



CERTIFICATE OF ACCREDITATION



United States Department of Agriculture

Agricultural Marketing Service

National Organic Program

PERRY JOHNSON REGISTRARS FOOD SAFETY, INC.

755 West Big Beaver Road, Suite 1390, Troy, Michigan, 48084, 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 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-59-25**

Effective Date: **08/02/2024**

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Christopher Purdy
Acting Deputy Administrator
National Organic Program

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NATIONAL ORGANIC PROGRAM: AUDIT & CORRECTIVE ACTION REPORT

GENERAL INFORMATION

- **Certifier Name** Perry Johnson Registrars Food Safety, Inc., (PJRFSI)
- **Physical Address** 755 West Big Beaver Road, Troy, Michigan 48084, U.S.A.
- **Audit Type** Renewal Audit
- **Auditor(s) & Audit Dates** Jonathan Surrency, Jessica Walden, Kendra Volk
09/10/2024 to 09/13/2024
- **Audit Identifier** NOP-26-24

CERTIFIER OVERVIEW

The National Organic Program (NOP) conducted an onsite Renewal Audit of Perry Johnson Registrar Food Safety, Inc.'s (PJRFSI) USDA organic certification program, covering the period of April 02, 2021 – Sept 13, 2024. The purpose of the audit was to verify PJRFSI'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 PJRFSI personnel, a records audit, and two onsite witness audits. The two witness audits consisted of one annual onsite inspection of a crop operation in Tennessee, and one annual onsite inspection of a handling operation in Michigan.

PJRFSI is a for-profit corporation initially accredited on August 2, 2019. PJRFSI is accredited to the crops and handling scopes and their office of record is in Troy, Michigan. PJRFSI certifies 13 operations and offers certification services in Arizona, California, Colorado, Florida, Georgia, Michigan, New Jersey, Pennsylvania, and Tennessee. Certification activities are performed by 1 full-time employee plus 9 contractors.

NOP DETERMINATION:

NOP reviewed the audit results to determine whether PJRFSI'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-2049-20 - Cleared.
AIA-2050-20 - Cleared.
AIA-2051-20 - Cleared.
AIA-6269-21 - Cleared.
AIA-6270-21 - Cleared.
AIA-6272-21 - Cleared.
AIA-6273-21 - Cleared.
AIA-6275-21 - Cleared.
AIA-379-22 - Cleared.
AIA-1720-22 - Cleared.

Noncompliances Identified during the Current Assessment

AIA-3313-24 - 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: *PJRFSI did not meet the requirement to sample and test from 5% of its certified operations annually in 2021 or 2022. The auditors reviewed certification files and found that zero samples were collected or tested in 2021 and 2022.*

Corrective Action: PJRFSI selected an operation for sampling and testing in October 2025 to meet the annual requirement for sampling and testing from a minimum of five percent of PJRFSI's certified operations. PJRFSI's Organic Program Manager will be alerted via an e-calendar's reoccurring notice on January 15th annually to select high risk operations and schedule sampling activities. PJRFSI amended its “F-75org SCTA Risk Assessment Form” to identify the highest risk operations for sampling consideration. PJRFSI updated its “Organic Accreditation Audit Checklist (F-73org)” in February 2025 to include annual internal verification that sampling activities were completed. PJRFSI updated its “Organic Quality Manual” in December 2024 to incorporate a procedure for the “Accreditation Audit Checklist,” detailing the responsible parties, the process, and the timeline for completing the checklist. PJRFSI plans to record all sampling activities on the “Organic Accreditation Checklist” and “Pesticide Residue & Unannounced Audit Tracking Sheet.” PJRFSI conducted in-house training on February 24, 2025, and NOP all staff training on March 17, 2025, regarding the requirement to sample and test a minimum of five percent of operations certified.

AIA-3316-24 - Accepted. 7 CFR § 205.642 states, “Fees charged by a certifying agent must be reasonable, and a certifying agent shall charge applicants for certification and certified production and handling operations only those fees and charges that it has filed with the Administrator. 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. 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. The certifying agent shall provide all persons inquiring about the application process with a copy of its fee schedule.”

Comments: *PJRFSI does not provide all persons inquiring about the application process with a copy of its fee schedule. The auditors interviewed certification staff and found that applicants are not provided a copy of the fee schedule until after non-refundable fees are paid.*

Corrective Action: PJRFSI posted its fee schedule on its website for applicants to reference at any time. PJRFSI updated its “Organic Quality Manual” in December 2024 to state that applicants are able to obtain the fee schedule on the PJRFSI website and that operations renewing certification will be emailed or provided the fee schedule in their SharePoint folder. PJRFSI updated its “Organic Certification Manual (SOP-01org)” in March 2025 to inform operations the fee schedule is located on the PJRFSI website. PJRFSI conducted in-house training on February 24, 2025, and NOP all staff training on March 17, 2025, regarding the fee schedule requirements.

AIA-3317-24 - Accepted. 7 CFR § 205.403(f)(2) states, “A copy of the on-site inspection report and any test results will be sent to the inspected operation by the certifying agent.”

