



United States Department of Agriculture

Agricultural Marketing Service
National Organic Program

CERTIFICATE OF ACCREDITATION

GLOBAL ORGANIC ALLIANCE, INC

Township Road 179 3185, Bellefontaine, Ohio, 43311, U.S.A.

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

7 CFR Part 205

as an Accredited Certifying Agent

for the scope of

Crops, Handling, 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-9-18**

Effective Date: **4/29/2017**

Renewal Date: **4/29/2022**

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



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NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

AUDIT AND REVIEW PROCESS

An onsite renewal assessment of Global Organic Alliance, Inc's (GOA) organic program was conducted on October 2-6, 2017. The National Organic Program (NOP) reviewed GOA's corrective actions in response to the Notice of Noncompliance to assess GOA's compliance to the USDA organic regulations. This report provides the results of NOP's assessment.

GENERAL INFORMATION

Applicant Name	Global Organic Alliance, Inc.
Physical Address	3185 Township Road 179, Bellefontaine, OH 43311
Mailing Address	3185 Township Road 179, Bellefontaine, OH 43311
Contact & Title	Betty Kananen, President/CEO
E-mail Address	goaorg@centurylink.net
Phone Number	9377-593-1232
Reviewer & Auditors	Penny Zuck, NOP Reviewer; Robert Yang and Miguel Caceres, Onsite Auditors
Program	USDA National Organic Program (NOP)
Review & Audit Date(s)	Corrective Action review: September 17, 2018 and November 13, 2018 NOP assessment: April 18, 2018 Onsite audit: October 2-6, 2017
Audit Identifier	NOP-46-17
Action Required	None
Audit & Review Type	Renewal Assessment
Audit Objective	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of GOA's certification system.
Audit & Determination Criteria	7 CFR Part 205, National Organic Program as amended
Audit & Review Scope	GOA's certification services in carrying out the audit criteria during the period: August 6, 2014 through October 6, 2017

Global Organic Alliance, Inc. (GOA) is a for-profit, privately owned company accredited on April 29, 2002 by the USDA National Organic Program to certify crops, wild crops, livestock and handling operations under the USDA organic regulations. GOA certifies 1,078 operations to the following certification scopes: crops (695), wild crops (5), and handling (73). GOA does not certify grower groups. GOA's sole office is located in Bellefontaine, OH. GOA currently certifies operations located in the U.S. and the Philippines.

Certification services are performed by the Chief Executive Officer/President, the Vice President, the Certification Director, two Certification Coordinators, two Certification Review Specialist, and three administrative staff. GOA has 43 contracted inspectors.

Three witness audits were conducted. The first witness audit was conducted during an annual inspection of a crops/wild crops operation. The operation was certified for 100% organic buckwheat, hay, vegetable transplants, 14 types of fruits/vegetables, and wild chanterelle mushrooms. The second witness audit was conducted during an annual inspection of a handling (processing) operation. The operation was certified for 100% organic and organic cocoa powder products. The third witness audit was conducted during an annual inspection of a crops/livestock/handling (processing) operation. The operation was certified for layers, organic eggs, and livestock feed.

NOP DETERMINATION:

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

NP416800A.NC1 – Cleared
NP416800A.NC2 – Cleared
NP416800A.NC3 – Cleared
NP416800A.NC4 – Cleared
NP416800A.NC5 – Cleared
NP416800A.NC6 – Cleared
NP416800A.NC7 – Cleared
NP416800A.NC8 – Cleared

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-46-17.NC1 – 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." Specifically, § 205.201(a)(6) states, "An organic production or handling system plan must include: Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations."

Comments: *GOA's organic system plan templates are currently limited to asking operations to provide information regarding export of product(s) or use of organic product(s) imported under*

the US – Canada Equivalency Arrangement, and do not cover any of the other international organic trade arrangements.

Corrective Action: GOA developed the International Compliance Plan (F053B), which was sent to all operations (Crops, Livestock, Processing/Handling) in 2018. The International Compliance Manual is used for staff and inspector training and reference. GOA revised the inspection report to include questions for the inspector to verify importing and exporting of organic products. The international compliance plan (F0053B) was submitted to the NOP. GOA provided training to inspectors on March 21-22, 2018 and plan to provide additional training in 2019.

