



CERTIFICATE OF ACCREDITATION



# United States Department of Agriculture

Agricultural Marketing Service

National Organic Program

***AGRICULTURAL SERVICES CERTIFIED ORGANIC***

***2 Rodgers Road, Salinas, California, 93907, 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-29-24**

Effective Date: **04/07/2021**

Expiration Date: **04/07/2026**

Issue Date: **10/10/2024**

**Jennifer Tucker, Ph.D.**  
**Deputy Administrator**  
**National Organic Program**

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## **NATIONAL ORGANIC PROGRAM: AUDIT AND CORRECTIVE ACTION REPORT**

### **GENERAL INFORMATION**

- **Certifier Name** Agricultural Services Certified Organic, (ASCO)
- **Physical Address** 2 Rodgers Road, Salinas, California 93907, U.S.A
- **Audit Type** Renewal Audit
- **Auditor(s) & Audit Dates** Sherry Aultman, Patricia Bursten, Samuel Schaefer-Joel, 02/01/2021 to 02/02/2021
- **Audit Identifier** NOP-91-20

### **CERTIFIER OVERVIEW**

Agricultural Services Certified Organic (ASCO) is a for-profit Limited Liability Corporation established by Articles of Incorporation filed with the State of California on April 15, 2004. ASCO was accredited as a certifying agent to the USDA National Organic Program (NOP) on April 7, 2006, for the scopes of crops, wild crops, livestock, and handling/processing operations.

ASCO currently has 142 certified operations with 88 crops, 44 processor/handlers, and one grower group. ASCO's certified operations are located in the United States, mainly in California and Arizona. ASCO does not currently certify any wild crops or livestock operations.

All certification activities are conducted through the ASCO office located in Salinas, California. ASCO has 17 employees: three certification reviewer/officers, seven inspectors (staff and contracted), one staff general manager, two administrative staff, one director/owner, one staff chief inspector, and, when needed, two contract consultants.

### **NOP DETERMINATION**

NOP reviewed the audit results to determine whether ASCO'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 "**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**

None.

### **Noncompliances Identified during the Current Assessment**

**AIA-5726-21 – Accepted.** 7 C.F.R. §205.670(g) states, “If test results indicate a specific agricultural product contains pesticide residues or environmental contaminants that exceed the Food and Drug Administration's or the Environmental Protection Agency's regulatory tolerances, the certifying agent must promptly report such data to the Federal health agency whose regulatory tolerance or action level has been exceeded. Test results that exceed federal regulatory tolerances must also be reported to the appropriate State health agency or foreign equivalent.”

**Comments:** *ASCO does not fully carry out the procedures of NOP 2613 Instruction Responding to Results from Pesticide Residue Testing. The auditors' review of three pesticide residue analysis reports, two with no detected residues and one detection below 5 percent of the EPA tolerance, found that ASCO sent a notification with the test results, but did not indicate that the product may be sold as organic.*

**Corrective Actions:** ASCO submitted a revised DOC 132 Notification Pesticide Residues letter which now includes checkboxes to indicate that the product may or may not be sold as organic, as applicable to the test results. ASCO management reviewed NOP 2613 Instruction Responding to Results from Pesticide Residue Testing and the revised notification letter in February 2021. All staff were notified of the letter updates during ASCO staff meetings in March and April 2021.

**AIA-5727-21 – Accepted.** 7 C.F.R. §205.403(c)(1) states, “The onsite inspection of an operation must verify: The operation's compliance or capability to comply with the Act and the regulations in this part.”

**Comments:** *ASCO's inspectors do not always verify an operation's compliance with the recordkeeping requirements of §205.103(b)(2), which requires that records must fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited. The auditors' review of three operations' inspection reports found that ASCO inspectors are not consistently performing traceability exercises during the inspection.*

