



United States Department of Agriculture

Agricultural Marketing Service

National Organic Program

Bolicert (Boliviana de Certificacion)

La Paz, Bolivia

meets all the requirements prescribed in the National Organic Program Regulations

7 CFR Part 205

As an Accredited Certifying Agent

for the scope of

Crops, Wild Crops and Handling

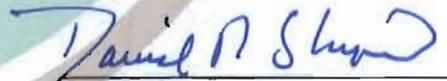
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CERTIFICATE OF ACCREDITATION



Certificate No: NP9215MMA
Issue Date: March 13, 2008
Renewal Date: March 13, 2013


for **Rayne Pegg**
Administrator
Agricultural Marketing Service

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AUDIT INFORMATION

Applicant Name:	Boliviana de Certificación (Bolicert)
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Phone Number:	591-2-29 02103
Auditor(s):	Julie Hartley, Accreditation Manager; Betsy Rakola, Accreditation Manager
Program:	USDA National Organic Program (NOP)
Audit Date(s):	May 8 2012 – April 8, 2013
Audit Identifier:	NP1255AKA
Action Required:	No
Audit Type:	Corrective Action review (Mid-Term Assessment)
Audit Objective:	To verify that corrective actions adequately address the noncompliances identified during the renewal assessment.
Audit Criteria:	7 CFR Part 205, National Organic Program (NOP), Final Rule, dated December 21, 2000; as amended August 3, 2011.
Audit Scope:	Corrective actions submitted by Bolicert
Location(s) Audited:	Desk

Boliviana de Certificación (Bolicert) was originally accredited on March 13, 2003 as a USDA National Organic Program (NOP) certifying agent for the scopes of crops, handling, and wild crops. Bolicert operates out of one office in La Paz, Bolivia and provides organic certification services throughout the country. Bolicert's list of NOP certified operations identify 16 certified clients, of which 8 are certified to two scopes. The 16 clients consist of 12 crop producers, 2 wild crop operations, and 10 handling operations. Four of the certified crop producers are identified as grower groups. Bolicert is IFOAM accredited and is also accredited by IOAS for ISO/IEC Guide 65:1996 for its private standards, as well as the EU and COR regulations.

The NOP conducted a Mid-Term Assessment of Bolicert on September 12-16, 2011. This assessment, NP1255AKA, resulted in twelve noncompliances. Eleven noncompliances identified at the 2009 Renewal Assessment were verified as implemented and effective, with the exception of NP9215MMA.NC3 and NP9215MMA.NC13, which remain outstanding. The NOP issued a Notice of Noncompliance to Bolicert on November 9, 2011. Bolicert responded

with proposed corrective actions on December 11, 2011. The NOP requested additional information, which Bolicert provided on June 28 and August 28, 2012.

The NOP's review of these corrective actions found that Bolicert was not complying with the USDA organic regulations for adverse actions and reinstatements under §205.662, as noted in the additional noncompliance, numbered AIA102412JAH.NC1. Bolicert also failed to resolve NP1255AKA.NC11. The NOP therefore issued Bolicert a Notice of Noncompliance and Proposed Suspension on January 4, 2013. The NOP concurrently offered Bolicert a settlement agreement, if it agreed to submit evidence of sufficient corrective actions within 45 days. Bolicert signed the settlement agreement on January 9, 2013 and submitted further corrective actions on February 23, and April 5, 2013. These corrective actions satisfied the terms of the settlement agreement.

FINDINGS

The corrective actions submitted by Bolicert in response to the noncompliances identified during the Mid-Term Assessment are accepted. One additional noncompliance, AIA102412JAH.NC1, was identified during the corrective action review. Bolicert's corrective action in response to this noncompliance was also accepted. Bolicert's next onsite assessment will verify whether all corrective actions were implemented and effective.