NOP 47-17.NC2 – 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: *During the witness audit of an annual crops inspection, the auditor observed that the inspector did not conduct the trace-back and in/out balance audit activities appropriately. The inspector used information received from the operator verbally to conduct the activities. Additionally, a review of the operation’s prior inspection report found that the inspector’s description of the trace-back audit conducted only stated the types of records maintained; the description of the in/out balance audit conducted only stated the year the crop was last harvested and the fields the crop was harvested from.*

Corrective Action: GOA created form F033B to address conformity of trace back and production to sales audits, which is now part of the Inspection Report template used for all inspections. Training on trace back and mass balance audits was conducted for inspectors in February and March 2018. Form F033B and inspector training agendas were submitted to the NOP.

NOP-46-17.NC3 – 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.” Specifically, § “205.304(a)(1)(i) Packaged products labeled "made with organic (specified ingredients or food group(s)). Agricultural products in packages described in § 205.301(c) may display on the principal display panel, information panel, and any other panel and on any labeling or market information concerning the product: The statement: "Made with organic (specified ingredients)": Provided, that, the statement does not list more than three organically produced ingredients;”

Comments: *The review of approved product labels revealed that GOA incorrectly approved seven product labels on which the “made with organic” statement on the principal display panel listed three organically produced ingredients/food groups, along with additional organic ingredients listed underneath the statement.*

Corrective Action: GOA required the certified operation to submit revised labels to comply with the “Made with organic (specified ingredients or food groups)” statement. GOA provided training to all staff members who review and approve labels using this specific case example for compliant “Made with organic (specified ingredients or food groups)” labeling.

NOP-46-17.NC4 – Accepted. 7 C.F.R. §205.504(b)(2) 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...A copy of the procedures to be used for reviewing and investigating certified operation compliance with the Act and the regulations in this part ...”

Comments: *GOA does not have inspection procedures for conducting investigations of certified operations when a prohibited substance has been detected. The review of certification files revealed an instance where sample testing resulted in the detection of prohibited substances in two fields. During a follow-up inspection to investigate the cause of the detection, GOA’s inspector failed to collect samples from both fields.*

Corrective Action: GOA provided clarification that the positive result was from one field, not two fields. GOA developed a procedure (P009B) for investigating positive test results and it will be implemented with all future positive test results. GOA submitted the new procedure to the NOP.

NOP-46-17.NC5 – 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 5022 Guidance Wild Crop Harvesting, Section 5.2 Organic System Plan, states all the information that should be included in a wild-crop Organic System Plan.

Comments: *GOA’s Wild Crops organic system plan form does not ask the operator to provide all the information required by NOP 5022 Wild Crop Harvesting, Section 5.2 Organic System Plan. Examples of information not asked of the operator include:*

- *A list of any rare, threatened, or endangered terrestrial or aquatic plants or animals that occur in the harvest area.*
- *Training provided to ensure that all collectors harvest crops in accordance with the OSP and in a manner that does not damage the environment.*

Corrective Action: GOA revised the Wild Crops organic system plans (long and short) to include a list of rare, threatened, or endangered terrestrial or aquatic plant or animals in the harvest area; a description of training provided and procedures employed to ensure that all collectors harvest crops in compliance with the Organic Systems Plan and in a manner that does not damage the environment; and harvest training materials supplied to collectors as a required attachment. The revised documents were distributed to all personnel and contracted individuals with instructions and directives of the revisions.

NOP-46-17.NC6 – 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.” Specifically, NOP 2609, “Unannounced Inspections,” Section 4.1.1 states, “We recommend that certifying agents conduct unannounced inspections of 5 percent of their total certified operations per year”

Comments: *GOA did not conduct unannounced inspections of 5 percent of its total certified operations in 2015 and 2016. In 2015, GOA had 854 certified operations. GOA should have conducted unannounced inspections of 43 operations; GOA only conducted unannounced inspections of 34 operations. In 2016, GOA had 916 certified operations. GOA should have*

conducted unannounced inspection of 46 operations; GOA only conducted unannounced inspections of 27 operations.

