe an accreditation term extension until its accreditation renewal assessment is completed. USDA NOP expects the assessment process to conclude during 2021.

For questions concerning Ecoglobe's status, please contact the NOP at 202-720-3252.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. Yang". The signature is stylized with a large, sweeping initial "R" and a long, horizontal stroke extending to the right.

Robert Yang
Director, Accreditation Division
National Organic Program



CERTIFICATE OF ACCREDITATION



United States Department of Agriculture

Agricultural Marketing Service

National Organic Program

ECOGLOBE, LLC

80 Arami Street, Yerevan, 0022, ARMENIA

meets all the requirements prescribed in the USDA National Organic Program Regulations

7 CFR Part 205

an Accredited Certifying Agent
for the scope of

Crops, Handling, Livestock, Wild Crops Operations

This certificate is receivable by all officers of all courts of the United States as prima facie evidence of the truth of the statements therein contained. This certificate does not excuse failure to comply with any of the regulatory laws enforced by the U.S. Department of Agriculture .

Status of this accreditation may be verified at <http://www.ams.usda.gov>

Certificate No: **USDA-75-25**

Effective Date: **06/10/2024**

Expiration Date: **06/10/2029**

Issue Date: **08/01/2025**

Jennifer Tucker, Ph.D.

Deputy Administrator
National Organic Program

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National Organic Program
1400 Independence Avenue, SW.
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NATIONAL ORGANIC PROGRAM: AUDIT & CORRECTIVE ACTION REPORT

GENERAL INFORMATION

- **Certifier Name** Ecoglobe, LLC (EGLO)
- **Physical Address** 80 Arami Street, Yerevan, 0022, ARMENIA
- **Audit Type** Renewal Audit
- **Auditors & Audit Dates** Kelly Skoda, Joshua Lindau, Kelly Skoda, 08/19/2024 to 09/06/2024
- **Audit Identifier** NOP-23-24

CERTIFIER OVERVIEW

The National Organic Program (NOP) conducted an onsite Renewal Audit of Ecoglobe Certification Services, LLC's (EGLO) USDA organic certification program covering the period August 20, 2021 to September 6, 2024. The purpose of the audit was to verify EGLO's compliance with the Organic Foods Production Act of 1990 (OFPA), the USDA organic regulations (7 CFR Part 205), and the NOP Handbook. Audit activities included a review of certification activities, interviews with EGLO personnel, a records audit, and two onsite witness audits. The two witness audits consisted of one annual onsite inspection of a crops and handling producer group operation in Serbia and one annual onsite inspection of a wild crops operation in Armenia.

EGLO is a private limited liability company initially accredited on June 10, 2009. EGLO is accredited to the crops, wild crops, livestock, and handling scopes. EGLO's office is in Yerevan, Armenia. EGLO certifies forty-one operations and offers certification services in Armenia, Egypt, Kazakhstan, Russian Federation, Serbia, Ukraine, and United Arab Emirates. Certification activities are performed by five employees and eight contracted inspectors.

NOP DETERMINATION:

NOP reviewed the audit results to determine whether EGLO's corrective actions adequately addressed previous noncompliances. The NOP also reviewed the findings identified during the audit to determine whether noncompliances should be issued to EGLO.

Any noncompliance labeled as “**Cleared**” indicates that the corrective actions for the noncompliance are determined to be implemented and working effectively. Any noncompliance labeled as “**Accepted**” indicates acceptance of the corrective actions and verification of corrective action implementation will be conducted during the next audit.

Noncompliances from Prior Assessments

AIA-7206-21 - Cleared

AIA-7287-21 – Cleared

AIA-7289-21 - Cleared

AIA-7306-21 - Cleared

AIA-7307-21 - Cleared

Noncompliances Identified during the Current Assessment and Corrective Actions

AIA-3548-24 - Accepted. 7 CFR § 205.501(a)(3) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§ 205.402 through 205.406 and § 205.670;”

Comments: *EGLO does not consistently carry out the provisions of the Act and regulations. The auditors reviewed certification files and found EGLO incorrectly issued a partial denial to an applicant for land not eligible for certification instead of issuing a notice of noncompliance that would provide the applicant with an opportunity to withdraw the ineligible land from its application for certification.*

Corrective Actions: EGLO issued a notice of noncompliance to the operation according to the appropriate process. EGLO trained certification and review staff on May 6, 2025, to prevent the error from recurring.

AIA-3549-24 - Accepted. 7 CFR § 205.501(a)(2) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Demonstrate the ability to fully comply with the requirements for accreditation set forth in this subpart.”

Comments: *EGLO does not consistently demonstrate the ability to fully comply with the requirements for accreditation and NOP 2601 Instruction: The Organic Certification Process. The auditors reviewed certification files and found EGLO’s inspection reports prompt inspectors to suggest corrective actions for deficiencies or inconsistencies identified at the inspection.*

Corrective Actions: EGLO submitted revised inspection reports that do not prompt the inspector to suggest corrective actions. EGLO trained reviewers and inspectors on the changes on May 6, 2025, and implemented the new inspection reports on May 31, 2025.

AIA-3571-24 - Accepted. 7 CFR § 205.403(c)(2) states “All on-site inspections must be conducted when an authorized representative of the operation who is knowledgeable about the operation is present and at a time when land, facilities, and activities that demonstrate the operation's compliance with or capability to comply with the applicable provisions of subpart C

of this part can be observed, except that this requirement does not apply to unannounced on-site inspections.”

Comments: *EGLO did not conduct the annual onsite inspection of an operation when an authorized and knowledgeable representative was present. The auditors reviewed certification files and interviewed certification personnel and found EGLO scheduled the inspection with the authorized representative, however when the representative did not show, the EGLO inspector conducted the annual inspection with another representative. EGLO did not return to conduct a full annual inspection of the operation with the authorized and knowledgeable representative.*

Corrective Actions: EGLO trained staff and inspectors to ensure that a responsible person is present during inspections on May 6, 2025.

NATIONAL ORGANIC PROGRAM: AUDIT & CORRECTIVE ACTION REPORT

GENERAL INFORMATION

Certifier Name	Ecoglobe, LLC (EGLO)
Physical Address	80 Arami Street, Yerevan, 0022, Armenia
Audit Type	Mid-term Assessment (Desk-audit)
Auditors & Audit Dates	Joshua Lindau, Alicia Hudson, and Sherry Aultman August 16, 2021 to August 19, 2021
Audit Identifier	NOP-39-21

CERTIFIER OVERVIEW

Ecoglobe, LLC (EGLO) is a private limited liability company with its main certification office in Yerevan, Armenia. EGLO certifies operations in Armenia, Georgia, Russia, Belarus, Ukraine and Kazakhstan.

EGLO was accredited as a certifying agent for Crops, Wild Crops, Livestock, and Handling on June 10, 2009. At the time of the midterm assessment, EGLO certifies worldwide 44 operations: Crops (6), Wild Crops (10), Livestock (4) and Handlers (24).

The organic program is overseen by the General Director, a Director of Operations and a Deputy Director of Quality manager, who also conduct inspections. There is one administrative staff member dedicated to the organic program and seven staff inspectors that work for the EGLO organic program.

