



CERTIFICATE OF ACCREDITATION



United States Department of Agriculture

Agricultural Marketing Service

National Organic Program

GEORGIA CROP IMPROVEMENT ASSOCIATION

2425 South Milledge Avenue, Athens, Georgia, 30605, U.S.A.

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

7 CFR Part 205

as an Accredited Certifying Agent

for the scope of

Crops, Handling, Livestock 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 .

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Certificate No: **USDA-104-23**

Effective Date: **04/29/2022**

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Deputy Administrator

National Organic Program

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NATIONAL ORGANIC PROGRAM: AUDIT & CORRECTIVE ACTION REPORT

GENERAL INFORMATION

- **Certifier Name** Georgia Crop Improvement Association, (GCIA)
- **Physical Address** 2425 South Milledge Avenue, Athens, Georgia 30605, U.S.A.
- **Audit Type** Midterm Audit
- **Auditor(s) & Audit Dates** Alicia Hudson, Jonathan Surrency, Kendra Volk, 03/11/2024 to 03/15/2024
- **Audit Identifier** NOP-2-24

CERTIFIER OVERVIEW

The National Organic Program (NOP) conducted an onsite Midterm Audit of Georgia Crop Improvement Association's (GCIA) USDA organic certification program covering the period September 24, 2021 - March 15, 2024. The purpose of the audit was to verify GCIA'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 GCIA personnel, a records audit, and two onsite witness audits. The two witness audits consisted of one additional onsite inspection of a handling operation and one annual onsite inspection of a crops operation; both operations are in Georgia.

GCIA is a non-profit initially accredited on April 29, 2002. GCIA is accredited to the crops, livestock, and handling scopes. GCIA's office is in Athens, Georgia. GCIA certifies 160 operations and offers certification services in Alabama, Arizona, Georgia, Kentucky, Mississippi, North Carolina, and Tennessee. Certification activities are performed by 9 employees.

NOP DETERMINATION:

NOP reviewed the audit results to determine whether GCIA'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 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 “**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-3453-20 – Cleared.
AIA-7886-21 – Cleared.
AIA-7887-21 – Cleared.
AIA-7888-21 – Cleared.
AIA-7889-21 – Cleared.
AIA-7890-21 – Cleared.
AIA-7892-21 – Cleared.
AIA-7893-21 – Cleared.
AIA-7894-21 – Cleared.
AIA-7896-21 – Cleared.
AIA-7897-21 – Cleared.
AIA-5852-23 – Cleared.

Noncompliances Identified during the Current Assessment and Corrective Actions

AIA-1501-24 – Accepted. 7 CFR § 205.501(a)(6)(ii) states “Certifying agents must maintain documented policies, procedures, and records for annual performance evaluations and witness inspections.”

Comments: *GCIA does not fully comply with § 205.501(a)(6) which requires certifying agents to conduct witness inspections of its inspectors. The auditors reviewed GCIA’s records of witness inspections and found that GCIA did not conduct a witness inspection for one inspector in 2022 or 2023. GCIA’s policy was to conduct witness inspections of inspectors annually.*

Corrective Action: GCIA revised the position descriptions for Senior Inspector and Program Manager in its “Organic Certification Program Administration and Policy Manual” to clarify the responsibilities for conducting, tracking and recording witness inspections for their inspectors in compliance with the requirements of § 205.501(a)(6). GCIA implemented an Inspector Evaluation and Witness Audit Annual Schedule form to document the years of experience and dates of personnel evaluations and witness inspections for each inspector. The Senior Inspector and Program Manager will reference this form to verify that only inspectors who have received witness inspections at the required frequency are used. GCIA notified staff of the changes to the position descriptions on October 8, 2024.