Corrective Action: GOA submitted a spreadsheet of unannounced inspections scheduled vs conducted in 2017. GOA conducted over 5% unannounced inspection in 2017 with 56 unannounced inspections out of a total of 1025 operations. GOA plans to increase the number of unannounced inspections scheduled as the number of certified operations changes and monitor the spreadsheet and add inspections if deemed necessary to achieve 5% of the total certified operations.

NOP-46-17.NC7 – 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 2609 Instruction Unannounced Inspections, Section 4.1.4 states, “The certifying agent should disclose to the operation the reason that the operation was chosen for the unannounced inspection.”

Comments: *The review of three Inspection Authorization letters GOA issued to its inspectors for presentation to the operation at the start of the unannounced inspection found that the letter did not disclose the reason that the operation was chosen for the unannounced inspection. The information in the letters was limited to guidance for the inspector regarding sample collection or inspection scheduling.*

Corrective Action: GOA revised the Unannounced Inspection Authorization Letter templates to include the reason the operation was chosen. GOA has provided training to inspectors including The Path to Sound and Sensible Organic Inspections and will include NOP 2609 guidance discussion to the agenda for the 2019 inspector training.

NOP-46-17.NC8 – 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 Instruction Organic Certificates states, “Organic certificates should ... include the following (* identifies elements required by 7 CFR § 205.404 of the USDA organic regulations):”

Comments: *GOA’s organic certificate, which comprises of the NOP Certification Certificate and Certification Profile addendum, does not comply in the following manner:*

1. *Certificates state the name of the certified operation and include multiple other names (i.e. the name(s) of the operation’s partners or staff) As a result, it is not clear who the certified “person” is.*

Corrective Action: GOA revised the certificate and profile addendum to better define the certified entity and responsible persons. GOA provided additional training to certification staff to properly define the certified entity as described in NOP guidance 2603.

2. *For certified subcontracted operations, the Certification Profile lists the name and address of the certified subcontracted operation next to “Physical,” and lists the name and address of its main contractor next to “Entity”. As a result, it is not clear who the certified “person” is.*

Corrective Action: GOA submitted a revised certificate with contractor information omitted. GOA provided additional training to certification staff to properly define the certified entity as described in NOP guidance 2603.

3. *Wild Crops is incorrectly stated as “Wild Harvest” on the NOP Certification Certificate.*

Corrective Action: GOA revised wording in their database of organic certificates to Wild Crop. GOA submitted a revised certificate for a Wild Crop operation.

NOP-46-17.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 NOP’s International Trade Policies: Taiwan page states, “Scope: The trade arrangement includes all USDA organic products produced in the United States or its territories. USDA organic products produced outside the United States are not included in this arrangement.”

Comments: *The review of TM-11 certificates GOA issued to its certified operations for products exported under the Taiwan Export Arrangement found two instances where a TM-11 certificate was inappropriately issued for organic virgin coconut oil that was produced in the Philippines and exported from the Philippines to Taiwan.*

Corrective Action: GOA will no longer use TM-11s for product not produced in the U.S.A. GOA issued a letter to the operation notifying them that GOA will not issue TM-11’s for product produced in the Philippines for export to Taiwan. A copy of the letter was provided to the NOP. GOA plans to conduct training of export/import documentation on or before 2/24/2019.

NOP-46-17.NC10 – 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 2027 Instruction Personnel Performance Evaluations states, “Certification agents must conduct annual performance evaluations of personnel...that perform any of the following roles: evaluate qualifications for certification; and make certification decisions or make recommendations concerning certification decisions.”

Comments: *The CEO/President of GOA does not undergo an annual performance evaluation. The review of certification files found that the CEO/President signed notices of noncompliance, made decisions regarding allowance of materials, informed clients of labeling requirements, and provided guidance to staff on certification requirements in order to make certification decisions.*

Corrective Action: Performance evaluation was conducted 11/15/17 for the CEO/President and the next annual performance evaluation is planned during the internal audit in November 2018. GOA will use the Performance Review F049 form for the CEO/President annual performance evaluations.

NOP 46-17.NC11 – Accepted. 7 C.F.R. § 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.”

Comments: *GOA does not provide its applicants with an estimate of the annual cost of updating certification.*

Corrective Action: GOA revised the renewal member packet indexes to provide a “Projected Certification Costs” and will be provided to all existing operators at the beginning of the certification year. GOA revised the new member packet index to provide more clarity with the “Projected Certification Costs” included.