AIA102412JAH.NC1 – Accepted. NOP §§205.662(f)(1) states: *“A certified operation whose certification has been suspended under this section may at any time, unless otherwise stated in the notification of suspension, submit a request to the Secretary for reinstatement of its certification. The request must be accompanied by evidence demonstrating correction of each noncompliance and corrective actions taken to comply with and remain in compliance with the Act and the regulations in this part.”*

A review of the corrective actions and supporting evidence submitted indicates that the suspension notices issued to a certified operation dated September 2, 2011 and October 1, 2011 did not follow USDA organic regulation procedure to reinstate a suspended operation. The first suspension notice (September 2, 2011) was issued to suspend the operation during the course of an investigation. The second suspension notice (October 1, 2011) was issued at the conclusion of the investigation and reinstated the operation's organic certification, with the exception of the portion of the land which was determined to be contaminated with prohibited substances. The Bolicert board therefore reinstated the operation's organic certification without an approval of reinstatement from the Secretary. **Corrective action** (February-April 2013): Bolicert submitted a complete request for reinstatement of the suspended portion of the operator's land. Bolicert also submitted revised policies for reinstatement, which incorporated the NOP's policy 2605, *Reinstating Suspended Organic Operations*.

NP9215MMA.NC3 – Accepted. NOP §205.207(a) states, *“(a) A wild crop that is intended to be sold, labeled, or represented as organic must be harvested from a designated area that has had no prohibited substance, as set forth in §205.105, applied to it for a period of 3 years immediately preceding the harvest of the wild crop.”*

Bolicert certified a wild crop operation without verifying 3 years of no prohibited substances on all collection areas because the wild crop is collected from a national park. Additionally,

the organic system plan and the maps provided to the Bolicert did not adequately identify the designated area. Maps provided were for the region and not the specific collection sites.

Corrective Action (March 23, 2010): Bolicert developed a form (BOL-39-FIZP) where the collection sites are to identify the exact zone of organic production. The form requests from the client how many years it has been since prohibited substances have been utilized. Bolicert had the wild crop operation resubmit maps that properly identified the collection areas within the zones and the map was submitted for review. As part of the corrective actions Bolicert submitted the 2009 inspection report as evidence that the inspector reviewed the operation's records for possible inputs utilized by the operation when it was first certified and 36 months prior to certification as verification that no prohibited inputs were utilized. However, the non-compliance remains outstanding because it is not clear if the records of the inputs used in the 36 months preceding harvest are to be submitted by the operation for review upon application.

Mid-Term Assessment Finding (September 2011): There is still no documentation indicating what inputs have or have not been applied to the harvest areas in the 36 months preceding harvest. However, Bolicert indicated that this client has decided to surrender their certification. At the time of the assessment, the client had not yet surrendered certification.

Corrective Action: Bolicert provided supplemental evidence regarding the operation's records declaring that pesticides had not been applied to the area where the wild harvest occurs.

NP9215MMA.NC13 – Accepted. NOP §205.681(a) states, *“An applicant for certification may appeal a certifying agent’s notice of denial of certification, and a certified operation may appeal a certifying agent’s notification of proposed suspension or revocation of certification to the Administrator.”*

BOL-d1 at sections 1.3.3, 7.2, 8.2, and 8.5 make reference to Bolicert clients appealing directly to Bolicert which would be reviewed by the Bolicert Appeals Board. There were no appeals made to Bolicert by NOP certified operations since they were accredited. However, the procedure itself does not meet the requirements.

Corrective Action (March 23, 2010): Bolicert revised their certification procedures and removed section 1.3.3; revised section 7.2 and 8.1.2 (identified above as 8.2) to remove the reference to the Bolicert Appeals Board; and 8.5 to indicate the applicant or certified operation can rebut noncompliances to the Bolicert board and appeal directly to the NOP.

Mid-Term Assessment Finding (September 2011): The Bolicert Certification Procedures BOL-1B-SCOC Section 12.4 Appeals dated January 2010 still states that the applicant must appeal to the Bolicert Appeals Committee first, then if the committee upholds adverse action, the applicant may then appeal to the NOP.

Corrective Action (2012): Bolicert updated its Notice of Certification Denial (BOL-46-ARC) to convey the right of the operation to appeal to the NOP administrator. Bolicert also amended its Procedure Manual (BOL-1B-SCOC) Section 12.4, Appeal Process by removing the statement that an applicant can rebut noncompliances to the Bolicert board and adding a section stating that the applicant shall appeal to the NOP Administrator.