AIA-1502-24 – 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: *GCIA does not carry out the provisions of the Act and regulations. GCIA does not verify sufficient information to determine the compliance of input materials and incorrectly determined input material compliance. The auditors reviewed certification files and found:*

- 1. GCIA approved manure for use by a crop operation without verifying additives and potential contaminants. The operation answered questions in the organic system plan (OSP) regarding manure ingredients/additives and potential contaminants with “unknown.”*
- 2. GCIA approved two livestock mineral premixes in livestock feed without collecting full ingredient information.*
- 3. GCIA approved wood shavings for use as animal bedding without verifying their source and their compliance.*

Corrective Action: GCIA took the following actions:

1. GCIA collected off-farm manure use affidavits for each of the operation’s manure suppliers which provided the necessary compliance statements for manure as a crop input. GCIA revised its Material Inputs Form to prompt operations to collect and provide affidavits for any manure inputs used and collected an updated form from the operation.
2. GCIA created and implemented a “Materials Composition Affidavit – Livestock Feed” form for operations to provide to livestock feed manufacturers to complete for livestock feed inputs. GCIA collected the completed affidavits and supporting compliance documentation required to verify compliance for the two livestock mineral premixes.
3. GCIA collected an updated Poultry Materials Input Inventory from the operation which listed pine shavings and collected a compliance statement from the pine shavings supplier. GCIA also updated its OSP forms to instruct operations to answer all questions and that “unknown” was not an acceptable answer and updated its Poultry OSP to add questions regarding source and compliance of wood shavings used as livestock bedding.

Additionally, GCIA revised its “Policy Defining Inputs” to include its requirements for evaluating compliance of livestock feed. On October 29, 2024, GCIA provided training to certification staff and inspectors on input evaluation requirements, input restrictions, prohibited substances and GCIA material review policies.

AIA-1503-24 – Accepted. 7 C.F.R. §205.501(a)(5) states “A private or governmental entity accredited as a certifying agent under this subpart must: Ensure that its responsibly connected persons, employees, and contractors with inspection, analysis, and decision-making responsibilities have sufficient expertise in organic production or handling techniques to successfully perform the duties assigned.”

Comments: *GCIA does not consistently ensure that its staff have sufficient expertise in material review prior to performing the duties assigned. The auditors reviewed certification files and conducted interviews with certification staff and found:*

- 1. GCIA evaluated materials using documentation that did not demonstrate how the materials were compliant with the scope requested for use.*
- 2. The auditors observed an inspector citing incorrect material restrictions during a witness audit.*
- 3. GCIA issued a noncompliance to a handling operation for using diatomaceous earth for pest control, incorrectly citing that diatomaceous earth could only be used for food filtering.*
- 4. GCIA’s inspectors and reviewers failed to identify a prohibited substance on a livestock operation’s supplemental organic system plan (OSP) documentation.*

Corrective Action: GCIA collected compliance documentation from the operation identified in

bullet one, which demonstrated that the input was compliant for use with the scope requested. GCIA reported that the operation had an older version of the Materials Input Form in its OSP; in November 2022, GCIA revised the form to add a verification point that requested inputs are approved for the applicable scope of certification. GCIA implemented a new policy, “Policy Defining Inputs for Crop Production, Processor/Handlers and Livestock Operations” which includes requirements for inputs used in post-harvest handling. GCIA issued a notice of noncompliance to the operation identified in bullet four for the prohibited substance listed in its OSP. The operation reported that the substance was listed in error on the vaccine schedule and had not been used; it submitted a corrected vaccine schedule with the substance removed and an updated Material Inputs Form. GCIA conducted an unannounced inspection of the operation on September 6, 2024 and verified that the substance had not been used. On October 29, 2024, GCIA provided training to certification staff and inspectors on their input policy and evaluation of inputs for compliance, including identifying appropriate certification category for use, any applicable use restrictions, and prohibited substances.

AIA-1508-24 - 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: *GCIA does not fully implement NOP’s international organic trade arrangement policies and procedures, which are outlined on NOP’s International Trade Partners webpage. The auditors reviewed certification files and found the following on GCIA’s “Organic Product Summary”:*

1. *GCIA incorrectly identifies products certified in accordance with the U.S.-Canada Organic Equivalency Arrangement (USCOEA) as “Certified to NOP and COR” (Canada Organic Regime).*
2. *GCIA issued a certificate for a handling operation identifying a product as NOP/COR which was not eligible for the USCOEA due to the use of sodium nitrate.*

Corrective Action: GCIA revised its certificate addendum template to replace the COR reference with a reference to USCOEA compliance. GCIA issued an updated certificate addendum to the handling operation in question with the reference to US/Canada equivalency removed. On October 29, 2024, GCIA provided training to its certification staff and inspectors on verifying compliance with international organic trade arrangements.

