



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

Accreditation Status Confirmation

May 3, 2023

To Whom This May Concern:


Pennsylvania Certified Organic (PCO) is a United States Department of Agriculture (USDA), National Organic Program (NOP) accredited certifying agent. Furthermore, PCO 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.

PCO's accreditation certificate indicates a renewal date of April 29, 2022; however, its accreditation is in good standing and continues to be valid. USDA NOP granted PCO an accreditation term extension until its accreditation renewal assessment is completed. USDA NOP expects the assessment process to conclude during 2023.

For questions concerning PCO's status, please contact the NOP at 202.720.3252.

Sincerely,

**ROBERT
YANG**

Digitally signed by ROBERT YANG
Date: 2023.05.03 16:39:27 -04'00'

Robert Yang
Director, Accreditation Division
National Organic Program



United States Department of Agriculture

Agricultural Marketing Service

National Organic Program

Pennsylvania Certified Organic

106 School Street, Suite 201, Spring Mills, PA 16875-8118

meets all the requirements prescribed in the National Organic Program Regulations

7 CFR Part 205

as an Accredited Certifying Agent

for the scope of

Crops, Wild Crops, Livestock and Handling 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 OF ACCREDITATION



Certificate No: **NP7219JLA**
Effective Date: **April 29, 2017**
Expiration Date: **April 29, 2022**

Ruihong Guo FOR RS

Ruihong Guo, Ph.D.
Acting Deputy Administrator
National Organic Program

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NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

AUDIT AND REVIEW PROCESS

The National Organic Program (NOP) conducted an audit as part of the NOP's assessment of the certifier's USDA organic certification program. NOP reviewed the auditor's assessment to determine compliance with the USDA organic regulations. This report provides the results of NOP's assessment and review of corrective actions.

GENERAL INFORMATION

Applicant Name	Pennsylvania Certified Organic (PCO)
Physical Address	106 School Street, Spring Mills, Pennsylvania 16875, U.S.A.
Mailing Address	106 School Street, Spring Mills, Pennsylvania 16875, U.S.A.
Contact & Title	Ms. Kyla Smith, Certification Director, Interim Co-Executive Director
E-mail Address	kyla@paorganic.org
Phone Number	814-422-0251
Reviewers & Auditors	Karin French, NOP Reviewer; Sherry Aultman, Joshua Lindau, Auditors
Program	USDA National Organic Program (NOP)
Review & Audit Dates	Corrective Action Review: January 20, 2022 NOP assessment review: June 1, 2021 Onsite audit: November 16, 2020 to November 20, 2020
Audit Identifier	NOP-40-20
Action Required	No
Audit & Review Type	Mid-Term Assessment
Audit Objective	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of PCO's certification
Audit & Determination Criteria	<i>7 CFR Part 205, National Organic Program as amended</i>
Audit & Review Scope	PCO's demonstrated conformance and program implementation during the period: August 11, 2017 through November 20, 2020.

Pennsylvania Certified Organic (PCO) is a non-profit organization initially accredited by the USDA National Organic Program (NOP) on April 29, 2002 for the scopes of Crops, Wild Crops, Livestock, and Handling.

At the time of the assessment, PCO certified 1,629 operations: 927 crops, 6 wild crops, 976 livestock, and 261 handling operations. PCO's certified operations are located in Arkansas, California, Connecticut, Delaware, District of Columbia, Florida, Illinois, Indiana, Iowa, Kentucky, Maine, Maryland, Missouri, New Hampshire, New Jersey, New York, North

Carolina, Ohio, Pennsylvania, Tennessee, Vermont, Virginia, and West Virginia. PCO does not certify grower groups.

PCO's office is located in Spring Mills, PA. PCO staff consist of three directors, nine Managers, eight certification officers, six administrative staff, three Program Assistants, two Material Specialists, and forty-two contracted inspectors. Nine of the permanent staff also perform onsite inspections.

