



CERTIFICATE OF ACCREDITATION



# United States Department of Agriculture

Agricultural Marketing Service

National Organic Program

**CCPB SRL**

**Viale Angelo Masini 36, Bologna, Emilia-Romagna, 40126, ITALY**

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, Livestock, Wild Crops 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-52-25**

Effective Date: **06/30/2024**

Expiration Date: **06/30/2029**

Issue Date: **04/11/2025**

**Christopher Purdy**  
**Acting Deputy Administrator**  
**National Organic Program**

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

## NATIONAL ORGANIC PROGRAM: AUDIT & CORRECTIVE ACTION REPORT

### GENERAL INFORMATION

- **Certifier Name** CCPB Srl, (CCPB)
- **Physical Address** Viale Angelo Masini 36, Bologna, Emilia-Romagna 40126, ITALY
- **Audit Type** Renewal Audit
- **Auditor(s) & Audit Dates** Alicia Hudson, Daniel Oliver, 03/05/2024 to 04/12/2024
- **Audit Identifier** NOP-6-24

### CERTIFIER OVERVIEW

The National Organic Program (NOP) conducted an onsite Renewal Audit of CCPB Srl (CCPB)'s USDA organic certification program covering the period September 27, 2021 to April 12, 2024. The purpose of the audit was to verify CCPB's compliance with the Organic Foods Production Act of 1990 (OFPA), the USDA organic regulations (7 CFR Part 205), and the NOP Handbook. Audit activities included a review of certification activities, interviews with CCPB personnel, a records audit, and two onsite witness audits. The two witness audits consisted of one additional onsite inspection of a wild crop/handling operation in Turkey and one annual onsite inspection of a crops operation in Italy.

CCPB is a limited liability company initially accredited on July 1, 2014. CCPB is accredited to the crops, wild crops, livestock, and handling scopes. CCPB's office is in Bologna, Italy. CCPB certifies 208 operations and offers certification services in Algeria, Belgium, China, Egypt, Germany, Italy, Jordan, Lebanon, Morocco, Netherlands, Philippines, Tunisia, Turkey, and United Arab Emirates. Certification activities are performed by 62 employees.

## **NOP DETERMINATION:**

NOP reviewed the audit results to determine whether CCPB'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**

**AIA-4190-20 - Cleared.**  
**AIA-6828-21 - Cleared.**  
**AIA-6829-21 - Cleared.**  
**AIA-7858-21 - Cleared.**  
**AIA-7859-21 - Cleared.**  
**AIA-7860-21 - Cleared.**  
**AIA-7861-21 - Cleared.**  
**AIA-7862-21 - Cleared.**

**AIA-6819-21 – Accepted.** 7 C.F.R. § 205.501(a)(4) states, "A certifying agent under this subpart must: Use ... adequately trained personnel, including inspectors ... to comply with and implement the organic certification program established under the Act and the regulations in subpart E of this part."

**Comments:** *CCPB personnel did not consistently demonstrate during the audit an adequate understanding of the USDA regulations and NOP policies (i.e. NOP Handbook). The following are examples:*

- a. Inspectors did not consistently discuss and reference USDA organic regulations, including NOP Instruction, Guidance, and Policies (i.e. NOP Handbook) during inspections and exit interviews with operators.*
- b. Inspectors, certification reviewers, and decision makers (identified by assessing certification records) were unaware of processes required in the USDA organic regulations, such as: the OSP requirement for operations to monitor their compliance (205.201(a)(3)); the Crop rotation practice standard and its application to perennial crops (205.205); NOP 5022, Wild Crops Harvesting, requirements; and, identification of material inputs and corresponding restrictions stated in the National List(205.600), e.g. copper sulfate.*
- c. Inspectors are not adequately verifying the completeness of Organic System Plan (OSP) and did not demonstrate an understanding of the central role of the OSP in USDA organic certification.*
- d. During the wild crops witness audit, the inspector did not plan sufficient time to conduct an*

*adequate inspection. The inspection was rushed and did not adequately verify the operation's compliance.*

- e. During the wild crops witness audit, the inspector did not identify harvesting in the village area where there were significant signs of trash, animal manure, and potential contaminants until the auditor pointed this out.*
- f. Verification of flow charts and site maps did not consistently occur during inspections. Maps lacked sufficient detail such as potential contamination risks, and inspectors did not identify incomplete maps as an issue of concern.*
- g. The lack of a crop rotation plan was not identified as an issue of concern during the inspection of a crops operation.*
- h. The inspector did not identify labels as an issue of concern when approved labels did not identify the organic ingredients as "organic" in the ingredients statement as required by 205.303(b)(1).*

**2019 Corrective Action:** CCPB will revise organic system plans (OSP) and checklists to assist operations and staff to understand the USDA organic regulation and handbook policies. OSP revisions will insert relevant content and examples from NOP handbook documents. The inspection checklist revisions focus on adding clarity to the findings section and a section for documenting audit trail-mass balance verifications. CCPB provided specific training to all NOP inspectors and reviewers on July 15, 2019 in Tunisia and on July 30, 2019 in Morocco on the noncompliances of the NOP audit and CCPB's proposed corrective actions and revisions to the Standard Control Procedures. Revision of documents will be initiated after the September 2019 review and scheduled for completion by the end of 2019. CCPB plans to conduct additional training for applicable staff on implemented changes to the Standard Control Procedures document by the end of 2019.

**2019 Verification of Corrective Action:** This corrective action is not fully implemented because it is scheduled to be completed by the end of 2019. CCPB demonstrated that they have developed checklist drafts, provided and developed trainings for certification staff, and improved maps, which indicates they are on schedule to implement the corrective action. Corrective actions will need verification during the next audit assessment.

**2021 Verification of Corrective Action:** The auditors verified changes to OSP forms and inspection reports comply with USDA organic regulations and NOP handbook policies. The auditors confirmed updated inspection reports include a new section to document findings and audit trail activities. CCPB held additional trainings in 2020 and 2021 that reviewed changes to the OSPs and inspection reports, and CCPB phased in the use of these forms during this period. However, the auditors' review of certification files found that CCPB inspectors do not always identify potential noncompliances. For example, when an OSP did not accurately describe an operation's practice, the inspector did not identify this discrepancy as an issue of concern. The auditors recommend witness audits to verify future correction of this noncompliance.

**2022 Corrective Action:** CCPB revised witness audit instructions to emphasize the need for inspectors to identify noncompliances. They alerted staff to changes in the focus of witness audits by email sent August 3, 2022. Then used the training surveillance worksheet, "SK/BB" form, to track witness audit findings. CCPB also conducted training for relevant staff and inspectors on December 22, 2022, in how to verify the accuracy of an operation's OSP, identify potential noncompliances, and document issues of concern for any discrepancies observed on-site.

**2024 Verification of Corrective Action:** The auditors reviewed certification files, conducted

witness audits, and interviewed staff and found CCPB inspectors failed to identify potential noncompliances during inspection. The inspector failed to note goats grazing and goat manure in the wild crop collection area as an issue of concern.

**2024 Corrective Action:** CCPB will instruct the inspector to investigate possible issues of concern for goats grazing in the wild crop collection area during the annual inspection of the impacted operation in 2025. In addition, CCPB plans to hold training in early 2025 to assist inspectors and reviewers in navigating potential issues for grazing in wild collection areas.

### **Noncompliances Identified during the Current Assessment and Corrective Actions**

#### **AIA-1792-24 - Rebuttal accepted.**

**AIA-1794-24 - Accepted.** 7 CFR § 205.501(a)(3) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§ 205.402 through 205.406 and § 205.670;”

**Comments:** *CCPB does not carry out the provisions of the Act and regulations. The auditors reviewed certification files and found that CCPB does not require operations to conduct a commercial availability search for NOP-certified organic seed before using non-NOP certified organic seed as required by §205.204(a).*

**Corrective Action:** CCPB communicated the seed practice standard to the impacted operation via email on December 18, 2024 and provided instructions on documenting an annual commercial availability search. In addition, CCPB revised procedure *PCS 002 CCPB Operative Procedure – Carrying out inspection visits* to instruct inspectors on reviewing non-NOP organic seed. Training on the revised procedure emphasized how to check commercial availability requirements for operations using non-NOP organic seed. All inspectors must complete the training by April 11, 2025.

**AIA-1795-24 - Accepted.** 7 CFR § 205.501(a)(3) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§ 205.402 through 205.406 and § 205.670;”

**Comments:** *CCPB does not carry out the provisions of the Act and regulations. The auditors reviewed CCPB’s inspection reports and found that CCPB inspectors do not include the NOP regulatory citation as required by CCPB’s inspection report template.*

**Corrective Action:** CCPB will continue to require inspectors to include the NOP regulatory citation when identifying issues in the inspection report template. Training on the existing procedure confirms how staff must use the inspection report outline. All inspectors must complete the training by April 11, 2025.

**AIA-1891-24 - Accepted.** 7 CFR § 205.501(a)(3) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§ 205.402 through 205.406 and § 205.670;”

**Comments:** CCPB does not carry out the provisions of the Act and regulations. The auditors reviewed certification files and found that CCPB conducted an investigation for a complaint and determined that their certified operation had used a non-organic natural flavor contaminated with a prohibited substance. CCPB did not issue a noncompliance to the operation for failing to protect organic products from contact with prohibited substances, as required by § 205.272(a).

**Corrective Action:** CCPB collected an updated organic system plan (OSP) to document the contamination prevention measures planned by the impacted operation. Training on the topic of the National List of Allowed and Prohibited Substances clarified the issue of ingredients in contact with prohibited substances. All inspectors must complete the training by April 11, 2025.

**AIA-1893-24 - Accepted.** 7 CFR § 205.663(f) states, “Any settlement agreement reached through mediation must comply with the Act and the regulations in this part. The Program Manager may review any mediated settlement agreement for conformity to the Act and the regulations in this part and may reject any agreement or provision not in conformance with the Act or the regulations in this part.”

**Comments:** CCPB’s settlement agreements do not comply with the requirements of the USDA organic regulations. The auditors reviewed settlement agreements established by CCPB and found the following:

1. CCPB’s settlement agreements do not always include terms or actions that bring the operation into compliance with the USDA organic regulations.
2. CCPB’s settlement agreements do not always include a defined period of time for the terms to be completed.

**Corrective Action:** CCPB revised the settlement agreement template *MOD NPSE r 0 2024-10-31 SETTLEMENT AGREEMENT* which clarifies that all terms for the operation to come into compliance must be listed under 1.a – Compliance Actions section of the template. The revised settlement agreement template requires a clear timeline under 2.a Timeline for Compliance section which requires an end date for each compliance action.

**AIA-1900-24 - Accepted.** 7 CFR § 205.663(b)(1) states, “A certified operation or applicant for certification must submit any request for mediation in writing to the applicable certifying agent or State organic program within 30 calendar days of receipt of the notice of proposed suspension or proposed revocation of certification or denial of certification.”

**Comments:** CCPB does not allow its certified operations 30 calendar days to request mediation after receipt of a notice of proposed suspension or proposed revocation. The auditors reviewed notices of proposed suspension and proposed revocation issued by CCPB and found that CCPB allows only 10 days for a certified operation to request mediation.

**Corrective Action:** CCPB updated its adverse action templates *MOD NP/PS Rev.1 2024-07-31* and *MOD NP/PR Rev. 1 2024-07-31* to inform operations of their right to request mediation within 30 days. CCPB notified staff of the controlled document changes on July 29, 2024 via email with a note explaining the 30-day requirement for operations to submit mediation requests.

**AIA-1928-24 - Accepted.** 7 CFR § 205.501(a)(3) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§ 205.402 through 205.406 and §

205.670;”

**Comments:** *CCPB does not carry out the provisions of the Act and regulations. CCPB does not fully verify the compliance of information provided by operations in organic system plans (OSP). The auditors reviewed certification files and found two operations’ OSPs did not include compliant crop rotation plans, as required by § 205.205.*

**Corrective Action:** CCPB requested updated organic system plans (OSP) from the two impacted operations. Training on the requirements for crop rotation explains how to evaluate an operation’s cropping system at inspection and review. All staff must complete the training by April 11, 2025.