**Corrective Actions:** ASCO submitted new inspector audit trail templates implemented on March 20, 2022: DOC 182(a) Mass Balance/Yield Analysis Crop, 182(b) Mass Balance/Yield Analysis Processor, DOC 107(c) Mass Balance Livestock, DOC 183(a) Traceability Crop, DOC 183(b) Traceability Processor, and DOC 107(b) Traceability Livestock. ASCO also allows inspectors to record audit trail documentation in a narrative format in the inspection report as long as it captures the same information as stated in the documents above. ASCO submitted DOC 11c Inspector Check Off List Crop, DOC 11a Inspector Check Off List Processor, and DOC 11F Inspector Check Off List Livestock implemented April 20, 2022, which instructs inspectors to use these new templates or the narrative format when conducting inspection audit exercises. ASCO submitted DOC 034 Quality Management System Administrative Procedures,

revised April 20, 2022, instructing inspectors to conduct at least one Mass Balance audit and one Trace Back audit at each inspection and states that final reviewers are required to conduct a thorough review of the inspection audit documentation. All ASCO staff have completed OILC NOP 080 Traceability Techniques.

**AIA-5729-21 – Accepted.** 7 C.F.R. §205.501(a)(3) states “A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670.”

**Comments:** *ASCO is not consistently verifying an operation’s compliance with §205.303(b). The auditors’ review of the certification files for one operation found that ASCO had approved two labels where the “certified organic by” statement was not located on the information panel, below the information identifying the handler or distributor of the product.*

**Corrective Actions:** ASCO submitted updated labels for the noncompliant operation showing the compliant placement of the “certified organic by” statement. ASCO updated DOC 007 Organic Label Review Checklist, which now includes the complete text of NOP labeling regulations as checkpoints. ASCO management and staff reviewed the updated label checklist and NOP Online Training on Subpart D during the staff meetings in March and April 2021. All staff were encouraged to complete OILC NOP 160 Organic Regulations and Retail Labeling, and seven out of ten staff had completed the training as of April 2022.

**AIA-8878-21 – Accepted.** 7 C.F.R. §205.501(a)(3) states “A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670.”

**Comments:** *ASCO is not consistently verifying an operation’s compliance with §205.270(b)(1) and is not maintaining documentation supporting the approval of non-organic and non-agricultural ingredients used in organic products. The auditors’ review of the certification file for one operation found that ASCO did not have documentation to demonstrate that ASCO verified commercial availability information for two non-organic ingredients. Additionally, the auditors’ review of other certification files found that ASCO did not have documentation demonstrating that the use of a non-agricultural ingredient complied with the National List annotation.*

**Corrective Actions:** ASCO submitted documentation demonstrating that the noncompliant operations either removed products from their certificate or obtained commercial availability documentation. ASCO submitted an updated DOC 013(a) Organic Commercial Availability Sourcing Verification implemented February 2022, which requires that a minimum of three vendors who supply organic products must be contacted for each applicable ingredient. All staff are required to complete OILC NOP 130 Organic Seed Search, and three of ten staff had completed the training as of April 2022.

**AIA-8879-21 – Accepted.** 7 C.F.R. §205.501(a)(3) states “A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670.”

**Comments:** *ASCO is not consistently verifying an operation's compliance with §205.204(a)(1). The auditor's review of the certification files for one operation found that ASCO did not have documentation demonstrating that ASCO verified mushroom spawn as organic, nor did ASCO have documentation to demonstrate that ASCO verified commercial availability.*

**Corrective Actions:** ASCO submitted documentation from the operation demonstrating that the mushroom spawn was certified organic. ASCO implemented Policy DOC 170(b) Mushroom Policy and Requirements which states that mushroom producers must use organic spawn or provide commercial availability documentation. ASCO created and submitted a separate organic system plan addendum for mushroom producers requiring information on spawn, DOC 029 Organic System Plan – Mushroom Addendum, implemented February 2022. ASCO submitted updated DOC 013(a) Organic Commercial Availability Sourcing Verification implemented February 2022, requiring that a minimum of three vendors who supply organic products must be contacted for each applicable ingredient. ASCO staff reviewed NOP Guidance 5029 Seeds, Annual Seedlings, and Planting Stock in Organic Crop Production in January 2022. All staff were instructed to complete OILC NOP 130 Organic Seed Search, and three of ten staff had completed the training as of April 2022.

**AIA-5730-21 – 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.” to comply with the Act and the regulations in this part.”