NOP DETERMINATION

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

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. 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-3138-20 (NP7219JLA.NC1) – Cleared.
AIA-3217-20 (NP7219JLA.NC2) – Cleared.
AIA-3218-20 (NP7219JLA.NC3) – Cleared.
AIA-3219-20 (NP7219JLA.NC4) – Cleared.
AIA-3220-20 (NP7219JLA.NC5) – Cleared.
AIA-3221-20 (NP7219JLA.NC6) – Cleared.

Noncompliances Identified during the Current Assessment

AIA-3290-20 – Accepted. 7 C.F.R. §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."

Comments: *PCO did not issue a notification of noncompliance to certified operations, even though PCO's inspections of the operations revealed noncompliant practices. The auditor's review of certification files of four operations found that PCO issued a certification decision report with "conditions for certification" after noncompliant practices were identified during the inspection. The inspection reports identified issues including incomplete DMI calculations,*

confinement of livestock, knowingly purchasing nonorganic livestock for organic slaughter, incomplete feed rations, and failure to meet 30% DMI from pasture for ruminants.

Corrective Actions: PCO managers will monitor five certification files for each certification specialist to ensure that timely and accurate notifications of noncompliance are issued to noncompliant operations. The monitoring began October 25, 2021 and will be documented in staff evaluations. PCO conducted internal training for certification staff on the revised Standard Operating Procedures and the Compliance Decision Tree in October 2021. PCO submitted “Compliance Decision Tree”, “CER007-Certification Report Process SOP”, “CER008-Compliance Process SOP”, and “Certification Review” training documentation as objective evidence of training staff on differentiating between issues of concern and noncompliances. PCO will require all existing certification specialists to complete the NOP OILC course “NOP 170 Certification Review Essentials” by January 10, 2022. PCO will also require the NOP 170 course for onboarding certification specialists.

AIA-3291-20 – 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: *PCO does not consistently issue certified operations a Notice of Noncompliance per §205.406(c) when the certified operation is not in compliance. The auditor’s review of certification files found that organic system plans and supporting documents were incomplete due to the applicant not answering questions or providing inaccurate answers. The auditors also found product profiles that were incomplete and missing critical information. PCO did not issue a notification of noncompliance to the operations for incomplete or inaccurate information.*

Corrective Actions: PCO submitted a revised “CER002 – Initial Review Process SOP,” instructing certification specialists to issue an “Initial Review (IRR) – Not Approved” letter to operations when the OSP is incomplete or inaccurate. PCO conducted training for certification specialists on the revised initial review process in September 2021 including the requirement to issue the “IRR – Not Approved”. PCO conducted refresher training for certification specialists on product reviews and complete product profiles in September 2021. PCO submitted the training documentation. PCO will require all certification specialists and program assistants to complete the NOP Organic Integrity Learning Center course “NOP 170 Certification Review Essentials” by January 2022. PCO will revise “C-OPS001: The Prospective Client Process SOP”, “CER002: Initial Review Process SOP”, “CER012: Product Profile Review”, the initial review checklist, and the New application screening task to provide certification staff the regulatory standards and expectations for OSPs, supporting documents, and product profile reviews. In order to provide guidance and expectations for submitting complete applications to prospective clients, PCO will revise the “Welcome New Applicant Letter” and the “Application Received Letter”. PCO will conduct training on the revised procedures and processes in January 2022. All pending revised documents will be submitted in February 2022.

AIA-3292-20 – Accepted. 7 C.F.R. §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.”

Comments: *The auditors’ review of three conflict of interest disclosures found that the documents were incomplete because they did not have the Certification Agency Representative’s signature to document PCO’s acknowledgement of employee conflicts of interest.*

Corrective Actions: PCO revised their “Conflict of Interest Disclosure” (COI) form and integrated the forms into their Intact database. COIs are entered into the database when received and any conflicts are noted on the corresponding entity file providing a transparent review and documentation process. PCO submitted the updated ‘Conflict of Interest Disclosure and Confidentiality Agreement’, the “Conflict of Interest, Confidentiality and Qualifications Documentation SOP QS008,” and evidence of COI notations in the database.

