

USDA

United States Department of Agriculture

Agricultural Marketing Service

National Organic Program

Colorado Department of Agriculture

Lakewood, Colorado, USA

meets all the requirements prescribed in the National Organic Program Regulations

7 CFR Part 205

(Updated February 25, 2013)

as an Accredited Certifying Agent

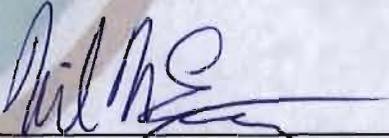
for the scope of

Crops, Wild Crops, Livestock and Handling Operations

This certificate is receivable by all officers of all courts of the United States as prima facie evidence of the truth of the statements therein contained. This certificate does not excuse failure to comply with any of the regulatory laws enforced by the U.S. Department of Agriculture .

Status of this accreditation may be verified at <http://www.ams.usda.gov>

Certificate No: NP2142EEA
Effective Date: **October 16, 2012**
Expiration Date: **October 16, 2017**


Miles V. McEvoy
Deputy Administrator
National Organic Program



The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or because all or part of an individual's income is derived from any public assistance program.

CERTIFICATE OF ACCREDITATION

Applicant Name:	Colorado Department of Agriculture (CDA)
Est. Number:	N/A
Physical Address:	700 Kipling Street, Suite 4000, Lakewood, CO 80215
Mailing Address:	700 Kipling Street, Suite 4000, Lakewood, CO 80215
Contact & Title:	Mitch Yergert, Director, Division of Plant Industry Casey Palmer, Organic Program Manager
E-mail Address:	Mitchell.Yergert@ag.state.co.us ; Casey.Palmer@ag.state.co.us
Phone Number:	303-239-4138
Auditor(s):	Julie Hartley, Accreditation Manager
Program:	USDA National Organic Program (NOP)
Audit Date(s):	February 14, 2013
Audit Identifier:	NP2142EEA
Action Required:	No
Audit Type:	Corrective Action audit
Audit Objective:	To verify review and approve corrective actions addressing the non-compliances identified during the Renewal Assessment.
Audit Criteria:	<i>7 CFR Part 205, National Organic Program; Final Rule</i> , dated December 21, 2000; revised March 15, 2012
Audit Scope:	CDA's December 26, 2012 response letter to the Renewal Assessment non-compliance report
Location(s) Audited:	Desk

GENERAL INFORMATION

Colorado Department of Agriculture (CDA) is a State of Colorado certification organization that carries out inspection activities for the purpose of verifying compliance of agricultural produce, foods, food products, and feed with State control programs national standards that include *7 CFR Part 205, National Organic Program, Final Rule*. CDA was initially accredited to the USDA National Organic Program as an authorized certifying agent for crop, wild crop, livestock, and processing/handling operations on October 16, 2002. CDA only certifies entities whose primary address is in Colorado.

AUDIT INFORMATION

During the Renewal Assessment, the corrective actions for the non-compliances identified during the 2010 Mid-Term Assessment were verified and found to be implemented and effective and the non-compliances were cleared. There were two non-compliances identified during this audit. CDA was notified of this finding in a notice from the NOP on December 4, 2012. A response was received from CDA on December 26, 2012.

FINDINGS

NP2142EEA.NC1 – Accepted. NOP §205.402 (a)(2) states, “Upon acceptance of an application for certification, a certifying agent must: Determine by a review of the application materials whether the applicant appears to comply or may be able to comply with the applicable requirements of subpart C of this part.” *Eleven files were reviewed from the last full certification cycle in 2010/2011. The files reviewed represented all scopes of accreditation and found that in 6 files related to crop production, the Organic System Plan (OSP) did not demonstrate and/or define the buffers for each specific operation as defined in §205.201(a)(5). The files, including one wild harvest, were either incomplete or in some cases missing the necessary information. One file contained an OSP where Section 7 (Maintenance of Organic Integrity) was checked “Not Applicable” or N/A; however, Section 7 of the inspection report indicated that the buffer zones were “appropriate.” Two files described buffers for adjacent land owned by the producer; however, there was no description of the measures used to maintain organic integrity from activities of adjacent landowners. Corrective Action:* 1) CDA updated its Crop OSP, Section 7 (Maintenance of Organic Integrity) by omitting the “Not Applicable” or “None” in the “safeguard preventions” and buffer areas sections. Operations must now list all buffers and adjoining land use information. 2) In 2012, CDA required all crop operations to submit updated/new maps. 3) In 2013, CDA will notify crop operations of the document update. Operations will need to complete the form, include buffer width, location, and adjoining land use information, and to provide evidence of notifications to adjoining landowners. 4) Spring inspector training will address buffer zones, Crop OSP changes, and verification methods during inspection. CDA will provide training sign-in sheets and meeting agendas to the NOP by May 1, 2013. 5) CDA updated its Crop Inspection Report form to include areas for the inspector to describe measures taken by the operation to maintain organic integrity and to provide verification that buffer zones are in place and adequate. CDA will provide examples of completed Crop OSPs with buffer documentation to the NOP by September 1, 2013.