**Comments:** *ASCO does not fully implement the NOP's international organic trade arrangement policies and procedures, which are outlined in the NOP's International Trade Policies resources. The auditors' review of one operation's certification file found that ASCO approved an EU-certified ingredient that was directly imported to the operation from India without final processing or handling in an EU member state. Additionally, the auditors found that ASCO's inspection report templates do not adequately instruct the inspectors to verify import activities and the required import documentation.*

**Corrective Actions:** ASCO submitted documentation from the noncompliant operation verifying that the EU certified ingredient imported from India has been discontinued and removed from the product profile and label. In February 2022, ASCO implemented a system of flagging operations that may import with DOC 176 File Alert Import Verification Required, prompting additional verifications throughout the certification process. ASCO submitted inspection documents DOC 026B Record of Verification for Crops Production, DOC 012 Record of Verification for Handlers, and DOC 012A Record of Verification for Livestock updated February 2022, which incorporate import and export verification into the main inspection report. ASCO management reviewed the updated documents at staff meetings in January and February 2022. Inspectors were trained on updated documents in February 2022. All staff are required to complete NOP 060 Import Oversight Essentials, and seven of ten staff had completed the training as of April 2022.



## NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

### AUDIT AND REVIEW PROCESS

The National Organic Program (NOP) conducted a renewal assessment of Agricultural Services Certified Organic (ASCO). An onsite audit was conducted and the audit report reviewed to determine ASCO's capability to continue operating as a USDA accredited certifying agent. This report provides the results of the renewal assessment and review of YDA's corrective actions.

### GENERAL INFORMATION

<b>Applicant Name</b>	Agricultural Services Certified Organic (ASCO)
<b>Physical Address</b>	902 Padre Drive, Salinas, CA 93912
<b>Mailing Address</b>	902 Padre Drive, Salinas, CA 93912
<b>Contact &amp; Title</b>	Katherine Borchard, Director & Partner
<b>E-mail Address</b>	<a href="mailto:kat@ascorganic.com">kat@ascorganic.com</a>
<b>Phone Number</b>	831-449-6365
<b>Reviewer(s) &amp; Auditor(s)</b>	Rebecca Claypool, NOP Reviewer; Martin Friesenhahn, Penny Zuck, On-site Auditors.
<b>Program</b>	USDA National Organic Program (NOP)
<b>Review &amp; Audit Date(s)</b>	NOP assessment review: September 12, 2016 Onsite audit: August 15-18, 2016
<b>Audit Identifier</b>	NP6228BBA
<b>Action Required</b>	None
<b>Audit &amp; Review Type</b>	Renewal Assessment
<b>Audit Objective</b>	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of ASCO's certification
<b>Audit &amp; Determination Criteria</b>	7 CFR Part 205, National Organic Program as amended
<b>Audit &amp; Review Scope</b>	ASCO's certification services in carrying out the audit criteria during the period: June, 2013 through August, 2016.

Agricultural Services Certified Organic (ASCO) is a for-profit Limited Liability Corporation that was established on April 15, 2004. ASCO was accredited as a certifying agent on April 7, 2006, to the USDA National Organic Program (NOP) for the scopes of crops, wild crops, livestock, and handling/processing operations. ASCO is currently accredited to ISO/IEC 17065:2012, Conformity assessment requirements for bodies certifying products, processes, and services for the scope of NOP organic certification of crop, livestock, wild crop, and handling. The company currently has 143 certified clients to the NOP, which includes 87 crop and 56 processor/handler operations. The majority of clients are located in California, with clients in 11 additional states throughout the U.S. All certification activities are conducted through the ASCO office located in Salinas, CA.

## **NOP DETERMINATION:**

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

#### **NP3161NNA.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.

**NP6228BBA.NC1 – Accepted.** 7 C.F.R. §205.402(c) states, "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."

**Comments:** *ASCO issued a Notice of Noncompliance & Denial of Certification Resolution in response to an operation's withdrawal of application for certification after being issued a Notice of Noncompliance and Denial of Certification. The regulations allow for withdrawal of application prior to the issuance of a notice of noncompliance and certification denial but not afterwards.*

**2016 Corrective Action:** ASCO will no longer submit a notice of resolution after a notice of denial has been issued. ASCO submitted an updated template for a Notice of Noncompliance & Denial of Certification letter. The updated template lists the options to the operator to reapply for certification, request mediation or file an appeal. ASCO trained staff on this change during their September 20, 2016 staff meeting.