AIA-3293-20 – 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: *PCO’s internal program review does not adequately verify and monitor effective implementation of corrective actions identified by its own internal audits. PCO’s 2018 and 2019 internal program reviews identified certificates missing information required by the USDA organic regulations and NOP Policy. The same issue was identified during PCO’s NOP Renewal audit in 2017 and corrective actions were accepted by the NOP. Internal program reviews in 2018 and 2019 also noted “inaccuracies, incompleteness and lack of timely documentation of noncompliance procedure activities have been noted in past internal program reviews and continue to be problematic” and the 2020 internal program review noted “Lack of substantial improvement has generated a concern about our ability to effectively ensure organic integrity”, demonstrating continuing issues with identified noncompliances that are not resolved through corrective actions implemented by the certifier.*

Corrective Actions: PCO instituted a quarterly audit which will verify and track corrective actions previously identified in annual internal program reviews. Quarterly audit findings will be reviewed by the PCO Leadership team, the Certification Director, and the appropriate Certification Team Assistant Managers to verify corrective action implementation. PCO submitted the “PCO Internal Program Review SOP QS010 V3” and the “PCO Quarterly Audit Template V1” documenting the new process of tracking and verifying implementation of corrective actions.

NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

AUDIT AND REVIEW PROCESS

An onsite renewal assessment of Pennsylvania Certified Organic's (PCO) organic program was conducted on August 7-11, 2017. The National Organic Program (NOP) reviewed the auditor's report to assess PCO's compliance to the USDA organic regulations. This report provides the results of NOP's assessment.

GENERAL INFORMATION

Applicant Name	Pennsylvania Certified Organic (PCO)
Physical Address	106 School Street, Suite 201 Spring Mills, PA 16875
Mailing Address	106 School Street, Suite 201 Spring Mills, PA 16875
Contact & Title	Kyla Smith, Certification Director
E-mail Address	kyla@paorganic.org
Phone Number	814-422-0251
Reviewer(s) & Auditor(s)	Graham Davis, NOP Reviewer; Rebecca Claypool and Jason Lopez, Onsite Auditors
Program	USDA National Organic Program (NOP)
Review & Audit Date(s)	Corrective actions review: December 8, 2017 NOP assessment review: August 30, 2017 Onsite audit: August 7-11, 2017
Audit Identifier	NP7219JLA
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 PCO's certification system.
Audit & Determination Criteria	<i>7 CFR Part 205, National Organic Program as amended</i>
Audit & Review Scope	PCO's certification services in carrying out the audit criteria during the period: July 25, 2014 through August 11, 2017

Pennsylvania Certified Organic (PCO) is a non-profit organization initially accredited by the USDA National Organic Program (NOP) on April 29, 2002 for the scopes of Crops, Wild Crops, Livestock, and Handling.

At the time of the assessment, PCO certified 1215 operations: 769 crops, 4 wild crops, 800 livestock, and 239 handling operations. PCO's certified operations are located in Delaware, Florida, Illinois, Indiana, Kentucky, Maine, Maryland, Massachusetts, Missouri, New

Hampshire, New York, New Jersey, North Carolina, Ohio, Pennsylvania, West Virginia, Virginia, Vermont, Washington D.C., California, Georgia, and Michigan. PCO does not certify grower groups.

PCO's office is located in Spring Mills, PA. PCO staff consist of 9 administrative staff, 18 certification staff, 2 quality management & IT staff, and 28 contracted inspectors. Eight of the certification specialists also conduct inspections.

Four witness audits were conducted. One witness audit of an annual inspection of a crops and dairy operation; one witness audit of an annual inspection of a soybean processing plant; and witness audits of an unannounced inspection of a crops and wild crops operation and a partial inspection of a crops and livestock operation.

NOP DETERMINATION:

NOP reviewed the onsite audit results to determine whether PCO'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 acceptance of the corrective actions and verification of corrective action implementation will be conducted during the next onsite audit.

AIA16138GD.NC1 – Cleared
AIA15170RKA.NC1 – Cleared
AIA14233RK.NC1 – 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.

NP7219JLA.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 2603, *Organic Certificates*, Section 3.1, indicates the elements of an organic certificate, and Section 3.4 states "Certifying agents should issue a new organic certificate each year."