NP2142EEA.NC2 – Accepted. NOP §205.403(c)(2) states, “*Verification of Information.* The on-site inspection of an operation must verify: 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.” *The 2011 OSP for a crop operation (herbs) lists in the section for Manure Use, “medicinal herbs – Field numbers 1&3; Date Manure Incorporated - May 1, 2011; Expected date of Harvest - August 1, 2011.” The inspection report does not include the harvest dates for these herb fields or provide other information to support specific dates when incorporation of manure into the soil was completed. The inspection report indicated that the NOP requirements, in §205.203 (c)(1), for 90 day pre-harvest manure incorporation was met, and the 120 day pre-harvest manure incorporation was met. An interview with the inspector of record indicated that the dates were not verified during the inspection by the certified operation’s records. Based on the missing harvest dates and the inspector’s statements, the NOP compliance of the raw manure application was not verified during the inspection and verification, as required by §205.403, was not achieved. Corrective Action:* 1) CDA submitted the operation’s 2012 manure application and crop harvest log as evidence that the records indicate application and harvest dates are in accordance with §205.203. 2) CDA updated its Crop Inspection Report form to have inspectors collect documentation to support compliance

Page 3

regarding manure application and dates of harvest. A reminder will be issued in 2013 to crop operations to provide adequate records regarding manure use during the annual inspection. CDA will provide examples of completed Crop Inspection reports with manure use records to the NOP by September 1, 2013. 3) Spring inspector training will address manure records and requirements. CDA will provide training sign-in sheets and meeting agendas to the NOP by May 1, 2013.



1400 Independence Avenue, SW.
 Room 2646-S, STOP 0268
 Washington, DC 20250-0201

AUDIT INFORMATION

Applicant Name:	Colorado Department of Agriculture (CDA)
Est. Number:	N/A
Physical Address:	700 Kipling Street, Suite 4000, Lakewood, CO 80215
Mailing Address:	Same
Contact & Title:	Mitch Yergert, Director, Division of Plant Industry
E-mail Address:	mitchell.yergert@ag.state.co.us
Phone Number:	303-239-4138
Auditor(s):	Miguel A. Caceres
NOP Review:	Robert L. Pooler
Program:	USDA National Organic Program (NOP)
Audit Date(s):	July 22 – 29, 2010; April 4, 2011
Audit Identifier:	NP0103MMA
Action Required:	No
Audit Type:	Corrective Action Audit
Audit Objective:	To verify that corrective actions adequately address the non-compliances identified during the Mid-Term Audit.
Audit Criteria:	<i>7 CFR Part 205, National Organic Program; Final Rule</i> , dated December 21, 2000; amended December 13, 2010. Program handbook: <i>Guidance and Instructions for Accredited Certifying Agents & certified Operations</i> , Winter Edition, January 31, 2011.
Audit Scope:	The agency’s quality manual including personnel, processes, procedures, facilities, and related records.
Location(s) Audited:	Desk

The Colorado Department of Agriculture Mid Term Audit was conducted April 13 – 15, 2010.

On June 21, 2010, the NOP issued a Notice of Noncompliance to the Colorado Department of Agriculture (CDA) for noncompliances NP0103MMA.NC1 – 4 identified during the Mid Term Audit.

On July 21 and July 29, 2010, the CDA submitted corrective actions for noncompliances NP0103MMA.NC1 – 4 identified during the Mid Term Audit. These corrective actions were forwarded to, and reviewed by, the original auditor, Miguel Caceres.

On September 21, 2010, the NOP issued a second Notice of Noncompliance to CDA for noncompliance NP0103MMA.NC2 as the submitted corrective actions for this noncompliance were incomplete and did not resolve the noncompliance.