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### GENERAL INFORMATION

- **Certifier Name** CCPB Srl, (CCPB)
- **Physical Address** Viale Angelo Masini 36, Bologna, Emilia-Romagna 40126, ITALY
- **Audit Type** Witness Audit/Review Audit
- **Auditor(s) & Audit Dates** Patricia Bursten, 10/30/2023 to 11/04/2023
- **Audit Identifier** NOP-199-23

### CERTIFIER OVERVIEW

The National Organic Program (NOP) conducted an onsite audit of CCPB Srl's certification activities in Turkey. The purpose of the audit was to verify CCPB's conformance to the USDA organic regulations. Audit activities included one witness audit and one review audit. The witness audits consisted of the unannounced inspections of one producer group - including producers, ICS, and handling in Izmir and Aydin. The review audit was conducted at a handler in Izmir.

CCPB is a for-profit organization initially accredited on July 1, 2014 for the scopes of crops, wild crops, livestock, and handling. CCPB's main office is in Bologna, Italy. CCPB certifies 29 operations in Turkey.



## **NOP DETERMINATION:**

NOP reviewed the audit results to determine whether CCPB'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 “**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 and Corrective Actions**

**AIA-6542-23 - 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:** *CCPB does not carry out the provisions of the Act and regulations. The auditors conducted a witness audit and identified that CCPB does not verify an operation’s compliance with the USDA organic regulations. The auditors found that a producer group’s organic system plan (OSP) did not include specific buffer crop acreage and individual operations’ on-farm storage capacity, per the requirements of §205.201(a)(5). Therefore, CCPB was not able to verify that the operation’s total organic production and organic sales were appropriate for the operation’s total organic acreage.*

**Corrective Action:** CCPB issued the producer group a Notice of Noncompliance on November 5, 2023 for their OSP missing buffer crop acreage and members’ on-farm storage capacity information. The operation submitted an updated OSP which included the missing information, and CCPB accepted this corrective action on December 22, 2023. CCPB plans to update their *Guidelines for Setting Up an ICS for Grower Groups*, points 2.7.2 (c) and (h) specifying group member records/information to be collected in the OSP, to include buffer size and buffer crop harvest records. CCPB plans to complete these revisions and provide training to certification reviewers and inspectors on the updated requirements by July 30, 2024.

**AIA-6543-23 - 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:** *CCPB does not consistently carry out the provisions of the Act and regulations. The auditors reviewed organic product labels and identified that CCPB does not fully verify an operation’s compliance with § 205.303 and § 205.307. CCPB did not verify the compliance of a non-retail product label displaying a “certified organic by...” statement of another certifier. The product was manufactured by a CCPB operation under a private label agreement.*

**Corrective Action:** On December 1, 2023, CCPB Turkey sent a reminder to all staff and inspectors that inspectors must verify compliant use of labels during inspections and report the use of any labels approved by another certifier in the inspection report. By July 30, 2024, CCPB plans to provide training to its NOP inspectors focused on non-retail container labeling requirements and verifying compliant use of labels even if they have been approved by the brand owner’s certifier.



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## NATIONAL ORGANIC PROGRAM: AUDIT & CORRECTIVE ACTION REPORT

### GENERAL INFORMATION

- **Certifier Name** CCPB Srl, (CCPB)
- **Physical Address** Viale Angelo Masini 36, Bologna, Emilia-Romagna 40126, ITALY
- **Audit Type** Material Review Audit
- **Auditor(s) & Audit Dates** Samuel Schaefer-Joel, 10/16/2023 to 10/20/2023
- **Audit Identifier** NOP-333-23

### CERTIFIER OVERVIEW

The National Organic Program (NOP) conducted a remote audit of CCPB Srl's (CCPB) material review activities. The purpose of the audit was to verify CCPB's compliance with the Organic Foods Production Act of 1990 (OFPA), the USDA organic regulations (7 CFR Part 205), and the NOP Handbook. Audit activities included the assessment of CCPB's material input review policies and procedures, and a review of compliance documentation for inputs used by certified clients.

CCPB is a for-profit organization initially accredited on July 1, 2014 for the scopes of crops, wild crops, livestock, and handling. CCPB's office is in Bologna, Italy. CCPB certifies 230 operations in 14 countries.

## **NOP DETERMINATION:**

NOP reviewed the audit results to determine whether CCPB's corrective actions adequately addressed previous noncompliances. NOP also reviewed any corrective actions submitted as a result of noncompliances issued from Findings identified during the audit.

Any noncompliance labeled as “**Cleared**” indicates that the corrective actions for the noncompliance are determined to be implemented and working effectively. Any noncompliance labeled as “**Accepted**” indicates acceptance of the corrective actions and verification of corrective action implementation will be conducted during the next audit.

### **Noncompliances Identified during Prior Assessments**

None

### **Noncompliances Identified during the Current Assessment and Corrective Actions**

**AIA-6565-23 - Accepted.** 7 C.F.R. §205.501(a)(2) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Demonstrate the ability to fully comply with the requirements for accreditation set forth in this subpart.”

**Comments:** *CCPB does not demonstrate the ability to fully comply with the requirements for accreditation. The auditor reviewed CCPB's material review policy and found it does not contain clear written protocols and procedures outlining the expectations regarding the frequency of the review necessary to determine the continued compliance of input materials, as required in NOP 3012 Interim Instruction Material Review.*

**Corrective Action:** CCPB submitted updated material review policy and procedures that include frequency of input material review. CCPB created and submitted a master list of approved input materials with dates to track the last date of review. CCPB has begun a systematic re-review of all approved inputs and anticipates finishing these reviews by the end of March 2025.

**AIA-6566-23 – 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:** *CCPB does not carry out the provisions of the Act and regulations. CCPB's input material reviews are not sufficient to verify compliance to §205.105 and §205.201(a)(2) or NOP 5012 Approval of Liquid Fertilizers for Use in Organic Production. The auditor found the following systemic issues in CCPB's material review program:*

- 1. The auditor reviewed seven multi-ingredient crop input materials and found that for all seven inputs, CCPB did not document their full composition. CCPB approved these products by reviewing only labels and technical sheets.*
- 2. The auditor reviewed three input materials containing substances available in both synthetic and nonsynthetic forms and found that for all three substances, CCPB did not make the synthetic/nonsynthetic determinations necessary to determine the inputs' compliance.*
- 3. CCPB approved certified operations to use two liquid fertilizers containing more than 3% nitrogen that have not been approved by a material evaluation program as detailed in NOP 5012 Approval of Liquid Fertilizers for Use in Organic Production.*

**Corrective Action:** CCPB submitted updated material review policy and procedures that include requirements to evaluate the full composition of input materials, make synthetic/nonsynthetic determinations and verify external approvals of liquid fertilizers containing more than 3% nitrogen. CCPB submitted a training log showing staff were trained on the updated procedures on June 24, 2024.

CCPB also submitted updated organic system plans (OSPs) and material review documentation showing that products that were not correctly reviewed (liquid fertilizers containing over 3% nitrogen and products with incomplete composition and/or synthetic/nonsynthetic documentation) have been removed from the operations' OSPs or correctly documented to be compliant.

CCPB has begun a systematic re-review of all approved inputs and anticipates finishing these reviews by the end of March, 2025.

## NATIONAL ORGANIC PROGRAM: AUDIT & CORRECTIVE ACTION REPORT

### GENERAL INFORMATION

- **Certifier Name** CCPB Srl, (CCPB)
- **Physical Address** Viale Angelo Masini 36, Bologna,  
Emilia Romagna 40126, ITALY
- **Audit Type** Mid-Term Assessment
- **Auditor(s) & Audit Dates** Colleen O'Brien, Alison Howard, Jessica Walden,  
03/15/2021 to 03/16/2021
- **Audit Identifier** NOP-26-21

### CERTIFIER OVERVIEW

CCPB is a for profit company, and received USDA NOP accreditation for the scopes of crops, wild crops, and handling on July 1, 2014.

The CCPB current list of NOP certified operations included 202 operations, consisting of 128 crops, 27 wild crops, 1 livestock, 179 processing/handling operations, and 81 grower groups. CCPB maintains a primary office in Bologna, Italy and has satellite offices in Egypt, Lebanon, Morocco, Tunisia (Menzah) and Turkey (Melikgazi). CCPB is currently certifying operations in Algeria, Belgium, Burkina Faso, China, Egypt, Germany, Italy, Lebanon, Morocco, Philippines, Tunisia, Turkey.

CCPB administers their NOP certification program with 11 staff members, some occupying more than one role: general manager, quality managers, administrative, certification reviewers, and inspectors. CCPB engages 32 contract inspectors operating out of their 5 satellite offices.

## **NOP DETERMINATION:**

NOP reviewed the audit results to determine whether CCPB'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**

**AIA-3469-20 – Cleared.**  
**AIA-6818-21 – Cleared.**  
**AIA-6820-21 – Cleared.**  
**AIA-6821-21 – Cleared.**  
**AIA-6822-21 – Cleared.**  
**AIA-6823-21 – Cleared.**  
**AIA-6824-21 – Cleared.**  
**AIA-6825-21 – Cleared.**  
**AIA-6826-21 – Cleared.**  
**AIA-6827-21 – Cleared.**  
**AIA-6830-21 – Cleared.**  
**AIA-7022-21 – Cleared.**  
**AIA-7023-21 – Cleared.**

### **Noncompliances Identified during the Current Assessment and Corrective Actions**

**AIA-6819-21 – Accepted.** 7 C.F.R. § 205.501(a)(4) states, "A certifying agent under this subpart must: Use ... adequately trained personnel, including inspectors ... to comply with and implement the organic certification program established under the Act and the regulations in subpart E of this part."

**Comments:** *CCPB personnel did not consistently demonstrate during the audit an adequate understanding of the USDA regulations and NOP policies (i.e. NOP Handbook). The following are examples:*

- a. Inspectors did not consistently discuss and reference USDA organic regulations, including NOP Instruction, Guidance, and Policies (i.e. NOP Handbook) during inspections and exit interviews with operators.*
- b. Inspectors, certification reviewers, and decision makers (identified by assessing certification records) were unaware of processes required in the USDA organic regulations, such as: the OSP requirement for operations to monitor their compliance (205.201(a)(3)); the Crop rotation practice standard and its application to perennial crops (205.205); NOP 5022, Wild Crops Harvesting, requirements; and, identification of material inputs and corresponding restrictions stated in the National List (205.600), e .g. copper sulfate.*
- c. Inspectors are not adequately verifying the completeness of Organic System Plan (OSP)*

*and did not demonstrate an understanding of the central role of the OSP in USDA organic certification.*

*d. During the wild crops witness audit, the inspector did not plan sufficient time to conduct an adequate inspection. The inspection was rushed and did not adequately verify the operation's compliance.*

*e. During the wild crops witness audit, the inspector did not identify harvesting in the village area where there were significant signs of trash, animal manure, and potential contaminants until the auditor pointed this out.*

*f. Verification of flow charts and site maps did not consistently occur during inspections. Maps lacked sufficient detail such as potential contamination risks, and inspectors did not identify incomplete maps as an issue of concern.*

*g. The lack of a crop rotation plan was not identified as an issue of concern during the inspection of a crops operation.*

*h. The inspector did not identify labels as an issue of concern when approved labels did not identify the organic ingredients as "organic" in the ingredients statement as required by 205.303(b)(1).*

**2019 Corrective Actions:** CCPB will revise organic system plans (OSP) and checklists to assist operations and staff to understand the USDA organic regulation and handbook policies. OSP revisions will insert relevant content and examples from NOP handbook documents. The inspection checklist revisions focus on adding clarity to the findings section and a section for documenting audit trail-mass balance verifications. CCPB provided specific training to all NOP inspectors and reviewers on July 15, 2019 in Tunisia and on July 30, 2019 in Morocco on the noncompliances of the NOP audit and CCPB's proposed corrective actions and revisions to the Standard Control Procedures. Revision of documents will be initiated after the September 2019 review and scheduled for completion by the end of 2019. CCPB plans to conduct additional training for applicable staff on implemented changes to the Standard Control Procedures document by the end of 2019.

**2019 Verification of Corrective Action:** This corrective action is not fully implemented because it is scheduled to be completed by the end of 2019. CCPB demonstrated that they have developed checklist drafts, provided and developed trainings for certification staff, and improved maps, which indicates they are on schedule to implement the corrective action. Corrective actions will need verification during the next audit assessment.

**2021 Verification of Corrective Action:** The auditors verified changes to OSP forms and inspection reports comply with USDA organic regulations and NOP handbook policies. The auditors confirmed updated inspection reports include a new section to document findings and audit trail activities. CCPB held additional trainings in 2020 and 2021 that reviewed changes to the OSPs and inspection reports, and CCPB phased in the use of these forms during this period. However, the auditors' review of certification files found that CCPB inspectors do not always identify potential noncompliances. For example, when an OSP did not accurately describe an operation's practice, the inspector did not identify this discrepancy as an issue of concern. The auditors recommend witness audits to verify future correction of this noncompliance.