## AUDIT INFORMATION

<b>Applicant Name:</b>	Agricultural Services Certified Organic (ASCO)
<b>Est. Number:</b>	N/A
<b>Physical Address:</b>	901 Padre Drive, Salinas, CA 93901
<b>Mailing Address:</b>	PO Box 4871 Salinas, CA 93912
<b>Contact &amp; Title:</b>	Katherine Borchard, Director and Partner
<b>E-mail Address:</b>	kat@ascorganic.com
<b>Phone Number:</b>	(831) 449-6365
<b>Auditor(s):</b>	Lars Crail, Accreditation Manager
<b>Program:</b>	USDA National Organic Program (NOP)
<b>Audit Date(s):</b>	August 2 – 20, 2013
<b>Audit Identifier:</b>	NP3161NNA
<b>Action Required:</b>	None
<b>Audit Type:</b>	Mid-term Assessment - Corrective Action (CA)
<b>Audit Objective:</b>	To review and approve corrective actions addressing the noncompliance notification issued July 22, 2013. To review the verification of corrective actions for noncompliances identified during the 2010 Renewal Assessment.
<b>Audit Criteria:</b>	7 CFR Part 205, National Organic Program; Final Rule, dated December 21, 2000; revised January 1, 2013.
<b>Audit Scope:</b>	ASCO's corrective action responses.
<b>Location(s) Audited:</b>	Desk

## GENERAL INFORMATION

Agricultural Services Certified Organic (ASCO) is a for-profit Limited Liability Corporation that was established by Articles of Incorporation filed with the State of California on April 15, 2004. ASCO was accredited as a certifying agent on April 7, 2006, to the USDA National Organic Program (NOP) for the scopes of crops, wild crops, livestock, and handling/processing operations. The company currently has 85 certified clients to the NOP, which includes 59 crops and 26 processor/handlers. The clients are located in California, Oregon, Missouri, and Arizona. All certification activities are conducted through the ASCO office located in Salinas, CA.

## FINDINGS

Corrective actions for the two noncompliances identified during the 2010 surveillance – accreditation renewal assessment (NP0229ADA.NC1 – 2) were verified and found to be implemented and effective and the noncompliances were cleared. One new noncompliance was identified during the mid-term assessment (NP316NNA.NC1). ASCO submitted corrective actions that are accepted by the NOP and will be verified for implementation and effectiveness during the next on-site audit.

**NP0229ADA.NC1 – Cleared** - NOP §205.501(a)(11)(v) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Prevent conflicts of interest by:



Requiring all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and all parties responsibly connected to the certifying agent to complete an annual conflict of interest disclosure report.” NOP §205.504(c)(2) states, “...a conflict of interest disclosure report, identifying any food or agriculture related business interests, including business interests of immediate family members, that cause a conflict of interest.” *The Statement of Confidentiality & Conflict of Interest Form (Doc 030) completed by ASCO staff and subcontractors does not disclose any conflicts of interests. The form simply states they will be free of conflicts of interests and how ASCO will prevent conflicts of interests.* **Corrective Action:** ASCO created and implemented Doc 114 for staff, contracted inspectors and reviewers to disclose conflict of interest issues. This form was completed by all current inspectors and reviewers and subsequently was submitted to NOP for review. Additionally, ASCO revised page 4 of Quality Manual Section II Administrative Procedures and submitted the update to NOP for review. All corrective actions taken by ASCO are determined by NOP to adequately address NC1. **2013 Verification of Corrective Action:** ASCO created a new form for conflict of interest that is completed by all employees and contracted inspectors. The new form asks for previous employers and information regarding business interests that could be construed as a conflict of interest. Certification personnel and responsibly connected parties completed an annual conflict of interest disclosure report. Employee file reviews revealed that there are records of conflicts noted in the form.