On October 05, 2010, CDA submitted additional corrective actions for noncompliance NP0103MMA.NC2. CDA submitted the following corrective actions:

- Letter containing proposed corrective actions for noncompliance NP0103MMA.NC4.
- CDA Inspection report, follow up inspection conducted on October 04, 2010.
- Documentation and verification of operation's cleaning process.
- Documentation and verification of operation's organic labeling.
- OSP template form for documenting cleaning process / material review.

FINDINGS

The corrective actions submitted by CDA adequately addressed the outstanding non-compliance (NP7288MMA.NC2) from the Surveillance-Accreditation Renewal Audit and three of the four non-compliances identified during the Mid-Term Audit. Additional corrective actions submitted by CDA adequately addressed the outstanding non-compliance NP0103MMA.NC2.

NP7288MMA.NC2 – Adequately Addressed – NOP §205.403(c)(2) and (3) states, “The on-site inspection of an operation must verify: (2) That the information, including the organic production or handling system plan...accurately reflects the practices used or to be used by the applicant for certification or by the certified operation. (3) That prohibited substances have not been and are not being applied to the operation through means which.” *For the livestock inspection the inspectors did not identify deficiencies of the organic system plan where they were not reflective of the actual practices being used by the operation. The organic system plans (OSP) were not reviewed during two of the three witness inspections conducted. There was no verification of the handler's practices during the inspection because the facility was not observed in operation (no tour of facility). When the OSP was reviewed, the differences were not identified by the inspector. Material inputs were not verified during the crop inspection.* **Corrective Action:** The CDA corrective actions proposal addressed the non-compliance by breaking it down into several sections as follows: 1) Concerning the livestock inspection: The CDA response stated that the conventional livestock on the operation were not the producer's organic livestock; were not being certified; were discernable by ear tags; that the herbicide observed in the storage shed was verified as not being used; and that none of these issues affected certification. CDA also stated that they now understand the discrepancies with regard to the OSP's and would ensure the inspection staff documents all discrepancies of the OSP during inspections. Training of the inspection staff was to be conducted April 3, 2008. **Conclusion:** No objective evidence provided to verify that the organic system plan for the livestock operation now accurately reflects its actual practices and that inspector training has been conducted. It is important to note that the inspector training was to occur on April 3 and the corrective actions proposal was submitted on April 2, 2008. 2) Concerning the OSP's not reviewed during the inspection: CDA stated it is their practice that the inspectors evaluate “the OSP prior to conducting the inspection so that they are familiar with all aspects of the operation prior to being on site. The fact that the inspector did not read the OSP in the field during the inspection does not mean that the inspector is not familiar with the details of the OSP.” **Conclusion:** No corrective actions provided. The non-compliance is not in reference to the inspectors not reading the organic system plan during the inspection but reviewing the OSP with the operations representative in order to verify that it accurately reflects the actual practices of the

