



United States Department of Agriculture

Agricultural Marketing Service

National Organic Program

A Bee Organic, LLC

De Luz, California, U.S.A.

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

7 CFR Part 205

(As amended)

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 No: **NP5229RYA**
Effective Date: **April 28, 2015**
Expiration Date: **April 28, 2020**


Miles V. McEvoy
Deputy Administrator
National Organic Program



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CERTIFICATE OF ACCREDITATION

NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

AUDIT AND REVIEW PROCESS

The National Organic Program (NOP) conducted a renewal assessment of A Bee Organic, LLC (ABO). The NOP has reviewed ABO's application for renewal of accreditation, conducted an audit, and reviewed the audit report to determine ABO's capability to operate as a USDA-accredited certifier. This report provides the results of the review of ABO's corrective actions.

GENERAL INFORMATION

Applicant Name	A Bee Organic, LLC (ABO)
Physical Address	40707 Daily Road, De Luz, CA 92028
Mailing Address	40707 Daily Road, De Luz, CA 92028
Contact & Title	Sara Costin, Administrator Director
E-mail Address	sarah@abeeorganic.com
Phone Number	760-731-0155
Reviewer(s) & Auditor(s)	Penny Zuck, NOP Reviewer; Robert Yang, Nikki Adams, and Jason Lopez, Onsite Auditors.
Program	USDA National Organic Program (NOP)
Review & Audit Date(s)	Corrective Action review: May 16, 2016 – October 14, 2016 NOP assessment review: March 11, 2016 Onsite audit: Witness inspections - July 28, 2015; September 3, 2015 Office audit - August 17-19, 2015
Audit Identifier	NP5229RYA
Action Required	No
Audit & Review Type	Renewal Assessment
Audit Objective	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of ABO's certification system.
Audit & Determination Criteria	<i>7 CFR Part 205, National Organic Program as amended</i>
Audit & Review Scope	ABO's certification services in carrying out the audit criteria during the period May 10, 2012 through August 19, 2015.

A Bee Organic, LLC (ABO) is a for-profit Member-Managed Limited Liability Corporation that has been accredited by the USDA National Organic Program (NOP) since April 28, 2010 to certify crops, wild crops, livestock, and handling operations. ABO currently certifies 103 operations, which include 48 crops, 2 wild crops, 2 livestock, and 54 handling operations. ABO does not certify grower groups.

NOP DETERMINATION:

NOP reviewed the onsite audit results to determine whether ABO'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.

NP2128ADA.NC1 – Cleared

AIA14244RKA.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.

NP5229RYA.NC1 – Accepted. 7 CFR § 205.662(c)(1)-(4) states, "When correction of a noncompliance is not possible, the notification of noncompliance and the proposed suspension or revocation of certification may be combined in one notification. The notification of proposed suspension or revocation of certification shall state: The reasons for the proposed suspension or revocation; the proposed effective date of such suspension or revocation; the impact of a suspension or revocation on future eligibility for certification; and the right to request mediation pursuant to § 205.663 or to file an appeal pursuant to § 205.681."

Comments:

- *ABO issued two combined notices of noncompliance and proposed suspension that stated the operation's right to rebut or correct the noncompliance. The notifications also did not state the proposed effective date of such suspension; the impact of a suspension or revocation on future eligibility for certification; and the right to request mediation pursuant to § 205.663 or to file an appeal pursuant to § 205.681. One notification was incorrectly titled, "Combined Notification of Noncompliance with Proposed Suspension of Certificate."*
- *ABO's Certification Policies and Procedures Guide (version 2, October 2014) incorrectly allows for the review of rebuttal or corrections of noncompliances after the issuance of a notification of proposed suspension or proposed revocation.*

2016 Corrective Action: ABO will have an additional staff person, other than the one writing the notice, review the notices prior to sending. The notifications of Proposed Suspension and Proposed Revocation have been revised and no longer include the operation's right to rebut or correct the noncompliance(s) and include two signature lines to verify the second staff person is reviewing the notice to avoid the recurring of this noncompliance. ABO revised the Certification

Policies and Procedures Guide (Version 4, April 2016) to remove the references to rebuttal or correction when referring to proposed suspension (with or without Notification of Noncompliance), suspension, proposed revocation (with or without Notification of Noncompliance), or revocation. ABO submitted copies of the revised Notification of Proposed Suspension, Notification of Proposed Revocation, and Certification Policies and Procedures Guide.