NP1255AKA.NC1 - Accepted. NOP §205.402(a)(2) states, *“Upon acceptance of an application for certification, a certifying agent must: 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.”*

*Two approved labels did not identify the name of the ACA preceded by the statement "Certified organic by ***" or similar phrasing as required by §205.303. One of the labels did not reference the name of the ACA in any way, and the other had only the email address of the ACA listed.*

Corrective Action: Bolicert updated its Label Evaluation Form (BOL-34-FAE) points 1.2, 4.2 and 'note' to ensure that the name of the certifying agent and the statement referring to the certifying agent is on the label, reviewed, and compliant prior to approval of labels each year. The Bolicert Procedure Manual (BOL-1B-SCOC) Section 3.22(c), Labeling, was also amended to record the compliance of labels prior to approval.

NP1255AKA.NC2 – Accepted. NOP §205.402(a)(2) states, "Upon acceptance of an application for certification, a certifying agent must: 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."

Bolicert did not ensure that source and composition documentation for a soil input listed in an applicant's OSP was included with the application as required in §205.201(a)(2). The input was also identified by the applicant for possible use in the written production plan submitted to Bolicert. No reference to this product was made by the inspector in the initial onsite inspection report, so it is not known whether usage of this input was verified or not.

Corrective Action: Bolicert provided documentation showing the composition of the soil input and evidence of its review. This input was not applied by the operation. Bolicert amended its forms Application –Supplements for Crop and for Grower Groups (BOL-9A-Supplement and Supplement "G") to show that an operation must submit the source and composition of any substance that may be applied. If an applicant does not submit the information, Bolicert will now issue a notice of denial of certification.

NP1255AKA.NC3 - Accepted. NOP §205.670(c) states, "The preharvest 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."

In one instance, Bolicert had a technician from the contracted laboratory draw soil and product samples for analysis. This technician did not have confidentiality and conflict of interest documents on file with Bolicert. Bolicert's procedures for sampling (BOL-1B-SCOC 3.5) require a contracted inspector of Bolicert to draw all samples.

Corrective Action: Bolicert amended the Residue Testing section of its Procedural Manual (BOL-1B-SCOC), Section 12.11(c) (referred to above as 3.5) to state that a residue test sample must be taken by qualified Bolicert personnel with current conflict of interest and confidentiality agreements. The material of concern was resampled by Bolicert to be compliant with §205.670(c).

NP1255AKA.NC4 - Accepted. NOP §205.670(d)(1) states, "Results of all analyses and tests performed under this section: Must be promptly provided to the Administrator."

In both instances where samples were drawn, the results of analysis were not promptly sent, and have not been sent to the Administrator. In both cases where samples were drawn, the applicants have not exported any product to the United States. However, both applicants are

certified under the NOP and are therefore subject to the provisions of this part.

Corrective Action: Bolicert submitted to the NOP the laboratory residue sample results of the agricultural product which had been exported to Germany for sale and selected for sampling by an importer in Germany. Bolicert also created a new form, Notice to the Administrator (BOL-48-CA-NOP), to notify the NOP Administrator of sample analysis results.

NP1255AKA.NC5 – Accepted. NOP §205.670(e) 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.”

In one of the cases where laboratory samples were drawn, the results indicated high levels of heavy metals (arsenic, cadmium and lead) which exceeded Food and Drug Administration (FDA) and Environmental Protection Agency (EPA) tolerances. Neither of the agencies has been notified to date of the results. In both cases where samples were drawn, the applicants have not exported any product to the United States. However, both applicants are certified under the NOP and are therefore subject to the provisions of this part. **Corrective Action:** This noncompliance is cleared. The material sampled by Bolicert indicating high levels of heavy metals was a soil sample used to determine land requirements for organic certification and not an agricultural product for sale as regulated by §205.670(e). Bolicert submitted the laboratory residue sample results of the agricultural product to the NOP, as required, and determined that the residues were within the limit allowed by the FDA. The Bolicert Procedure Manual (BOL-1B-SCOC) Section 12.11(b), Residue Testing, states that laboratory results indicating a specific agricultural product has residues or environmental contamination that exceed FDA or EPA regulatory tolerances will be reported to the agency whose tolerance has been exceeded, as compliant with §205.670(e). Therefore, no corrective actions are required.

NP1255AKA.NC6 – Accepted. NOP §205.501(a)(15)(i) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Submit to the Administrator a copy of: Any notice of denial of certification issued pursuant to §205.405, notification of noncompliance, notification of noncompliance correction, notification of proposed suspension or revocation, and notification of suspension or revocation sent pursuant to §205.662 simultaneously with its issuance.”