NOP-46-17.NC12 – Accepted. 7 C.F.R. § 205.660(d) states, “Each notification of ... rejection of mediation, noncompliance resolution ... 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: *GOA does not send rejections of mediation and notifications of noncompliance resolution to the recipient via a delivery service which provides dated return receipts. The notifications are sent via regular postal mail.*

Corrective Action: GOA revised the letter templates to instruct staff to send via “certified mail return receipt.” GOA submitted copies of a rejection of mediation and a notice of noncompliance resolution issued to operations showing the revisions of being sent via certified mail and included copies of tracking information and the USPS return receipts.

NOP-46-17.NC13 – Accepted. 7 C.F.R. § 205.662(a) states, “When an inspection, review, or investigation of a certified operation by a certifying agent or a State organic program's governing State official reveals any noncompliance with the Act or regulations in this part, a written notification of noncompliance shall be sent to the certified operation.”

Comments: *The review of certification files and interviews with certification staff revealed that all notices, including adverse action notices, issued to a subcontracted operation are addressed to the main contractor, even though the subcontracted operation is certified on its own.*

Corrective Action: GOA sends all correspondence to the certified operation and copies the main contractor. A copy of a certification decision letter sent to a certified operation was submitted to demonstrate this change. GOA revised work instructions related to contract operations.

NOP-46-17.NC14 – Accepted. 7 C.F.R. §205.662(a)(3) states, “When an inspection, review, or investigation of a certified operation by a certifying agent or a State organic program's governing State official reveals any noncompliance with the Act or regulations in this part, a written notification of noncompliance shall be sent to the certified operation. Such notification shall provide: the date by which the certified operation must rebut or correct each noncompliance and submit supporting documentation of each such correction when correction is possible.”

Comments: *A review of six notifications of noncompliance revealed that the notification did not provide the operation with an opportunity to rebut the noncompliance. The notifications only stated that GOA must receive a written response.*

Corrective Action: GOA revised the notice of noncompliance template to include the option to rebut and submitted copies of issued notifications to demonstrate the corrective action has been implemented.

NOP-46-17.NC15 – Rebuttal Accepted.

NOP-46-17.NC16 – Accepted. 7 C.F.R. § 205.663 states, “Any agreement reached during or as a result of the mediation process shall be in compliance with the Act and these regulations. The Secretary may review any mediated agreement for conformity to the Act and these regulations and may reject any agreement or provision not in conformance with the Act or these regulations.”

Comments: *The review of settlement agreements established by GOA revealed an instance where the agreement included non-finite terms that required ongoing compliance with a USDA organic regulation. The agreement inappropriately included a term for the operation to submit documentation and other information as required for continued certification and when requested by stated due dates.*

Corrective Action: GOA submitted a few settlement agreements issued since the audit and they include specific timeframes for terms to be met to bring the operation into compliance. All settlement agreements will be reviewed by the Certification Director and the President/CEO for compliance with this standard.

NOP-46-17.NC17 – Accepted. 7 C.F.R. § 205.670(d) states, “A certifying agent must, on an annual basis, sample and test from a minimum of five percent of the operations it certifies, rounded to the nearest whole number.”

Comments: *In 2016, GOA did not sample and test from a minimum of five percent of its certified operations. GOA certified 916 operations in 2016, and therefore should have sampled and tested from a minimum of 46 operations. GOA only sampled and tested from 44 operations.*

Corrective Action: GOA increased the total number of requests for samples to be tested to insure 5% of certified operations are tested annually. A spreadsheet is maintained and monitored to determine if more samples may need to be requested. In 2017, GOA sampled 103 operations out of a total 1025 certified operations, which is 10% and above the requirement.

NOP-46-17.NC18 – Accepted. 7 C.F.R. § 205.671 states, “When residue testing detects prohibited substances at levels that are greater than 5 percent of the Environmental Protection Agency’s tolerance for the specific residue detected or unavoidable residual environmental contamination, the agricultural product must not be sold, labeled, or represented as organically produced....”