AIA-1509-24 - Accepted. 7 CFR § 205.403(e) states, “The inspector must conduct an exit interview with an authorized representative of the operation who is knowledgeable about the inspected operation to confirm the accuracy and completeness of inspection observations and information gathered during the on-site inspection. The inspector must also address the need for any additional information as well as any issues of concern.”

Comments: *GCIA’s exit interviews do not fully comply with the requirements of the USDA organic regulations. The auditors reviewed inspection reports and found that inspectors are not documenting potential noncompliances as issues of concern on the exit interview form. The auditors identified that an operation did not have organic certificates available at inspection and the supplier list was not accurate, however, the inspector did not identify these as issues of concern.*

Corrective Action: GCIA revised the Inspector job duties in its “Organic Certification Program Administration and Policy Manual” to include the requirement to discuss and document issues of concern during the exit interview. On October 29, 2024, GCIA provided training to its certification staff and inspectors on the requirement to document issues of concern on the exit interview form.

AIA-1510-24 - Accepted. 7 CFR § 205.501(a)(18) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Provide the inspector, prior to each on-site inspection, with previous on-site inspection reports and notify the inspector of its decision regarding certification of the production or handling operation site inspected by the inspector and of any requirements for the correction of minor noncompliances.”

Comments: *GCIA does not consistently provide its inspectors with a copy of previous inspection reports and certification decisions prior to the inspection. The auditors reviewed certification files and conducted interviews with certification staff and found that GCIA's inspectors are not provided with previous unannounced inspection reports or with operation's corrective actions to noncompliances issued during the current or previous certification cycle.*

Corrective Action: In July 2024, GCIA revised the Organic Certification Specialist (OCS) job duties in its “Organic Certification Program Administration and Policy Manual” to include providing the inspector with unannounced inspection reports and the operation's corrective actions submitted during the current or previous certification cycle. GCIA also revised the OCS' checklist for creating inspection packets to include these items.

AIA-1511-24 - Accepted. 7 CFR § 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: *GCIA did not meet the requirement to sample and test from 5% of its certified operations annually in 2023. The auditors reviewed sample collection files and found GCIA collected 11 total samples from six operations, or 4% of their certified operations, in 2023. GCIA collected five of the 11 samples from product in storage at one certified handling operation and attributed each of the samples to the respective certified crop operation that supplied the sampled product to the handling operation.*

Corrective Action: In July 2024, GCIA updated the Program Manager job duties in its “Organic Certification Program Administration and Policy Manual” to include calculating the number of operations which require sampling annually using 5% of the number of GCIA's certified operations as of January 2 each year. GCIA submitted the tracking spreadsheet the Program Manager uses to document the number of samples required in a calendar year and monitor GCIA's progress towards meeting the requirement. The 2024 tracking spreadsheet includes enough operations scheduled for sampling events to meet the 5% requirement.

AIA-1513-24 - Accepted. 7 CFR § 205.406(b) states, “The certifying agent must arrange and conduct an on-site inspection, pursuant to § 205.403, of the certified operation at least once per calendar year.”

Comments: *GCIA did not arrange and conduct an annual onsite inspection of all certified operations. The auditors conducted interviews with certification staff and reviewed certification files and found that in 2022 and 2023, not all clients received an annual inspection.*

Corrective Action: In July 2024, GCIA updated its “Organic Certification Program Administration and Policy Manual” to state that each facility must receive an on-site inspection at least once per calendar year, and updated the Program Manager job duties to require monitoring and verification that each operation receives an on-site inspection once per calendar year. GCIA implemented a tracking spreadsheet for the Program Manager to use for monitoring the annual certification cycle and inspection completion dates for all certified operations each year and submitted the 2024 tracking spreadsheet demonstrating progress to date.