operation. 3) Concerning the inspector not conducting a tour of the operation during the inspection: CDA stated, "CDA's policy is to conduct a thorough inspection of all parts of the operation during each inspection. The crop and handler inspections were "mock" inspections as the certification inspection had been conducted earlier in the year. This led to the inspector not conducting all activities in the normal manner. Since the inspectors felt they had accomplished all activities at the earlier inspection they did not go through all normal procedures. For instance, at the time of the crops mock inspection all crops had been harvested and sold so the inspector did not walk the fields as he did during the regular inspection. The inspector at the handling facility did not do a tour of the operation since he had been there a few months earlier and felt he was familiar with the operation. We will reiterate with all inspection personnel that all aspects of the operation must be viewed during each inspection to determine and document any changes have been made." **Conclusion:** No corrective actions provided. It was stated by the USDA auditor on at least two occasions that the mock inspections were to be conducted in the manner of a normal inspection to verify compliance to the NOP standards. This was re-iterated prior to the inspection of the handler operation. 4) Concerning when the OSP was reviewed that the differences were not identified by the inspector: The CDA response stated, "It is not clear what differences were not identified by the statement in the auditor's report. All differences between observed practices and the OSP should be documented and addressed by the inspector. It is the inspector's responsibility to verify at each inspection whether the information contained in the OSP is accurate." **Conclusion:** No corrective actions provided. The non-compliance states that this discrepancy occurred during the livestock inspection; and the text in the body of the on-site audit report issued clearly identified what was not included in the OSP and not addressed by the inspector. Please refer to the report NP7288MMA NC Report CDA Lakewood CO 11 29 07 under the section "Observations made during the witness inspections included: Livestock..." 5) Concerning the issue of material inputs not being verified during the crop inspection: CDA stated, "CDA's policy is that all material inputs be verified during the inspection. We will reiterate in our training with all inspection personnel that all material inputs must be verified during the inspection. In the future, if mock inspections are conducted CDA will perform the inspections as actual inspections to the extent possible. Conducting mock inspections led to confusion on the part of the inspectors as to what exactly was expected." **Conclusion:** No corrective actions and objective evidence provided to validate material inputs are accurately being verified by the inspectors. **Corrective Action (dated January 16, 2009): For items 1 and 4,** CDA provided the 2008 OSP for the livestock operation, the January 2009 inspection report, and other supporting documents to verify that the non-compliances with the OSP and the operation were adequately addressed as part of the corrective actions and that the OSP was an accurate reflection of the practices conducted by the operation. The training conducted and plans are described under the next items. **For items 2, 3, and 5,** CDA provided comprehensive Organic Inspector Training and Evaluation Plans for calendar years 2008 and 2009; a blank Supervisor Ride Along Field Audit form; and completed Ride Along Field Audit forms for 3 inspectors. CDA also provided the DPI Field Services Supervisor Ride-Along Log; a record showing attendance for the Quarterly Training sessions for inspectors conducted April, July and October 2008 and the training documents which included the scope of the training; Organic Inspector Performance Review Summary for 10 inspectors; and a blank Performance Planning and Evaluation Agreement. To address preventative actions, CDA made reference to the 2009 training plan and the quarterly training that has already been conducted and the required supervisory field observation inspections on organic

operations. CDA sent one inspector to the IOIA process/handler training and provided a copy of the Certificate of Completion. CDA stated the IOIA trained inspector would discuss the training and pass along information learned to the other staff inspectors. CDA plans to send one inspector to the IOIA basic training and one inspector to the IOIA advanced training each year and rotate through all inspectors. Additionally, the inspection forms were revised to provide evidence that the OSP's are verified, areas reviewed, and that inputs are evaluated during the inspections. To assist with input reviews both by inspectors and the program manager, CDA stated they now subscribe to OMRI and signed an agreement with WSDA to use their approved products list. Both agreements were provided for review and stated the final decision on the use of inputs by organic operations remained with CDA. **Mid-Term Audit Finding:** This finding could not be cleared because although the corrective actions were implemented at the time of the 2010 audit, they were not yet effective. Additionally, during the Surveillance-Accreditation Audit in 2007, complete inspections were not conducted and the deficiencies identified below could not be evaluated. In reference to training records identified in the corrective actions proposal; CDA conducted quarterly training and had records outlining the scope of each quarterly meeting. However, there was only one attendance record kept to verify attendance of inspectors (March 2009). The non-compliance cannot be cleared because not all materials and inputs were reviewed in two of the three witness inspections and labels were not properly verified as being those approved by CDA.

Specifically:

During the **crop and processor** inspection:

- The inspector asked the client to explain how product could be traced but no actual traceability audit or in/out balance audit was conducted.
- There were no approved labels in the file but the inspector did not review all packaging materials to verify none were in use.
- The inputs and materials on hand were not verified as compliant (gypsum, limestone and hardwood saw dust included in the OSP).

During the **livestock** inspection:

- Labels were in use on the egg cartons and the 15 dozen case and other than a cursory glance they were not reviewed.
- The color format of the USDA seal on the labels was not in accordance with NOP §205.311(b)(1) – (3).

During the **Handler** inspection (although the inspector was knowledgeable and thorough):

- Labels were not reviewed because they are submitted and approved through the office; and
- There was no in/out balance audit conducted.

Corrective Action (July 21, 2010): CDA addressed the non-compliances by breaking it down into four items: 1) Documentation of inspector training; 2) Inspectors were not reviewing the product labels during the inspection; 3) All inputs were not being reviewed during the inspection; and 4) No full audit or in/out balance was conducted during the process or inspection. For item's 1, 2, and 3 CDA had two training sessions since the completion of the NOP Mid-Term audit and provided the training records to verify inspectors were trained. CDA also provided copies of the training slides used for the training sessions. The first session conducted April 21, 2010 was in-house training and covered the NOP Mid-