NP5229RYA.NC2 – Accepted. 7 CFR § 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.” NOP 2027 Instruction Performance Evaluations states, “Certifying agents conducting performance reviews should use the following kinds of evaluation criteria ... Inspectors should be evaluated during an onsite inspection by a supervisor or peer (another inspector) at least annually.”

Comments: *ABO does not conduct field evaluations of its inspectors annually; only when there are concerns with an inspector's performance.*

2016 Corrective Action: ABO revised the Administrative Policies and Procedures Guide – Performance Evaluation section to state “*Staff inspectors are evaluated per job at review. Field evaluations of staff inspectors will be completed annually. Field evaluations of contracted inspectors are requested by A Bee Organic from the individual inspector. If the inspector has not been field evaluated during the current year, A Bee Organic will work with other certifiers through the Accredited Certifiers Association to complete field evaluations and share the results. IOIA accreditation witness audits are accepted by A Bee Organic as field evaluations.*” Changes to the Administrative Policies and Procedures Guide will be reviewed at the 2016 trainings for staff and inspectors. The staff and inspector training agendas were submitted to the NOP and ABO will collect signatures of attendees.

NP5229RYA.NC3 – Accepted. 7 CFR § 205.501(a)(16) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Charge applicants for certification and certified production and handling operations only those fees and charges that it has filed with the Administrator.”

Comments: *At the time of the office audit, ABO was charging applicants and certified operations according to its updated 2015 Organic Certification Fee Schedule, which ABO had not filed with the Administrator.*

2016 Corrective Action: ABO submitted the 2016 fee schedule in January 2016 and a revised fee schedule in April 2016. ABO submitted copies of the emails sent to the NOP with these fee schedules. ABO submitted a copy of the new policy adopted and included in the Certification Policies and Procedures Guide to prevent the reoccurrence of this noncompliance. The new policy outlines the process of new fee schedules being approved and submitted to the NOP. This new policy is included on the agenda for the 2016 staff training.

NP5229RYA.NC4 – Accepted. 7 CFR § 205.406(d) states, “If the certifying agent determines that the certified operation is complying with the Act and the regulations in this part and that any of the information specified on the certificate of organic operation has changed, the certifying

agent must issue an updated certificate of organic operation pursuant to § 205.404(b).” NOP 2603 Instruction Organic Certificates states, “3.4 Organic certificates should be updated at least annually -- Certifying agents should issue a new organic certificate each year.... These updated certificates may be issued after reviewing the annual update or after the annual inspection is completed.”

Comments: *ABO's practices do not comply in the following manner:*

- *ABO issued a certified operation an updated certificate on July 30, 2013 and subsequently on March 24, 2015. An interview with certification staff indicated that the operation was in the process of applying for an additional certification scope, and therefore ABO decided not to issue an updated certificate until the operation was certified for the additional scope. In lieu of an updated certificate, ABO issued the operation a letter on October 14, 2014 stating that the operation had “completed their annual audit for continuation in organic certification on September 15, 2014 and continues in good standing.”*
- *ABO's Notice of Noncompliance Resolution states, “When A Bee Organic has received the signed contract and payment, your operation will be issued your Organic Certificate and Certificate Addendum.” An interview with certification staff indicated that in lieu of issuing a certified operation a notification of noncompliance for nonpayment of certification fees, ABO does not issue the certified operation its updated certificate until the fees are received.*

2016 Corrective Action:

- ABO revised the policy on issuing certificates located in the Certification Policies and Procedures Guide. The revised policy indicates ABO will issue certificates when an operation annually updates its OSP, regardless of new scopes being requested. This revised policy is included on the agenda for the 2016 staff training.
- ABO revised the “Notification-Corrections Accepted” template. The revised notice indicates the client’s updated certificate and addendum is issued with the notice. The notice was also revised to include a statement requiring payment of fees to avoid further noncompliance. This document revision is included on the agenda for the 2016 staff training.