AIA-1514-24 - 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: *GCIA does not carry out the provisions of the Act and the regulations. The auditors reviewed certification files and identified that GCIA does not require operations to provide a description of practices and procedures as required by §205.201(a)(1). The auditors found that:*

1. *Rebuttal accepted.*
2. *The OSP of a storage facility did not describe the how the operation confirms and maintains organic integrity of products received and stored.*

Corrective Action: GCIA took the following actions:

1. Rebuttal accepted.
2. On October 15, 2024, GCIA issued a notice of noncompliance to the operation in question for having an OSP that did not fully disclose its practices and procedures. GCIA also stated it is reviewing the operation’s annual renewal submission and has sent an incomplete OSP notification to the client requesting a comprehensive description of their practices and procedures. Additionally, on October 22, 2024, GCIA revised its Processor/Handler inspection report template to include questions about whether the operation’s OSP sufficiently describes all organic and non-organic functions of the operation, and whether the operation sufficiently monitors organic integrity concerns at receiving and storage. GCIA provided training to certification staff and inspectors on the revised inspection report template on October 29, 2024.

AIA-1515-24 - 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: *GCIA is not following its own processes and procedures for conducting and documenting unannounced inspections The auditors reviewed certification files and conducted interviews with certification staff and found:*

1. *GCIA does not provide direction regarding the scope and purpose of unannounced inspections to the assigned inspector, which is required by GCIA’s “Organic Certification Program Administration and Policy Manual.” The manual states, “Unannounced inspections may be limited in scope, depth and breadth, and may cover only certain aspects of the operation, such as parcels, facilities, products, etc. This will be determined by the Program Manager in consultation with the Program Administrator, noted on the inspection report form and communicated in advance to the inspector.”*
2. *Inspectors are not consistently recording the scope and purpose of unannounced inspections in the designated section of the inspection report template.*

Corrective Action: GCIA updated the Program Manager job duties in its “Organic Certification Program Administration and Policy Manual” to include assigning unannounced inspections to inspectors; determining the scope and purpose of unannounced inspections; and communicating this information to the inspector in advance of the unannounced inspection. On October 29, 2024, GCIA provided training for certification staff and inspectors on the requirement to document the scope and purpose of unannounced inspections on the inspection report template.

NATIONAL ORGANIC PROGRAM: AUDIT & CORRECTIVE ACTION REPORT

GENERAL INFORMATION

- **Certifier Name** Georgia Crop Improvement Association (GCIA)
- **Physical Address** 2425 South Milledge Avenue, Athens, Georgia 30605, U.S.A.
- **Audit Type** Renewal Assessment
- **Auditor(s) & Audit Dates** Patricia Bursten, Jessica Walden, Joshua Lindau
September 20-24, 2021
- **Audit Identifier** NOP-41-21

CERTIFIER OVERVIEW

GCIA operates out of one office in Athens, Georgia and conducts certification in Georgia, Alabama, Arizona, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee. GCIA certifies 178 operations, consisting of 76 crop operations, 3 livestock operations, and 99 handlers. There are no grower groups certified by GCIA.

GCIA's organic certification program is staffed by the following seven positions: Program Administrator, Organic Program Manager, two Organic Certification Auditor/Reviewers, one Organic Auditor, and two Organic Certification Administrative Assistants. All staff were identified as GCIA employees. The majority of inspections are conducted by the Organic Program Manager.

NOP DETERMINATION:

NOP reviewed the audit results to determine whether GCIA'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 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 "**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-3452-20 – Cleared.

AIA-3453-20 – Accepted. (NOP-42-19.NC2) 7 C.F.R. §205.501(a)(21) 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; Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.” The NOP website provides instructions and the terms of international trade arrangements.