Comments: *The review of residue analysis reports revealed an instance where the level of prohibited substance was greater than 5 percent of the Environmental Protection Agency’s (EPA) tolerance. GOA incorrectly notified the operation that the detected level was less than 5 percent of the EPA’s tolerance level.*

Corrective Action: GOA clarified this particular notice combined one detected substance that was above the 5% EPA tolerance with two other substances that were detected below the EPA tolerance. GOA sent a revised letter to the operation. A copy of the letter was submitted to the NOP. GOA developed the Pesticide Test Result Notification (F067E) and a template letter for notifying the operation of results with positive residue detection. All detect letters will be reviewed for accuracy by the Certification Director or the President/CEO.

NOP-46-17.NC19 – Rebuttal Accepted.

NOP-46-17.NC20 – Accepted. 7 C.F.R. § 205.501(a)(4) states, “A certifying agent under this subpart must: Use a sufficient number of ... personnel, including ... 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 following is evidence that GOA does not have a sufficient number of certification staff to implement its USDA organic program:*

1. *The review of eleven certification files found four instances where the certification decision was 7-9 months after the inspection. In one of those instances, the inspection was conducted in November 2016, the certification decision was made in August 2017, and at the time of the onsite audit, GOA had not yet issued the operation’s updated 2016 certificate because it was awaiting the operation’s responses to the certification decision.*
2. *The review of complaint investigation files revealed that in one instance, GOA began its investigation in March 2017; at the time of the audit the investigation was still in process. In one instance where the investigation was referred to GOA by the NOP, GOA received the referral on June 8, 2017; the investigation was completed on September 8, 2017.*

Corrective Action: GOA hired three certification review specialists in 2017; two clerical staff in 2017; and contracted with nine new inspectors. GOA provided clarification on the dates of the complaint investigation and copies of the request for investigation from the NOP (dated 8/22/17) and the NOP closure letter following GOA’s investigative report submitted to the NOP (dated 9/29/17). GOA provided an update on the status of file reviews in 2018 with 46.4% being completed on less than 4 weeks and a total of 44 open certification files with the Final Review Committee. GOA’s monitoring of the Daily Activity Spreadsheet will indicate workload and turnaround time for files.

NOP-46-17.NC21 – Accepted. 7 C.F.R. § 205.403(c)(1) states, “The onsite inspection of an operation must verify: The operation's compliance or capability to comply with the Act and the regulations in this part;”

Comments: *During the witness audit of an annual crops inspection, the auditor observed that the inspector did not verify the operation’s compliance with material use restrictions.*

Corrective Action: GOA revised the input logs to include documentation of restriction compliance for inputs and provided training to inspectors in 2018 on the input logs; use of materials and use restrictions. This will also be included in the 2019 inspector training workshops.

NOP-46-17.NC22 – 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: *During the witness audit of an annual crops inspection, the auditor observed that in the exit interview document the operator was provided with, the inspector did not cite the applicable USDA organic regulation for each issue of concern. Additionally, a review of the operation’s prior inspection records found that the exit interview document also did not cite the applicable USDA organic regulation for the issue of concern.*

Corrective Action: GOA has a section on the exit interview form for the NOP regulation number for the inspector to include the regulation on the exit interview. GOA revised the

checklist that is completed to evaluate inspectors on their inspection reports to include whether the inspector cited the USDA organic regulations for issues of concern in the exit interview. GOA provided training to inspectors on proper completion of documents including the regulation citation on the exit interviews. This training was provided to inspectors at the 2018 training workshops held February 21-22, 2018 and March 21-22, 2018.

NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

AUDIT AND REVIEW PROCESS

An onsite mid-term assessment of the Global Organic Alliance, Inc.'s (GOA) organic program was conducted on June 17 & 19, July 9 and August 4-6, 2014. The National Organic Program (NOP) reviewed the auditor's report to assess GOA's compliance to the USDA organic regulations. This report provides the results of NOP's assessment.