NP5229RYA.NC5 – Accepted. 7 CFR § 205.501(a)(21) states, “A private or governmental entity accredited as a certifying agent under this subpart must: ... implement, and carry out any other terms and conditions determined by the Administrator to be necessary.”

Comments: *ABO's process for verifying certified organic products exported/imported under an equivalency or export arrangement and applicable documents do not comply in the following manner:*

- *ABO uses a label review checklist when verifying whether a product label is compliant. The checklist does not include verification of whether the labeling of product exported under an equivalency meets the requirements of the country the product is being exported to (i.e. EU, Canada, Korea, and Japan). Additionally, it could not be determined whether the product labels ABO had on file for products exported to the EU, Canada, and Korea under the equivalency arrangements were reviewed and approved because the review and the results of the review were not documented.*
- *For certified operations that use organic product imported under an equivalency arrangement to produce/handle organic products, ABO does not verify whether the*

operation has an NOP import certificate for the imported product. For organic products imported under the US-EU Equivalency Arrangement, ABO only requires the operations to submit a valid EU organic certificate. During the witness inspection of a handling operation that was using EU-certified products imported under the US-EU Equivalency Arrangement, it was observed that the inspector only verified whether valid EU organic certificates were on-file.

- ABO's handling organic system plan does not require an operation to provide information regarding whether the operation is using/plans to use certified organic products imported under an equivalency arrangement to produce certified organic products.
- ABO's Certification Policies and Procedures Guide incorrectly states:
 - In the requirements for export of U.S. organic products to the European Union section, "Handlers may verify compliance: ... With documentation of compliance to European or IFOAM standards."
 - In the requirements for export of U.S. organic products to the Canada section, "Handlers may verify compliance: ... With documentation of compliance to European or IFOAM standards."
 - In the requirements for export of U.S. organic products to Japan section, "A Bee Organic requires documentation that these products have been produced in accordance with the Japanese organic standards."
 - In the requirements for export of U.S. organic products to Taiwan section, "A Bee Organic requires documentation that these products have been produced in accordance with the Taiwanese organic standards."
- ABO does not maintain a log for export certificates issued for products exported to Taiwan or Japan.

2016 Corrective Action:

- ABO submitted a copy of their revised label review worksheet which includes verification questions regarding labels for export. This corrective action is accepted.
- Results of the label reviews for products being exported according to trade arrangements will be documented on the revised label review worksheet, which will be stored in the applicable online client files. This corrective action is accepted.
- ABO will inform all handlers that maintenance of import certificates for equivalency arrangements will be verified at annual onsite audits. A copy of the email notification that was sent to the handlers was submitted to the NOP.
- ABO submitted the revised Certification Policy and Procedure Guide which includes an import section including requirements for importing and exporting organic products. This corrective action is accepted.
- ABO has revised its requirements to include NOP import certificates for products being imported under the US-EU Equivalency Arrangement. ABO submitted revised inspection report templates for handlers and traders which now include the requirement to verify import certificates. This corrective action is accepted.
- ABO created a Handler Import/Export Guide, which was provided to all handlers, both certified and in the application process, on May 27, 2016.
- ABO submitted the revised Certification Policy and Procedure Guide with incorrect statements removed. All incorrect statements have been replaced with language copied from the NOP international directives for each country.

- ABO submitted the revised Certification Policy and Procedure Guide which includes procedures for creating and maintaining export certificate logs. ABO also submitted copies of the export certificate logs to the NOP. The revised procedures are included on the agenda for the 2016 staff training.

NP5229RYA.NC6 – Accepted. 7 CFR § 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: *ABO sends all notifications of noncompliance, rejection of mediation, noncompliance resolution, proposed suspension or revocation, and suspension or revocation to its clients via email, either using Microsoft Outlook or Google Mail, which do not provide dated return receipts.*

2016 Corrective Action: ABO has subscribed to a registered email service which provides time date stamped proof of delivery and delivery audit trail for notices sent via this service. The delivery audits will be kept in the clients’ online files. ABO submitted copies of receipts being obtained for notices that were sent to clients. This new procedure is included on the agenda for the 2016 staff training.