Noncompliances from Prior Assessments

Any noncompliance labeled as “**Cleared**,” indicates that the corrective actions for the noncompliance are determined to be implemented and working effectively. Any noncompliance labeled as “**Outstanding**” indicates that either the auditor could not verify implementation of the corrective actions or that records reviewed and audit observations did not demonstrate compliance. Any noncompliance labeled as “**Accepted**” indicates acceptance of the corrective actions and verification of corrective action implementation will be conducted during the next audit.

AIA-3230-20 (NOP-44-19.NC1) – Cleared.
AIA-3231-20 (NOP-44-19.NC2) – Cleared.

Noncompliances Identified during the Current Assessment

AIA-7306-21 – Accepted. 7 C.F.R. §205.501(a)(3) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670;”

Comments: *EGLO is not consistently carrying out the provisions of the Act and regulations. The auditors’ review of certification files found the following issues in EGLO’s noncompliance and adverse action process:*

1. *EGLO issued notices of noncompliance that did not include the operation’s right to rebuttal as required by §205.662(a).*
2. *EGLO issued notices of noncompliance that included “remediation measures” that are corrective actions for the operation. This is not in compliance with §205.662(a).*
3. *EGLO incorrectly issued a partial suspension for some of an operation’s processed products and issued a notice of partial denial for some of an operation’s livestock.*
4. *EGLO established a settlement agreement that included only terms that required ongoing compliance with a USDA organic regulation and did not include a defined period in which the terms would be complete.*

Corrective Action: EGLO implemented the following corrective actions:

1. EGLO revised its Notice of Noncompliance template (NoNC), dated 24.09.2021, version 3, to include the following language, “Please inform us in writing about any corrective measures or rebuttal with evidences, which have to be implemented not later than [1 month] [date], so we can ensure proper consideration for ongoing certification.”
2. EGLO removed the remediation measures from the NoNC template. EGLO trained staff that a NoNC should not give any directions for remediation as this may create impression of consulting.
3. EGLO updated its procedures manual May 1, 2022, to state, “...partial suspension shall not be issued for some of an operation’s processed or agricultural products and for some of an operation’s livestock (beehives).” EGLO hosted a training May 20, 2022 for staff which covered the new procedure regarding the identification of individual products and individual beehives, which are found to be noncompliant with NOP Final Rule. EGLO staff will now issue a letter or email with a specific statement regarding what product (name and quantity, if known) or beehives (ID and number of hives) cannot be marketed as organic. EGLO will describe the issue identified in detail in the noncompliance issued to the operation so the operation can readily understand the noncompliance and the facts that support the certification decision.
4. EGLO revised its settlement agreement template to now include an expiry date in section five. The revised Settlement Agreement template prompts certification staff to include a defined period in which the terms would be complete.

EGLO hosted a training for all its staff covering the corrective actions for this noncompliance on May 20, 2022. The EGLO staff responsible for issuing notices of noncompliance and settlement agreements were provided copies of the most recent version of both templates.

AIA-7307-21 – Accepted. 7 C.F.R. §205.501(a)(2) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Demonstrate the ability to fully comply with the requirements for accreditation set forth in this subpart.”

Comments: *EGLO does not demonstrate the ability to fully comply with the requirements for accreditation, including NOP 3012 Interim Instruction Material Review. The auditors found the following issues related to EGLO’s material review process:*

1. *EGLO could not demonstrate that its staff follow a clear protocol regarding the depth and frequency of material reviews. EGLO does not have documented procedures for the evaluation of ingredients, sub-ingredients, processing aids, and manufacturing methodologies at all stages associated with the approved input materials. Additionally, while staff noted that all materials are reviewed annually, this is not reflected in the NOP Manual of Procedures.*
2. *EGLO does not maintain material review records in a manner that clearly supports material determinations and is readily auditable.*

Corrective Action: EGLO implemented the following corrective actions:

1. EGLO introduced a new material review database, “NOP EU Database of Inputs and Materials,” for all products and materials reviewed and assessed, including result of review.
2. EGLO updated the “NOP Procedures Manual, version 020, dated 01 May 2022” to state, “The ‘NOP EU Database of Inputs and Materials ECOGLOBE (only) EC NOP.xlsx’ is filled in for all materials, substances, ingredients that are applied for and reviewed between the official annual updates of OSP and inspection/certification periods (or application and inspection/certification periods).” The new database will allow for improved tracking and improved documentation of the entire process. EGLO will review all materials used by NOP certified operations annually to verify their eligibility for use in the NOP certification. EGLO will maintain supporting documents in the operators’ “Inputs” folders.

EGLO hosted a training for all its staff covering the corrective actions for this noncompliance on May 20, 2022.

AIA-7206-21 – Accepted. 7 C.F.R. §205.670(d) states, “A certifying agent must, on an annual basis, sample and test from a minimum of five percent of the operations it certifies, rounded to the nearest whole number.”

Comments: *EGLO did not meet the requirement to sample and test from 5% of its certified operations annually in 2020. The auditor’s review of sample collection files found that EGLO collected one sample for residue testing which was 2.9% of EGLO’s operations in 2020.*

Corrective Action: EGLO did not meet the requirement to sample and test from 5% of its certified operations annually in 2020 due to the sudden onset of the COVID-19 pandemic and the limitations placed on travel during pandemic. EGLO did meet the requirement to sample and test from 5% of its certified operations annually in 2021. In 2021 EGLO conducted sampling and testing at 19 operations, or 47.5% of the EGLO’s 40 NOP certified clients.

AIA-7287-21 – Accepted. 7 C.F.R. §205.501(a)(7) states, “A private or governmental entity accredited as a certifying agent under this subpart must: have an annual program review of its

certification activities conducted by the certifying agent's staff, an outside auditor, or a consultant who has expertise to conduct such reviews and implement measures to correct any noncompliances with the Act and the regulations in this part that are identified in the evaluation;”

Comments: *The EGLO annual internal program review does not meet the requirements of NOP 2025 Instruction Internal Program Review. EGLO’s 2019 and 2020 annual internal program review reports do not address the corrective actions for noncompliances from previous internal reviews.*

Corrective Action: EGLO created the document “NOP Register of Control over the Implementation of Corrective Action” to track the implementation and effectiveness of EGLO’s corrective actions for noncompliances from previous internal reviews. EGLO updated the “NOP Internal Audit Report” template Section 4.4 to state, “To refer to the control over implementation of corrective actions resulted from previous Internal audits please refer to the document ‘NOP Register of Control of Corrective Action_year’ (NOP-REGCCA- 001-10062009).” EGLO hosted a training for all its staff covering the corrective actions for this noncompliance on May 20, 2022.