Comments: *PJRFSI does not consistently send operations a copy of their inspection report. The auditors reviewed certification files and found that PJRFSI does not send clients copies of their unannounced inspection reports.*

Corrective Action: PJRFSI provided the previously unshared unannounced inspection report to the operation. PJRFSI updated its “FS-72org Organic Client Administration Tasks” certification checklist to prompt staff to provide all inspection reports to the operation including those for unannounced inspections. PJRFSI will create an inspection report sub-folder in each operation’s SharePoint folder where inspection reports will be made available. PJRFSI conducted in-house training on February 24, 2025, and NOP all staff training on March 17, 2025, regarding the requirement and new process to provide all inspection reports to operations.

AIA-3319-24 - 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: *PJRFSI does not carry out the provisions of the Act and regulations. The auditors reviewed certification files and found that PJRFSI did not correctly assess multi-ingredient processed products according to § 205.301(b). PJRFSI approved multi-ingredient product formulations that do not account for 100% of product ingredients by weight, and did not properly calculate the percentage of organic ingredients in an organic product.*

Corrective Action: PJRFSI revised its “Organic Product Profile (OPP), to correct the inaccurate organic percentage calculations and to account for 100% of product ingredients by weight. PJRFSI updated the OPP version 1.6 in February 2025 to include significant figures with two decimal points (XX.XX%) to accurately calculate an operation’s total ingredient percentage and total organic

product content from the sum of ingredients. PJRFSI will require operations to update their organic system plan (OSP) with the OPP v1.6 during their annual renewal in 2025. PJRFSI reviewed operations using older versions of the OPP and verified operations are in compliance. PJRFSI created a new “Reviewer OSP Policies” document in February 2025 identifying the required handler OSP documents including the updated OPP. PJRFSI conducted in-house training on February 24, 2025, and NOP all staff training on March 17, 2025, regarding how to correctly evaluate an operation’s calculation of multi-ingredient processed products.

AIA-3320-24 - 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: *PJRFSI does not carry out the provisions of the Act and regulations. The auditors reviewed certification files and conducted witness audits and found that PJRFSI was not consistently following their policies and procedures on establishing approved input lists within an operation’s organic system plan. Specifically, auditors found a certification file with multiple input lists, with no clear way to determine which was the authoritative list containing all approved inputs.*

Corrective Action: PJRFSI updated its crop organic system plan (OSP) (version 1.7) in 2024 and required new applicant crop operations to use the input material list in section C9. PJRFSI implemented a new electronic handler OSP in February 2025 with stand-alone addendums for listing inputs and ingredients in a “Processing Materials List” and “Supplier List.” PJRFSI will require operations to update their OSP and input lists to the newest format during their 2025 annual renewal. PJRFSI staff will provide notice to an operation that the input is approved with any restrictions, or denial for use, after the material review is completed. PJRFSI will document the approval of inputs in the OSP materials lists. Additionally, the electronic handler OSP will require reviewers to initial and date approval of an input and the documents they reviewed in the electronic OSP. PJRFSI developed a new “Reviewer OSP Policies” document in February 2025 identifying the required crop and handler OSP documents including the new input material lists. PJRFSI updated its “Organic Quality Manual” to include the requirement for informing an operation when a material is approved or denied. PJRFSI will create electronic denial and archive folders for storing operation documentation, as applicable. PJRFSI conducted in-house training on February 24, 2025, and NOP all staff training on March 17, 2025, regarding the updated crop and handler OSP input material lists and how to verify an operation’s planned use of inputs through the initial review, inspection and final review.

AIA-3321-24 - 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: *PJRFSI does not carry out the provisions of the Act and regulations. The auditors conducted witness audits and reviewed certification files and found that PJRFSI certification staff accepted incomplete or inaccurate organic system plans (OSP) and did not require the operation to provide the missing information. An OSP for an operation certified for multiple years did not contain a description of methods to prevent commingling and contamination, a complete description of private labeling and co-packing arrangements, and accurate information on product composition and use of material inputs.*

Corrective Action: PJRFSI required the operation in question to provide a co-packing agreement with product brand name, an updated product material list, and updated product composition profiles with accurate values. PJRFSI implemented a new electronic handler organic system plan (OSP) in February 2025 with controls requiring an operation to complete each question. PJRFSI is developing and testing an electronic OSP system for crop operations in 2025 with implementation to be

determined. PJRFSI conducted in-house training on February 24, 2025, and NOP all staff training on March 17, 2025, regarding PJRFSI's crop and handler OSPs, OSP addendums, inspection reports and review forms. The staff training included requirements and checklists to verify that an operation's OSP and supporting documents are complete and accurate, and to contact the operation for additional information or issue a notice of noncompliance as needed.

AIA-3324-24 - Accepted. 7 CFR § 205.501(a)(5) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Demonstrate that all persons with inspection or certification review responsibilities have sufficient expertise in organic production or handling techniques to successfully perform the duties assigned. Sufficient expertise must include knowledge of certification to USDA organic standards and evidence of education, training, or professional experience in the fields of agriculture, science, or organic production and handling that relates to assigned duties."