Bolicert has never submitted notices of noncompliance or notification of noncompliance correction to the Administrator and was not aware of this requirement. Bolicert is sending notification of noncompliance and notification of noncompliance resolution letters to clients (applicants or certified operations). Bolicert has only issued one notification of suspension; however, they did not submit this to the Administrator. Bolicert stated it was because they were waiting for another soil laboratory test for the client and the process was not complete.

Corrective Action: Bolicert submitted the notice of suspension as issued to the operation in October 2011 to the NOP. Bolicert updated its Procedure Manual (BOL-1B-SCOC) Section 2.9.11 to state that notices will be sent to the NOP Administrator as soon as they are issued.

NP1255AKA.NC7 – Accepted. NOP §205.501(a)(2)(8) 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; Provide sufficient information to persons seeking certification to enable them to comply with the applicable requirements of the Act and the regulations in this part.”

Bolicert is currently using USDA organic regulations, updated May 14, 2009 and was not aware of the NOP Handbook. Bolicert is providing clients the older version of the USDA organic regulations.

Corrective Action: Bolicert requested copies of the handbook and updated organic regulations and was directed to the NOP Web site. Bolicert’s Administrative Director is now subscribed to the *Organic Insider* to receive updates via email. Bolicert is translating the NOP Handbook’s documents into Spanish. The translated versions will be issued to clients and Bolicert personnel, using a service which provides delivery confirmation. Bolicert amended its Procedure Manual (BOL-1B-SCOC) Section 12.6, Application and Renewal of the Bolicert Certification, to state that applicants and renewing operations will receive a complete copy of the USDA organic regulations in electronic or printed form.

NP1255AKA.NC8 – Accepted. 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...perform on-site inspections...to complete an annual conflict of interest disclosure report.”

One inspector did not complete an annual conflict of interest (COI) disclosure report in 2011. The inspector’s most recent COI disclosure report was signed February 5, 2010 and this inspector conducted two inspections in March 2011. The inspector attended Bolicert’s NOP inspector training course in February 2011 and Bolicert stated they assumed an updated COI disclosure report was completed at that time since it is their normal procedure. Bolicert did not confirm the inspector’s updated COI disclosure report prior to assigning the inspection and was not able to obtain one after the inspection because the inspector left to raise a family. All other inspectors, certification staff, and responsibly connected parties with Bolicert had current COI disclosure reports on file and records verified they were being completed annually.

Corrective Action: Bolicert acquired and submitted the conflict of interest disclosure from the one inspector who did not complete the forms in 2011. Bolicert notified all personnel that conflict of interest documentation is to be signed by February 15 each year.

NP1255AKA.NC9 – Accepted. NOP §205.662(a)(2) states, “When an inspection, review, or investigation of a certified operation by a certifying agent...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: The facts upon which the notification of noncompliance is based.”

Bolicert’s notification of noncompliance (NONC) does not include the facts upon which the noncompliance is based (i.e. relevant section of USDA organic regulation Title 7 CFR Part 205: §205.662(a)(2)). This information (reference) is in the report but is not in the NONC.

Corrective Action: Bolicert amended its Noncompliance notification template (Certification Announcement – BOL-25B-AC) to include a section to describe the noncompliance and reference the USDA organic regulations.

NP1255AKA.NC10 – Accepted. NOP §205.662(a) states, “When an inspection, review, or investigation of a certified operation by a certifying agent...reveals any noncompliance with the Act or regulations in this part, a written notification of noncompliance shall be sent to the certified operation.”

Bolicert did not issue a notification of noncompliance (NONC) to one operator where seven noncompliances were identified because they suspended them pending additional soil and crop test results. These seven noncompliances were unrelated to the soil and crop tests and Bolicert should have sent a NONC. Bolicert did send a report to the client; however, they did not send a NONC.

Corrective Action: Bolicert submitted a copy of the notice of noncompliance, which was issued to the operation. Bolicert amended its Procedure Manual (BOL-1B-SCOC) Sections 2.11.1 and 2.11.11 (Bolicert procedures for treatments of non-compliance of certified operations) to reflect the order of adverse actions issued to operations in order to ensure that a notice of noncompliance is issued prior to a notice of proposed suspension or revocation.