AIA-7289-21 – Accepted. 7 C.F.R. §205.403(c)(1) states, “The onsite inspection of an operation must verify: The operation's compliance or capability to comply with the Act and the regulations in this part;”

Comments: *EGLO’s inspectors do not fully verify an operation’s compliance with the USDA organic regulations. The auditor’s review of certification files and interview with certification staff found that EGLO’s inspectors are not consistently conducting and documenting mass balance and traceability audits during inspections. EGLO inspectors do not conduct mass balance and trace back exercises as part of the initial inspection of a new organic operation. The auditors also found mass balances and trace backs lacked sufficient detail to be readily understood and audited. This does not meet the requirements of NOP 2601 Instruction: The Organic Certification Process, which instructs certifiers to perform traceability and mass balance exercises.*

Corrective Action: EGLO updated its procedure manual section 4.2.2 on May 1, 2022 to state “The inspector has to carry out the following tasks during the on-site inspection in the presence of the client or a duly authorized and knowledgeable representative: ... Conduct both mass balance and traceback exercises as part of the inspection process.” EGLO created and started using “Mass balance document” and updated the inspection report so that information captured by the inspector would be more readily understood. EGLO also hosted training for all its staff covering the corrective actions for this noncompliance on March 11-13, 2022 and May 20, 2022. On June 8, 2022, EGLO submitted a new “Mass Balance and Traceback Inspection Audits Instruction” as guidance for inspectors the requirements of mass balance and trace back exercises, and on August 10, 2022 submitted inspection report templates updated to add subsections that direct the inspector in recording mass balance and trace back activities.

NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

AUDIT AND REVIEW PROCESS

An onsite Renewal audit of the Ecoglobe, LLC organic program was conducted on August 27 – 30, 2019. The National Organic Program (NOP) reviewed the auditor's report to assess Ecoglobe, LLC's compliance to the USDA organic regulations. This report provides the results of NOP's review of the certifier's corrective actions and assessment of the certifier's capability to operate as a USDA accredited certifier.

GENERAL INFORMATION

Applicant Name	Ecoglobe, LLC (EGLO)
Physical Address	80 Arami Street, 0022, Yerevan, Republic of Armenia
Mailing Address	80 Arami Street, 0022, Yerevan, Republic of Armenia
Contact & Title	Mr. Filip Ashikyan, General Director
E-mail Address	fa@ecoglobe.com
Phone Number	+374(55) 57-55-27
Reviewer & Auditor	Karin French and Jessica Walden, NOP Reviewers; Miguel A. Caceres, On-site Auditor.
Program	USDA National Organic Program (NOP)
Review & Audit Date(s)	NOP corrective action review: November 20, 2020-January 17, 2021. NOP assessment review: May 26, 2020 and Onsite audit: August 27 – 30, 2019
Audit Identifier	NOP-44-19
Action Required	No
Audit & Review Type	Renewal Assessment
Audit Objective	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of EGLO's certification system.
Audit & Determination Criteria	<i>7 CFR Part 205, National Organic Program as amended</i>
Audit & Review Scope	EGLO's certification services in carrying out the audit criteria during the period: August 19, 2016 through August 30, 2019

EGLO is a for-profit business which was accredited on June 10, 2009 and maintains the accreditation scopes of crops, wild crops, livestock, and handling.

EGLO's list of USDA organic certification operations at the time of the assessment includes 42 operations: Crops (12), Wild Crop (6), Livestock (4 apiaries), and Handler/Processor/Exporter (20). There are no grower groups certified by EGLO. Certified operations are located in the following countries: Republic of Armenia, Georgia, Ukraine, Belarus, Federation of Russia, and Kazakhstan.

EGLO's one office is located in Yerevan, Republic of Armenia. EGLO's staff consists of eight individuals: General Director, Director Operations/Certification, Deputy Director/Quality Manager, Assistant Director, and four contract inspectors. The first four individuals (directors) conduct certification reviews and inspections in addition to their administration functions.

As part of the mid-term onsite assessment activities, one witness audit of a wild crop and handling operation inspection was conducted. Another witness audit of a livestock (apiary), crop, and handling operation inspection was conducted. Both operations were located in Armenia.

NOP DETERMINATION

NOP reviewed the onsite audit results to determine whether EGLO's corrective actions adequately addressed previous noncompliances. NOP also reviewed any corrective actions submitted as a result of noncompliances issued from Findings identified during the onsite audit. Any noncompliance labeled as "**Cleared**," indicates that the corrective actions for the noncompliance are determined to be implemented and working effectively. Any noncompliance labeled as "**Outstanding**" indicates that either the auditor could not verify implementation of the corrective actions or that records reviewed and audit observations did not demonstrate compliance. Any noncompliance labeled as "**Accepted**" indicates acceptance of the corrective actions and verification of corrective action implementation will be conducted during the next onsite audit.

Noncompliances from Prior Assessments

AIA-3226-20 – Cleared.

AIA-3227-20 – Cleared.

AIA-3228-20 – Cleared.

AIA-3229-20 – Cleared.

Noncompliances Identified during the Current Assessment

AIA-3230-20 (NOP-44-19.NC1) – Accepted. 7 C.F.R. §205.501(a)(21) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary." NOP 5022, Wild Crop Harvesting, Section 5.2.1, states, "A wild-crop harvesting Organic System Plan includes: A full map of the area(s) to be harvested defining boundaries, borders, adequate buffer zones point and non-point sources of contaminants and prohibited materials, and wild crops to be harvested."

Comments: *One wild crop file reviewed did not include a complete description of the collection area. The organic system plan and maps did not adequately define the border and boundaries of the areas to be harvested and include the exact collection areas.*

Corrective Action: EGLO sent out a reminder to all operators that their maps needed to be improved and in line with NOP 5022, and that their OSP's needed to include a thorough description of harvest areas, defined boundaries, borders, buffer zones, and sources of potential

contamination. EGLO plans to report to NOP the results of the 2020 inspections by January 10, 2021. Inspectors, reviewers, and certification staff were trained on NOP 5022 and the map guidelines with an emphasis on the proper identification of collection areas, the descriptiveness of the OSP's of collection areas, identification of wild crops, buffer zones, and borders. As evidence to support this corrective action, EGLO submitted the OSP and maps of the operator that was visited by NOP auditors in 2019, as well as several email communications to their existing clients reminding them about quality of maps and wild crop documentation. In addition, EGLO submitted the documents that are provided to new wild crop applicants, which include map instructions, NOP 5022 Wild Crop Harvesting Guidance, and number of other documents providing guidance on the wild crop certification process. Evidence of the training carried out with staff on July 1, 2020, was also provided.

AIA-3231-20 (NOP-44-19.NC2) – Accepted. 7 C.F.R. §205.501(a)(2) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Demonstrate the ability to fully comply with the requirements for accreditation set forth in this subpart.”

Comments: *EGLO does not fully understand the NOP's international organic trade arrangement policies and procedures, which are outlined in the NOP's International Trade Policies resources. The auditor found that there is no system in place to review and verify the terms of the US- Canada Equivalency Arrangement and that EGLO staff were not aware of the attestation requirement.*

Corrective Action: EGLO explained that the EGLO staff in charge of NOP certification activities do understand the requirements of the US Canada Equivalency Arrangement but they had not yet trained other technical staff (reviewers and inspectors) because there are currently no operations trading under this arrangement. EGLO carried out a staff training on 6/15/2020 and updated their NOP Procedures Manual, which now describes the requirements of the equivalency agreement. A copy of the updated page from the NOP Procedures manual, edition #017, and evidence of the training carried out on June 15, 2020 was submitted with the corrective action.