**2022 Corrective Action:** CCPB revised witness audit instructions to emphasize the need for inspectors to identify noncompliances. They alerted staff to changes in the focus of witness audits by email sent August 3, 2022. Then used the training surveillance worksheet, "SK/BB"

form, to track witness audit findings. CCPB also conducted training for relevant staff and inspectors on December 22, 2022, in how to verify the accuracy of an operation's OSP, identify potential noncompliances, and document issues of concern for any discrepancies observed on-site.

**AIA-6828-21 - Accepted.** 7 C.F.R. §205.501(a)(4) states, "A private or governmental entity accredited as a certifying agent under this subpart must:... Use a sufficient number of adequately trained personnel, including inspectors and certification review personnel, to comply with and implement the organic certification program established under the Act and the regulations in subpart E of this part;..."

**Comments:** *The auditors observed or identified the following issues while conducting witness audits, records review, and certification staff interviews in Italy that demonstrate insufficient knowledge and skills of the USDA organic regulations and NOP policies by certification personnel including inspectors:*

- *The auditors found the following issues regarding material inputs:*
  - *National List annotations are not verified for approved inputs.*
  - *Technical information for inputs is not collected, reviewed, and verified for compliance. In one case a material not on the National List was approved as a processing aid in the production of a certified product.*
- *Review personnel were not able to demonstrate that materials and ingredients are adequately assessed for compliance with 100% organic composition and commercial availability requirements.*
- *Inspectors are not adequately trained to conduct verification activities according to the NOP requirements, or reference and discuss the USDA organic regulations with operators.*
- *Current organic system plans do not reflect current practices; are not monitored by the operator, and are not updated if there are any deviations. Inspectors are frequently not identifying that organic system plans should be updated even though their inspection checklists describe activities that should be in the organic system plan.*
- *Materials used in the production and handling of organic products are not consistently listed in the organic system plan and thus not reviewed for compliance by the certifier.*
- *Review personnel are not adequately reviewing the inspection reports (including checklist and relevant attachments) as well as the organic system plans and identifying issues of concerns that may be missed by the inspectors.*
- *Product formulations and percentage calculations records for processed products are completed by the operator but are not verified for compliance by CCPB review or inspection personnel.*
- *Issued NOP certificates include an effective date that is the same as the certificate issue date. When an updated certificate is issued, the effective date continues to be the same as the certificate issue date.*

**2020 Corrective Action:** Staff training was conducted on December 11, 2019 after the on-site audit to discuss issues identified with Italian inspectors and relevant NOP certification program staff. For staff in China, a face-to-face training was conducted on November 6, 2019 in Hangzhou, China. Trainings were also held with Directors, Local Quality Managers and relevant inspectors of the five local CCPB office in the Mediterranean basin in May 2020 with two



sessions held on the 20th and 27th of the month. To manage their quality system, CCPB has added an additional staff member responsible for quality system management and internal audits. Regarding inspection deficiencies, CCPB is requiring all inspectors to complete four relevant Organic Integrity Learning Center trainings regarding proper inspections and materials use/review. For review deficiencies, CCPB is requiring all reviewers to complete three relevant Organic Integrity Learning Center trainings regarding proper review and materials use. CCPB's OSP templates have been amended to capture all materials used in production and handling operations. The OSP templates have also been amended to better describe the practices of certified operations with additional control points for verification. CCPB's control procedures have been updated to ensure verification of practices and materials, manage updates of OSPs at the time of inspection and reviews, and issue certificates in the proper format. In addition, CCPB plans to conduct additional witness audits of inspectors. CCPB has also sought to be more involved by becoming members of the Accredited Certifiers Association for a better understanding of how other NOP accredited certifiers approach and conduct USDA organic certification. CCPB will continue to attend BioFach in the coming year for NOP training as well.

**2021 Verification of Corrective Action:** The auditors verified that CCPB became a member of the Accredited Certifiers Association, had inspectors and review staff complete Organic Integrity Learning Center course modules and NOP trainings as described in the corrective action, held several different training sessions specific to NOP regulations in 2019, 2020 and 2021 for both reviewers and inspectors, and conducted witness audits of each of their inspectors. The auditors' review found CCPB adequately assesses materials for compliance with 100% organic composition and commercial availability requirements, and organic certificates included accurate effective dates. However, the auditors noted the following issues:

1. CCPB does not obtain sufficient technical information to verify compliance of all inputs and does not consistently ensure that approved inputs comply with National List annotations. In a review of materials used by production and handling operations, the auditors found CCPB did not collect technical sheets and/or labels for all inputs reviewed or consistently verify compliance with material annotations. In two examples, CCPB inspectors did not verify compliance of material restrictions, or the accuracy of material lists in the operator's OSP.
2. CCPB's updated OSP and inspection report templates do not capture all materials used. The Crop & Group OSP forms only ask for pest control inputs, CCPB staff stated they intended for the operation to list all inputs used for crop pest, disease, and weed management in this space. Materials used in the production and handling of organic products are also not consistently listed in the OSP. In addition, CCPB's updated Standard Control Procedures do not explain how reviewers are to verify the compliance of materials used for each certification scope.
3. Current OSPs do not always reflect current practices and are not updated if there are any deviations. Inspectors do not always identify when OSPs should be updated even though their inspection checklists describe activities that should be in the OSP. In one case, the OSP for a crop operation stated that no compost or manure was used, but the field sheet stated that a fertilizer containing compost and sheep manure was used. The inspector indicated that the OSP and annexes were compliant and did not clarify which information was correct.
4. CCPB inspectors do not consistently demonstrate an understanding of the how to cite the

USDA Organic regulations. The auditors reviewed an inspection report in which the inspector cited §205.201(a)(5), which requires a description of practices to prevent commingling, when a facility employee did not have a medical certificate.

5. CCPB review personnel do not adequately review inspection reports (including the checklist and relevant attachments) and OSPs, and do not identify issues of concerns that may be missed by the inspectors.

6. CCPB does not consistently verify accurate product formulations are maintained for processed products. In a review of certification files for a handler, the auditors found the product flow diagram for one product included salt as a processing aid, but this was not listed on the product sheet.

**2022 Corrective Action:** CCPB updated Standard Control Procedure (SCP), “PCS 002 ED 0 Rev 7,” to include the following points:

- Section 2.3.4.1 Compliance evaluation of input review directs staff to review all processing aids and material inputs using supporting ingredient and manufacturing documentation while ensuring all materials are consistently listed in the OSP.
- Section 2.3.7.1 directs inspectors to verify the accuracy of the material list within the context of operation’s production or handling system which includes verifying compliant use of the material and any National List annotations or restrictions.

In addition, CCPB updated the OSP templates to collect a complete list of an operation’s material inputs. A revised checklist of documentary evidence, “NP/VD” form, documents CCPB staff members material review evaluations. The inspection report template, “NP/VI” form, was updated to document verification of the operator’s material use and ingredients / processing aids reported in product formulations. All procedural and template updates for OSPs and inspection report forms were communicated to staff in a December 22, 2022, training event.

**AIA-6829-21 - Accepted.** 7 C.F.R. §205.501(a)(2) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Demonstrate the ability to fully comply with the requirements for accreditation set forth in this subpart.”

**Comments:** *CCPB has no formal review process for assessing materials used in or on NOP certified production and handling operations.*

**Corrective Action:** The Standard Control Procedures (point 2.3.4 and 2.3.7.4) have been updated and specifically require review and inspection of any material used in accordance with the USDA Organic Regulations. Organic System Plan templates and annexes have been amended and specifically require all materials used in production and/or handling operations. As part of scheduled training, the issues identified were discussed with the Italian inspectors and relevant staff in a meeting of December 11, 2019. Furthermore, additional trainings have been completed on May 20, 2020 and May 27, 2020 with Directors and Local Quality Managers of the five local offices of CCPB in the Mediterranean basin.

**Verification of Corrective Action:** CCBP is not fully following its procedure as described in Standard Control Procedures 2.3.4 and 2.3.7.4. The auditors’ review of records for materials used by production and handling operations found CCPB reviewers did not collect technical sheets and/or labels for all inputs reviewed or consistently verify compliance with material

annotations. The auditors identified two examples where inspectors did not verify compliance of material restrictions or the accuracy of material lists in the operator's OSP. Additionally, CCPB still does not have a procedure that describes how reviewers are to verify compliance of materials under difference scopes of certification.

**2022 Corrective Action:** CCPB updated its Standard Control Procedures (PCS) in December 2022 to include instructions for the reviewer on evaluating the compliance of inputs and instructions for inspectors on verifying the compliance and accuracy of an operation's materials list. CCPB updated the checklist of documentary evidence, "NP/VD" form to record the staff review of inputs, ingredients, and processing aids. CCPB conducted training for relevant staff and inspectors on the new policy on December 22, 2022.

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

**AIA-7858-21 - Accepted.** 7 C.F.R. §205.404(b)(1-4) states, "The certifying agent must issue a certificate of organic operation which specifies the: (1) Name and address of the certified operation; (2) Effective date of certification; (3) Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation; and (4) Name, address, and telephone number of the certifying agent.;"

**Comments:** *CCPB's organic certificates are not in alignment with all elements required by §205.404(b) and NOP 2603 Organic Certificates. The auditors' review of certification files found CCPB organic certificates incorrectly list "Beekeeping" as a category of certification, do not state "Certified to the USDA organic regulations, 7 CFR Part 205," and do not include the correct attestation statement for operations with products approved under the US-Canada Organic Equivalency Arrangement.*

**Corrective Action:** CCPB issued the affected operations updated organic certificates that correctly list 'livestock' as the category of certification for beekeeping operations. CCPB updated its organic certificate template in September 2022 to include the statement "Certified to the USDA organic regulations, 7 CFR part 205." CCPB issued corrected organic certificates to all operations in December 2022. CCPB conducted training for relevant staff and inspectors on the new templates in December 2022. The certificate template was revised in January 2024 with the correct text of the US-Canada Organic Equivalency Agreement attestation statement. CCPB conducted training for relevant staff and inspectors on the new policy on December 22, 2022.

**AIA-7859-21 - 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:** *CCPB does not fully carry out the procedures of NOP 2613, Instruction: Responding to Results from Pesticide Residue Testing. The auditors' review of pesticide residue analysis reports found the following:*

- *CCPB does not indicate the product may be sold as organic when residue analysis indicates no detection of prohibited substances, as stipulated in NOP 2613.*

- CCPB subtracted the uncertainty of the measurement identified on the analysis report to make a final determination that the pesticide residue detected did not exceed 0.01ppm. The report indicated a residue of 0.014ppm for a substance that does not have an established EPA tolerance or FDA action level and the report indicated an uncertainty measurement of  $\pm 50\%$ ; CCPB subtracted 0.007 and concluded that the product was eligible to be sold as organic. This type of calculation is not provided for in the USDA organic regulations.

**Corrective Action:** CCPB updated its Standard Control Procedures (PCS) in December 2022 to include additional references to NOP 2613 and to state, “the uncertainty measurement in a calculation cannot be factored into the final determination of the pesticide residue detection amount.” CCPB also updated its Notice of Inspection Results, “NP/CI” form, in September 2022 to include the sentence, “the product can be sold as organic” for situations when no prohibited substances are detected in pesticide residue testing results. Training was conducted for relevant staff and inspectors on the new policy on December 22, 2022.

**AIA-7860-21 - Accepted.** 7 C.F.R. §205.501(a)(2) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Demonstrate the ability to fully comply with the requirements for accreditation set forth in this subpart.”

**Comments:** CCPB does not fully implement the NOP’s international organic trade arrangement policies and procedures. The auditors’ review of organic system plans (OSPs) for operations with products listed as verified to the US-Canada Organic Equivalency Arrangement found that CCPB’s OSP templates do not prompt operations to provide a description of how the operation complies with the terms of the arrangement. CCPB inspection report templates also do not prompt inspectors to verify that the operation is compliant with the terms of the arrangement. CCPB procedures also do not describe what is required of their inspectors, reviewers, or certified operations to comply with NOP’s trade arrangements.