NP5229RYA.NC7 – Accepted. 7 CFR § 205.662(a)(1)-(3) 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. Such notification shall provide: a description of each noncompliance; the facts upon which the notification of noncompliance is based; and the date by which the certified operation must rebut or correct each noncompliance and submit supporting documentation of each such correction when correction is possible.”

Comments: *ABO issued a certified operation a “Notification Potential Noncompliance” to inform the operation that there was not enough information to determine whether the material the operation had used without pre-approval from ABO could be allowed for use, and to request additional information regarding the material. The notification additionally informed the operation to “not package or sell the olive oil or olives as organic until further notice.”*

2016 Corrective Action: ABO informed all certification staff that only approved current versions of notifications may be used. ABO will include the proper use of all forms, letters, and notifications on the agenda for the 2016 staff training.

NP5229RYA.NC8 – Accepted. 7 CFR § 205.403(a)(2)(iii) states, “Additional inspections may be announced or unannounced at the discretion of the certifying agent.” NOP 2609 Instruction Unannounced Inspections states, “An unannounced inspection should not include prior notification of the inspector’s arrival. However, there may be special cases where extenuating circumstances make it impossible to conduct an unannounced inspection of the operation without prior notification (e.g. biosecurity issues). In such cases, the certifying agent may notify the operation up to four (4) hours prior to the inspector arriving on-site to ensure that appropriate representatives are present.”

Comments: *ABO's Certification Policies and Procedures Guide states, "A Bee Organic will call the operation prior to the inspector's arrival. The timing of the call will be specific to the operation." This does not fully meet the requirement. Unannounced inspections should not include prior notification of the inspector's arrival. However, if required, notification should not occur more than four (4) hours prior to the inspector arriving on-site. ABO's procedure both requires a phone call, and does not specify when it will occur.*

2016 Corrective Action: ABO submitted the revised Certification Policies and Procedures Guide which states, *"A qualified inspector is assigned to perform unannounced inspections. If extenuating circumstances make it impossible to conduct an unannounced inspection of the operation without prior notification, A Bee Organic may notify the operation up to four (4) hours prior to the inspector arriving on-site to ensure that appropriate representatives are present."* ABO will include unannounced inspections training on the agendas for the 2016 staff training and 2016 inspector training.

NP5229RYA.NC9 – Accepted. 7 CFR § 205.642 states, "The certifying agent shall provide each applicant ... an estimate of the annual cost of updating the certification."

Comments: *ABO does not currently provide its certified clients with an estimate of the annual cost of updating the certification. ABO issues its certified clients a Renewal Application Invoice. However, the invoice does not provide the operation with an estimate of the annual cost of updating the certification.*

2016 Corrective Action: ABO has revised its accounting procedure to send a total cost estimate to renewal operations 2 months before the anniversary date. An invoice will follow 1 week after the estimate. Estimates and invoices are uploaded to the operation's online file and will be available for view.

NP5229RYA.NC10 - Accepted. 7 CFR § 205.501(a)(4) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Use ... adequately trained personnel, including inspectors ... to comply with and implement the organic certification program established under the Act and the regulations in subpart E of this part."

Comments: *During the witness inspection of a split handling operation, the following was observed:*

- *The operation was labeling a non-certified Organic Raw Blue Agave Nectar product as certified organic and also having its certified organic products relabeled at an uncertified, offsite storage company. The inspector did not address the operation's noncompliant practices as issues of concern.*
- *The operation was repackaging EU-certified organic products imported under the US-EU Equivalency Arrangement. The inspector did not verify whether NOP import certificates for the imported products were on-file.*

2016 Corrective Action:

- ABO has included this scenario on the agenda for the 2016 inspector training to educate inspectors on the need for clear, documented information in reports. "Issues of Concern" will be reviewed along with the difference between observing and reporting or making certification decisions onsite.
- ABO submitted the revised Certification Policies and Procedures Guide which includes the addition of import procedures for ABO, clients, and verification by inspectors. ABO submitted the revised handler inspection report which includes questions to be asked by

the inspector and a directive to verify import and export documents and to perform an audit of product to include import/export documents as applicable. The revised procedures and forms will be on the agenda for the 2016 inspector training.