AIA-3232-20 (NOP-44-19.NC3) – Accepted. 7 C.F.R. §205.501(a)(4) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Use ... adequately trained personnel, including inspectors and certification review personnel, to comply with and implement the organic certification program established under the Act and the regulations in subpart E of this part;”

Comments: *The auditor's review found that the template EGLO staff used to issue a “NOP Notice Regarding Suspension of Certification (Partial)” was incorrectly titled “NOP Notice of Denial/Revocation of Certification”. Additionally, the template used to issue a “NOP Notice of Proposed Suspension” was incorrectly titled, “NOP Notice of Noncompliance.”*

Corrective Action: EGLO submitted revised notice templates for the Notice of Proposed Suspension, Notice of Suspension, and Notice of Denial of Certification, all of which are now correctly titled and contain compliant language.

NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

AUDIT AND REVIEW PROCESS

The National Organic Program (NOP) conducted a mid-term assessment of Ecoglobe, LLC (EGLO). An onsite audit was conducted, and the audit report reviewed to determine EGLO's capability to continue operating as a USDA accredited certifier.

GENERAL INFORMATION

Applicant Name	Ecoglobe, LLC (EGLO)
Physical Address	1 Aram Khachaturyan, apt.66, 0033
Mailing Address	0025 Yerevan, Republic of Armenia
Contact & Title	Nune Daribinyan, General Director, CEO
E-mail Address	nuneemil@yahoo.com; nd@ecoglobe.am
Phone Number	(374 10) 221295 office / (374 91) 41 83 11 cellular
Reviewer(s) & Auditor(s)	Graham Davis, NOP Reviewer; Lars Crail, Onsite Auditor.
Program	USDA National Organic Program (NOP)
Review & Audit Date(s)	Corrective actions review: November 2, 2016 NOP assessment review: August 30, 2016 Onsite audit: August 13, 2016
Audit Identifier	NP6228LCA
Action Required	Yes
Audit & Review Type	Mid-Term Assessment
Audit Objective	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of EGLO's certification system.
Audit & Determination Criteria	7 CFR Part 205, National Organic Program as amended
Audit & Review Scope	EGLO's certification services in carrying out the audit criteria during the period: May 18, 2014 through August 13 2016

NOP conducted an onsite mid-term accreditation assessment of Ecoglobe, LLC (EGLO) from August 16 through 19, 2016.

EGLO is a for-profit business which was accredited on June 10, 2009 and maintains accreditation scopes of crops, wild crops, livestock, and handling.

EGLO's list of USDA organic certification operations at the time of the assessment includes 27 operations: Crops (10), Wild Crop (9), Livestock (3 apiaries), and Handler/Processor/Exporter (17). There are no grower groups certified by EGLO. Certified operations are located in the following countries: Republic of Armenia, Georgia, Ukraine, Belarus, Federation of Russia, and

Kazakhstan.

EGLO's one office is located in Yerevan, Republic of Armenia. EGLO's staff consists of eight individuals: General Director, Deputy Director, Quality/Office Manager, and five contract inspectors. The General and Deputy Directors conduct certification reviews and inspections in addition to their administration functions. A five member Advisory Board composed of various community and business stakeholders advise the General Director regarding strategic business matters.

NOP DETERMINATION:

NOP reviewed the onsite audit results to determine whether EGLO's corrective actions adequately addressed previous noncompliances. NOP also reviewed any corrective actions submitted as a result of noncompliances issued from Findings identified during the onsite audit.

Non-compliances from Prior Assessments

Any noncompliance labeled as "**Cleared**," indicates that the corrective actions for the noncompliance are determined to be implemented and working effectively. Any noncompliance labeled as "**Outstanding**" indicates that either the auditor could not verify implementation of the corrective actions or that records reviewed and audit observations did not demonstrate compliance.

NP1241MMA.NC3 – Cleared.
NP4138LCA.NC1 – Cleared.
NP4138LCA.NC2 – Cleared.
NP4138LCA.NC3 – Cleared
NP4138LCA.NC4 – Cleared.
NP4138LCA.NC5 – Cleared.
NP4138LCA.NC6 – Cleared.
NP4138LCA.NC7 – Cleared.
NP4138LCA.NC8 – Cleared.
NP4138LCA.NC9 – Cleared.
NP4138LCA.NC10 – Cleared.

Non-compliances Identified during the Current Assessment

Any noncompliance labeled as "**Accepted**," indicates that the corrective actions for the noncompliance are accepted by the NOP and will be verified for implementation and effectiveness during the next onsite audit.

NP6228LCA.NC1 – 7 C.F.R. §205.501(a)(3) states, "A private or governmental entity accredited as a certifying agent under this subpart must:... Carry out the provisions of the Act

and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670.” 7 C.F.R. 205.303(b)(1) states, “Agricultural products in packages described in §205.301(a) and (b) [100 percent organic and organic] must:... For products labeled “organic,” identify each organic ingredient in the ingredient statement with the word, “organic,” or with an asterisk or other reference mark which is defined below the ingredient statement to indicate the ingredient is organically produced....”

Comments: *The auditor reviewed the label of a “100% Organic” category product that stated in the ingredient panel “100% organic...” rather than indicating the ingredient as “organic.”*

2016 Corrective Action: EGLO will require the operator to revise the label so that the ingredient lists defines the organic ingredients as “organic” and not “100% organic” when the operation runs out of the current label. EGLO will train their staff on label review procedures by December 1, 2016.

NP6228LCA.NC2 - 7 C.F.R. §205.662(c)(2) and (3) states, “When rebuttal is unsuccessful or correction of the noncompliance is not completed within the prescribed time period, the certifying agent or State organic program’s governing State official shall send the certified operation a written notification of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the noncompliance.... The notification of proposed suspension or revocation of certification shall state:... The proposed effective date of such suspension or revocation; The impact of a suspension or revocation on future eligibility for certification;...”

Comments: *The one auditor reviewed Notice of Proposed Suspension did not consistently state the impact of suspension and the effective date of suspension:*

- *The issued Notice of Proposed Suspension stated that the period of suspension would be three (3) months; whereas, the issued Notice of Suspension stated that suspension would be for three (3) years.*
- *The auditor reviewed Notice of Proposed Suspension issued on September 3, 2014 stated that the effective date of suspension would occur on August 29, 2014 rather than 30 days after the issue of the Notice of Proposed Suspension (October 3, 2014).*

2016 Corrective Action: EGLO staff will define the same duration of suspension period in different adverse action documentation (to remain within the same proposed periods). EGLO has updated their adverse actions templates to be compliant with the regulations. EGLO revised the adverse actions section of their procedure manual to include the statement “the proposed date of the suspension or revocation will be 30 days after the date of issue of the notice of proposed suspension or proposed revocation.” EGLO will conduct training of the staff involved in document review and adverse actions by December 1, 2016.