**Corrective Action:** CCPB updated the Crop Field Sheet, Livestock-Product Sheet, and Handling Product Sheet OSP templates for operators to report US-Canada Organic Equivalency Arrangement verification points. The inspection report templates for all scopes now include sections and verification points regarding compliance with the US-Canada Organic Equivalency Arrangement (USCOEA). CCPB updated Standard Control Procedures (PCS) to include instructions for reviewers and inspectors on how to evaluate an operation’s compliance with the terms of the USCOEA. CCPB conducted training for relevant staff and inspectors on the updated procedures on December 22, 2022.

**AIA-7861-21 – Accepted.** 7 C.F.R. §205.501(a)(2) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Demonstrate the ability to fully comply with the requirements for accreditation set forth in this subpart.”

**Comments:** CCPB does not consistently demonstrate the ability to fully comply with the requirements for accreditation. The auditors’ review of certification files found CCPB does not always complete timely certification decisions and does not have a process in place to monitor annual certification activities. Interviews with CCPB staff indicate that satellite office personnel do not always forward the documents necessary to complete a timely certification cycle, such as updated organic system plans and completed inspection reports. The auditors found evidence that a certified operation had not received an updated certificate in 3 years because CCPB was unaware that it had not received the inspection report for review. Another certified operation did

*not receive a certification decision until one year following the inspection date because the inspection report appears to have been misplaced by another CCPB department.*

**Corrective Action:** CCPB issued organic certificates for both impacted operations in 2022. CCPB sent an email notification in September 2022 to its offices in Italy stating that all NOP inspection reports must be immediately sent to CCPB's NOP-dedicated office. CCPB sent an email notification to its satellite offices in December 2022 stating that the Local Quality Manager (LQM) is responsible for monitoring annual certification activities and providing the results to CCPB's office in Bologna. CCPB updated its Standard Control Procedures (PCS) in December 2022 to include deadlines for sending inspection reports to the reviewer in CCPB's office in Bologna. CCPB conducted training for relevant staff and inspectors on the new process on December 22, 2022.

**AIA-7862-21 - Accepted.** 7 C.F.R. §205.662(c) states, "Proposed suspension or revocation. 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."

**Comments:** *CCPB issues combined notices of noncompliance and proposed revocation for correctable violations. CCPB incorrectly classified an operation's repeated failure to schedule an annual inspection as not correctable.*

**Corrective Action:** CCPB confirmed as of August 2022 they no longer issue a combined notice of noncompliance and proposed revocation when the operation denies access and will instead issue a notice of noncompliance. CCPB conducted training for relevant staff and inspectors on the revised noncompliance flow on December 22, 2022.

## NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

### AUDIT AND REVIEW PROCESS

An onsite renewal assessment of CCPB Srl (CCPB)'s organic program was conducted on October 21 – 25, 2019. The National Organic Program (NOP) reviewed the auditor's report to assess CCPB's compliance to the USDA organic regulations. This report provides the results of the NOP's assessment.

### GENERAL INFORMATION

<b>Applicant Name</b>	CCPB Srl (CCPB)
<b>Physical Address</b>	Viale Masini 36 Bologna, 40126 Italy
<b>Mailing Address</b>	Same as above
<b>Contact &amp; Title</b>	Roberto Setti, Technical Office and Quality Assurance Manager
<b>E-mail Address</b>	rsetti@ccpb.it
<b>Phone Number</b>	39 051 6089811
<b>Reviewer &amp; Auditor</b>	Jon Frady, NOP Reviewer; Lars Crail and Jessica Walden, On-site Auditors
<b>Program</b>	USDA National Organic Program (NOP)
<b>Review &amp; Audit Date(s)</b>	Corrective action review: May 6, 2020 – June 15, 2021 NOP assessment review: December 16, 2019 Onsite audit: October 21 – 25, 2019
<b>Audit Identifier</b>	NOP-19-19
<b>Action Required</b>	Yes
<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 CCPB's certification
<b>Audit &amp; Determination Criteria</b>	7 CFR Part 205, National Organic Program as amended
<b>Audit &amp; Review Scope</b>	CCPB's certification services in carrying out the audit criteria during the period: June 2016 through October 2019

CCPB is a for-profit company, accredited by the NOP as a USDA certifying agent for the scopes of crops, wild crops, livestock and handling operations. CCPB was initially accredited as a certifying agent on December 9, 2002. On July 24, 2012, CCPB surrendered its accreditation due to the implementation of the EU/US Equivalency Arrangement. In October 2013, CCPB once again applied for NOP accreditation and was accredited on July 1, 2014.

The CCPB current list of NOP certified operations included 191 operations, consisting of 123 crops, 32 wild crops, 0 livestock, 141 processing/handling operations, and 58 grower groups.

CCPB is currently certifying operations in Italy, Morocco, Philippines, Tunisia, Egypt, China, Lebanon, and Turkey.

During the on-site assessment, two witness audits were conducted in Italy.

## **NOP DETERMINATION**

The NOP reviewed corrective actions submitted as a result of noncompliances issued from findings identified during the renewal audit, and a previous audit noncompliance that was still outstanding.

### **Noncompliances from Prior Assessments and Corrective Actions**

Any noncompliance labeled as “**Cleared**,” indicates that the corrective actions for the noncompliance are determined to be implemented and working effectively. Any noncompliance labeled as “**Accepted**” indicates acceptance of the corrective actions and verification of corrective action implementation will be conducted during the next audit assessment.

**NP6172MMA.NC1 – Cleared.**  
**NP6172MMA.NC2 – Cleared.**  
**NP6172MMA.NC3 – Cleared.**  
**NP6172MMA.NC4 – Cleared.**  
**NP6172MMA.NC5 – Cleared.**  
**NP6172MMA.NC6 – Cleared.**  
**NP6172MMA.NC7 – Cleared.**  
**NP6172MMA.NC8 – Cleared.**  
**NP6172MMA.NC9 – Cleared.**

**AIA-6818-21 (NP4132OOA.NC1) – Accepted.** 7 CFR §205.402 (b)(2) states, “The certifying agent shall within a reasonable time: Provide the applicant with a copy of the on-site inspection report, as approved by the certifying agent, for any on-site inspection performed.”

**Comments:** *CCPB’s policy and procedure is for the inspector to leave a copy of the unapproved inspection report with the applicant/certified operation after completing the inspection. The inspector would then submit the inspection report to CCPB for approval. The operator would only receive an approved inspection report if CCPB amended the inspector’s original report. The operator would not receive an approved report if CCPB did not amend the report. CCPB is not in compliance because CCPB does not provide an approved copy of the complete inspection report to all applicants.*

**2014 Corrective Action:** CCPB approves all inspection reports and results of audits prior to an initial review. CCPB has added a statement to form Mod.NO/VI - *Checklist of organic system plan*, stating, “This report and the result of the audit is confirmed in absence of different written communication from CCPB in the following 60 days from the inspection.” CCPB amended the inspectors *Standard Control Procedure* - Operative procedure 2.3.7 to define “inspection report and complete checklist” as the reports to be issued to the operator. CCPB made employees aware of these procedural changes in an email sent on August 11, 2014.

**2016 Verification of Corrective Action:** The inspection reporting process and inspection report templates used are not consistent in all CCPB offices. There are multiple versions of inspection report templates being used that contain different wording. Latest revision to the inspection report template removed the “60 days” specification, which has resulted in separate versions of the same document in use among CCPB offices.

**2016 Corrective Action:** CCPB revised its inspection report forms and checklists. The amended forms were submitted to the NOP and include the statement “A copy of this completed report and of the check list must be left, by the inspector, with the inspected party as compliant with the requirements of NOP 205.403(e)(2). This report and the result of the audit is confirmed in absence of different written communication from CCPB in the following 60 days from the inspection.” CCPB held a training meeting with the Directors on this topic and submitted the training agenda.

**2019 Verification of Corrective Action:** This corrective action was not adequately implemented. During the two witness audits, only the “inspection report” was provided to the operator and not the “inspection checklist.” Both the inspection report (i.e. a summary of the inspector’s findings) and the inspection checklist (i.e. a detailed report of the inspector’s verification) constitute the inspection report as stated in the accepted corrective actions.

**2020 Corrective Action:** CCPB has modified their communication post inspection to operations and has begun sending the operation the complete inspection report (summary of the inspector’s findings), including the checklist (detailed report of the inspector’s verification). The inspection report template has been amended to state at the signature line, “Report Copy - 7 C.F.R NOP 205.403(e)(2).: A copy of the present on-site inspection report and any test results will be sent to the inspected operation by CCPB, following the review process.”

**AIA-6819-21 (NOP-52-18.NC1) – Accepted.** 7 C.F.R. § 205.501(a)(4) states, “A certifying agent under this subpart must: Use ... adequately trained personnel, including inspectors ... to comply with and implement the organic certification program established under the Act and the regulations in subpart E of this part.”

**Comments:** *CCPB personnel did not consistently demonstrate during the audit an adequate understanding of the USDA regulations and NOP policies (i.e. NOP Handbook). The following are examples:*

- a. Inspectors did not consistently discuss and reference USDA organic regulations, including NOP Instruction, Guidance, and Policies (i.e. NOP Handbook) during inspections and exit interviews with operators.*
- b. Inspectors, certification reviewers, and decision makers (identified by assessing certification records) were unaware of processes required in the USDA organic regulations, such as: the OSP requirement for operations to monitor their compliance (205.201(a)(3)); the Crop rotation practice standard and its application to perennial crops (205.205); NOP 5022, Wild Crops Harvesting, requirements; and, identification of material inputs and corresponding restrictions stated in the National List (205.600), e.g. copper sulfate.*
- c. Inspectors are not adequately verifying the completeness of Organic System Plan (OSP) and did not demonstrate an understanding of the central role of the OSP in USDA organic certification.*



*d. During the wild crops witness audit, the inspector did not plan sufficient time to conduct an adequate inspection. The inspection was rushed and did not adequately verify the operation's compliance.*

*e. During the wild crops witness audit, the inspector did not identify harvesting in the village area where there were significant signs of trash, animal manure, and potential contaminants until the auditor pointed this out.*

*f. Verification of flow charts and site maps did not consistently occur during inspections. Maps lacked sufficient detail such as potential contamination risks, and inspectors did not identify incomplete maps as an issue of concern.*

*g. The lack of a crop rotation plan was not identified as an issue of concern during the inspection of a crops operation.*

*h. The inspector did not identify labels as an issue of concern when approved labels did not identify the organic ingredients as "organic" in the ingredients statement as required by 205.303(b)(1).*

**2019 Corrective Actions:** CCPB will revise organic system plans (OSP) and checklists to assist operations and staff to understand the USDA organic regulation and handbook policies. OSP revisions will insert relevant content and examples from NOP handbook documents. The inspection checklist revisions focus on adding clarity to the findings section and a section for documenting audit trail-mass balance verifications. CCPB provided specific training to all NOP inspectors and reviewers on July 15, 2019 in Tunisia and on July 30, 2019 in Morocco on the noncompliances of the NOP audit and CCPB's proposed corrective actions and revisions to the Standard Control Procedures. Revision of documents will be initiated after the September 2019 review and scheduled for completion by the end of 2019. CCPB plans to conduct additional training for applicable staff on implemented changes to the Standard Control Procedures document by the end of 2019.

**2019 Verification of Corrective Action:** This corrective action is not fully implemented because it is scheduled to be completed by the end of 2019. CCPB demonstrated that they have developed checklist drafts, provided and developed trainings for certification staff, and improved maps, which indicates they are on schedule to implement the corrective action. Corrective actions will need verification during the next audit assessment.

**AIA-6820-21 (NOP-52-18.NC2) – Accepted.** 7 C.F.R. §205.501(a)(21) states, "A private or governmental entity accredited as a certifying agent under this subpart must:... Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary." NOP 2603 Organic Certificates, Section 3.1, Elements of the Organic Certificate, provide the necessary layout and terminology used on organic certificates.

**Comments:** *The auditor's review of issued organic certificates found the following issues:*

*a. Certificates incorrectly state the Crops certification scope as "Plant Production."*

*b. Certificates incorrectly state the Wild Crops certification scope as "Wild products."*

*c. Certificates include an operation's "First issuing date" rather than an "Effective Date."*

**2019 Corrective Actions:** CCPB revised and submitted the organic certificate template correcting the scopes and date effective. CCPB provided specific training to all NOP inspectors and reviewers on July 15, 2019 in Tunisia and on July 30, 2019 in Morocco on the noncompliances of the NOP audit and CCPB's proposed corrective actions and revisions to the Standard Control Procedures. Revision of documents will be initiated after the September 2019

review and scheduled for completion by the end of 2019. CCPB plans to conduct additional training for applicable staff on implemented changes to the Standard Control Procedures document by the end of 2019.