GENERAL INFORMATION

Applicant Name	Global Organic Alliance, Inc. (GOA)
Physical Address	3185 Township Road 179, Bellefontaine, OH 43311-0530
Mailing Address	Same
Contact & Title	Betty Kananen, President/Chief Executive Officer
E-mail Address	goaorg@centurylink.net
Phone Number	937-593-1232
Reviewer & Auditors	Janna Howley, NOP Reviewer Darrell Wilson & Lars Crail, On-site Auditors
Program	USDA National Organic Program (NOP)
Review & Audit Dates	NOP assessment review: May 20, 2015 Onsite audits: June 17 & 19, July 9 and August 4-6, 2014
Audit Identifier	NP416800A
Action Required	None
Audit & Review Type	Mid-Term Assessment
Audit Objective	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of GOA's certification.
Audit & Determination Criteria	<i>7 CFR Part 205, National Organic Program as amended</i>
Audit & Review Scope	GOA's certification services in carrying out the audit criteria during the period: September 2012 - August 2014.

Global Organic Alliance (GOA) is a for-profit, privately owned organization incorporated by the state of Ohio in 1997. GOA offers organic certification to organic producers and processors/handlers. GOA has been accredited to the National Organic Program (NOP) as a certifying agent since April 2002, for the scopes of crop, wild crop, livestock and handling. GOA has 828 clients certified to the NOP, including 288 crop, 451 livestock, 3 wild crop, and 64 handling operations. Clients are located throughout the US, and the Philippines. All certification activities are conducted at the Bellefontaine office.

Nine administrative and technical staff members operate the GOA certification program. The staff consists of the Chief Executive Officer/President, a Certification Director/Quality Manager,

three Certification Coordinators, a Certification Review Specialist and three Administrative Assistants. GOA has a four-member Advisory Board; it functions strictly as a source of advice and information and has no certification duties. GOA currently has 51 subcontracted inspectors for inspection activity.

NOP DETERMINATION:

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

AIA13339BJR.NC1 – Cleared

AIA13339BJR.NC2 – Cleared

NP2219NNA.NC1 – Cleared

NP2219NNA.NC2 – Cleared

NP2219NNA.NC3 – Cleared

NP2219NNA.NC4 - 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.

NP4168OOA.NC1 – 7 CFR §205.662 (c)(3) states, "When rebuttal is unsuccessful or correction of the noncompliance is not completed within the prescribed time period, the certifying agent or State organic program's governing State official shall send the certified operation a written notification of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the noncompliance. When correction of a noncompliance is not possible, the notification of noncompliance and the proposed suspension or revocation of certification may be combined in one notification. The notification of proposed suspension or revocation of certification shall state: The impact of a suspension or revocation on future eligibility for certification."

Comments: *One Notice of Proposed Suspension issued indicated a proposed suspension of 6 months. However, when the suspension was issued the suspension was for one year.*

Corrective Action: GOA has changed its procedure so that all Notices of Proposed Suspension will be proofread, and initialed, by the Office Manager before mailing. A copy of the Notice of Noncompliance will now be attached to the Notices of Proposed Suspension. An example of the new letter, updated procedure, and Office Manager position description were provided to the

NOP.

NP416800A.NC2 – 7 CFR §205.405 (a) states, “When the certifying agent has reason to believe, based on a review of the information specified in §205.402 or §205.404, that an applicant for certification is not able to comply or is not in compliance with the requirements of this part, the certifying agent must provide a written notification of noncompliance to the applicant.”

Comments: *In one of the reviewed files, fruit that originated from Chile, certified to the EU regulations, was being included in product being produced as NOP organic. There was no supporting documentation provided that indicated that the fruit was certified to NOP regulations. The certifier failed to identify the noncompliance and issue a Notice of Noncompliance.*

Corrective Action: GOA updated its *Certification and Attestation of Compliance Procedure* document to include the requirement that all documentation needed to verify compliance to the product or process requested for certification must be submitted to GOA. GOA also requested, and received, the correct supporting documentation for the product originating from Chile. GOA conducted trainings on this updated requirement at its annual staff training on March 3, 2015, and its inspector training on March 4, 2015. Copies of the new procedure were provided at both trainings. A copy of the *Certification and Attestation of Compliance Procedure* document was provided to the NOP for review.

NP416800A.NC3 – 7 CFR §205.403 (a)(1) states, “A certifying agent must conduct an initial on-site inspection of each production unit, facility, and site that produces or handles organic products and that is included in an operation for which certification is requested. An on-site inspection shall be conducted annually thereafter for each certified operation that produces or handles organic products for the purpose of determining whether to approve the request for certification or whether the certification of the operation should continue.”