NP6228LCA.NC3 – 7 C.F.R. §205.501(a)(21) states, “A private or governmental entity accredited as a certifying agent under this subpart must:... Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.” NOP 5022, *Wild Crop Harvesting*, Section 5.2.5, states, “A wild-crop harvesting Organic System Plan (OSP) includes:... A list of any rare, threatened, or endangered terrestrial or aquatic plants or animals that occur in the harvest area.”

Comments: *The wild crop organic system plan template does not correctly require operations to list any rare and endangered species in the harvest area. The current template only requests the operators to list those harvested or collected crops that are rare or endangered: "Please indicate if any of collected wild species are rare or endangered..."*

2016 Corrective Action: EGLO will revise their wild crop organic system plan template by December 1, 2016. The template will now require the operators to indicate any rare and endangered wild species among those harvested or collected crops, indicate any rare and endangered wild species growing in the harvested area, and indicate any rare or endangered species of animals or living organisms which nutrition is based on the collected wild species. EGLO will train staff to introduce changes in OSP for wild crops by December 1, 2016.

NP6228LCA.NC4 – 7 C.F.R. §205.501(a)(16) states, "A private or governmental entity accredited as a certifying agent under this subpart must: ...charge applicants for certification and certified production and handling operations only those fees and charges for certification activities that it has filed with the Administrator."

Comments: *EGLO's third country fee schedule has not been filed with Administrator.*

2016 Corrective Action: EGLO's third country fee schedule is available to the public and listed on their website. EGLO revised their procedures manual to include the statement, "EGLO is obliged to file any changes or modifications or revisions of fee schedule with the Administrator immediately when the change occur." EGLO will conduct training of the relevant staff by December 1, 2016.

NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

AUDIT AND REVIEW PROCESS

The National Organic Program (NOP) conducted a renewal assessment of Ecoglobe, LLC. An onsite audit was conducted, and the audit report reviewed to determine Ecoglobe, LLC's capability to operate as a USDA accredited certifying agent. This report provides the results of the renewal assessment and review of Ecoglobe LLC's corrective actions.

GENERAL INFORMATION

Applicant Name	Ecoglobe, LLC (EGLO)
Physical Address	1, Aram Khachaturyan, Apt. 66, 0033 Yerevan, Republic of Armenia
Mailing Address	1 Aram Khachaturyan, apt. 66, 0033 Yerevan, Republic of Armenia
Contact & Title	Nune Darbinyan, General Director
E-mail Address	nuneemil@yahoo.com
Phone Number	374 10 221295
Reviewer(s) & Auditor(s)	Robert Yang, NOP Reviewer Lars Crail, On-site Auditor
Program	USDA National Organic Program (NOP)
Review & Audit Date(s)	NOP assessment review: August 5 - 27, 2015 Onsite audit: May 18-20, 2014
Audit Identifier	NP41328LCA
Action Required	None
Audit & Review Type	Renewal Assessment
Audit Objective	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of EGLO's certification system.
Audit & Determination Criteria	<i>7 CFR Part 205, National Organic Program as amended</i>
Audit & Review Scope	EGLO's certification services in carrying out the audit criteria during the period: August 2011 through May 2014.

Ecoglobe, LLC (EGLO) is a for-profit business which was initially accredited as a USDA National Organic Program (NOP) certifying agent on June 10, 2009, for crops, livestock, and handling operations. On August 9, 2012, EGLO was granted an accreditation scope extension for wild crops.

EGLO has one office in Yerevan, Republic of Armenia. The EGLO list of USDA organic certified operations includes twelve operations with the following certification scopes: Crops (4),

Wild Crop (5), Livestock (2 apiaries), and Handler/Processor/Exporter (5). There are no grower groups certified by EGLO. All operations are located in the Republic of Armenia with the exception of one in Pakistan and one in Belarus.

NOP DETERMINATION:

NOP reviewed the onsite audit results to determine whether EGLO's corrective actions adequately addressed previous noncompliances. NOP also reviewed any corrective actions submitted as a result of noncompliances issued from Findings identified during the onsite audit.

Non-compliances from Prior Assessments

Any noncompliance labeled as "**Cleared**," indicates that the corrective actions for the noncompliance are determined to be implemented and working effectively. Any noncompliance labeled as "**Outstanding**" indicates that either the auditor could not verify implementation of the corrective actions or that records reviewed and audit observations did not demonstrate compliance. Any noncompliance labeled as "**Accepted**," indicates that the corrective actions for the noncompliance are accepted by the NOP and will be verified for implementation and effectiveness during the next onsite audit.

NP1241MMA.NC1 – Cleared
NP1241MMA.NC2 – Cleared
NP1241MMA.NC4 – Cleared
NP1241MMA.NC5 – Cleared
NP1241MMA.NC6 – Cleared
NP1241MMA.NC7 – Cleared
NP1241MMA.NC8 – Cleared
NP1241MMA.NC9 – Cleared
AIA13196LMC.NC1 – Cleared
AIA13196LMC.NC2 – Cleared
AIA13196LMC.NC3 – Cleared

NP1241MMA.NC3 – Accepted. 7CFR §205.501(a)(3) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670."

Comments: *A review of the files verified that EGLO allowed use of Potassium Permanganate for a crop operation. This input is not included on the National List. Another crop operation was allowed the use of copper sulfate without verification that product was used in a manner that minimizes accumulation of copper in the soil (§205.601(i)(3)). For the wild crop operation visited during the witness inspection, verification that wild crops were harvested from a designated area which had no prohibited substances applied for a period of three years*

immediately preceding the harvest was not obtained until August 2011 while the certification was granted in 2010.

2011 Corrective Actions: EGLO conducted additional client operation reviews and inspections to verify the application of materials. The operation that applied Potassium Permanganate was issued an adverse action notification (i.e. combined notice) and subsequently suspended for three years. The operation applying copper materials was re-inspected and it provided information as evidence of compliance. Training of EGLO's certification staff regarding the process of review and compliance of inputs was conducted. EGLO's certification program manual was updated at section 4.1.6 to include additional procedures for input material review. Documented evidence of the corrective measures was submitted for NOP review and determined by NOP to adequately address the noncompliance.

2014 Verification of Corrective Action: A file review of several certified operations and witness audit observations indicated that there was no evidence that EGLO is allowing the use of prohibited substances or materials. This noncompliance remains outstanding since EGLO's NOP Procedure Manual was not revised as stated in the accepted corrective actions submitted to the NOP. The revised text for inclusion in the NOP Procedure Manual was reviewed by the auditor but was determined to be lacking sufficient detail to adequately clear this noncompliance.

Corrective Action: EGLO established additional procedures for input material review. EGLO updated section 4.1.6 Review of Application Document of its NOP Procedures manual with the additional procedures. EGLO conducted training on the procedures for its certification staff, inspectors, and quality manager on July 1, 2015.

Non-compliances Identified during the Current Assessment

Any noncompliance labeled as “**Accepted**,” indicates that the corrective actions for the noncompliance are accepted by the NOP and will be verified for implementation and effectiveness during the next onsite audit.