**2019 Verification of Corrective Action:** This corrective action is not fully implemented because it is scheduled to be completed by the end of 2019. CCPB demonstrated that they have developed checklist drafts, provided and developed trainings for certification staff, and improved maps. which indicates they are on schedule to implement the corrective action. Corrective actions will need verification during the next audit assessment.

**AIA-6821-21 (NOP-52-18.NC3) – Accepted.** 7 C.F.R. §205.504(b)(1) states, “A private or governmental entity seeking accreditation as a certifying agent must submit the following documents and information to demonstrate its expertise in organic production or handling techniques; its ability to fully comply with and implement the organic certification program established in §§205.100 and 205.101, §§205.201 through 205.203, §§205.300 through 205.303, §§205.400 through 205.406, and §§205.661 and 205.662; and its ability to comply with the requirements for accreditation set forth in §205.501: ...A copy of the procedures to be used to evaluate certification applicants, make certification decisions, and issue certification certificates.”

**Comments:** *Operations that request and receive Wild Crops certification complete an Organic System Plan (OSP) for the Crops certification scope which does not permit operations to fully describe how they will comply with the Wild Crops requirements in NOP 5022, Wild Crop Harvesting. Furthermore, the inspection checklist/report is not designed to instruct the inspector to record the verification of the Wild Crops requirements.*

**2019 Corrective Action:** CCPB developed and submitted a wild crop OSP and checklist to include the requirements of NOP 5022. CCPB trained inspectors and staff on the new documents at the July 15, 2019 in Tunisia and the July 30, 2019 training session in Morocco. These documents will be incorporated in to CCPB’s Standard Control Manual prior to the end of 2019. CCPB will train applicable staff on the revisions to its Standard Control Procedure document prior to the end of 2019.

**2019 Verification of Corrective Action:** This corrective action is not fully implemented because it is scheduled to be completed by the end of 2019. CCPB demonstrated that they have developed checklist drafts, provided and developed trainings for certification staff, and improved maps. which indicates they are on schedule to implement the corrective action. Corrective actions will need verification during the next audit assessment.

**AIA-6822-21 (NOP-52-18.NC4) – Accepted.** 7 C.F.R. §205.403(c)(2) states, “The on-site inspection of an operation must verify: The operation’s compliance or capability to comply with the Act and the regulations of this part; That the information, including the organic production or handling system plan, provided in accordance with §§205.401, 205.406, and 205.200, accurately reflects the practices used or to be used by the applicant for certification or by the certified operation.”

**Comments:** *During the inspection of a wild crops operation, the inspector did not adequately verify the following:*

*a. The accuracy of the site’s boundaries, and an assessment of the potential for contamination from adjoining land use.*

*b. The requirements of NOP 5022, Wild Crops Harvesting, to include the adequate training of wild crop gatherers.*

*c. That the flow chart was accurate and described all harvesting and post-harvest activities.*

**2019 Corrective Action:** CCPB developed and submitted a wild crop inspector checklist to include the requirements of NOP 5022 CCPB trained inspectors and staff on the new documents at the July 15, 2019 in Tunisia and the July 30, 2019 training session in Morocco. These documents will be incorporated in to CCPB's Standard Control Manual prior to the end of 2019. CCPB will train applicable staff on the revisions to its Standard Control Procedure document prior to the end of 2019.

**2019 Verification of Corrective Action:** This corrective action is not fully implemented because it is scheduled to be completed by the end of 2019. CCPB demonstrated that they have developed checklist drafts, provided and developed trainings for certification staff, and improved maps. which indicates they are on schedule to implement the corrective action. Corrective actions will need verification during the next audit assessment.

**AIA-6823-21 (NOP-52-18.NC5) – Accepted.** 7 C.F.R. §205.403(e)(2) states, “A copy of the on-site inspection report and any test results will be sent to the inspected operation by the certifying agent.”

**Comments:** *Inspectors are providing operations a copy of their inspection reports, rather than the certifying agent.*

**2019 Corrective Action:** CCPB revised its policy and inspectors will no longer provide operations a copy of the inspection report. CCPB will implement this policy prior to the end of September 2019. CCPB trained inspectors and staff on this policy change in Tunisia (July 15, 2019) and in Morocco (July 30, 2019). CCPB will integrate the policy change in to its Standard Control Procedure prior to the end of 2019.

**2019 Verification of Corrective Action:** This corrective action is not fully implemented because it is scheduled to be completed by the end of 2019. CCPB demonstrated that they have developed checklist drafts, provided and developed trainings for certification staff, and improved maps. which indicates they are on schedule to implement the corrective action. Corrective actions will need verification during the next audit assessment.

**AIA-6824-21 (NOP-52-18.NC6) – Accepted.** 7 C.F.R. §205.403(d) states, “The inspector must conduct an exit interview ... to confirm the accuracy and completeness of inspection observations and information gathered during the on-site inspection. The inspector must also address the need for any additional information as well as any issues of concern.”

**Comments:** *Exit Interview forms and Inspection Reports templates identify inspection findings as “Noncompliances.” Inspectors should verify compliance to the approved Organic System Plan and the USDA organic regulations by identifying “issues of concern” or potential noncompliances.*

**2019 Corrective Action:** CCPB will revise the inspection checklists to replace “noncompliances” with “issues of concern.” CCPB provided specific training to all NOP inspectors and reviewers on July 15, 2019 in Tunisia and on July 30, 2019 in Morocco on this revision. Revisions to documents will be initiated after the September 2019 review and completion is scheduled for the end of 2019. CCPB plans to conduct additional training for

applicable staff on implemented changes to the Standard Control Procedures document prior to the end of 2019.

**2019 Verification of Corrective Action:** This corrective action is not fully implemented because it is scheduled to be completed by the end of 2019. CCPB demonstrated that they have developed checklist drafts, provided and developed trainings for certification staff, and improved maps. which indicates they are on schedule to implement the corrective action. Corrective actions will need verification during the next audit assessment.

**AIA-6825-21 (NOP-52-18.NC7) – Accepted.** 7 C.F.R. §205.504(b)(1) states, “A private or governmental entity seeking accreditation as a certifying agent must submit the following documents and information to demonstrate its expertise in organic production or handling techniques; its ability to fully comply with and implement the organic certification program established in §§205.100 and 205.101, §§205.201 through 205.203, §§205.300 through 205.303, §§205.400 through 205.406, and §§205.661 and 205.662; and its ability to comply with the requirements for accreditation set forth in §205.501: ...A copy of the procedures to be used to evaluate certification applicants, make certification decisions, and issue certification certificates.”

**Comments:** *The “Checklist of the Inspection” also known as the Inspection Report is not designed to allow the inspector to record verification of corrective actions to prior noncompliances listed on an operation’s annual update. However, the auditor did observe inspectors conducting verification of previously submitted corrective actions for implementation and effectiveness.*

**2019 Corrective Action:** CCPB will revise the inspection checklists to allow inspectors to record the corrective action verification of prior noncompliances. CCPB provided specific training to all NOP inspectors and reviewers on July 15, 2019 in Tunisia and on July 30, 2019 in Morocco on this revision. Revisions to documents are planned for after the September 2019 review and completion is scheduled for the end of 2019. CCPB plans to conduct additional training for applicable staff on implemented changes to the Standard Control Procedures document prior to the end of 2019.

**2019 Verification of Corrective Action:** This corrective action is not fully implemented because it is scheduled to be completed by the end of 2019. CCPB demonstrated that they have developed checklist drafts, provided and developed trainings for certification staff, and improved maps. which indicates they are on schedule to implement the corrective action. Corrective actions will need verification during the next audit assessment.

**AIA-6826-21 (NOP-52-18.NC8) – Accepted.** 7 C.F.R. §205.660(d) states, “Each notification of noncompliance, rejection of mediation, noncompliance resolution, proposed suspension or revocation, and suspension or revocation issued pursuant to §205.662, §205.663, and §205.665 and each response to such notification must be sent to the recipient's place of business via a delivery service which provides dated return receipts.”

**Comments:** *The auditor’s review of notifications of noncompliance and noncompliance resolutions found that CCPB did not issue such notifications via a delivery service which provides dated return receipts.*

**2019 Corrective Action:** CCPB will adopted the use of dated return receipt services for notices and provided specific training for this revision to all NOP inspectors and reviewers on July 15, 2019 in Tunisia and on July 30, 2019 in Morocco. On April 3, 2019, CCPB requested that all field offices provide a return receipt solution for their region. Revisions to the Standard Control Procedures are planned for after the September 2019 review and completion is scheduled for the end of 2019. CCPB plans to conduct additional training for applicable staff on implemented changes to the Standard Control Procedures document prior to the end of 2019.

**2019 Verification of Corrective Action:** This corrective action is not fully implemented because it is scheduled to be completed by the end of 2019. CCPB demonstrated that they have developed checklist drafts, provided and developed trainings for certification staff, and improved maps. which indicates they are on schedule to implement the corrective action. Corrective actions will need verification during the next audit assessment.

**AIA-6827-21 (NOP-52-18.NC9) – Accepted.** 7 C.F.R. §205.501(a)(21) states, “A private or governmental entity accredited as a certifying agent under this subpart must:… Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.” The audit engagement letter requested that documents be translated into English.

**Comments:** *Many records such as current Organic System Plans and Inspection Reports were in French and not translated to English.*

**2019 Corrective Action:** CCPB attributes the untranslated documents to a misunderstanding of the document request. CCPB has informed appropriate staff of the noncompliance and understand the need for translation of all requested documents. CCPB will communicate with the auditor directly about the files for review and translation times.

**2019 Verification of Corrective Action:** This corrective action is not fully implemented because it is scheduled to be completed by the end of 2019. CCPB demonstrated that they have developed checklist drafts, provided and developed trainings for certification staff, and improved maps. which indicates they are on schedule to implement the corrective action. Corrective actions will need verification during the next audit assessment.

### **Noncompliances Identified during the Current Assessment and Corrective Actions**

**AIA-6828-21 (NOP-19-19.NC1) – Accepted.** 7 C.F.R. §205.501(a)(4) states, “A private or governmental entity accredited as a certifying agent under this subpart must:… Use a sufficient number of adequately trained personnel, including inspectors and certification review personnel, to comply with and implement the organic certification program established under the Act and the regulations in subpart E of this part;…”

**Comments:** *The auditors observed or identified the following issues while conducting witness audits, records review, and certification staff interviews in Italy that demonstrate insufficient knowledge and skills of the USDA organic regulations and NOP policies by certification personnel including inspectors:*

- *The auditors found the following issues regarding material inputs:*
  - *National List annotations are not verified for approved inputs.*

- *Technical information for inputs is not collected, reviewed, and verified for compliance. In one case a material not on the National List was approved as a processing aid in the production of a certified product.*
- *Review personnel were not able to demonstrate that materials and ingredients are adequately assessed for compliance with 100% organic composition and commercial availability requirements.*
- *Inspectors are not adequately trained to conduct verification activities according to the NOP requirements, or reference and discuss the USDA organic regulations with operators.*
- *Current organic system plans do not reflect current practices; are not monitored by the operator, and are not updated if there are any deviations. Inspectors are frequently not identifying that organic system plans should be updated even though their inspection checklists describe activities that should be in the organic system plan.*
- *Materials used in the production and handling of organic products are not consistently listed in the organic system plan and thus not reviewed for compliance by the certifier.*
- *Review personnel are not adequately reviewing the inspection reports (including checklist and relevant attachments) as well as the organic system plans and identifying issues of concerns that may be missed by the inspectors.*
- *Product formulations and percentage calculations records for processed products are completed by the operator but are not verified for compliance by CCPB review or inspection personnel.*
- *Issued NOP certificates include an effective date that is the same as the certificate issue date. When an updated certificate is issued, the effective date continues to be the same as the certificate issue date.*

**2020 Corrective Action:** Staff training was conducted on December 11, 2019 after the on-site audit to discuss issues identified with Italian inspectors and relevant NOP certification program staff. For staff in China, a face-to-face training was conducted on November 6, 2019 in Hangzhou, China. Trainings were also held with Directors, Local Quality Managers and relevant inspectors of the five local CCPB office in the Mediterranean basin in May 2020 with two sessions held on the 20th and 27th of the month. To manage their quality system, CCPB has added an additional staff member responsible for quality system management and internal audits. Regarding inspection deficiencies, CCPB is requiring all inspectors to complete four relevant Organic Integrity Learning Center trainings regarding proper inspections and materials use/review. For review deficiencies, CCPB is requiring all reviewers to complete three relevant Organic Integrity Learning Center trainings regarding proper review and materials use. CCPB's OSP templates have been amended to capture all materials used in production and handling operations. The OSP templates have also been amended to better describe the practices of certified operations with additional control points for verification. CCPB's control procedures have been updated to ensure verification of practices and materials, manage updates of OSPs at

the time of inspection and reviews, and issue certificates in the proper format. In addition, CCPB plans to conduct additional witness audits of inspectors. CCPB has also sought to be more involved by becoming members of the Accredited Certifiers Association for a better understanding of how other NOP accredited certifiers approach and conduct USDA organic certification. CCPB will continue to attend BioFach in the coming year for NOP training as well.