Comments: *GCIA is not following the requirements in the terms of the equivalency arrangement between the U.S. and Korea, as outlined in the NOP’s International Trade Policies resources. The review of import certificates found the attestation statement required by the U.S.-Korea Organic Equivalency Arrangement was not included in any of the three NAQS Import Certificates issued since the previous assessment.*

Corrective Action: GCIA has corrected the NAQS Import Certificate and provided it to NOP. GCIA has revised the certificate by including the statement, “Certified in compliance with the terms of the US-Korea Organic Equivalency Agreement” in Box 16.

Verification of Corrective Action: The auditors’ review of the only NAQS Import Certificate GCIA has issued since the last audit found the following:

1. GCIA did not include the statement, “Certified in compliance with the terms of the US-Korea Organic Equivalency Agreement” in Box 16. In an interview, GCIA staff stated that they used the wrong template.
2. GCIA did not correctly complete the NAQS Import Certificate. Box 3 should only include the NOP ID number, but GCIA included an internal operator code.

2022 Corrective Action: GCIA revised their NAQS Import Certificate template to include the compliance statement in Box 16 and the NOP ID number in Box 3, and archived the previous version of the document. In September 2022, GCIA created an online account with the electronic NAQS system to use for issuing all future NAQS Import Certificates. At the September 29, 2022 staff meeting, GCIA conducted certification staff training on completing NAQS Import Certificates. GCIA submitted the current NAQS template, confirmation of GCIA’s eNAQS account, a compliant NAQS Import Certificate issued through the electronic system, and the staff meeting agenda and attendance list to NOP.

Noncompliances Identified during the Current Assessment and Corrective Actions

AIA-7886-21 - 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: *GCIA’s inspectors do not consistently verify an operation’s compliance with the USDA organic regulations. The auditors reviewed an inspection report for a certification applicant that produces organic and nonorganic products. The review found that the inspector did not carry out traceback and mass balance activities to verify the operation’s ability to comply with recordkeeping requirements.*

Corrective Action: GCIA revised their inspector guidance policy on mass balance and traceback

audits to require inspectors to verify and document whether recordkeeping systems are auditable if the operation does not yet have sales to allow for complete audit exercises to be conducted. GCIA plans to conduct training for inspectors and certification reviewers on the revised policy by end of June 2023. Additionally, GCIA certification staff plan to attend two traceability and mass balance trainings offered by International Organic Inspectors Association (IOIA) in May 2023. GCIA submitted the revised policy and training plan to NOP.

AIA-7887-21 - Accepted. 7 C.F.R. §205.403(a)(2)(ii) states, “The Administrator or State organic program's governing State official may require that additional inspections be performed by the certifying agent for the purpose of determining compliance with the Act and the regulations in this part.”

Comments: *GCIA did not conduct unannounced inspections of 5% of its total certified operations in 2019, which does not meet the instructions of NOP 2609 Unannounced Inspections. The auditors’ review of records found that GCIA performed unannounced inspections of 4.9% of all operations.*

Corrective Action: GCIA updated their unannounced inspections procedure to state that GCIA will conduct unannounced inspections of 5% of their total certified operations each year, and the Program Manager is responsible for determining how many clients will receive unannounced inspections each year. GCIA updated the Program Manager’s Duties and Responsibilities to include the responsibility for determining the number of unannounced inspections to be conducted each year. GCIA submitted the revised procedure and Program Manager responsibilities to NOP.

AIA-7888-21 - Accepted. 7 C.F.R. §205.501(a)(1) states, “A private or governmental entity accredited as a certifying agent under this subpart must: 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: *GCIA does not have sufficient expertise in organic production or handling techniques to fully comply with and implement an USDA organic certification program. The auditors’ review of ruminant livestock certification files and interviews with staff did not demonstrate that that GCIA is able to ensure compliant application of the USDA organic regulations for livestock.*