NP1255AKA.NC11 – Accepted. NOP §205.662(c) states, “Proposed Suspension or Revocation... When correction of a noncompliance is not possible, the notification of noncompliance and the proposed suspension or revocation may be combined in one notification.” Bolicert issued a notice of suspension to one operation with positive residue test results without first issuing a Notice of Noncompliance and/or a Notice of Proposed Suspension.

Corrective Action: Bolicert amended its Procedure Manual (BOL-1B-SCOC) Section 2.11.11 (Bolicert procedures for treatments of non-compliance of certified operations) to include proposed suspension and revocation, and to reflect the order of adverse actions issued to operations. Bolicert also incorporated procedures for combined Notices of Noncompliance and Notices of Proposed Suspension/Revocation, which it will send to any operation with non-correctable noncompliances. Bolicert submitted its modified forms of Noncompliance notification (Certification Announcement – BOL-25B-AC) and Suspension notification (Decision Certification Announcement – BOL-47-ADC). Bolicert conducted adverse action training with its Board of Directors in March 2013. Bolicert also submitted revised adverse action letters to the operation with the positive residue test results. Further inspection reports and test results from October 2012 indicated negative results for all parcels of land.

NP1255AKA.NC12 – Accepted. NOP §205.403(c)(1-3) states, “The on-site inspection of an operation must verify: The operation's compliance or capability to comply with the Act and the regulations in this part; 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; That prohibited substances have not been and are not being applied to the operation...”

Bolicert's inspector did not verify the cleaning agents being used in the processing operation during the witness audit. The inspector passed four storage lockers labeled as “cleaning supplies” and never looked in any of them. The inspector did look in locker number 5 but only briefly opened the door and did not closely evaluate the cleaning supplies. The operation was only using alcohol for the equipment and detergents for the floor and all appeared to be in

compliance to the USDA organic regulations.

Corrective Action: Bolicert amended its Inspection Form (BOL-4B-FIP) by adding an area for the inspector to note the composition of detergents used within a processing facility and to verify them for NOP compliance. Bolicert amended its Procedure Manual (BOL-1B-SCOC) Section 2.3.3, On-site Inspection, to state that all areas of production must be checked during an on-site inspection to verify compliance.



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AUDIT INFORMATION

ACA Name:	BOLICERT (Boliviana de Certificacion)
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Program:	USDA National Organic Program (NOP)
NOP Audit Date(s):	December 18, 2010-January 17, 2011-March 21-23, 2011
Audit Identifier:	NP9215MMA
Action Required:	No
Audit Type:	Corrective Action Audit
Audit Objective:	To verify continuing compliance to the requirements of the audit criteria.
Audit Criteria:	7 CFR Part 205, National Organic Program, Final Rule, December 21, 2000, amended August 24, 2010.
Audit Scope:	The company's quality manual including personnel, processes, procedures, facilities and related records.
Location(s) Audited:	Desk

BOLICERT's first round of corrective actions was received by the ARC auditor of record from the NOP on January 26, 2010. The corrective actions review process commenced on March 23, 2010. On March 23, 2010, an email requesting additional information from BOLICERT was submitted. The response was received from BOLICERT via email on April 9, 2010. During the corrective actions review process, the auditor's computer crashed and thus the review process was delayed because the additional information and documents submitted by BOLICERT were lost. At the request of the auditor, BOLICERT resubmitted the documents on June 29, 2010 and the review was completed July 10, 2010. The Corrective Action Audit report concluded that four noncompliances remained.

On December 16, 2010 the NOP auditor requested further corrective actions which were submitted on December 18, and the 29th as well as January 12, 2011. The second corrective action review process was completed on January 17, 2011.

FINDINGS

The corrective actions submitted and reviewed found that BOLICERT during the first review adequately addressed nine of the thirteen noncompliances identified during the Surveillance-Reaccreditation Renewal Audit and the outstanding noncompliance from the 2007 Annual Update (NP7110FFA). This left four noncompliances remaining that were not adequately addressed. These have now been found to be adequately addressed and will be reviewed for implementation at the next on-site audit.