**AIA-6829-21 (NOP-19-19.NC2) – Accepted.** 7 C.F.R. §205.501(a)(2) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Demonstrate the ability to fully comply with the requirements for accreditation set forth in this subpart.”

**Comments:** *CCPB has no formal review process for assessing materials used in or on NOP certified production and handling operations.*

**2020 Corrective Action:** The Standard Control Procedures (point 2.3.4 and 2.3.7.4) have been updated and specifically require review and inspection of any material used in accordance with the USDA Organic Regulations. Organic System Plan templates and annexes have been amended and specifically require all materials used in production and/or handling operations. As part of scheduled training, the issues identified were discussed with the Italian inspectors and relevant staff in a meeting of December 11, 2019. Furthermore, additional trainings have been completed on May 20, 2020 and May 27, 2020 with Directors and Local Quality Managers of the five local offices of CCPB in the Mediterranean basin.

**AIA-6830-21 (NOP-19-19.NC3) – Accepted.** 7 CFR §205.501(a)(16) states, “Charge applicants for certification and certified production and handling operations only those fees and charges for certification activities that it has filed with the Administrator;...”

**Comments:** *CCPB fee schedules for operations outside of Italy (i.e. countries) have never been submitted to the NOP.*

**2020 Corrective Action:** CCPB submitted fee schedules for all countries in which they conduct certification activities. To ensure new schedules are submitted to NOP prior to implementation, CCPB’s the Standard Control Procedure, point 2.4, now states: “Any update of the fee table must be notified to the NOP Administrator once they have been approved by the General Manager.”

## NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

### AUDIT AND REVIEW PROCESS

An onsite audit of CCPB Srl's satellite office in Morocco was conducted on September 10, 2018. The National Organic Program (NOP) reviewed the auditor's report to assess CCPB Srl's compliance to the USDA organic regulations. This report provides the results of NOP's assessment.

### GENERAL INFORMATION

<b>Name</b>	CCPB Srl – Morocco office (CCPB-Morocco)
<b>Physical Address</b>	21 Rue Al Maadar immeuble Al Khayr, app. 12 Cittè Essalam, Agadir, Morocco
<b>Mailing Address</b>	21 Rue Al Maadar immeuble Al Khayr, app. 12 Cittè Essalam, Agadir, Morocco
<b>Contact &amp; Title</b>	Robert Setti, Quality Manager
<b>E-mail Address</b>	<a href="mailto:ccpb@ccpb.it">ccpb@ccpb.it</a>
<b>Phone Number</b>	39 051 6089811
<b>Reviewers Auditor</b>	Jason Lopez and Rebecca Claypool, NOP Reviewer; Lars Crail, On-site Auditor.
<b>Program</b>	USDA National Organic Program (NOP)
<b>Review Dates</b>	NOP assessment review: December 17, 2018, July 10, 2019, September 9, 2019
<b>Audit Dates</b>	Onsite audit: September 10-14, 2018
<b>Audit Identifier</b>	NOP-52-18
<b>Action Required</b>	Yes
<b>Audit &amp; Review Type</b>	Satellite Office Assessment
<b>Audit Objective</b>	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of CCPB's certification
<b>Audit &amp; Determination Criteria</b>	<i>7 CFR Part 205, National Organic Program as amended</i>
<b>Audit &amp; Review Scope</b>	CCPB's certification services in carrying out the audit criteria during the period: July 1, 2014 through September 2018

CCPB is a private corporation accredited by the USDA NOP on December 9, 2002, to the scopes of crops, wild crops, livestock, and processing/handling. CCPB's main office is in Bologna, Italy. CCPB maintains an office in Morocco (CCPB-Morocco) to provide inspection activities and client outreach. CCPB-Morocco consists of seven staff personnel: six inspectors and one administrative staff. The office is responsible for the inspections of 51 certified operations to the



following scopes: 9 crops, 29 wild crops, 1 livestock, and 47 handling. Morocco office personnel conduct inspections in Morocco only.

As part of the on-site office audit, three witness audits were conducted. Inspections of handling (processing), wild crops, and crops operations were observed.

## **NOP DETERMINATION:**

NOP reviewed the onsite audit results to determine whether **CCPB**'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 Identified during the Current Assessment and Corrective Actions**

Any noncompliance labeled as “**Accepted**,” indicates that the corrective actions for the noncompliance are accepted by the NOP and will be verified for implementation and effectiveness during the next onsite audit.

**NOP-52-18.NC1 – Accepted.** 7 C.F.R. § 205.501(a)(4) states, “A certifying agent under this subpart must: Use ... adequately trained personnel, including inspectors ... to comply with and implement the organic certification program established under the Act and the regulations in subpart E of this part.”

**Comments:** *CCPB personnel did not consistently demonstrate during the audit an adequate understanding of the USDA regulations and NOP policies (i.e. NOP Handbook). The following are examples:*

- a. Inspectors did not consistently discuss and reference USDA organic regulations, including NOP Instruction, Guidance, and Policies (i.e. NOP Handbook) during inspections and exit interviews with operators.*
- b. Inspectors, certification reviewers, and decision makers (identified by assessing certification records) were unaware of processes required in the USDA organic regulations, such as: the OSP requirement for operations to monitor their compliance (205.201(a)(3)); the Crop rotation practice standard and its application to perennial crops (205.205); NOP 5022, Wild Crops Harvesting, requirements; and, identification of material inputs and corresponding restrictions stated in the National List (205.600), e.g. copper sulfate.*
- c. Inspectors are not adequately verifying the completeness of Organic System Plan (OSP) and did not demonstrate an understanding of the central role of the OSP in USDA organic certification.*
- d. During the wild crops witness audit, the inspector did not plan sufficient time to conduct an adequate inspection. The inspection was rushed and did not adequately verify the operation's compliance.*

- e. *During the wild crops witness audit, the inspector did not identify harvesting in the village area where there were significant signs of trash, animal manure, and potential contaminants until the auditor pointed this out.*
- f. *Verification of flow charts and site maps did not consistently occur during inspections. Maps lacked sufficient detail such as potential contamination risks, and inspectors did not identify incomplete maps as an issue of concern.*
- g. *The lack of a crop rotation plan was not identified as an issue of concern during the inspection of a crops operation.*
- h. *The inspector did not identify labels as an issue of concern when approved labels did not identify the organic ingredients as “organic” in the ingredients statement as required by 205.303(b)(1).*

**Corrective Actions:** CCPB will revise organic system plans (OSP) and checklists to assist operations and staff to understand the USDA organic regulation and handbook policies. OSP revisions will insert relevant content and examples from NOP handbook documents. The inspection checklist revisions focus on adding clarity to the findings section and a section for documenting audit trail-mass balance verifications. CCPB provided specific training to all NOP inspectors and reviewers on July 15, 2019 in Tunisia and on July 30, 2019 in Morocco on the noncompliances of the NOP audit and CCPB’s proposed corrective actions and revisions to the Standard Control Procedures. Revision of documents will be initiated after the September 2019 review and scheduled for completion by the end of 2019. CCPB plans to conduct additional training for applicable staff on implemented changes to the Standard Control Procedures document by the end of 2019.

**NOP-52-18.NC2 – Accepted.** 7 C.F.R. §205.501(a)(21) states, “A private or governmental entity accredited as a certifying agent under this subpart must:… Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.” NOP 2603 Organic Certificates, Section 3.1, Elements of the Organic Certificate, provide the necessary layout and terminology used on organic certificates.

**Comments:** *The auditor’s review of issued organic certificates found the following issues:*

- a. *Certificates incorrectly state the Crops certification scope as “Plant Production.”*
- b. *Certificates incorrectly state the Wild Crops certification scope as “Wild products.”*
- c. *Certificates include an operation’s “First issuing date” rather than an “Effective Date.”*

**Corrective Actions:** CCPB revised and submitted the organic certificate template correcting the scopes and date effective. CCPB provided specific training to all NOP inspectors and reviewers on July 15, 2019 in Tunisia and on July 30, 2019 in Morocco on the noncompliances of the NOP audit and CCPB’s proposed corrective actions and revisions to the Standard Control Procedures. Revision of documents will be initiated after the September 2019 review and scheduled for completion by the end of 2019. CCPB plans to conduct additional training for applicable staff on implemented changes to the Standard Control Procedures document by the end of 2019.

**NOP-52-18.NC3 – Accepted.** 7 C.F.R. §205.504(b)(1) states, “A private or governmental entity seeking accreditation as a certifying agent must submit the following documents and information to demonstrate its expertise in organic production or handling techniques; its ability to fully

comply with and implement the organic certification program established in §§205.100 and 205.101, §§205.201 through 205.203, §§205.300 through 205.303, §§205.400 through 205.406, and §§205.661 and 205.662; and its ability to comply with the requirements for accreditation set forth in §205.501: ...A copy of the procedures to be used to evaluate certification applicants, make certification decisions, and issue certification certificates.”

**Comments:** *Operations that request and receive Wild Crops certification complete an Organic System Plan (OSP) for the Crops certification scope which does not permit operations to fully describe how they will comply with the Wild Crops requirements in NOP 5022, Wild Crop Harvesting. Furthermore, the inspection checklist/report is not designed to instruct the inspector to record the verification of the Wild Crops requirements.*

**Corrective Actions:** CCPB developed and submitted a wild crop OSP and checklist to include the requirements of NOP 5022. CCPB trained inspectors and staff on the new documents at the July 15, 2019 in Tunisia and the July 30, 2019 training session in Morocco. These documents will be incorporated in to CCPB’s Standard Control Manual prior to the end of 2019. CCPB will train applicable staff on the revisions to its Standard Control Procedure document prior to the end of 2019.

**NOP-52-18.NC4 – Accepted.** 7 C.F.R. §205.403(c)(2) states, “The on-site inspection of an operation must verify: The operation’s compliance or capability to comply with the Act and the regulations of this part; That the information, including the organic production or handling system plan, provided in accordance with §§205.401, 205.406, and 205.200, accurately reflects the practices used or to be used by the applicant for certification or by the certified operation.”

**Comments:** *During the inspection of a wild crops operation, the inspector did not adequately verify the following:*

- a. The accuracy of the site’s boundaries, and an assessment of the potential for contamination from adjoining land use.*
- b. The requirements of NOP 5022, Wild Crops Harvesting, to include the adequate training of wild crop gatherers.*
- c. That the flow chart was accurate and described all harvesting and post-harvest activities.*

**Corrective Actions:** CCPB developed and submitted a wild crop inspector checklist to include the requirements of NOP 5022 CCPB trained inspectors and staff on the new documents at the July 15, 2019 in Tunisia and the July 30, 2019 training session in Morocco. These documents will be incorporated in to CCPB’s Standard Control Manual prior to the end of 2019. CCPB will train applicable staff on the revisions to its Standard Control Procedure document prior to the end of 2019.

**NOP-52-18.NC5 – Accepted.** 7 C.F.R. §205.403(e)(2) states, “A copy of the on-site inspection report and any test results will be sent to the inspected operation by the certifying agent.”

**Comments:** *Inspectors are providing operations a copy of their inspection reports, rather than the certifying agent.*

**Corrective Actions:** CCPB revised its policy and inspectors will no longer provide operations a copy of the inspection report. CCPB will implement this policy prior to the end of September 2019. CCPB trained inspectors and staff on this policy change in Tunisia (July 15, 2019) and in

Morocco (July 30, 2019). CCPB will integrate the policy change in to its Standard Control Procedure prior to the end of 2019.