NP4138LCA.NC1 – Accepted. 7 CFR §205.501(a)(21) states that a certifying agent must...“Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.” NOP 4009, “Who Needs to be Certified?,” specifies that uncertified operations may not produce or process, on its own land or premises, agricultural products to be sold, labeled, or represented as organic on behalf of a certified operation.

Comments: *EGLO's NOP Procedure Manual, Section 4.1.3, states that “Projects” are allowed where uncertified production and/or handling operations are allowed and covered by the certified operation's certification and must be outlined in the Organic System Plan, however, EGLO maintains that no such activities exist and there was no onsite audit evidence indicating that uncertified operations are producing or handling certified organic products in violation of the USDA organic regulations.*

Corrective Action: EGLO removed from section 4.1.3 Client Information of its NOP Procedures manual the statement that “Projects” are allowed where uncertified production and/or

handling operations are allowed and covered by the certified operation's certification. EGLO also updated the section to state that uncertified operations may not produce or handle organic products. EGLO conducted training on the updated section for its certification staff, inspectors, and quality manager on July 1, 2015.

NP4138LCA.NC2 – Accepted. 7 CFR §205.404(b) states that “The certifying agent must issue a certificate of organic operation which specifies the: (2) Effective date of certification; (3) Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation...”

Comments: *The “effective date” term is not used on certificates and there is a lack of consistency and clarity among the reviewed certificates as to when the operation was first certified. Furthermore, certificates do not specify the certification categories as Crops, Wild Crops, Livestock, and/or Handling and Processing. Organic certificates do not include the following requirements of NOP 2603, Instruction Organic Certificates:*

- 1. The labeling category of organic products: 100% Organic, Organic, Made with Organic (specified ingredients or food groups), and Livestock Feed (Organic or 100% Organic).*
- 2. The statement, “Certified to the USDA organic regulations, 7 CFR Part 205.”*

Corrective Action: EGLO revised its NOP organic certificate template to include an “Effective date of certification”; the statement, “Certified to the USDA NOP organic regulations, 7 CFR Part 205”; categories of organic operation; and labeling categories for each certified product. EGLO conducted training on the revised certificate template for its certification staff, inspectors, and quality manager on July 1, 2015.

NP4138LCA.NC3 – Accepted. 7 CFR §205.501(a)(21) states that a certifying agent must... “Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.” PM 12-2, Placement of Certified Organic By *** Statement.

Comments: *Two retail labels reviewed had the “Certified Organic By...” statement to the side of the manufacturer’s or the distributor’s name and address. Although the labels were approved prior to the issuance of PM 12-2, the certified operations were not notified of the noncompliance and the requirement to phase out their existing inventory of labels by January 1, 2016.*

Corrective Action: EGLO notified the operations that the placement of the “Certified Organic by ...” statement on their retail labels was noncompliant. EGLO received corrective action responses from both operations, including a revised, compliant label from one operation. EGLO also revised section 4.1.6 Review of Application Documents of its NOP Procedures manual to include instructions to review labels for compliance with 7 CFR §205.300 – 311 and Policy Memo 12-2. EGLO conducted training on the updated label review process for its certification staff, inspectors, and quality manager on July 1, 2015.

NP4138LCA.NC4 – Accepted. 7 CFR §205.501(a)(21) states that a certifying agent must... “Comply with, implement, and carry out any other terms and conditions determined by the

Administrator to be necessary.” NOP 2027, Personnel Performance Evaluations, require inspectors to be annually evaluated during an onsite inspection by a supervisor or peer (another inspector).

Comments: *An annual field observation is not recorded on inspector performance evaluations, nor is it listed as criteria on the performance evaluation template.*

Corrective Action: EGLO revised section 3.3 Qualification of Staff and Ongoing Training of its NOP Procedures manual to state that inspectors will be evaluated during an onsite inspection by a supervisor or peer at least annually. EGLO also submitted its Witness Audit Report form, which EGLO will use to document the annual field evaluation. EGLO conducted training on the inspector performance evaluation process for its certification staff, inspectors, and quality manager on August 16, 2015.

NP4138LCA.NC5 – Accepted. 7 CFR §205.670(e) states that “...sample integrity must be maintained throughout the chain of custody...”

Comments: *One pesticide residue sample of dried herbs was retained for several months by EGLO before it was shipped to a laboratory for analysis. EGLO indicated that there was no urgency to ship the sample since the sample was unlikely to spoil, the sample was not presumed to indicate any detection of prohibited pesticides, and the sample would be consolidated with other samples to reduce shipping costs.*

Corrective Action: EGLO updated section 5.19 Sample Taking Analyses of its NOP Procedures manual to state that collected samples will be sent to the lab either immediately after the inspection or at the earliest convenience if it cannot be sent immediately. EGLO conducted training on the revised procedure for its certification staff, inspectors, and quality manager on July 1, 2015.

NP4138LCA.NC6 – Accepted. 7 CFR §205.402 (a)(1) and (2) states, "Upon acceptance of an application for certification, a certifying agent must: (1) Review the application to ensure completeness pursuant to §205.401; (2) Determine by a review of the application materials whether the applicant appears to comply or may be able to comply with the applicable requirements of subpart C of this part."

Comments: *The wild crop organic system plans (OSP) reviewed are incomplete and do not meet the requirements of NOP5022, Wild Crop Harvesting. Missing or insufficient information includes:*

- 1. Crop harvest periods.*
- 2. Maps lack storage locations.*
- 3. Rare and endangered species.*
- 4. Details on the collection methods conducted in a sustainable manner.*

Corrective Action: EGLO revised its NOP and EU Organic System Plan Wild Collection form to include sections for the applicant to provide information regarding crop collection periods; rare or endangered species; details on the collection methods conducted in a sustainable manner per crop; and instructions for the applicant to include storage locations on submitted maps.

EGLO conducted training on the revised form for its certification staff, inspectors, and quality manager on August 16, 2015.

NP4138LCA.NC7 – Accepted. 7 CFR §205.504(b)(1) states that a certifier must demonstrate its ability to comply with the regulations by establishing “procedures to be used to evaluate certification applicants, make certification decisions, and issue certification certificates;..”

Comments: *The following procedures are not in EGLO’s NOP Procedure Manual:*

1. *Label review.*
2. *Material review.*
3. *Surrender of Certification.*
4. *Unannounced inspections.*
5. *Pesticide Residue Testing (Current procedures are not current and aligned with the new pesticide residue testing regulation effective January 1, 2013.)*

Corrective Action: EGLO updated its NOP Procedures manual to include detailed procedures for label review, material review, processing surrenders, unannounced inspections, and pesticide residue testing. EGLO conducted training on the revised procedures for its certification staff, inspectors, and quality manager on July 1 and August 16, 2015

NP4138LCA.NC8 – Accepted. 7 CFR §205.642 states that “... The certifying agent may require applicants for certification to pay at the time of application a nonrefundable fee which shall be applied to the applicant's fees-for-service account. The certifying agent may set the nonrefundable portion of certification fees; however, the nonrefundable portion of certification fees must be explained in the fee schedule submitted to the Administrator. The fee schedule must explain what fee amounts are nonrefundable and at what stage during the certification process fees become nonrefundable.”