NP9215MMA.NC3– Adequately Addressed. NOP §205.207(a) states, “A wild crop that is intended to be sold, labeled, or represented as organic must be harvested from a designated area that has had no prohibited substance, as set forth in §205.105, applied to it for a period of 3 years immediately preceding the harvest of the wild crop.” *BOLICERT certified a wild crop operation without verifying 3 years of no prohibited substances on all collection areas because the wild crop is collected from a national park. Additionally, the organic system plan and the maps provided to BOLICERT did not adequately identify the designated area. Maps provided were for the region and not the specific collection sites.* **Final Corrective Actions 1-12-11:** BOLICERT developed a form (BOL-39-FIZP) where the collection sites are to identify the exact zone of organic production and sent in their Program Manual (sections 3.3 and 3.4) which stated that three years of consecutive field histories are required prior to the harvest of an organic crop in order to be certified. They also submitted their Field History form which asks for three years of consecutive field histories prior to being certified. The corrective actions adequately addressed the noncompliance.

NP9215MMA.NC5– Adequately Addressed. NOP §205.403(c) (1) states, “The on-site inspection of an operation must verify: (1) the operation’s compliance or capability to comply with the Act and regulations in this part.” *During the witness inspection of the handling operation: 1) There were bags of quinoa in the receiving storage area which were not identified with any markings to indicate the product was organic. The inspector did not identify this as a noncompliance during the exit interview; 2) There was no in/out audit trail conducted to verify the figures in the inventory spreadsheet provided by the client for product received, produced and shipped; 3) There was one label in use which was different than the approved labels and it was not identified as a noncompliance during the exit interview; 4) the non-approved label did not meet the requirements of the standard because the certification body’s seal was displayed more predominately than the USDA seal and this was not identified as a noncompliance during the exit interview.* **Final Corrective Actions 1-12-11:** BOLICERT sent their Program Manual which included an explanation (section 2.6) of the exit interview process in addition to an exit interview form used by their inspectors. BOLICERT also sent three course outlines for organic certification trainings (which included NOP specific sessions) that took place in November and December (there were two in December) 2010. Additional training programs have assisted BOLICERT in understanding what the NOP requires in terms of the inspection/audit trail process. All corrective actions taken and submitted by BOLICERT have adequately addressed the noncompliance.

NP9215MMA.NC6– Adequately Addressed. NOP §205.501(a) (6) states, General Requirements for Accreditation 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.” *Records revealed that the current evaluation of the staff and inspectors is being performed by a contracted auditor who performs the evaluations at the time of the semi-annual internal audit of the company. The internal audit report indicates that paperwork was reviewed for contracted and staff inspections; however, records of an evaluation of the inspection and staff performance is not documented. No person within the business structure of BOLICERT is performing evaluations of the staff or inspectors and there are no records to support the brief evaluation description offered in the internal audit report.*

Final Corrective Actions 1-12-11: BOLICERT revised their certification procedures (BOL-1B-MCPB) to indicate that individual performance evaluations will be conducted by the BOLICERT Quality Staff member and they will be documented in the personnel files. BOLICERT also sent an example of their Annual Training evaluation form in addition to their Program Manual (section 8.10) which states that BOLICERT inspectors must undergo an annual evaluation. All corrective actions taken and submitted by BOLICERT have adequately addressed the noncompliance.

NP9215MMA.NC7– Adequately Addressed. NOP §205.501(a) (5) states, General Requirements for Accreditation 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 product or handling techniques to successfully perform the duties assigned.” *There are no records to demonstrate that three of the four members of the DAB (Board of Directors) have actually received initial or updated training pertaining to the NOP Standard. One of the responsibilities listed for the DAB Board is for them “to review strict compliance with the NOP-USDA requirements in the BOLICERT certification system.” Interviews conducted with two of the three PRC members (defined in first report) verified they were not familiar with basic requirements of the NOP standards such as raw manure application and non-organic seed requirements. There were only three training records total specific to the NOP training received for two of the three PRC members.* **Final Corrective Actions 1-12-11:** BOLICERT revised their certification procedures (BOL-1B-MCPB) to indicate that the BOLICERT board will receive training on BOLICERT standards and procedures every 4 months (quarterly). Additionally, the corrective actions stated that the PRC which was making the certification decision was removed and the certification decision would now be made by the DAB. Minutes of the meeting were provided showing the disbanding of the PRC and the election of new members was provided. Finally, BOLICERT submitted updated resumes that included information on training, education and the experience of the new members relative to the NOP standards. All corrective actions taken and submitted by BOLICERT have adequately addressed the noncompliance.