**NOP-52-18.NC6 – Accepted.** 7 C.F.R. §205.403(d) states, “The inspector must conduct an exit interview ... to confirm the accuracy and completeness of inspection observations and information gathered during the on-site inspection. The inspector must also address the need for any additional information as well as any issues of concern.”

**Comments:** *Exit Interview forms and Inspection Reports templates identify inspection findings as “Noncompliances.” Inspectors should verify compliance to the approved Organic System Plan and the USDA organic regulations by identifying “issues of concern” or potential noncompliances.*

**Corrective Actions:** CCPB will revise the inspection checklists to replace “noncompliances” with “issues of concern.” CCPB provided specific training to all NOP inspectors and reviewers on July 15, 2019 in Tunisia and on July 30, 2019 in Morocco on this revision. Revisions to documents will be initiated after the September 2019 review and completion is scheduled for the end of 2019. CCPB plans to conduct additional training for applicable staff on implemented changes to the Standard Control Procedures document prior to the end of 2019.

**NOP-52-18.NC7 – Accepted.** 7 C.F.R. §205.504(b)(1) states, “A private or governmental entity seeking accreditation as a certifying agent must submit the following documents and information to demonstrate its expertise in organic production or handling techniques; its ability to fully comply with and implement the organic certification program established in §§205.100 and 205.101, §§205.201 through 205.203, §§205.300 through 205.303, §§205.400 through 205.406, and §§205.661 and 205.662; and its ability to comply with the requirements for accreditation set forth in §205.501: ...A copy of the procedures to be used to evaluate certification applicants, make certification decisions, and issue certification certificates.”

**Comments:** *The “Checklist of the Inspection” also known as the Inspection Report is not designed to allow the inspector to record verification of corrective actions to prior noncompliances listed on an operation’s annual update. However, the auditor did observe inspectors conducting verification of previously submitted corrective actions for implementation and effectiveness.*

**Corrective Actions:** CCPB will revise the inspection checklists to allow inspectors to record the corrective action verification of prior noncompliances. CCPB provided specific training to all NOP inspectors and reviewers on July 15, 2019 in Tunisia and on July 30, 2019 in Morocco on this revision. Revisions to documents are planned for after the September 2019 review and completion is scheduled for the end of 2019. CCPB plans to conduct additional training for applicable staff on implemented changes to the Standard Control Procedures document prior to the end of 2019.

**NOP-52-18.NC8 – Accepted.** 7 C.F.R. §205.660(d) states, “Each notification of noncompliance, rejection of mediation, noncompliance resolution, proposed suspension or revocation, and suspension or revocation issued pursuant to §205.662, §205.663, and §205.665 and each response to such notification must be sent to the recipient's place of business via a delivery service which provides dated return receipts.”

**Comments:** *The auditor's review of notifications of noncompliance and noncompliance resolutions found that CCPB did not issue such notifications via a delivery service which provides dated return receipts.*

**Corrective Actions:** CCPB will adopted the use of dated return receipt services for notices and provided specific training for this revision to all NOP inspectors and reviewers on July 15, 2019 in Tunisia and on July 30, 2019 in Morocco. On April 3, 2019, CCPB requested that all field offices provide a return receipt solution for their region. Revisions to the Standard Control Procedures are planned for after the September 2019 review and completion is scheduled for the end of 2019. CCPB plans to conduct additional training for applicable staff on implemented changes to the Standard Control Procedures document prior to the end of 2019.

**NOP-52-18.NC9 – Accepted.** 7 C.F.R. §205.501(a)(21) states, “A private or governmental entity accredited as a certifying agent under this subpart must:... Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.” The audit engagement letter requested that documents be translated into English.

**Comments:** *Many records such as current Organic System Plans and Inspection Reports were in French and not translated to English.*

**Corrective Actions:** CCPB attributes the untranslated documents to a misunderstanding of the document request. CCPB has informed appropriate staff of the noncompliance and understand the need for translation of all requested documents. CCPB will communicate with the auditor directly about the files for review and translation times.

## NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

### AUDIT AND REVIEW PROCESS

The National Organic Program (NOP) conducted an initial assessment of CCPB Srl (CCPB).. An onsite audit was conducted, and the audit report and corrective actions have been reviewed to determine CCPB's capability to continue operating as a USDA accredited certifier.

### GENERAL INFORMATION

<b>Applicant Name</b>	CCPB Srl (CCPB)
<b>Physical Address</b>	Viale Masini 36
<b>Mailing Address</b>	Bologna, 40126 Italy
<b>Contact &amp; Title</b>	Roberto Setti, Technical Department & Quality Assurance Manager
<b>E-mail Address</b>	<a href="mailto:rsetti@ccpb.it">rsetti@ccpb.it</a>
<b>Phone Number</b>	39 051 6089811
<b>Reviewer(s) &amp; Auditor(s)</b>	Penny Zuck, NOP Reviewer; Miguel A. Caceres and Renée Gebault King, Onsite Auditors.
<b>Program</b>	USDA National Organic Program (NOP)
<b>Review &amp; Audit Date(s)</b>	NOP corrective action review: October 28, 2016 – February 21, 2017 NOP assessment review: July 20, 2016 Onsite audit: June 20 – 23, 2016
<b>Audit Identifier</b>	NP6172MMA
<b>Action Required</b>	No
<b>Audit &amp; Review Type</b>	Initial Assessment
<b>Audit Objective</b>	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of CCPB's certification system.
<b>Audit &amp; Determination Criteria</b>	7 CFR Part 205, National Organic Program as amended
<b>Audit &amp; Review Scope</b>	CCPB's certification services in carrying out the audit criteria during the period: July 1, 2014 through June 23, 2016.

CCPB SRL (CCPB) is a for-profit company, which was re-accredited as a USDA National Organic Program (NOP) certifying agent on July 1, 2014 for the scopes of crops, wild crops, livestock and handling operations. CCPB was initially accredited as a NOP certifying agent on December 9, 2002. On July 24, 2012 CCPB surrendered its accreditation due to the implementation of the EU/US Equivalency Arrangement. In October 2013, CCPB submitted an application to once again become a NOP certifying agent. CCPB has accreditations for EU 834/2007 and COR and is certified for numerous Programs such as Bio Suisse, JAS, and Demeter standards. The CCPB current list of NOP certified operations included 50 operations, consisting of 24 crop, 10 wild crops, 1 livestock and 46 processing/handling operations. CCPB does not certify any grower groups. CCPB is currently certifying operations in Italy, Morocco, Philippines, Tunisia, and Turkey.

CCPB utilizes 19 staff in Italy and 13 among foreign offices to conduct inspection and certification activities. In Italy, there are 4 technical staff, 9 inspectors, 2 quality managers, and 4 administrative personnel. Personnel are also located in CCPB's foreign offices: Tunisia (4 staff), Egypt (2 staff), Lebanon (2 staff), Turkey (2 staff), and Morocco (3 staff). Not all staff in the foreign offices perform USDA organic inspection activities.

## **NOP DETERMINATION:**

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

**NP4132OOA.NC1 – Accepted.** 7 CFR §205.402 (b)(2) states, "The certifying agent shall within a reasonable time: Provide the applicant with a copy of the on-site inspection report, as approved by the certifying agent, for any on-site inspection performed."

**Comments:** *CCPB's policy and procedure is for the inspector to leave a copy of the unapproved inspection report with the applicant/certified operation after completing the inspection. The inspector would then submit the inspection report to CCPB for approval. The operator would only receive an approved inspection report if CCPB amended the inspector's original report. The operator would not receive an approved report if CCPB did not amend the report. CCPB is not in compliance because CCPB does not provide an approved copy of the complete inspection report to all applicants.*

**Corrective Action:** CCPB approves all inspection reports and results of audits prior to an initial review. CCPB has added a statement to form Mod.NO/VI - *Checklist of organic system plan*, stating, "This report and the result of the audit is confirmed in absence of different written communication from CCPB in the following 60 days from the inspection." CCPB amended the inspectors *Standard Control Procedure* - Operative procedure 2.3.7 to define "inspection report and complete checklist" as the reports to be issued to the operator. CCPB made employees aware of these procedural changes in an email sent on August 11, 2014.

**2016 Verification of Corrective Action:** The inspection reporting process and inspection report templates used are not consistent in all CCPB offices. There are multiple versions of inspection report templates being used that contain different wording. Latest revision to the inspection report template removed the "60 days" specification, which has resulted in separate versions of the same document in use among CCPB offices.

**2016 Corrective Action:** CCPB revised its inspection report forms and checklists. The amended forms were submitted to the NOP and include the statement “A copy of this completed report and of the check list must be left, by the inspector, with the inspected party as compliant with the requirements of NOP 205.403(e)(2). This report and the result of the audit is confirmed in absence of different written communication from CCPB in the following 60 days from the inspection.” CCPB held a training meeting with the Directors on this topic and submitted the training agenda.

## **NP4132OOA.NC2 – 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.

**NP6172MMA.NC1 – Accepted.** 7 CFR §205.404(c) states, “Once certified, a production or handling operation's organic certification continues in effect until surrendered by the organic operation or suspended or revoked by the certifying agent, the State organic program's governing State official, or the Administrator.”

**Comments:** *The CCPB NOP contract used for operations entering the certification program includes statements which are not consistent with the USDA organic regulations. According to the USDA organic regulations, certification can only be surrendered, suspended, or revoked. The contract implies CCPB can stop certification of the certified operation without following the required adverse actions process.*

**2016 Corrective Action:** CCPB revised the Contract for USDA-NOP Certification to remove the following statement “CCPB can stop certification of the certified operation without following the required adverse actions process.”

**NP6172MMA.NC2 – Accepted.** 7 CFR §205.405(a)(1) states, “When the certifying agent has reason to believe...the certifying agent must provide a written notification of noncompliance to the applicant...” and 7 CFR §205.662(a-e) 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...”

**Comments:** *The majority of the CCPB templates to be used for notifications of noncompliance and the adverse actions process do not meet the notification requirements of the USDA organic regulations. Specifically:*

*1) The Notice of Noncompliance template:*

- *States failure to provide corrective actions can lead CCPB to issue a proposed suspension of certification. However, the notice does not include the option to issue a notice of proposed revocation;*
- *The notice includes a possible extended rebuttal period and states the recipient can appeal a notice of noncompliance which is not an option under the USDA organic regulations.*

*2) The “Notice of Revocation of Certification” template:*



- *Contains contradictory language in that it is a notice of revocation but states, “The suspension is due to the lack of resolution of the following non-compliance.”*
- 3) *All notifications that include an address, do not have the correct appeals address as required in 7 CFR §205.681(d)(1);*
- 4) *The templates state to include an “Abstract from the NOP Rule (incl. Ref. to the section) and description of the NC” and also state, “For further details of the detected non-compliance see the audit report issued by the Inspector.” It is not clear that this would include the facts upon which the noncompliance is based without the recipient of the notice having to refer to the inspection report;*
- 5) *The templates for proposed actions (suspension/revocation), combined notices, and denial of certification all state the recipient can rebut the proposed action or denial which is not an option under the USDA organic regulations and do not include the option to request mediation.*

**2016 Corrective Action:** OFDC submitted revised templates for Notices of Noncompliance and Adverse Actions.

- 1) The Notice of Noncompliance includes notification that failure to respond to the notice could result in OFDC issuing a notice of proposed suspension or notice of proposed revocation and includes the same timeframe for submitting a rebuttal or corrective actions.
- 2) The language in the Notice of Revocation was revised with the correct information pertaining to the process of revocation.
- 3) Revised notices include the correct address to file an appeal.
- 4) Revised notice templates include “the facts upon which the NC is based.”
- 5) The revised Notice of Proposed Revocation, Notice of Proposed Suspension, combined NoNC and NoPS, combined NoNC and NoPR, and Notice of Denial now indicate the option of mediation in accordance with the USDA organic regulations.

**NP6172MMA.NC3 – Accepted.** 7 CFR §205.501(a)(3) states, “A private or governmental entity accredited as a certifying agent under this subpart must:...Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670;...” §205.100(a) states, “Except for operations exempt or excluded in §205.101, each production or handling operation or specified portion of a production or handling operation that produces or handles crops, livestock, livestock products, or other agricultural products that are intended to be sold, labeled, or represented as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s))” must be certified according to the provisions of subpart E of this part and must meet all other applicable requirements of this part.” 7 CFR §205.501(a)(21) states, “A private or governmental entity accredited as a certifying agent under this subpart must:...Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.” NOP 4009, Who Needs to be Certified, section 3 states, “When organically producing or handling agricultural products, a certified operation may not allow an uncertified operation to produce or handle agricultural products, under contract or other arrangement, on the uncertified operation’s land or premises (i.e., at units, facilities, or sites not explicitly subject to inspection or compliance action by the NOP or a certifying agent).”