Comments: *PCO's certificate does not include all of the required elements of an organic*

certificate in the following manner:

- *An issue date is not specified on the certificate.*
- *An anniversary date is not specified on the certificate.*
- *The statement, “Certified to the USDA organic regulations, 7 CFR Part 205” is not included on the certificate.*
- *The statement “Once certified, a production or handling operation’s organic certification continues in effect until surrendered, suspended or revoked” is not included on the certificate.*

2017 Corrective Action: PCO revised its organic certificate template in the following manner:

1. An issue date has been specified on the certificate.
2. An anniversary date is captured on the certificate addendum to reflect the date upon which annual updates are due.
3. The statement, “Certified to the USDA organic regulations, 7 CFR Part 205” has been added to the organic certificate and the organic certificate addendum.
4. The statement “Once certified, a production or handling operation’s organic certification continues in effect until surrendered, suspended or revoked” has been added.

PCO will review their certificate, at minimum, annually for compliance with NOP 2603 and 7 CFR §205.404 (b). PCO amended their quality manual and internal program review standard operating procedure to specifically require a review of the certificates and certificate of operation-Addendums during their internal program review.

NP7219JLA.NC2 – 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 2603, *Organic Certificates*, Section 3.4 states “Certifying agents should issue a new organic certificate each year.”

Comments: *PCO does not issue all its certified operations a new organic certificate each year. A new certificate is issued only in cases where the category of organic operation or contact information of the certified operation changes.*

2017 Corrective Action: PCO implemented the following revisions to clearly identify their certificate of organic operation and their certificate of organic operation - addendum, collectively, as the complete certificate of organic operation:

1. Revised the previous title of the addendum from “Organic Product Verification” to “*Certificate of Organic Operation - Addendum*”.
2. Added the statement: “*This document is not valid without the Certificate of Organic Operation - Addendum*” to the Certificate of Organic Operation.
3. Added a corresponding statement to the Certificate of Organic Operation - Addendum which reads: “*This document is not valid without the Certificate of Organic Operation*”.

PCO will issue a revised certificate of organic operation and an explanatory letter to certified operations as their certification reports are completed for the 2017 review year. PCO will conduct

a comprehensive review of all organic certificates at the close of the review year to ensure all certified operations have been issued a revised and complete Certificate of Organic Operation. PCO conducted internal training on September 27, 2017, to inform staff of the updates to their certificate of organic operation and certificate of organic operation - addendum and to provide instruction on issuing the documents.

NP7219JLA.NC3 – Accepted. 7 C.F.R. §205.642 states, “Fees charged by a certifying agent must be reasonable, and... The fee schedule must explain what fee amounts are nonrefundable and at what stage during the certification process fees become nonrefundable.”

Comments: *PCO’s fee schedule does not clearly explain at which point certain fees become nonrefundable. The fee schedule notes that the application fee is nonrefundable, however it is unclear at which point the remaining fees are also nonrefundable. The fee schedule states that one half of the paid fees are nonrefundable, however in practice it appears that once fees are invoiced they become nonrefundable.*

2017 Corrective Action: PCO’s fee schedule has been updated to include a refund policy section. The revised fee schedule became effective as of September 29, 2017 and was updated on the PCO website on October 2, 2017. PCO is now providing it to all new applicants with their application and will be providing to renewing applicants with their annual update packets beginning January 1, 2018. The fee schedule will be reviewed annually by the certification director and the quality systems manager during the annual controlled document review to ensure that the refund policy is clearly explained.

NP7219JLA.NC4 – 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 2615 *Organic System Plans, Organic System Plan Updates, and Notification of Changes* Section 3.1 states, “The NOP expects certifiers to require that OSPs, annual updates, and notifications of changes contain sufficient information to determine whether an operation complies with the USDA organic regulations.”

Comments: *PCO’s organic system plan templates do not ask operations whether they import organic products.*

2017 Corrective Action: PCO revised their organic system plan- international trade supplement template, their organic system plan- general information form and annual update form to include questions regarding the import of organic products. The forms are controlled documents that will be reviewed annually through PCO’s internal auditing system to ensure that they contain appropriate questions about the operation’s import activities.