Comments: *PJRFSI personnel with certification review responsibilities do not have sufficient expertise in certification to USDA organic standards to perform the duties assigned. The auditors reviewed certification files and found PJRFSI issued a notice of noncompliance to an operation for a pesticide residue detection in a soil sample. PJRFSI did not follow the requirements of NOP Instruction 2613 Responding to Results from Pesticide Residue Testing and issued the noncompliance without evidence of application of prohibited substances and prior to initiating an investigation.*

Corrective Action: PJRFSI's manager and reviewer reviewed NOP 2613 to gain knowledge on this topic in order to provide in-house training to PJRFSI staff. PJRFSI developed "Certification Policies" prompting staff to follow the requirements of NOP 2613. PJRFSI conducted in-house training on February 24, 2025, and NOP all staff training on March 17, 2025, regarding NOP 2613 procedures for investigation, issuing noncompliances and when it is appropriate to take a soil sample.

AIA-3325-24 - Accepted. 7 CFR § 205.501(a)(5) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Demonstrate that all persons with inspection or certification review responsibilities have sufficient expertise in organic production or handling techniques to successfully perform the duties assigned. Sufficient expertise must include knowledge of certification to USDA organic standards and evidence of education, training, or professional experience in the fields of agriculture, science, or organic production and handling that relates to assigned duties."

Comments: *PJRFSI does not consistently ensure that its staff have sufficient expertise in ingredient and material input review prior to performing the duties assigned. The auditors reviewed certification files and found the following:*

- 1. PJRFSI approved non-organic food colorings not listed on § 205.606(d) for use in organic products.*
- 2. PJRFSI approved the use of a non-organic ingredient based on commercial availability search forms which indicated an equivalent organic product was commercially available.*
- 3. PJRFSI determined a crop material input was non-synthetic without sufficient evidence.*

Corrective Action: PJRFSI provided staff training on March 19, 2025, to use applicable NOP Handbook documents when conducting material reviews. PJRFSI issued the operation a combined notice of noncompliance and proposed suspension for the non-organic food colorings and other compliance issues. PJRFSI confirmed the crop operation surrendered certification therefore the crop material was not reviewed further. PJRFSI experienced staff will conduct final certification reviews using crop and handler review forms, prompting the reviewer to provide initial reviewers and inspectors with feedback on material reviews prior to determining an operation's compliance.

AIA-3326-24 - 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: *PJRFSI 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 export procedures and documents and found the following:*

1. *PJRFSI’s Organic Certification Manual includes outdated requirements for exporting organic products under NOP International Organic Equivalence Arrangements.*
2. *PJRFSI does not include the US-Canada Organic Equivalence Arrangement (USCOEA) attestation statement on organic certificates and/or certificate addendum per the requirements of the arrangement.*
3. *PJRFSI’s addendum identifies products as having "COR" compliance instead of compliance with the USCOEA.*
4. *PJRFSI does not have a process for verifying an operation’s compliance with the terms of organic equivalence arrangements, including a process for verifying compliance with specific international labeling requirements.*

Corrective Action: PJRFSI submitted the following corrective actions:

1. PJRFSI updated its “Organic Certification Manual” in May 2025 to include accurate information on exporting products to each country with an international organic equivalence arrangements and links to the NOP international trade partner webpages for additional information.
2. PJRFSI updated its organic certificate addendum language by adding the correct statement: “Certified in accordance with the terms of the U.S.-Canada Organic Equivalency Arrangement” (USCOEA) for qualifying organic products destined for Canada. PJRFSI developed the work instruction “Creating and Addendum (WI-33org)” in April 2025 prompting staff to issue an addendum with the correct equivalency attestations.
3. PJRFSI removed the reference to “COR” compliance from its organic certificate addendum.
4. PJRFSI updated its crop and handler OSP templates in February 2025 and April 2025 respectively, prompting reviewers to verify that an operations’ ingredients, products and labels meet the terms of organic equivalence arrangements:
 - a. PJRFSI updated its “Product List” prompting operations to disclose if they are exporting products.
 - b. PJRFSI updated its “Product Profile” to include a reviewer’s approval initials for product labels for export products.
 - c. PJRFSI updated its “Supplier List” prompting operations to disclose if they are importing and exporting ingredients or products.
 - d. PJRFSI updated its crop OSP section C4 to include a reviewer’s approval of product labels for export products.
5. PJRFSI’s current crops and handler inspection report templates prompt inspectors to verify an operation’s compliance with international trade arrangements and to list all countries where products will be exported to.

NATIONAL ORGANIC PROGRAM: AUDIT & CORRECTIVE ACTION REPORT

GENERAL INFORMATION

Certifier Name	Perry Johnson Registrar Food Safety, Inc. (PJRFSI)
Physical Address	755 West Big Beaver Road, Troy, Michigan 48084, U.S.A.
Audit Type	Initial Audit
Auditor(s) & Audit Dates	Joshua Lindau, Patricia Bursten, 03/29/2021 to 04/02/2021
Audit Identifier	NOP-9-21

CERTIFIER OVERVIEW

Perry Johnson Registrar Food Safety, INC. (PJRFSI) is a corporation originally accredited on August 2, 2019, to the USDA National Organic Program (NOP) for crops and handling operations. As of February 2021, PJRFSI had certified six operations to the following scopes: four Crops and two Handling/Processing. PJRFSI does not currently certify any grower groups. PJRFSI certifies operations in Michigan and Illinois.