Comments: *EGLO’s fee schedule does not include a non-refundable fee description and fees for unannounced inspections.*

Corrective Action: EGLO updated its NOP Tariffs and Fees in US-Dollars schedule to include the cost for unannounced inspections and an explanation of which fees are nonrefundable. EGLO informed its certification staff, inspectors, and quality manager of the fee schedule changes on August 16, 2015.

NP4138LCA.NC9 – Accepted. 7 CFR §205.504(b)(5) states that a certifying agent must establish “...procedures to be used, including any fees to be assessed, for making the following information available to any member of the public upon request...”

Comments: *EGLO’s NOP Procedure Manual does not include procedures to be used for making the following information available to the public upon request: Certification certificates issued during the current and 3 preceding calendar years; A list of producers and handlers whose operations it has certified, including for each the name of the operation, type(s) of operation, products produced, and the effective date of the certification, during the current and 3 preceding calendar years; The results of laboratory analyses for residues of pesticides and other*

prohibited substances conducted during the current and 3 preceding calendar years; and Other business information as permitted in writing by the producer or handler.

Corrective Action: EGLO updated section 5.12 Public Information of its NOP Procedures manual to include the information that is available to the public upon request. EGLO conducted training on the updated procedures for its certification staff, inspectors, and quality manager on August 16, 2015.

NP4138LCA.NC10 – Accepted. 7 CFR §205.501(a)(1) states that “A private or governmental entity accredited as a certifying agent under this subpart must: (1) Have sufficient expertise in organic production or handling techniques to fully comply with and implement the terms and conditions of the organic certification program established under the Act and the regulations in this part;”

Comments: *EGLO staff indicated insufficient knowledge regarding the Seeds and Planting Stock practice standard (§205.204) and the Crop Rotation practice standard (§205.205). EGLO was requiring operators to provide documentation that non-organic planting stock was untreated prior to purchase, this is not required since the NOP allows non-organic planting stock to produce a perennial crop to be sold, labeled, or represented as organic after the planting stock has been maintained under a system of organic management for a period of no less than 1 year. EGLO indicated crop rotation is not applicable for perennial cropping (orchard). The witness audit of these practices indicated the operations were in compliance with the regulations, however, EGLO personnel do not fully understand these two practice standards.*

Corrective Action: EGLO conducted training on the Seeds and Planting Stock practice standard (§205.204) and the Crop Rotation practice standard (§205.205) for its certification staff, inspectors, and quality manager on July 1, 2015.

AUDIT INFORMATION

Applicant Name:	Ecoglobe, LLC
Est. Number:	N/A
Physical Address:	Aram Khachaturyan 1, apt.66, 0033 Yerevan, Armenia
Mailing Address:	Herasti 18 Apt. 3, 0025 Yerevan, Republic of Armenia
Contact & Title:	Nune Daribinyan, General Director
E-mail Address:	nuneemil@yahoo.com
Phone Number:	(374 10) 221295
Auditor(s):	Lars Crail, NOP Accreditation Manager
Program:	USDA National Organic Program (NOP)
Audit Date(s):	November 25, 2011 through July 6, 2012
Audit Identifier:	NP1241MMA
Action Required:	No
Audit Type:	Correct Action Review - Initial Assessment
Audit Objective:	To review certifying agent submitted noncompliance corrective actions and determine if the measures should be accepted by the NOP.
Audit Criteria:	7 CFR Part 205, National Organic Program; Final Rule, dated December 21, 2000; updated December 15, 2010.
Audit Scope:	Ecoglobe's submitted materials to the Notice of Noncompliance issued October 18, 2011.
Location(s) Audited:	Desk

Grading and Verification Division (GVD) auditors conducted a Surveillance-Accreditation Initial on-site audit August 29 – 31, 2011, of Ecoglobe. NOP's review of the GVD on-site audit report (NP1241MMA) identified 9 noncompliances and a Notice of Noncompliance was issued to Ecoglobe on October 18, 2011. On November 18, 2011, December 5, 2011 and June 11, 2012, Ecoglobe submitted corrective actions for NOP's review.

FINDINGS

The corrective actions submitted by Ecoglobe are accepted and will be verified for implementation and effectiveness during the next onsite assessment.

NP1241MMA.NC1 – Accepted – NOP §205.402 (a)(1) and (2) states, "Upon acceptance of an application for certification, a certifying agent must: Review the application to ensure completeness pursuant to §205.401; (2) Determine by a review of the application materials whether the applicant appears to comply or may be able to comply with the applicable requirements of subpart C of this part." *The organic system plans (OSP) are incomplete and do not meet the requirements of an OSP. Missing or insufficient information included:*

- *Wild crop OSP states collection is "Implemented by trained collectors group." However, the OSP did not contain any further information on what if any training is provided.*
- *The wild crop processing OSP did not have information on complete processing and packaging of essential oils. The OSP also did not include information on cleaning processes for essential oil equipment. During the witness audit, the operator stated the glass distillation equipment was*

sometimes cleaned with alcohol followed by steam. Typically the equipment is just cleaned by steam but the alcohol is used on an infrequent basis (once or twice a year). However, this information was not included in the OSP nor was the alcohol.

- *Maps for collection areas are for the “community” and/or “village” and are not for a specific designated area other than the community. Information in the OSP and maps provided were not of sufficient detail to verify herbs are collected from a designated area. For the village visited during the witness audit, the OSP states the collection area is 62 hectares and the permit from the village Mayor stated the collection area was 62 hectares. The responsible representative for collectors of the village stated collectors can harvest from anywhere in the “community.” The community is defined as the entire region of the “named” village. There was no information available online, from Ecoglobe, or the collection representatives to determine the area of the region other than to state “it’s huge.”*
- *In addition, there was inadequate verification that no prohibited substances had been used for 36 months prior to the start of collection. The permit from the mayor stating no pesticides had been used in the region in the past 20 years was received by the ACA in August 2011 and the operation was certified in 2010.*
- *Wild crop collection and processing OSP did not include sufficient information on the identification and traceability of product prior to the inspection.*
- *As evident during the witness audit, there were four collection sites (villages) with insufficient detail as to what site each is doing specific to its collection activities.*

Corrective Actions: Ecoglobe stated that it implemented the following corrective action measures:

1. Issued a Notice of Noncompliance to those operations where OSPs are incomplete. The operations submitted revised OSPs and were subject to a minimum of one subsequent onsite inspection for verification purposes. Corrective measures were accepted by Ecoglobe and a resolution notification was issued to those client operations. Ecoglobe met the self-imposed deadlines to accomplish a review of all OSPs for completeness and issued noncompliances to operations that were identified to have incomplete OSPs.
2. Conducted training of certification staff for 2012.
3. Translated NOP Wild Crop Harvesting guidance document (NOP 5022) into Armenian and Russian and then distributing them to client operations.

Documented evidence was submitted for NOP review and determined to adequately address the noncompliance. These corrective measures are accepted by the NOP.