NP5229RYA.NC11 – Accepted. 7 CFR § 205.501(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: *Of the seventeen personnel files reviewed, five were missing a 2015 conflict of interest disclosure report. Three were Administrative Council members and two were contracted inspectors.*

2016 Corrective Action: ABO revised the ABO Administrative Policies and Procedures Guide to include an annual review to check that all signed, dated conflict of interest and confidentiality statement for ABO personnel and independent contractors are provided annually and that new personnel and /or independent contractors sign these documents prior to accessing client files. The revised guide with this information was submitted to the NOP.

NP5229RYA.NC12 – Accepted. 7 CFR § 205.501(a)(9) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Maintain all records pursuant to § 205.510(b) and make all such records available for inspection.”

Comments: *All records pursuant to § 205.510(b) were not available for inspection during the office audit. The following are examples of records that were not available:*

- *The inspection report, a record of the inspection report review, and notification of ABO’s findings to an operation ABO conducted an additional inspection of as part of a pesticide residue investigation.*
- *Cost estimates provided to two new applicants and one certified operation continuing certification.*
- *Emails sent to four certified operations in which ABO provided the operations with a copy of their analysis results.*
- *Email communication with two certified operations to whom ABO issued notices of noncompliances.*
- *An applicant’s request to withdraw its application for certification.*

2016 Corrective Action: ABO informed the auditor they suffered a loss of documents at the end of June, 2015. The documents had all been backed up on dropbox but not all were restored prior to the audit. All files have since been restored. Prior and current year documents have been moved to ABO’s new online database system and older files have been backed up to hard copy and are stored in dropbox. This implemented action is proving effective in preventing a reoccurrence as the system can be audited on request.

NP5229RYA.NC13 – Accepted. 7 CFR § 205.403(a)(1) states, “A certifying agent must conduct an initial on-site inspection of each production unit, facility, and site …. An on-site inspection shall be conducted annually thereafter for each certified operation that produces or

handles organic products for the purpose of determining whether to approve the request for certification or whether the certification of the operation should continue.”

Comments: *ABO's Certification Policies and Procedures Guide states, "1.4 Onsite Inspections. Handlers- Brokers/Distributors/Traders who do not take possession of product and conduct their business and store records electronically i.e. do not have a physical place of business may be inspected via conference sharing of all relevant documents and records necessary to verify compliance. Applicants will be instructed to have an authorized representative who is knowledgeable of the operation available for the onsite or conferencing inspection." An interview with certification staff revealed that for annual inspections of handling operations that do not take possession of product and conduct their business and store records electronically, ABO does not always conduct an onsite inspection. ABO's inspector may meet the operator at a location that is different from the certified operation's and conduct an inspection of the operation's electronic records on the representative's laptop.*

2016 Corrective Action: ABO revised its Certification Policies and Procedures Guide to include *"Handlers-Brokers/Distributors/Traders who do not take possession of product and conduct their business and store records electronically, i.e. do not have a physical place of business, will be inspected at their site that is included in the operation for which certification is requested."* This procedure change is on the agenda for the 2016 staff and inspector trainings.