PJRFSI conducts NOP certification activities from its main office in Troy, Michigan. PJRFSI's ten NOP certification staff include one Certification Reviewer and one Certification Reviewer/Inspector. PJRFSI also has five administration staff, a staff inspector, a strategic account manager, and an accreditation manager.

NOP DETERMINATION

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

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 the corrective actions were not effectively implemented. 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-2048-20 (NOP-56-18.NC1) – Cleared.

AIA-2049-20 (NOP-56-18.NC2) – Accepted. 7 C.F.R. § 205.403 (c)(1) - (2) states, “The on-site inspection of an operation must verify: The operation’s compliance or capability to comply with the Act and the regulations of this part;... That the information, including the organic production or handling system plan, provided in accordance with §§205.401, 205.406, and 205.200, accurately reflects the practices used or to be used by the applicant for certification or by the certified operation.”

Comments: *During witness audits of two operations (Crops and Processing/Handling) the auditor observed that the inspector did not fully verify the operation’s compliance with the regulations and the accuracy of the information in the organic system plans. Examples of missing verification include:*

- *Verifying crop inputs listed on the organic system plan with those on-site.*
- *Verifying cleaners/sanitizers listed on the organic system plan with those on-site and whether they are being used according to the procedures in the organic system plan.*
- *The crop operation’s organic system plan indicated monitoring of well water with testing, but the inspector did not review water test results to verify the operation’s monitoring practice.*
- *Processing operation – inspector did not adequately verify accuracy of the processing procedures in the OSP. Specifically, the inspector did not interview staff on the production floor (packaging product) to verify procedures that could not be observed.*
- *Verifying composition of finished product with production records.*
- *The inspector did not verify the finished product labels on file and approved by PJRFSI were those being used by the operation during the inspection.*

2019 Corrective Action: PJRFSI revised its WB-Crops and WB-Handling inspection report templates to include a check box that requires the inspector to confirm whether all sections of an operation’s OSP has been verified. PJRFSI also added verification of whether an inspector is verifying the accuracy of an operation’s OSP to its inspector witness audit checklist. PJRFSI provided the inspector with additional training on verification of an operation’s compliance with the USDA organic regulations and accuracy of an operation’s OSP. PJRFSI revised its Organic Quality Manual to state that all inspectors must complete the PJRFSI Organic Inspector Training Program prior to inspecting for PJRFSI.

2021 Verification of Corrective Action: PJRFSI’s inspectors do not fully verify an operation’s compliance with the USDA organic regulations and the accuracy of the information in organic system plans. In a review of inspection reports, auditors found that that PJRFSI inspection reports did not consistently include the following:

- *Verification that the crop rotation observed on a crop operation was compliant with the regulations. An inspector recorded that the operation’s the crop rotation was “as described on the OSP,” but the OSP did not include any crop rotation information.*
- *Verification that the list of equipment used in the production of organic products in the OSP matched those in use.*

- Verification of the traceability of organic products in the operation's organic system. The auditors also found that the PJRFSI inspection report templates did not include prompts for inspectors to record trace-back and mass balance exercises.

2022 Corrective Actions: As of October 24, 2021, PJRFSI updated its inspection report templates to include sections that prompt inspectors to verify an operation's compliance with §205.401, 205.406, and 205.200. The updated "PJRFSI Organic Inspection Report – Crops version 1.3" adds the following: Crop Rotation section, Equipment section, Simple On-farm Post-harvest Handling section, and a prompt for inspectors to complete a trace-back audit and a mass balance exercise. The updated "PJRFSI Organic Inspection Report – Handling version 1.3" adds the following: Equipment section, Sanitation section, and a prompt for inspectors to complete a trace-back audit and a mass balance exercise. PJRFSI hosted a training for staff on November 16, 2021, regarding the updates to the inspection report templates and the final review of the reports.

AIA-2050-20 (NOP-56-18.NC3) – Accepted. 7 C.F.R. § 205.402(a)(1)-(2) states, "Upon acceptance of an application for certification, a certifying agent must: Review the application to ensure completeness pursuant to § 205.401; 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 auditor's review of PJRFSI's initial review of applications and organic system plans (OSP) found that PJRFSI did not:*

- *Assess all input materials for compliance.*
- *Identify that the processing operation did not submit a facility map or flow chart with their application and OSP.*
- *Additionally, PJRFSI approved the application without this information.*

2019 Corrective Action: PJRFSI required the operation in question to add its cleaning materials to its OSP. PJRFSI revised its application review form to include verification questions for the listing and approval of all materials in an operation's OSP. The form also requires the reviewer to verify whether the operation has submitted maps and process flow charts, when applicable.