**Comments:** *A review of one handling/processor file verified that CCPB allowed a certified operation to contract with uncertified operations to produce and handle organic agricultural products. A review of the file verified that CCPB certified the operation which contracted with 17 uncertified producers which provide olives for their organic olive oil.*

**Corrective Action:** CCPB revised the Standard Control Procedure Organic Products USDA-NOP Scheme (PCS 002) to include a section on Certification of Groups of Producers. CCPB developed the following forms and documents for grower group certification: Description of the Internal Control System (MOD RT/IS), Organic System Plan, Inspection Report, and Guidelines for Setting up an Internal Control System (ICS). CCPB provided training for all Directors on grower group certification. CCPB submitted documentation verifying the noncompliant operation surrendered NOP certification in 2016.

**NP6172MMA.NC4 – Accepted.** 7 CFR §205.501(a)(3) states, “A private or governmental entity accredited as a certifying agent under this subpart must:…Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670;…” 7 CFR §205.504(b)(2) states, “A private or governmental entity seeking accreditation as a certifying agent must submit the following documents…A copy of the procedures to be used for reviewing and investigating certified operation…”

**Comments:** *The CCPB procedures for continuing certification do not include the actual process CCPB has in place to ensure certified operations submit an annual update. CCPB sends out the annual update requests for the Italy operations. The subsidiary offices send the annual update requests for operations outside of Italy. However, there is no set timeframe or standard documents/procedures for the offices to send the requests for the updates. The main office and the Tunisia office were using a standard template. The Morocco office used emails to submit the request. In one file review the CCPB main office was not aware if the request had been submitted to the certified operation without checking with the Tunisia office. The certification procedures do not include a clear description of what the other offices are responsible for during the certification process; do not include clear instructions on how to conduct/complete those processes; and do not include a clear description of what oversight the main office has in place to verify each responsibility during the certification process has been carried out.*

**Corrective Action:** CCPB revised the Standard Control Procedure Organic Products USDA-NOP Scheme (PCS 002, section 2.3.15) to include a timeframe for operators to submit organic system plan annual updates (by December 31<sup>st</sup>); and identifies the Inspection and Certification Activity Manager (RAC), located in the Bologna, Italy office with the responsibility of reviewing the annual updates for compliance. CCPB provided training for all Directors on this revised procedure.

**NP6172MMA.NC5 – Accepted.** 7 CFR §205.501(a)(16) states, “Charge applicants for certification and certified production and handling operations only those fees and charges for certification activities that it has filed with the Administrator;…” and 7 CFR §205.642 states, “...a certifying agent shall charge applicants for certification and certified production and handling operations only those fees and charges that it has filed with the Administrator. ...however, the nonrefundable fees must be explained in the fee schedule submitted to the Administrator.”

**Comments:** *A review of the fee schedule and various files/invoices found:*

- 1) *That CCPB revised their fee schedule in January 2015 and did not submit it to the administrator. In addition, the revised fee schedule has a different fee structure and thus the fees charged to the applicants and certified operations were not the same as those fees on file with the NOP administrator. The fees charged were in accordance with the new fee schedule.*
- 2) *That the CCPB fee schedule does not include non-refundable fees and the stages at which they become non-refundable.*

**Corrective Action:** 1) CCPB submitted the revised fee schedule with their 2016 annual report in July 2016. The staff responsible for submitting this documentation reviewed the annual report requirements to prevent reoccurrence. 2) CCPB clarified their fee schedule does not identify non-refundable fees since applicants and clients are not invoiced until after the inspection and therefore CCPB does not foresee any refundable fees.

**NP6172MMA.NC6 – Accepted.** 7 CFR §205.501(a)(18) states, “A private or governmental entity accredited as a certifying agent under this subpart must:…Provide the inspector, prior to each on-site inspection, with previous on-site inspection reports and notify the inspector of its decision regarding certification of the production or handling operation site inspected by the inspector and of any requirements for the correction of minor noncompliances.”

**Comments:** *Inspectors are not notified of CCPB’s decisions regarding certification of the operation inspected by the inspector or of any requirements for the correction of minor noncompliances. Under the CCPB process, inspectors are only required to be notified if there is a notice of noncompliance issued or a notice under the adverse action process.*

**Corrective Action:** CCPB adapted their database to include the decision for certification and any other communication to the operators so inspectors have access to the information. CCPB sends a copy of the decision to the inspector as notification. CCPB submitted an example of the decision that is sent to the inspector. CCPB provided training to Directors on this topic.

**NP6172MMA.NC7 – Accepted.** 7 CFR §205.501(a)(21) states, “A private or governmental entity accredited as a certifying agent under this subpart must:…Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.” NOP 2027, Personnel Performance Evaluation, Section 3.2b states, “Inspectors should be evaluated during an onsite inspection by a supervisor or peer (another inspector) at least annually.”

**Comments:** *CCPB does not conduct annual performance field evaluations of all inspectors outside of Italy.*

**Corrective Action:** CCPB revised the Procedure for Management of the Inspectors (PRO 002) to include inspectors in Italy and abroad. CCPB provided training to all Directors on this revised procedure.

**NP6172MMA.NC8 – Accepted.** 7 CFR §205.501(a)(21) states, “Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.” NOP 2603, Organic Certificates, Section 3.1, lists the elements of an organic certificate.

**Comments:** *A review of five certificates verified the following organic certificate elements are incorrect or missing on organic certificates issued:*

- 1) *Missing CCPB’s internet address;*
- 2) *Missing an anniversary date;*

- 3) *Missing the statement “Certified Organic under the U.S. National Organic Program 7 CFR Part 205”;*
- 4) *Missing the statement “Once certified, a production or handling operation’s organic certification continues in effect until surrendered, suspended or revoked”;*
- 5) *The scope listed on one of the five certificates states “Plant Production and Wine-Making,” instead of Crops or Handling/Processing.”*
- 6) *Certificates issued to wild crop operations do not include the scope of wild crops.*

**Corrective Action:** CCPB revised the certificate template to include CCPB’s internet address; anniversary date; the statement “Certified organic under the U.S. National Organic Program 7 CFR Part 205”; the statement “Once certified, a production or handling operation’s organic certification continues in effect until surrendered, suspended, or revoked”; and the scope of crops, wild crops, livestock, and/or processing/handling. A copy of a recent certificate issued to an operation was submitted to the NOP for review.

**NP6172MMA.NC9 – Accepted.** 7 CFR §205.501(a)(21) states, “A private or governmental entity accredited as a certifying agent under this subpart must:…Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.” NOP 5022, Wild Crop Harvesting, Section 5.2 states, “A wild-crop harvesting Organic System Plan (OSP) includes: A full map of the area(s) to be harvested defining boundaries…”

**Comments:** *A review of a wild crop file verified there was not a clear designation of the collection areas. The map for the certified operation was of an entire 5 region area with no other maps or description of the actual collection areas included in the organic system plan.*

**Corrective Action:** CCPB revised the OSPs for wild crops (Mod. NP/SR) to request an accurate map of the organic wild crop harvest area be submitted along with the wild area sheet. CCPB provided training to Directors on the revised OSPs.

## NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

### AUDIT AND REVIEW PROCESS

The National Organic Program (NOP) received CCPB SRL's (CCPB) application to become a U.S. Department of Agriculture (USDA) accredited certifier on October 17, 2013. The NOP reviewed CCPB's application, conducted an onsite audit (June 16-19, 2014), and reviewed the audit report to determine CCPB's capability to operate as a USDA accredited certifier.

### GENERAL INFORMATION

<b>Applicant Name</b>	CCPB SRL
<b>Physical Address</b>	Via Jacopo Barozzi 8, 40126 Bologna, Italy
<b>Mailing Address</b>	Via Jacopo Barozzi 8, 40126 Bologna, Italy
<b>Contact &amp; Title</b>	Roberto Setti, Technical Dept. & Quality Assurance Manager
<b>E-mail Address</b>	<a href="mailto:rsetti@ccpb.it">rsetti@ccpb.it</a>
<b>Phone Number</b>	+39 51 6089811
<b>Reviewer(s) &amp; Auditor(s)</b>	Lars Crail, NOP Reviewer; Darrell Wilson, On-site Auditor
<b>Program</b>	USDA National Organic Program (NOP)
<b>Audit &amp; Review Date(s)</b>	Audit: June 16 – 19, 2014 Review: August 19, 2014
<b>Audit Identifier</b>	NP4132OOA
<b>Action Required</b>	Yes
<b>Audit &amp; Review Type</b>	Pre-Decisional Assessment
<b>Audit Objective</b>	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of CCPB's certification system.
<b>Audit &amp; Determination Criteria</b>	<i>7 CFR Part 205, National Organic Program as amended</i>
<b>Audit &amp; Review Scope</b>	CCPB's certification services in carrying out the audit criteria required for continued accreditation as a certifying agent.

CCPB is a for profit body operating to check the compliance of food and non-food agriculture products in general, that are produced using organic farming methods. This includes such operations as: animal rearing, product preparation, processing, distribution and importing, and also those operating in the eco-friendly agricultural production sector. CCPB operates as an independent body according to the requirements of the Standard UNI CEI EN ISO/IEC 17065, in order to certify that products comply with the technical standards and other standards documents.

CCPB was initially accredited as a USDA National Organic Program (NOP) certifying agent on December 9, 2002. CCPB surrendered its accreditation on July 24, 2012 due to the implementation of the EU/US Equivalency Arrangement. However, in October 2013, CCPB

requested accreditation for the following scopes: Crops, Wild Crops, Livestock, and Handling/Processing. In addition, CCPB indicated that on July 1, 2014, it was planning to merge with the USDA certifier Istituto Mediterraneo di Certificazione (IMC). CCPB maintains their head office in Bologna, Italy. All NOP key certification activities will be conducted in the head office.

CCPB's organic certification program staff consists of an Inspection and Certification Activity Manager (RAC), a RAC Assistant, an Operator's Dossier Management and Product Labels Verification, three inspectors partially involved in the application review (when necessary), and 37 independent inspectors. After the merger with IMC, there will be approximately 17 additional independent inspectors. All personnel appear to be qualified to fulfil the duties assigned.

#### **NOP DETERMINATION:**

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

**NP8022DDA.NC2 – Cleared**  
**NP0111NNA.NC1 – Cleared**  
**NP0111NNA.NC2 – 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.

**NP4132OOA.NC1 – Accepted.** **7 CFR §205.402 (b)(2)** states, "The certifying agent shall within a reasonable time: Provide the applicant with a copy of the on-site inspection report, as approved by the certifying agent, for any on-site inspection performed." *CCPB's policy and procedure are for the inspector to leave a copy of the inspection report summary with the applicant/certified operation. This summary does not include the checklist portion of the inspector's report. Unless CCPB's review and assessment of the inspection report is different from the inspector's findings, there is no copy of CCPB's approved report sent to the operation.*

**Corrective Action:** By August 30, 2014 CCPB will issue internal circular containing specific instructions for all inspectors (to leave at the end of the inspection a complete copy of the checklist to the operators and to make notes on the evidence of the consignment). By December

31, 2014 the silence/approval clause will be deleted from the inspection report, and the Standard Control Procedure will be modified, adding the specific instruction for inspectors to leave a complete inspection report and check list to the operator at the end of the inspection.

**NP4132OOA.NC2 – Accepted. 7 CFR §205.642** states, “The certifying agent shall provide each applicant with an estimate of the total cost of certification and an estimate of the annual cost of updating the certification.” *Upon receiving a request for certification, the applicant is provided with a CCPB’s fee schedule. The applicant then determines their own cost estimate for certification. There is no review of this estimate by CCPB to ensure that the estimate is accurate. The applicant can however request an estimate from the CCPB if they so desire.*

**Corrective Action:** By August 30, 2014 CCPB will issue an internal circular to the concerned departments containing specific instructions to formulate to any new customer a specific estimate for the costs of certification to USDA-NOP and maintenance costs of the certification. By December 31, 2014 the Standard Control Procedure will be modified, adding the specific instruction for the formulation of appropriate estimate according to NOP requirements. By the same date the general fee table will be amended, specifying the fee for USDA-NOP certification, including the total cost of certification and the annual cost for maintenance of the certification.