1. *GCIA did not identify noncompliances during their review of the organic system plan (OSP), inspection, and final review, as follows:*
 - a. *GCIA did not identify that a producer did not correctly calculate, and report in the OSP, the percentage of DMI that livestock would receive from pasture. Calculations completed by the auditors concluded that livestock would have received far less DMI from pasture than reported by the operation.*
 - b. *GCIA did not identify that the producer stated in their OSP that they added non-organic livestock to the herd and incorrectly identified them as organic, even though the livestock were not eligible for transition or certification.*
2. *GCIA accepted an OSP that was missing information necessary to determine the compliance of a livestock operation, such as a description of preventative healthcare practices and maps that showed the location of water sources, pasture fencing, shade, and shelter.*

Corrective Action: GCIA suspended one of the ruminant livestock operations in question on October 28, 2022. On October 8, 2022, GCIA notified the NOP that due to a lack of administrative capacity, it had ceased accepting ruminant livestock applications and would no longer certify ruminant livestock operations as of July 1, 2023.

AIA-7889-21 - 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: *GCIA does not demonstrate the ability to fully comply with the requirements for accreditation. The auditors’ review of certification files for two ruminant livestock operations and interviews with staff the following issues:*

1. *GCIA’s organic system plan (OSP) forms do not prompt producers to describe all practices and procedures performed as required by 7 C.F.R. §205.201(a). The auditors found that GCIA’s OSP form did not require the following:*
 - a. *Grazing and pasture management plans. The OSPs do not include descriptions of how the pastures are managed to meet the feed regulations.*
 - b. *Yield information for crops harvested as livestock feed.*
 - c. *For new applicants, verification of management practices for three years prior to harvesting pasture as organic.*
 - d. *Descriptions of which livestock products are to be sold, labeled, or represented as organic.*
 - e. *Information required to determine the eligibility of poultry, dairy animals, or breeder stock for organic sale.*
2. *GCIA’s inspection reports do not demonstrate that GCIA inspectors verify the following:*
 - a. *The producer’s compliance with all elements of the pasture rule. The inspection report form does not prompt inspectors to verify the use of pasture during the entire grazing season, dry matter intake consumed from grazing by class of animal over the entire grazing season, or dry matter intake based on records of actual feed fed.*
 - b. *Origin of livestock and that dairy cattle purchased as “organic” were in the last 3rd of gestation at the time of purchase.*
 - c. *Livestock sold as “organic” for slaughter meet the requirements for origin of livestock.*
 - d. *Confinement of livestock meets the temporary confinement conditions and time frames.*
 - e. *How livestock treated with prohibited inputs are identified, and that they are not sold or represented as “organic.”*

Corrective Action: GCIA suspended one of the ruminant livestock operations in question on October 28, 2022. On October 8, 2022, GCIA notified the NOP that due to a lack of administrative capacity, it had ceased accepting ruminant livestock applications and would no longer certify ruminant livestock operations as of July 1, 2023.

AIA-7890-21 - 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: *GCIA does not demonstrate the ability to fully comply with the requirements for accreditation. GCIA is accepting organic system plans (OSPs) and inspection reports that do not demonstrate compliance with the USDA organic regulations. The auditors' review of ruminant livestock files and interviews with certification staff identified the following issues:*

1. *GCIA accepted incomplete or noncompliant livestock certification applications that do not demonstrate an applicant's ability to comply. GCIA accepted OSPs with the following issues:*
 - a. *The routine use of a 90-day confinement period for quarantine. This does not meet the requirements for temporary confinement.*
 - b. *No preventative health care practices listed.*
 - c. *A livestock producer's map that did not include field locations, location of water sources, pasture fencing, shade, and shelter.*
2. *GCIA listed non-organic livestock on an operation's organic certificate though the livestock were identified as ineligible for organic certification in both the inspection report and Certification Decision Checklist.*

Corrective Action: GCIA suspended one of the ruminant livestock operations in question on October 28, 2022. On October 8, 2022, GCIA notified the NOP that due to a lack of administrative capacity, it had ceased accepting ruminant livestock applications and would no longer certify ruminant livestock operations as of July 1, 2023.

AIA-7891-21 – Rebuttal accepted.