2021 Verification of Corrective Action: The auditors' review of certification files and interviews with certification staff found that:

- PJRFSI's review of an application did not determine whether the applicant was able to comply with the USDA organic regulations. PJRFSI reviewed an application in which prohibited materials were included on the OSP, but did not identify these materials as prohibited until after the inspection. PJRFSI then issued a combined notice of noncompliance and denial of certification to the operation.
- PJRFSI approved an incomplete application for certification. The auditors' review of an inspection report found the inspector noted the producer was engaged in post-harvest handling activities including the drying and packaging of finished product, but the OSP did not include required information regarding these activities. The inspector did not cite the information as missing from the OSP, and reviewers did not request the missing information from the operation for inclusion in the OSP.

2022 Corrective Actions: PJRFSI contracted an organic certification specialist to train PJRFSI staff and to aid with completing the initial review of an operation's application, material review,

and review for sufficient information to verify compliance. PJRFSI updated its Organic Quality Manual to state, “Initial review staff will demonstrate relevant experience and training history to review new applications and supporting documents for completeness to make a determination of ability to comply, or work under the oversight of a Certification Specialist with relevant experience.” The update includes the following reviewer training:

1. Review staff must complete the following Organic Integrity Learning Center training: Fundamentals of Inspection (NOP-030), Advanced Inspections: Investigations and Certification Review Essentials (NOP-070), Recordkeeping (NOP-140), Organic System Plans (NOP-150), and Input Material Review (NOP-120).
2. PJRFSI will conduct an assessment of the reviewer prior to reviewing certification files. New reviewers will complete the review of a renewal audit for their first review. Once completed, the new reviewer will meet with an experienced reviewer to go over findings and non-compliance report. The experienced reviewer may request that the new reviewer conduct additional renewal applications and have one on ones prior to completing initial reviews.

PJRFSI hosted a training November 16, 2021, covering application review, material review, inspections, certification reviews, and certification. All PJRFSI certification staff also completed the Sound and Sensible Organic Certification, Organic System Plan, and Recordkeeping training in the Organic Integrity Learning Center.

AIA-2051-20 (NOP-56-18.NC4) – Accepted. 7 C.F.R. § 205.501(a)(4) states, “A certifying agent under this subpart must: Use ... adequately trained personnel, including inspectors ... 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 observed the following during the witness audits:*

- *The inspector was unaware of accepted chlorine use and procedures found in NOP 5026. The inspector understood that a test for chlorine residue was required after chlorine is applied and allowed to dry on a food contact surface.*
- *The inspector did not appropriately conduct mass balance activities by verifying actual inventory on-site during the inspections.*
- *Inspectors have not been trained on sampling procedures.*

2019 Corrective Action: PJRFSI plans to conduct additional witness inspections of the inspector in question prior to approving the inspector to conduct additional organic inspections. PJRFSI revised and submitted its Organic Quality Manual to include requirements for inspector training, conducting witness audits of inspectors, and evaluation of training and knowledge prior to approving inspectors to conduct organic inspections independently.

2021 Verification of Corrective Action: The auditors’ review of certification files, personnel files and interview with staff found the following:

1. PJRFSI does not use sufficiently trained staff to conduct material reviews. One reviewer had not received relevant training, and the other had no record of receiving relevant training.
2. PJRFSI approved labels that did not include the “Certified organic by...” statement as required by §205.303(b)(2).

3. In all six inspection reports reviewed, the auditors found that no trace-back or mass balance exercises had been conducted at inspection. PJRFSI did not verify OSP and audit trail information during the inspection process or final review.

2022 Corrective Actions: PJRFSI contracted an organic certification specialist to train PJRFSI staff and to aid with completing the initial review of an operation's application, material review, and review for sufficient information to verify compliance. PJRFSI updated its Organic Quality Manual to state, "Initial review staff will demonstrate relevant experience and training history to review new applications and supporting documents for completeness to make a determination of ability to comply, or work under the oversight of a Certification Specialist with relevant experience." PJRFSI is also implementing the following:

1. The updated Organic Quality Manual requires review staff to complete the following Organic Integrity Learning Center training: Fundamentals of Inspection (NOP-030), Advanced Inspections: Investigations and Certification Review Essentials (NOP-070), Recordkeeping (NOP-140), Organic System Plans (NOP-150), and Input Material Review (NOP-120).
2. PJRFSI requested updated dated labels from the operation with noncompliant labels, received new labels and reviewed them for compliance. The new labels all contain the appropriate "Certified organic by..." statement as required by §205.303(b)(2).
3. PJRFSI hosted a training November 16, 2021, covering the PJRFSI updated the crop and handling inspection reports to version 1.3 which includes a prompt for inspectors to complete a trace-back audit and a mass balance exercise.