**NP0229ADA.NC2 – Cleared** - NOP §205.670(c) states, “The pre-harvest or postharvest tissue test sample collection pursuant to paragraph (b) of this section must be performed by an inspector representing the Administrator, applicable State organic program’s governing State official, or certifying agent.” *ASCO submitted 1 sample in 2009 and 1 in 2010 to a lab (Primus Labs, Santa Maria, CA) for testing of product. The 2009 sample was collected by a representative of the lab and not an inspector representing the ACA.* **Corrective Action:** ASCO submitted for NOP review completed Doc 115 “ASCO Confidential and Proprietary Information Non-Disclosure & Conflict of Interest Agreement – Laboratories” for three accredited laboratories. These agreements specify that the laboratories are representing ASCO when conducting sampling and analysis services. All corrective actions taken and submitted by ASCO are determined by NOP to adequately address NC2. **2013 Verification of Corrective Action:** The ASCO procedure now states that all samples will be collected by a representative of ASCO. Training has been conducted for all employees and subcontracted inspectors on procedures for collecting samples and maintaining the chain of custody.

**NP3161NNA.NC1 – Accepted** - NOP §205.662(c)(3) and 662(e)(1) states, “When rebuttal is unsuccessful or correction of the noncompliance is not completed within the prescribed time period, the certifying agent or State organic program's governing State official shall send the certified operation a written notification of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the noncompliance. 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 impact of a suspension or revocation on future eligibility for certification. If the certified operation fails to correct the noncompliance, to resolve the issue through rebuttal or mediation, or to file an appeal of the proposed suspension or revocation of certification, the certifying agent or State organic

program's governing State official shall send the certified operation a written notification of suspension or revocation.” *Three letters of proposed suspension were issued by ASCO to operations that did not respond within the stated time frame. The letters did describe the reasons for the proposed suspension, the effective date of the suspension and the right to request mediation or file an appeal; however, there was no clear description of the impact of a suspension to the client. The ASCO letters only referred to the process as stated in §205.662. In addition, ASCO issued one letter of suspension and proposed revocation combined in one letter when a client failed to respond to all communications regarding adverse action. The client could only be suspended or revoked. The adverse action of suspension cannot be combined with a proposed revocation. The client had not submitted an annual update which would have warranted a suspension only.* **Corrective Action:** ASCO modified the Notice of Proposed Suspension template to describe the impact of suspension. ASCO submitted the template for NOP review along with the templates of notices for suspension, revocation, and proposed revocation. NOP has determined that all template contents are compliant with USDA organic regulations.

<b>Applicant Name:</b>	Agricultural Services Certified Organic (ASCO)
<b>Est. Number:</b>	N/A
<b>Physical Address:</b>	901 Padre Drive, Salinas, CA 93901
<b>Mailing Address:</b>	PO Box 4871 Salinas, CA 93912
<b>Contact &amp; Title:</b>	Katherine Borchard, Director and Partner
<b>E-mail Address:</b>	ascorganic@aol.com
<b>Phone Number:</b>	831-449-6365
<b>Auditor(s):</b>	Lars Crail (NOP)
<b>Program:</b>	USDA National Organic Program (NOP)
<b>ARC Audit Date(s):</b>	November 30 – December 3, 2010
<b>ARC Audit Identifier:</b>	NP0229ADA
<b>Action Required:</b>	No
<b>Audit Type:</b>	Corrective Action Audit
<b>Audit Objective:</b>	To verify that corrective actions adequately address the non-compliances identified during the accreditation renewal audit.
<b>Audit Criteria:</b>	7 CFR Part 205 National Organic Program, Final Rule, dated December 21, 2000; updated August 24, 2010.
<b>Audit Scope:</b>	ASCO's submitted corrective actions.
<b>Location(s) Audited:</b>	Desk

## AUDIT INFORMATION

**GENERAL INFORMATION:** Agricultural Services Certified Organic (ASCO) is a for-profit organization that was established by Articles of Incorporation filed with the State of California on April 15, 2004. ASCO was accredited as a certifying agent on April 7, 2006, to the USDA National Organic Program (NOP) for crops, wild crops, livestock, and handling/processing operations. The company currently has 91 certified clients with 59 crops, 31 processor/handlers and 1 livestock certified to the NOP, which are located in California, Oregon, Missouri, and Arizona. A USDA ISO Guide 65 Program Reassessment was conducted concurrently with the Surveillance – Accreditation Renewal Audit.