NP7219JLA.NC5 – Accepted. 7 C.F.R. §205.403(c)(1) states, “The on-site inspection of an operation must verify: The operation's compliance or capability to comply with the Act and the regulations in this part;”

Comments: *Questions about import and export activities are not included in PCO’s inspection report templates and therefore, verification of such activities may not occur.*

2017 Corrective Action: PCO revised their inspection report templates to prompt for review of the OSP- International Trade Supplement. PCO will review these documents annually through

PCO's internal audit procedure to ensure that they contain appropriate questions about an operation's import/export activities. PCO additionally issued a memo to its inspectors on October 4, 2017, which contained the import/export presentation from their March 10, 2017 Annual Inspector Training and an International Trade Policies Chart reminding them of the expectations and requirements for verification of import/export activities. PCO revised two standard operating procedures (SOPs) to address the process for verification of import/export activities, and relevant NOP guidance documents were added to the reference sections of these SOPs as additional instruction. The new procedure and the revised inspection reports will be highlighted at PCO's annual inspector training in March 2018.

NP7219JLA.NC6 – 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 2601 *The Organic Certification Process* Section 3.4 states that the organic inspection should include, “Reconciliation of the volume of organic products produced or received with the amount of organic products shipped, handled and/or sold, also known as trace-back audits or in-out balances”

Comments: *The trace-back and in-out balance audits recorded in the inspection reports in six of the ten files reviewed by the auditors were incomplete. In two of the six files reviewed by the auditors, trace-back or in/out audits were not completed in the inspection report. The information provided in the inspection reports was inconsistent and lacked the detail necessary to evaluate compliance.*

2017 Corrective Action: PCO issued a memo to its inspectors on October 4, 2017, which contained the January 13, 2016 NOP audit reminders presentation. The memo was sent to remind inspectors to conduct thorough and complete trace-back or in/out audits with sufficient narrative detail including, which documents/records were used in the audits. PCO inspection reports have been revised to clarify expectations for audit narrative and documentation. PCO created Standard Operating Procedure “Writing and Evaluating Audit Report Narratives” to provide instruction on writing and reviewing inspection audit reports. PCO certification staff were given training on evaluating the audit sections contained in the inspection report at a certification team meeting in October 2017.

NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

AUDIT AND REVIEW PROCESS

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

GENERAL INFORMATION

Applicant Name	Pennsylvania Certified Organic (PCO)
Physical Address	106 School Street, Suite 20, Spring Mills, PA 16875-8118
Mailing Address	Same
Contact & Title	Leslie Zuck, Executive Director
E-mail Address	leslie@paorganic.org
Phone Number	(814) 422-0251
Reviewer & Auditor	Janna Howley, NOP Reviewer Rick Skinner, On-site Auditor
Program	USDA National Organic Program (NOP)
Review & Audit Dates	NOP assessment review: December 30, 2014 Onsite audit: July 22-25, 2014
Audit Identifier	NP4203EEA
Action Required	None
Audit & Review Type	Mid-Term Assessment
Audit Objective	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of PCO's certification.
Audit & Determination Criteria	<i>7 CFR Part 205, National Organic Program as amended</i>
Audit & Review Scope	PCO's certification services in carrying out the audit criteria during the period: April 2012 through July 2014.

Pennsylvania Certified Organic (PCO) is an organic, non-profit, membership certification program that is owned by members of the organization. The membership structure has three levels: Business, Associate, and Certified Operations; however, membership is not a pre-requisite to certification.

PCO has been accredited as a certifying agent since April 29, 2002, to the National Organic Program (NOP) for the scopes of crop, wild crop, livestock, and handling. Currently, PCO has 586 clients certified to the NOP that includes 463 crop, 6 wild crop, 297 livestock, and 145 handling operations, including 131 processors and 14 distributors. Most certified operations are located within the State of Pennsylvania; however, the geographic scope of certification includes, Delaware, Maryland, New Jersey, New York, North Carolina, Ohio, Virginia, West Virginia, and the District of Columbia. PCO does not have any other accreditations at this time.

NOP DETERMINATION

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

Noncompliances from Prior Assessments – Cleared

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.

NP213000A.NC1 – Rebutted and accepted.