Noncompliances Identified during the Current Assessment

AIA-6269-21 – 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: *PJRFSI does not demonstrate the ability to fully comply with the requirements for accreditation. The auditors review of certification files and interviews with staff found the following:*

1. *Organic system plan (OSP) templates do not fully address the requirements of §205.201(a)(3), which require operators to provide a description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented.*
2. *The OSP for a split crop operation contained conflicting information regarding the status of organic and conventional crops produced on the operation.*
3. *The auditors' review of two OSPs found that there were multiple material input lists, some without issue dates. Certification staff were not readily able to explain the various lists. In one of operation's file, there were four different supplier lists with conflicting approval dates and information. In another file, there were three different supplier lists. These documents have no dates to indicate receipt or review, and it was not consistently possible to determine which list reflected current organic suppliers.*
4. *The auditors' review of a crop OSP found that the operation had reported planting conventional, untreated seed in specific fields. During the inspection, the inspector did not verify that the operation had attempted to source organic seed.*

5. *PJRFSI does not have a system in place to re-review its approved material inputs to verify compliance over time.*
6. *The policies and procedures in “PJRFSI-1org Organic Quality Manual” do not accurately reflect their certification activities. The steps outlined for documenting and responding to noncompliances identified by the internal audit were not executed as described.*
7. *The auditors’ review of the material review process found that PJRFSI does not communicate material restrictions or annotations to operators.*

Corrective Actions: PJRFSI hosted a training for staff and inspectors on November 16, 2021 that covered the updates to their OSP templates and inspection report templates which included the following changes:

1. PJRFSI included prompts in the OSP template for the operation to describe in detail the OSP monitoring practices and procedures.
2. PJRFSI included additional questions in the OSP FS-11crops Ver 1.2 template for an operation to further describe split and parallel production.
3. PJRFSI created the OSP addendums OSP FS-11cropmaterial and FS-11processingmaterial to capture materials and how they are used in detail. PJRFSI also updated the standard operating procedure SOP-01organic and PJRFSI Organic Quality Manual to include a formal procedure for dating material review
4. PJRFSI included prompts for seed search verification in the Crops Inspection report WB-Crops.
5. PJRFSI updated the standard operating procedure SOP-01organic and PJRFSI Organic Quality Manual to include a formal procedure for the re-review of previously approved materials and the documentation of the re-review’s determination.
6. PJRFSI updated its Organic Quality Manual to reflect its current practices. The Organic Quality Manual now states “Any notification of noncompliance, rejection of mediation, noncompliance resolution, proposed suspension or revocation, and suspension or revocation issued, and each response to such notification will be sent to the recipient's place of business via a delivery service which provides dated return receipts.”
7. PJRFSI updated the OSP FS-11crop material and FS-11processing material addendums to include a column noting the restriction and a column for the operation to describe, “How do you comply with restrictions, if applicable?”

AIA-6270-21 – 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: *PJRFSI does not consistently ensure that its certification staff have sufficient expertise in organic production or handling techniques prior to performing the duties assigned. The following evidence was identified:*

1. *PJRFSI issued a Notice of Noncompliance and a Notice of Resolution on the same day and for the same issue. The specific noncompliance was observed and resolved prior to the issuance of either notice as part of an OSP update that occurred during the inspection.*

2. *Interviews with certification personnel indicated that organic system plans lacking required information were being assigned to inspectors prior to receiving updates. In interviews, certification staff indicated that this was done to expedite the certification process.*

Corrective Actions: PJRFSI contracted an organic certification specialist to train PJRFSI staff and to aid with completing the initial review of an operation's application, material review, and review for sufficient information to verify compliance. PJRFSI hosted a certification staff training November 16, 2021 outlining the review an operation's application, OSP and supporting documents to determine compliance as well as the new PJRFSI staff requirements to be able to evaluate an application and OSP. PJRFSI is creating a checklist for the review of applications and OSPs. PJRFSI will implement the updated review document by end of 2022, prior to the next internal audit.

AIA-6271-21 – Accepted. 7 C.F.R. §205.501(a)(6) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Conduct an annual performance evaluation of 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 implement measures to correct any deficiencies in certification services.”

Comments: *PJRFSI did not conduct inspector field evaluations for all inspectors in 2020 and has not implemented an alternate proposal for inspector field evaluations per the requirements of NOP 2027 Personnel Performance Evaluations. The auditors' review of personnel files and interviews with staff found that PJRFSI is currently relying on inspector field evaluations from other accredited certifiers. Of three evaluations reviewed, one was incomplete and one had been conducted in 2017.*

Corrective Actions: The PJRFSI Organic Program Manager will schedule an annual field evaluation for all inspectors and track the evaluations to ensure that all are completed. PJRFSI may accept another certifier's inspector annual field evaluation. PJRFSI Organic Program Manager will also review the inspection report from the annual field evaluation to determine the inspector's effectiveness.

AIA-6272-21 – 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: *PJRFSI's 2019 program review report did not identify how proposed corrective actions will be addressed in a timely and appropriate manner. The auditors' review of the 2019 Internal Audit FS-703 found the following:*

1. *The internal auditor identified noncompliances in the two full certification files reviewed. The internal auditor noted that those files had missing and inaccurate information. PJRFSI did not issue noncompliances to operations based on the findings of the internal audit. Instead, PJRFSI issued letters to the operations requesting that the missing*

information be available at the next inspection or be included in the next annual OSP update.