**PERSONNEL and CERTIFICATION:** ASCO is a very small certifying agency which is owned by three partners who also conduct and assign the majority of the work. The ASCO staff consists of the Director of Program Management, Director of Applications, Director of Certification & Policy and ten subcontracted inspectors. One subcontracted inspector is also authorized to conduct initial reviews, but has not performed any to date. The Director of Application or the Director of Program Management is continuing to conduct the initial application review and the reviews of the updated applications. The inspections are assigned by the Director of Application and are conducted by either the Director of Application, Director of

Program Management or any of the subcontracted inspectors based on qualifications. The Record of Verification (ROV) or on-site inspection report is reviewed by any of the three partners/directors as long as they have not conducted a review previously. The final review and certification decisions are currently being made by the Director of Certification & Policy. A review of the files and interviews conducted verified that none are reviewing and approving their own work.

Training records were reviewed and verified that the staff and inspectors had received additional training, which included the new access to the outdoors requirements. ASCO keeps records of all internal or external training received by the staff. Contracted inspectors submit their updated information on a yearly basis. Performance evaluations of the staff are conducted by the supervising official by actually reviewing the person and work. Performance is evaluated through review of sample, side-by-side reports and actual inspections in the field for inspectors. Performance is documented in the employees file and used for the performance evaluations. ASCO has a Material Review Contract and Recognition Agreement with the Organic Materials Review Institute (OMRI). Labels are submitted by clients to ASCO with the initial application or at other times during the year. ASCO reviews and approves the labels prior to use by the client.

**WITNESS INSPECTIONS:** The audit included observations of two renewal inspections and one demonstration inspection by ASCO. The renewal inspection for the livestock operation included organic beef cattle, and the renewal inspection for the crop operation included vegetables (avocados, asparagus, green beans and sugar snap peas). The demonstration inspection for the processor included organic personal care products.

## **FINDINGS**

Observations made, interviews conducted, and procedures and records reviewed verified that ASCO is currently operating in compliance to the requirements of the audit criteria, except as noted in the findings below. The corrective actions for the non-compliances identified during the Initial On-site Accreditation Audit were verified and found to be implemented and effective and the non-compliances were subsequently cleared.

NP7232DDA.NC1 – Cleared  
NP7232DDA.NC2 – Cleared  
NP7232DDA.NC3 – Cleared  
NP7232DDA.NC4 – Cleared

There were two new noncompliances identified during the on-site audit. NOP issued a Notice of Noncompliance on November 22, 2010 and ASCO responded with corrective actions the same day. ASCO's submitted corrective actions adequately addressed the two noncompliances.



**NP0229ADA.NC1 – Adequately Addressed** - NOP §205.501(a)(11)(v) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Prevent conflicts of interest by: Requiring all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and all parties responsibly connected to the certifying agent to complete an annual conflict of interest disclosure report.” NOP §205.504(c)(2) states, “...a conflict of interest disclosure report, identifying any food or agriculture related business interests, including business interests of immediate family members, that cause a conflict of interest.” *The Statement of Confidentiality & Conflict of Interest Form (Doc 030) completed by ASCO staff and subcontractors does not disclose any conflicts of interests. The form simply states they will be free of conflicts of interests and how ASCO will prevent conflicts of interests.* **Corrective Action:** ASCO created and implemented Doc 114 for staff, contracted inspectors and reviewers to disclose conflict of interest issues. This form was completed by all current inspectors and reviewers and subsequently was submitted to NOP for review. Additionally, ASCO revised page 4 of Quality Manual Section II Administrative Procedures and submitted the update to NOP for review. All corrective actions taken by ASCO are determined by NOP to adequately address NC1.

**NP0229ADA.NC2 - Adequately Addressed** - NOP §205.670(c) states, “The pre-harvest or postharvest tissue test sample collection pursuant to paragraph (b) of this section must be performed by an inspector representing the Administrator, applicable State organic program’s governing State official, or certifying agent.” *ASCO submitted 1 sample in 2009 and 1 in 2010 to a lab (Primus Labs, Santa Maria, CA) for testing of product. The 2009 sample was collected by a representative of the lab and not an inspector representing the ACA.* **Corrective Action:** ASCO submitted for NOP review completed Doc 115 “ASCO Confidential and Proprietary Information Non-Disclosure & Conflict of Interest Agreement – Laboratories” for three accredited laboratories. These agreements specify that the laboratories are representing ASCO when conducting sampling and analysis services. All corrective actions taken and submitted by ASCO are determined by NOP to adequately address NC2.