AIA-7892-21 - 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: *GCIA 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 GCIA's material review process:*

1. *GCIA does not have policies, procedures, and work instructions for evaluating and approving material inputs for use in organic production or handling.*
2. *The auditors' review of a livestock operation's organic system plan found that a crop input was listed as a livestock material. GCIA records could not demonstrate how the crop input was reviewed and approved for livestock production. During interviews with GCIA staff, they explained that the product was used for pest control; however, the use of the crop input as a pesticide was not described in the organic system plan.*

Corrective Action: GCIA submitted the following corrective actions:

1. GCIA developed and implemented a policy for evaluating and approving inputs for use in organic production and handling. The policy states that GCIA only allow inputs approved by an NOP-recognized material review organization (MRO), and/or those products as allowed on §205.600-§205.606 of the organic regulations. GCIA archived older forms used to list inputs, implemented new Material Input Inventory forms for crops, livestock, processing and greenhouse production, and notified currently certified operations to complete and submit the applicable forms with their next annual update. The forms include the intended use and any use restrictions for each material, as well as an attestation that the operation understands any use restrictions for the requested

materials. Operations are required to complete and submit the applicable Material Input Inventory forms with their organic system plan (OSP) and to submit updates to GCIA whenever there is a change. GCIA reviewers evaluate listed inputs for compliance with the regulations and NOP 3012 upon submission and during annual update review and GCIA inspectors evaluate input lists for compliance prior to/during inspection. At the September 29, 2022 staff meeting, GCIA conducted certification staff training on the new policy and forms. GCIA submitted the new inputs policy, Material Input Inventory forms, and the staff meeting agenda and attendance list to NOP.

2. GCIA suspended the livestock operation in question on October 28, 2022. Additionally, on October 8, 2022, GCIA notified the NOP that due to a lack of administrative capacity, it had ceased accepting ruminant livestock applications and would no longer certify ruminant livestock operations as of July 1, 2023.

AIA-7893-21 - 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: *GCIA does not consistently implement the required pesticide residue analysis process. The auditors’ review of pesticide residue analysis files and interview of certification staff identified the following issues:*

1. *GCIA does not fully carry out the procedures of **NOP 2613, Instruction: Responding to Results from Pesticide Residue Testing**. The auditors’ review of pesticide residue analysis files found that, when residues are not detected or are detected at less than 0.01 ppm, the notifications to operations of the results did not indicate that the product may be sold as organic.*
2. *GCIA does not fully carry out the procedures of **NOP Policy 2610, Sampling Procedure for Residue Testing**. The auditors found that GCIA did not ship fresh produce samples in a timely manner. In two of the four residue sampling files reviewed, GCIA shipped samples to the laboratory more than 11 days after their collection.*

Corrective Action: GCIA stated that they have discontinued the practice of holding residue samples prior to shipping and revised their residue sampling and testing procedures to specify that samples should be shipped to the lab no later than the day after collection. GCIA revised their residue testing report email template to include a statement informing the operation that the tested product may be sold as organic, when applicable. At the September 29, 2022 staff meeting, GCIA conducted certification staff training on the revised procedure. GCIA submitted the revised procedure, email template, and staff meeting agenda and attendance list to NOP.

AIA-7894-21 - Accepted. 7 C.F.R. §205.501(a)(5) states “A private or governmental entity accredited as a certifying agent under this subpart must: Ensure that its responsibly connected persons, employees, and contractors with inspection, analysis, and decision-making responsibilities have sufficient expertise in organic production or handling techniques to successfully perform the duties assigned.”

Comments: *GCIA does not consistently ensure that certification staff have sufficient expertise in organic production or handling techniques prior to performing the duties assigned. The auditors’ review of certification files and interviews with staff found the following issues:*

1. *GCIA staff does not monitor online marketing materials to ensure that:*
 - a. *Certified operations accurately represent the labeling claim of their products. Products that are listed on one operation's organic certificate as "organic" are incorrectly represented as "100% USDA Certified Organic" on the company's website.*
 - b. *Certified operations correctly use the USDA Organic Seal to identify only those products that are certified organic to the USDA organic standards.*
2. *GCIA does not ensure that the term "organic" in a brand name is used correctly on products that do not meet the "organic" labeling claim, as described in NOP Policy 4012, Use of Brand or Company Names Containing the Word "Organic."*