2. *Corrective actions were not created and implemented for all of the noncompliances identified. The internal auditor noted four noncompliances in internal audit checklist, but only three corrective actions were written for implementation.*

Corrective Actions: PJRFSI hired an outside auditor with relevant expertise to conduct the annual program review of all PJRFSI's certification activities. PJRFSI's annual program review will assess corrective actions from prior program reviews, identify new findings, and identify how any proposed corrective actions will be addressed in a timely and appropriate manner. PJRFSI will inform personnel responsible for certification activities of the annual program review's findings. PJRFSI will create and implement corrective actions for all noncompliances identified by the annual program review.

AIA-6273-21 – 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: *PJRFSI does not always issue a notice of noncompliance to its certified operations when a noncompliance of the NOP Regulation has been found. In one file reviewed, the auditors observed that the Inspection Summary identified issues of concern for recordkeeping. None of those issues were noted on the FS-67 Organic Inspection Review Form, and no notice of noncompliance was sent to the operation.*

Corrective Actions: PJRFSI updated its “Organic Quality Manual for Perry Johnson Registrars Food Safety, Inc., Organic Review,” to include, “Certification review staff will demonstrate relevant experience and training history to qualify to review inspection reports and supporting documents to determine ability to comply with NOP Part 205.” PJRFSI contracted an organic certification specialist to train PJRFSI staff, conduct certification reviews and make recommendations for noncompliances identified. Once PJRFSI certification staff reviewers have relevant training and experience they will be tasked with the issuance of noncompliances. PJRFSI hosted a training for staff on November 16, 2021, that included certification reviews and issuing noncompliances.

AIA-6275-21 – Accepted. 7 C.F.R. §205.660(d) states, “Each notification of noncompliance, rejection of mediation, noncompliance resolution, proposed suspension or revocation, and suspension or revocation issued pursuant to §205.662, §205.663, and §205.665 and each response to such notification must be sent to the recipient's place of business via a delivery service which provides dated return receipts.”

Comments: *PJRFSI does not use a delivery service that provides dated return receipts when issuing the notifications listed in §205.660(d).*

Corrective Actions: PJRFSI now uses “Read Notify,” which provides dated return receipts, to send notifications by electronic mail. PJRFSI updated the Organic Quality Manual for Perry Johnson Registrars Food Safety, Inc., Decision of Certification section to state, “Each notification of noncompliance, rejection of mediation, noncompliance resolution, proposed suspension or revocation, and suspension or revocation issued, and each response to such notification will be sent to the recipient's E-mail via a delivery service, Read Notify which

provides dated return receipts.” PJRFSI hosted a training for staff on November 16, 2021, covering the requirement to use “Read Notify” when issuing notices of noncompliance, rejection of mediation, noncompliance resolution, proposed suspension or revocation, and suspension or revocation.

NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

AUDIT AND REVIEW PROCESS

An onsite Pre-decisional Audit of Perry Johnson Registrars Food Safety, Inc. organic program was conducted on November 26-30, 2018. The National Organic Program (NOP) reviewed the auditor's report to assess Perry Johnson Registrars Food Safety, Inc.'s compliance to the USDA organic regulations. This report provides the results of NOP's assessment.

GENERAL INFORMATION

Applicant Name	Perry Johnson Registrars Food Safety, Inc. (PJRFSI)
Physical Address	755 West Big River Road, Suite 1390 Troy, Michigan 48084
Mailing Address	755 West Big River Road, Suite 1390 Troy, Michigan 48084
Contact & Title	Lauren Maloney, Food Safety Program Accreditation Manager.
E-mail Address	lmaloney@pjrfsi.com
Phone Number	248-519-2523 ext. 4785
Reviewer Auditor	Jason Lopez, NOP Reviewer Penny Zuck, On-site Auditor.
Program	USDA National Organic Program (NOP)
Review Dates Audit Dates	Corrective Actions Review: July 8, 2019 NOP assessment review: February 26, 2019 Onsite audit: November 26 - 30, 2018
Audit Identifier	NOP-56-18
Action Required	Yes
Audit & Review Type	Pre-decisional Assessment
Audit Objective	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of PJRFSI's certification
Audit & Determination Criteria	<i>7 CFR Part 205, National Organic Program as amended</i>
Audit & Review Scope	PJRFSI's certification services in carrying out the audit criteria.

Perry Johnson Registrars Food Safety Inc. (PJRFSI) has applied for USDA National Organic Program accreditation for the scopes of crops and handling/processing.

PJRFSI is a for-profit company owned by Registrars Holding, Inc., located in Troy, Michigan. PJRFSI expects to initially certify approximately 75 operations to the NOP and they plan to offer certification services in all 50 states of the United States of America.

PJRFSI employs 6 staff members who will perform the NOP certification activities. The staff includes one Food Safety Accreditation Manager, and one Technical Advisor, 2 Inspectors/Certification Specialists, and 2 Administrative Staff.

The auditor conducted two witness audits. The auditor observed a crops inspection and a handling/processing inspection.

NOP DETERMINATION

The NOP reviewed the onsite audit results to determine whether PJRFSI'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.