1400 Independence Avenue, SW.
Room 2646-S, STOP 0268
Washington, DC 20250-0201

Term audit results, information on implementation of the pasture rule, reviewing inputs, conducting audit trails, and label reviews. The second training session was an IOIA Pasture Rule Training via webinar on June 30, 2010 and was attended by the livestock inspectors and CDA staff. To address the incorrect labels, CDA had the client revise the labels for the egg cartons and shipping container. CDA developed a "Label Review Sheet Claiming Organic" form for review of labels. The completed forms for the review of egg cartons and shipping containers along with the revised labels were provided as part of the corrective actions. The inspection forms and Supervisor Review forms were revised to include verification that all inputs and labels are verified during inspections. Two additional forms were developed to assist the inspectors in conducting audit trails and mass in/out balance audits. CDA provided completed "Organic Certification Process/Handling Audit Trail" and "Organic Certification Crop Audit Trail" forms for two operations along with copies of the inspection report narratives. CDA provided a blank copy of the "Process Handling Mass In and Out Balance Form" and stated that completed mass in-out balance forms would be provided March 1, 2011 because most of the mass in-out balances would be performed at process handling operations which are inspected in the winter. However, the completed audit trail forms supplied for the producer verified that a mass in/out balance audit was conducted. CDA revised their inspection procedures to include that all inputs and labels should be verified during inspections and include audit trails and mass in/out balance audits. A copy of the revised inspection procedures and revised inspection forms were also provided for review.

NP0103MMA.NC1 – Adequately Addressed – NOP §205.202 states, "Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as "organic" must: (b) Have no prohibited substances, as listed in § 205.105, applied to it for a period of 3 years immediately preceding harvest of the crop." *CDA had one operation with a wild crop as their third category of certification. There was insufficient information in the organic system plan to verify that prohibited substances were not used on the collection areas for the wild crop.* **Corrective Action:** CDA stated that prior to them addressing the issue with the wild crop collector they were informed by the operation that they would no longer be collecting the wild crop from federal land and would be removing that specific wild crop from their certification. Instead they would harvest a wild crop from their own land which was not present at the original location. CDA revised their wild crop certification questionnaire to gather information on prior land use and require all future wild crop applicants to complete a three year field history form for collection areas. The revised questionnaire along with the field history sheet for the client's property was provided for review. Since this was the only certified operation with wild crops the non-compliance is adequately addressed.

NP0103MMA.NC3 – Adequately Addressed – NOP §205.303(a) states, "Agricultural products in packages described in §205.301(a) and (b) may display, on the principal display panel, information panel, and any other panel of the package and on any labeling or market information concerning the product, the following: (1) The term, "100 percent organic" or "organic," as applicable, to modify the name of the product; (2) For products labeled "organic," the percentage of organic ingredients in the product; (The size of the percentage statement must not exceed one-half the size of the largest type size on the panel on which the statement is displayed and must appear in its entirety in the same type size, style, and color without highlighting.)" *Fourteen of 28 labels reviewed were incorrect. Labels stated both "100% Organic" and "Organic" and product only qualified for the organic category. Two of the*

approved labels for a chocolate processor stated “100% Organic” however, a review of the file verified the product was actually “Organic” and the font was not the same size for the entire statement.

Corrective Action: In an effort to address corrective and preventative actions, CDA revised their process for label reviews and file handling. Labels have been removed from the main file and placed into a “label file” which includes the label, product profile sheets, and supporting documents such as the certificate of the organic ingredient suppliers. A label review form was developed to keep track of each label in the file. The form includes the date reviewed, label name, whether the label is approved, and if not comments are included as to the status of the review/label. CDA hired a new employee in May 2010 to assist with the review of labels for all certified operations. The employee’s resume and personnel action form were provided for review. The resume verified that the employee has a Masters Degree in Agricultural Sciences but did not have any prior experience with organic production and handling techniques. Training on the review of labels and materials input was provided in house by the CDA certification specialist and through the use of the NOP online training presentations for Subparts D and E, and IOIA online training on material inputs. The employee also observed two inspections to become familiar with the entire certification process. Additional information obtained from CDA verified that the employee was initially hired just for the label reviews. CDA is in the process of trying to make the position permanent to assist with label reviews, material input reviews, and the initial organic system plan reviews. All labels were reviewed by the employee with the assistance of the certification specialist. A document with the status of all the reviewed labels along with the label review form (tracking form) for two operations was provided as supporting documents. The certified operation which had the labels with both “100% Organic” and “Organic” revised the labels to remove the 100% Organic claim. Two of the labels were provided for review. The chocolate labels had not been revised at the time of the corrective actions review as this is the same operation that had a non-compliance in their cleaning process as identified in *NP0103MMA.NC2*. Although the chocolate labels have not been revised this non-compliance has been adequately addressed because CDA must provide additional corrective actions for *NP0103MMA.NC2* and the process of the label reviews itself has been adequately addressed.