NP5229RYA.NC14 – 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: *The procedures and documents ABO submitted as demonstration of its ability to fully comply do not comply in the following manner:*

- *ABO's unannounced inspections policy does not fully demonstrate how it will meet the requirement to conduct a minimum of five percent of ABO's total certified operations per year. ABO's Certification Policies and Procedures Guide states, "Unannounced inspections will be performed in each category unless there is a category with two or less certified operations, resulting in continuing unannounced inspections of these operations."*
- *ABO's Notice of Noncompliance template for certified operations incorrectly cites 7 CFR § 205.405(b) as the operation's rights upon receiving such notice.*
- *ABO's certification contract template incorrectly states, "Rights and Responsibilities. Withdrawal of Application: The Operation may withdraw from the certification process at any time, unless there is a current investigation of a certified operation." Pursuant to 7 CFR § 205.402(c), an applicant for certification may withdraw its application at any time.*

2016 Corrective Action:

- ABO submitted the revised Certification Policies and Procedures Guide which states, *"An annual minimum of 5% of certified operations, based on number of clients at end of November of the current year, will be subject to unannounced inspections."* ABO has implemented a practice of assigning unannounced inspections and residue testing during the first quarter of the year based on 5% of the expected total certified operations at the end of the year. This revised procedure is on the agenda for the 2016 inspector training.

- ABO submitted the revised Notice of Noncompliance template. The revised template no longer cites 7 CFR § 205.405(b).
- ABO submitted the revised Notice of Noncompliance template which states, *CFR 7 §205.402 (c) states that* " *The applicant may withdraw its application at any time. An applicant who withdraws its application shall be liable for the costs of services provided up to the time of withdrawal of its application. An applicant that voluntarily withdrew its application prior to the issuance of a notice of noncompliance will not be issued a notice of noncompliance. Similarly, an applicant that voluntarily withdrew its application prior to the issuance of a notice of certification denial will not be issued a notice of certification denial.*"

AUDIT INFORMATION

Applicant Name:	A Bee Organic, LLC
Est. Number:	N/A
Physical Address:	40707 Daily Road, De Luz, CA 92028
Mailing Address:	40707 Daily Road, De Luz, CA 92028
Contact & Title:	Sarah Costin, Member Partner; Ro Elgas, Member Partner
E-mail Address:	sarah@abeeorganic.com ; ro@abeeorganic.com
Phone Number:	(760) 731-0155
Auditor(s):	Lars Crail, NOP AIA Accreditation Manager
Program:	USDA National Organic Program (NOP)
Audit Date(s):	June 15, 2012
Audit Identifier:	NP2128ADA
Action Required:	No
Audit Type:	Correct Action Review - Initial Assessment
Audit Objective:	To review certifying agent submitted noncompliance corrective actions and determine if the measures should be accepted by the NOP.
Audit Criteria:	<i>7 CFR Part 205 National Organic Program, Final Rule</i> , dated December 21, 2000; updated March 15, 2012. NOP 2608, Instruction – Responding to Noncompliances.
Audit Scope:	ABO submitted corrective actions corresponding to the noncompliances issued on May 24, 2012.
Location(s) Audited:	Desk

A Bee Organic, LLC (ABO) was originally accredited as a NOP certifying agent on April 28, 2010 for crops, wild crops, livestock, and handling. ABO is currently certifying 29 operations in the United States (CA, AZ, UT, and VA). On May 7 – 10, 2012, NOP conducted an onsite audit of ABO to fulfill the requirement of a NOP Initial Accreditation Assessment.

On May 24, 2012, ABO was issued a Notice of Noncompliance for one noncompliance (NP2128ADA.NC1) identified during the onsite audit. ABO submitted corrective actions to the NOP on June 8, 2012.

FINDINGS

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

NP2128ADA.NC1 – Accepted - NOP §205.663 states, "...If the certifying agent rejects the request for mediation, the certifying agent shall provide written notification to the applicant for certification or certified operation. The written notification shall advise the applicant for certification or certified operation of the right to request an appeal, pursuant to §205.681, within 30 days of the date of written notification of rejection of the request for mediation." A review found that while ABO does have a form in place, the *"Notification of Rejection of Mediation Request"* form, it was not used to reply to the client denying the request for mediation. Therefore, the right to appeal and timeline were not addressed. **Corrective Actions:** ABO conducted a review of its adverse action procedures and corresponding forms on June 8, 2012 and provided NOP with a record of the event. ABO will perform additional training of adverse action procedures and forms prior to its annual reporting date. The corrective actions submitted for NC1 by ABO are accepted.