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 “**Accepted**” indicates acceptance of the corrective actions and verification of corrective action implementation will be conducted during the next onsite audit.

NOP-65-17.NC1 – Cleared.
NOP-65-17.NC2 – Cleared.
NOP-65-17.NC3 – Cleared.
NOP-65-17.NC4 – Cleared.
NOP-65-17.NC5 – Cleared.
NOP-65-17.NC6 – Cleared.
NOP-65-17.NC7 – Cleared.
NOP-65-17.NC8 – Cleared.
NOP-65-17.NC9 – Cleared.
NOP-65-17.NC10 – Cleared.
NOP-65-17.NC11 – Cleared.
NOP-65-17.NC12 – Cleared.
NOP-65-17.NC13 – Cleared.
NOP-65-17.NC14 – Cleared.
NOP-65-17.NC15 – Cleared.
NOP-65-17.NC16 – Cleared.
NOP-65-17.NC17 – Cleared.

Noncompliances 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.

NOP-56-18.NC1 – Accepted. 7 C.F.R. § 205.642 states, “...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: *PJRFSI’s Fee Schedule does not explain when fees become nonrefundable. The PJRFSI Organic certification manual states, “An applicant who withdraws its application shall be liable for the cost of services provided up to the time of withdrawal of its application.”*

Corrective Actions: PJRFSI revised and submitted its fee schedule. The fee schedule explains which fees are refundable and when each fee becomes nonrefundable.

NOP-56-18.NC2 – Accepted. 7 C.F.R. § 205.403 (c)(1) - (2) states, “The on-site inspection of an operation must verify: The operation’s compliance or capability to comply with the Act and the regulations of this part;... That the information, including the organic production or handling system plan, provided in accordance with §§205.401, 205.406, and 205.200, accurately reflects the practices used or to be used by the applicant for certification or by the certified operation.”

Comments: *During witness audits of two operations (Crops and Processing/Handling) the auditor observed that the inspector did not fully verify the operation’s compliance with the regulations and the accuracy of the information in the organic system plans. Examples of missing verification include:*

- *Verifying crop inputs listed on the organic system plan with those on-site.*
- *Verifying cleaners/sanitizers listed on the organic system plan with those on-site and whether they are being used according to the procedures in the organic system plan.*
- *The crop operation’s organic system plan indicated monitoring of well water with testing, but the inspector did not review water test results to verify the operation’s monitoring practice.*
- *Processing operation – inspector did not adequately verify accuracy of the processing procedures in the OSP. Specifically, the inspector did not interview staff on the production floor (packaging product) to verify procedures that could not be observed.*
- *Verifying composition of finished product with production records.*
- *The inspector did not verify the finished product labels on file and approved by PJRFSI were those being used by the operation during the inspection.*

Corrective Actions: PJRFSI revised its WB-Crops and WB- Handling inspection report templates to include a check box that requires the inspector to confirm whether all sections of an operation’s OSP has been verified. PJRFSI also added verification of whether an inspector is verifying the accuracy of an operation’s OSP to its inspector witness audit checklist. PJRFSI provided the inspector with additional training on verification of an operation’s compliance with the USDA organic regulations and accuracy of an operation’s OSP. PJRFSI revised its Organic Quality Manual to state that all inspectors must complete the PJRFSI Organic Inspector Training Program prior to inspecting for PJRFSI.

NOP-56-18.NC3 – Accepted. 7 C.F.R. § 205.402(a)(1)-(2) states, “Upon acceptance of an application for certification, a certifying agent must: Review the application to ensure completeness pursuant to § 205.401; 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 auditor's review of PJRFSI's initial review of applications and organic system plans (OSP) found that PJRFSI did not:*

- *Assess all input materials for compliance.*
- *Identify that the processing operation did not submit a facility map or flow chart with their application and OSP. Additionally, PJRFSI approved the application without this information.*

Corrective Actions: PJRFSI required the operation in questions to add its cleaning materials to its OSP. PJRFSI revised its application review form to include a verification questions for the listing and approval of all materials in an operation's OSP. The form also requires the reviewer to verify whether the operation has submitted maps and process flow charts, when applicable.

NOP-56-18.NC4 - Accepted. 7 C.F.R. § 205.501(a)(4) states, "A certifying agent under this subpart must: Use ... adequately trained personnel, including inspectors ... 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 observed the following during the witness audits:*

- *The inspector was unaware of accepted chlorine use and procedures found in NOP 5026. The inspector understood that a test for chlorine residue was required after chlorine is applied and allowed to dry on a food contact surface.*
- *The inspector did not appropriately conduct mass balance activities by verifying actual inventory on-site during the inspections.*
- *Inspectors have not been trained on sampling procedures.*

Corrective Actions: PJRFSI plans to conduct additional witness inspections of the inspector in question prior to approving the inspector to conduct additional organic inspections. PJRFSI revised and submitted its Organic Quality Manual to include requirements for inspector training, conducting witness audits of inspectors, and evaluation of training and knowledge prior to approving inspectors to conduct organic inspections independently.