NP0103MMA.NC4 – Adequately Addressed – NOP §205.642 states, “Fees charged by a certifying agent must be reasonable, and a certifying agent shall charge applicants for certification and certified production and handling operations only those fees and charges that it has filed with the Administrator. The certifying agent shall provide each applicant with an estimate of the total cost of certification and an estimate of the annual cost of updating the certification.” *The CDA fee estimates provided to clients include only the cost of inspection and not the total cost of certification. There is no review process in place on fees paid by applicants and certified operations and a review of records verified that at least two entities were overcharged.* **Corrective Action:** CDA provided a refund to one of the two overcharged operations. For the second operation, CDA stated that upon further review of the organic system plan (OSP) the client had been properly charged. Supporting documents in the form of refund documents, fee schedule, and OSP were provided for the corrective actions. CDA revised their procedures to send new applicants a total cost of certification based on the information they provide and annual update clients an estimate based on their current certification. CDA revised their initial review form to include a review of the fees paid to ensure future clients are paying the correct fees. Examples of the revised letter and form were provided for review.

NP0103MMA.NC2 – Adequately Addressed – NOP §205.272(a) states, “The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances.” *A chocolate processor’s cleaning procedures included using conventional cocoa butter to remove the conventional chocolate residue from the previous batch followed by a purge with organic product prior to organic production. The purge method used would not be adequate to remove all of the conventional cocoa butter.* **Corrective Action:** CDA issued the chocolate processor a notice of non-compliance to address the issue of using conventional cocoa butter and an inadequate purge. The notice included the incorrect labels for the chocolate processor identified in non-compliance *NP0103MMA.NC3*. The certified operation was given until August 9, 2010 to provide a response to the notice. An additional inspection of the operation was conducted on July 13, 2010 to review the cleaning procedures and was submitted as part of the corrective actions. The corrective actions stated that the operation only produces the organic chocolate bars twice per year and was in the process of trying to source organic cocoa butter for the cleaning process. The corrective actions also stated the facility was in the process of moving this part of the operation to another building and would not be producing the organic chocolate for several months. Since the operation has until August 9, 2010 to respond to the notice of non-compliance; is moving part of the operation to another building; and is not producing organic product for several months; CDA stated they would submit the response to the NOP August 15, 2010 and the follow-up inspection report when the next production run is conducted. The revisions to the operations organic system plan concerning the cleaning process and labels will be dependent on whether they can source organic cocoa butter and 100% organic ingredients or just organic ingredients. CDA stated they had reviewed all of their manufacturing operation’s files and no other operations were using purging as a method of cleaning. The auditor of record inquired if the review of files was for the cleaning process itself or just for those utilizing purging. CDA stated the initial review was just for those utilizing a purge but would conduct a further review of all handling operation files to verify the cleaning process and would check to see if they have to revise their OSP forms when an operation is utilizing a conventional product. CDA will provide a follow-up on the corrective actions with the response to the notice of non-compliance from the certified operation (August 15, 2010); a follow-up inspection report (when inspection is conducted); and the results of the review on the handler files for proper cleaning and evaluation of changes to the OSP form (September 15, 2010).

NOP review: The October 5, 2010, corrective actions submitted by CDA adequately addressed the outstanding noncompliance remaining from the July 21, 2010 corrective action audit review. The CDA corrective action stated that the handling operation submitted corrective actions in response to the Notice of Noncompliance. CDA determined that the handling operation’s OSP modifications resolved the noncompliance. The handling operation’s OSP modifications included use of organic cocoa butter during the cleaning process of the chocolate production line. When reviewing the modified OSP, CDA applied it’s revised label review process on the ingredients used for the cleaning process. A follow up inspection was also conducted on the handling operation. This inspection verified that the handling operation was operating in compliance with the NOP regulations. To prevent the accreditation noncompliance from reoccurring, CDA changed its program quality system by revising the program’s OSP template to include documentation of handling cleaning procedures, and by requesting more detailed information on materials used for the cleaning process.