NP213000A.NC2 – Cleared – 7 CFR §205.642 states, “The certifying agent shall provide each applicant with an estimate of the total cost of certification and an estimate of the annual cost of updating the certification.”

2012 Comments: *A review of 10 certification files indicated that an estimate for total cost of certification was not being provided to applicants or clients. This was further substantiated by interviews with PCO personnel who indicated that cost estimates are not being provided to applicants or clients.*

2012 Corrective Action: PCO submitted new procedures for providing cost estimates to new and renewing applicants. The Office Manager shall develop templates for cost estimates, and the new procedure will be implemented starting November 1, 2012. PCO will conduct an internal training session for PCO staff prior to implementation of the new procedures.

2014 Verification of Corrective Action: PCO created new templates and new procedures for providing cost estimates. Training was conducted prior to the implementation of the new procedure and template. Cost estimates are being provided to applicants and clients.

Noncompliances Identified during the Current Assessment

None.

AUDIT INFORMATION

Applicant Name:	Pennsylvania Certified Organic
Est. Number:	N/A
Physical Address:	106 School Street, Suite 201, Spring Mills, PA 16875-8118
Mailing Address:	106 School Street, Suite 201, Spring Mills, PA 16875-8118
Contact & Title:	Robert Yang, Quality Systems Manager; Leslie Zuck, Executive Director
E-mail Address:	robert@paorganic.org ; leslie@paorganic.org
Phone Number:	(814) 422-0251
Auditor(s):	Betsy Rakola, Accreditation Manager
Program:	USDA National Organic Program (NOP)
Audit Date(s):	August 7-13, 2012
Audit Identifier:	NP213000A
Action Required:	No
Audit Type:	Corrective Action
Audit Objective:	To verify continuing compliance to the audit criteria.
Audit Criteria:	7 CFR Part 205, National Organic Program, Final Rule, dated December 21, 2000; updated March 15, 2012.
Audit Scope:	Corrective Actions submitted by PCO.
Location(s) Audited:	Desk

GENERAL INFORMATION:

Pennsylvania Certified Organic (PCO) is an organic non-profit, membership certification program that is owned by members of the organization. PCO was accredited as a certifying agent on April 29, 2002, to the National Organic Program (NOP) for crops, wild crops, livestock, and handling operations. The PCO list of certified operations included 647 certified operations, consisting of 429 crop, 367 livestock, 9 wild crop, and 160 processor/handling operations certified to the NOP Standards. The majority of clients are certified in the State of Pennsylvania with some clients in Delaware, Maryland, New Jersey, New York, North Carolina, Ohio, Virginia, West Virginia and Washington D.C.

Members of the Grading and Verification Division conducted an NOP and ISO 65 audit of PCO on May 9 and May 15 – 17, 2012. The NOP issued PCO a Notice of Noncompliance to PCO based on this report on July 5, 2012. PCO contacted the NOP twice to discuss the findings and to indicate their intention to rebut NC1. On August 6, 2012, PCO submitted a rebuttal for NC1 and corrective actions for NC2. The

NOP Deputy Administrator approved the rebuttal on August 12, 2012. As a result, NC1 has been

eliminated from the corrective actions report.

FINDINGS

Observations made, interviews conducted, and procedures and records reviewed verified that PCO is currently operating in compliance to the requirements of the audit criteria, except as identified below. There was one non-compliance identified during the renewal assessment.

NP213000A.NC1 – Rebutted and accepted.

NP213000A.NC2 – Adequately addressed. NOP §205.642 states, “The certifying agent shall provide each applicant with an estimate of the total cost of certification and an estimate of the annual cost of updating the certification.” *A review of 10 certification files indicated that an estimate for total cost of certification was not being provided to applicants or clients. This was further substantiated by interviews with PCO personnel who indicated that cost estimates are not being provided to applicants or clients.* **Corrective Action:** PCO submitted new procedures for providing cost estimates to new and renewing applicants. The Office Manager shall develop templates for cost estimates, and the new procedure will be implemented starting November 1, 2012. PCO will conduct an internal training session for PCO staff prior to implementation of the new procedures