NP1241MMA.NC2 – Accepted – NOP §205.403 (a)(1) states, “A certifying agent must conduct an initial on-site inspection of each production unit, facility, and site that produces or handles organic products and that is included in an operation for which certification is requested.” *As verified through interviews conducted, wild crop collection sites are inspected based on sampling of which sites to visit as selected by the inspector and not all collection sites are visited and inspected. Sites as referenced in this noncompliance are in reference to the collection areas and not the villages as all villages are visited.*

Corrective Actions: All wild crop collection sites were inspected by Ecoglobe during an additional inspection. EcoGlobe conducted training for certification staff regarding the requirement to inspect all sites and facilities. EcoGlobe’s certification program manual at 4.2.2 was modified to indicate that all

production and handling sites must be inspected during the annual monitoring inspection. Documented evidence was submitted for NOP review and determined to be adequate. These corrective measures are accepted by the NOP.

NP1241MMA.NC3 – Accepted – NOP §205.501 (a)(3) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670.” *A review of the files verified that Ecoglobe allowed use of Potassium Permanganate for a crop operation. This input is not included on the National List. Another crop operation was allowed the use of copper sulfate without verification that product was used in a manner that minimizes accumulation of copper in the soil (§205.601(i)(3)). For the wild crop operation visited during the witness inspection, verification that wild crops were harvested from a designated area which had no prohibited substances applied for a period of three years immediately preceding the harvest was not obtained until August 2011 while the certification was granted in 2010.* **Corrective Actions:** Ecoglobe conducted additional client operation reviews and inspections to verify the application of materials. The operation that applied Potassium Permanganate was issued an adverse action notification (i.e. combined notice) and subsequently suspended for three years. The operation applying copper materials was re-inspected and it provided information as evidence of compliance. Training of Ecoglobe’s certification staff regarding the process of review and compliance of inputs was conducted. Ecoglobe’s certification program manual was updated at section 4.1.6 to include additional procedures for input material review. Documented evidence of the corrective measures was submitted for NOP review and determined by NOP to adequately address the noncompliance. These corrective measures are accepted.

NP1241MMA.NC4 – Accepted – NOP §205.501 (a)(10) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Maintain strict confidentiality with respect to its clients under the applicable organic certification program...” and the Ecoglobe NOP Manual of Procedures section 5.3 states, “The personnel of ECOGLOBE LTD, the members of the Advisory Board and the Commissions and Committees as well as all subcontractors have to sign a statement of confidentiality.” *Confidentiality statements were on file for all Ecoglobe staff members. However, there were none on file for any of the Advisory Board members.* **Corrective Actions:** Confidentiality statements for the Advisory Board members were completed. Ecoglobe’s certification program manual was updated at section 5.3. Documented evidence was submitted for NOP review and determined to be adequate. These corrective measures are accepted.

NP1241MMA.NC5 – Accepted – NOP §205.501 (a)(11)(v) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Prevent conflicts of interest by: requiring all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and all parties responsibly connected to the certifying agent to complete an annual conflict of interest disclosure report.” *The members of the Advisory Board had not submitted an annual conflict of interest disclosure report since 2009.* **Corrective Actions:** Conflict of Interest statements were completed by the Advisory Board members and retained by Ecoglobe. Ecoglobe’s certification program manual was updated at section 5.2. Documented evidence was submitted for NOP review and determined to be adequate. These corrective measures are accepted.

NP1241MMA.NC6 – Accepted – NOP §205.501 (a)(21) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.” Form NOP 2000A, Terms of Accreditation, dated June 10, 2009 states, “Accreditation permits you to certify crops, livestock, and handling operations in accordance with the Organic Foods Production Act of 1990 (Act) and the NOP regulations. In order to retain this accreditation you must: #19 - Make application to the Administrator and receive approval for any change to the scope of this accreditation prior to implementing any such change.” *While Ecoglobe intended to be initially accredited for wild crops, due to miscommunication during the assessment process they were granted accreditation for crops, livestock, and handling operations only. Due to a lack of understanding that the four scopes of accreditation were separate and distinct; at the time of the initial on-site assessment four of the six operations certified by Ecoglobe included the scope of certification to wild crops.* **Corrective Actions:** Ecoglobe submitted an application for a scope extension to the NOP on May 6, 2011. NOP conducted a review of the application and determined that Ecoglobe appears to be capable of complying with the NOP regulations covering the wild crop accreditation scope. Documented evidence was submitted for NOP review and determined to be adequate. This corrective measure is accepted.

NP1241MMA.NC7 – Accepted – NOP §205.504 (b)(2) states, “A private or governmental entity seeking accreditation as a certifying agent must submit the following documents and information to demonstrate its expertise in organic production or handling techniques... A copy of the procedures to be used for reviewing and investigating certified operation compliance with the Act and the regulations in this part and the reporting of violations of the Act and the regulations in this part to the Administrator.” *Ecoglobe does not have documented procedures for handling annual updates in accordance with §205.406. The general client information provided to certified operations does not address the requirements that the updated organic system plan, which is submitted, must include a summary statement detailing any deviations from, changes to, modifications to, or other amendments made to the previous year's organic system plan during the previous year along with supporting documentation and an update on the correction of minor noncompliances previously identified by the certifying agent (§§205.406 (a)(1)(i) and (a)(3)).* **Corrective Actions:** Ecoglobe's certification program manual was updated at section 4.3.6. Ecoglobe revised OSP templates to include elements capturing annual operation updates or modifications. Ecoglobe staff participated in training to implement the new procedures. Documented evidence was submitted for NOP review and determined to be adequate. These corrective measures are accepted.

NP1241MMA.NC8 – Accepted – NOP §205.662 (a) states, “When an inspection, review, or investigation of a certified operation by a certifying agent or a State organic program's governing State official reveals any noncompliance with the Act or regulations in this part, a written notification of noncompliance shall be sent to the certified operation.” *Notifications of noncompliance are not being properly issued by Ecoglobe and noncompliances are not properly identified. The certification letters submitted to certified operations identify noncompliances as “areas for your further improvement.” These are not considered noncompliances by Ecoglobe and do not meet the requirements for a notification of noncompliance as they do not include the facts upon which the noncompliance is based and do not include the date by which the certified operation must rebut or correct the noncompliance (§§205.406 (a)(2) and (3)). In addition, the certification letters which are taking the place of the notification of noncompliance (when there are noncompliance's) are not submitted to the Administrator (§205.501 (15)(i)).* **Corrective Actions:**

Ecoglobe submitted all noncompliance and adverse action templates for NOP review. Ecoglobe conducted certification staff training on the use of the templates and implementation procedures. Documented evidence was submitted for NOP review and determined to be adequate. These corrective measures are accepted.

NP1241MMA.NC9 – Accepted – NOP §205.670 (d)(1) states, “Results of all analyses and tests performed under this section: Must be promptly provided to the Administrator...” *Ecoglobe had conducted sampling and testing of organic products but the results have not been submitted to the Administrator.* **Corrective Actions:** Ecoglobe will submit all test results to the Administrator electronically through the AIAInbox@ams.usda.gov. This corrective measure is accepted.