Corrective Action: On October 29, 2021, GCIA issued a notice of noncompliance to the operation for the noncompliant labeling and marketing of products on their website. The operation responded by removing the incorrect "100% organic" statements from their product pages and ceasing to sell nonorganic products under their brand name. On March 20, 2023, GCIA issued another noncompliance for additional noncompliant marketing statements on the operation's website and third-party retailer websites. The operation updated their website to remove noncompliant statements, confirmed the third-party retailers had removed noncompliant statements, and implemented a plan to monitor third-party representation of their organic products. GCIA updated their organic system plan (OSP) forms to request the operation's website address. GCIA revised the duties in the Organic Certification Specialist (formerly Administrative Assistant) job description to include review of websites listed on submitted OSPs to assess compliance of organic product representation and any use of the USDA organic seal. At the September 29, 2022 staff meeting, GCIA conducted staff training on the revised OSP forms and job duties and reviewed the requirements of NOP 4012. GCIA submitted the notifications to the operation, the operation's corrective actions, revised OSP forms, job description, and the staff meeting agenda and attendance list to NOP.

AIA-7896-21 - Accepted. 7 C.F.R. §205.402(a)(4) states, "Upon acceptance of an application for certification, a certifying agent must: Schedule an on-site inspection of the operation to determine whether the applicant qualifies for certification if the review of application materials reveals that the production or handling operation may be in compliance with the applicable requirements of subpart C of this part."

Comments: *GCIA does not consistently schedule the onsite inspection of an applicant for certification after the review of application materials reveals that the operation may comply with the USDA organic regulations. The auditors' review of applicant files and interviews with staff identified the following issues:*

1. *GCIA conducts initial inspections even though organic system plans are incomplete.*
2. *GCIA does not consistently ensure that incomplete organic system plans are updated for incomplete information during or after inspections.*

Corrective Action: GCIA reviewed and updated the organic system plans (OSP) for the operations in question. GCIA hired a new Organic Certification Specialist (OCS) to focus on pre- and post-audit reviews. GCIA implemented a new letter template, Incomplete OSP Notification, to be used by the OCS if an operation's OSP is missing information. GCIA revised the duties and responsibilities for the OCS position to include confirmation of complete OSPs prior to moving operations to inspection, and documenting updates to OSPs as needed after

inspection. At the September 29, 2022 staff meeting, GCIA conducted certification staff training on the revised OCS job duties and the letter template. GCIA submitted the revised OCS job duties; resume, performance evaluation and training records for the new OCS hire; the letter template; and the staff meeting agenda and attendance list to NOP.

AIA-7897-21 - Accepted. 7 C.F.R. §205.406(c) states, “If the certifying agent has reason to believe, based on the on-site inspection and a review of the information specified in §205.404, that a certified operation is not complying with the requirements of the Act and the regulations in this part, the certifying agent shall provide a written notification of noncompliance to the operation in accordance with §205.662.”

Comments: *GCIA does not consistently issue a notice of noncompliance to its certified operations, even though the auditors’ review of the certification files finds that the operations do not comply with the USDA organic regulations. The auditors’ review of certification files identified the following issues:*

1. *Rebuttal accepted.*
2. *GCIA does not consistently issue noncompliances when incomplete organic system plans are identified during inspection and the review processes.*

Corrective Action: GCIA suspended the operation in question on October 28, 2022. GCIA hired a new Organic Certification Specialist (OCS) to focus on pre- and post-audit reviews. GCIA revised the duties and responsibilities for the OCS position to include documenting updates to organic system plans (OSP) as needed after inspection, and issuing noncompliances at the direction of the Program Manager. At the September 29, 2022 staff meeting, GCIA conducted certification staff training on the revised OCS job duties and the letter template. GCIA submitted the revised OCS job duties; resume, performance evaluation and training records for the new OCS hire; the letter template; and the staff meeting agenda and attendance list to NOP.