Comments: *One of the six files reviewed was granted certification as “Private Label” without conducting an on-site inspection. Discussions with the CEO and the Certification Director indicated that certificates are being issued for all Private Label reviews without inspections.*

Corrective Action: GOA revised all document templates related to its Private Label review and approvals, including the *Work Instructions, Private Label Application, GOA Approval Letter, and Private Label Authorization Certificate*. Additionally, GOA’s *Certification Procedure (P008), Section 2, 2.3*, requires an annual inspection of all certified operations. *Section 4.1* of the same document provides timeframes for sending annual inspection reminder notices and due dates. The March 3, 2015 staff training also covered the certification procedure. Copies of all documents were provided to the NOP for review.

NP416800A.NC4 – 7 CFR §205.404 (b)(3) states, “The certifying agent must issue a certificate of organic operation which specifies the: Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified

operation.”

Comments: *Certificates are being issued for “Private Label” which is not one of the categories defined in the USDA National Organic Program regulations.*

Corrective Action: GOA’s *Certification Procedure (P008), Section 8.1* lists the information required on the certificate, including scope. GOA’s *Policy Manual, Section 15.4.4* also states that the certificate will specify: “Scope of certification – crops, wild crop, livestock, processing, or handling.” Staff received training on the procedure on March 3, 2015. Copies of all documents were provided to the NOP. GOA also provided documentation to demonstrate that “Private Label” certificates being issued are visually distinct from organic certification certificates, and do not include the same information as organic certificates. GOA also provided to the NOP its Private Label application, request for co-packer’s current organic certificate, work instructions and approval letter.

NP416800A.NC5 – 7 CFR §205.501 (a)(11)(v) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Prevent conflicts of interest by: Requiring all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and all parties responsibly connected to the certifying agent to complete an annual conflict of interest disclosure report.”

Comments: *Five of the six employed personnel did not have a current conflict of interest disclosure report at the time of the assessment.*

Corrective Action: GOA has now added Conflict of Interest (COI) forms to staff semi-annual evaluation procedures to ensure that they are completed. The *Conflict of Interest* form will be a required portion of the April evaluation; The *Employee Performance Review* document now includes this statement and the requirement for the COI form to be attached to the blank evaluation form to prevent it from being overlooked. The President/Chief Executive Officer’s job description has been updated to include the responsibility for the annual completion of staff COI forms. Copies of all documents were provided to the NOP for review.

NP416800A.NC6 – 7 CFR §205.501 (a)(10) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Maintain strict confidentiality with respect to its clients under the applicable organic certification program and not disclose to third parties (with the exception of the Secretary or the applicable State organic program’s governing State official or their authorized representatives) any business-related information concerning any client obtained while implementing the regulations in this part, except as provided for in §205.504(b)(5).”

Comments: *Five of the six employed personnel did not have a currently signed Confidentiality Statement. GOA Policy Manual, Section 3.4 states, “Individuals that review and/or evaluate applications/documents for certification or perform on-site inspections, make certification decisions and all parties responsibly connected to GOA must complete a Confidentiality Statement annually.”*

Corrective Action: GOA has now added Confidentiality Statements to staff semi-annual evaluation procedures to ensure that they are completed. *GOA Policy Manual AD001, Section 4.1*, has been updated to reflect this requirement. The *Confidentiality Statement* form will be a required portion of the April evaluation; The *Employee Performance Review* document now includes this statement and the requirement for the *Confidentiality Statement* form to be attached to the blank evaluation form to prevent it from being overlooked. The President/Chief Executive Officer's job description has been updated to include the responsibility for the annual completion of staff *Confidentiality Statement* forms. Copies of all documents were provided to the NOP for review.

NP416800A.NC7 – 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.”

Comments: *NOP 2027, Personnel Performance Evaluations, require inspectors to be annually evaluated during an onsite inspection by a supervisor or peer (another inspector). Annual field observations of contracted inspectors are not conducted.*

Corrective Action: GOA has revised its Policy Manual to reflect the requirement of an annual evaluation of all persons who perform on-site inspections. Additionally their *Inspector Evaluation Procedure P006D* was revised to require that all active inspectors be subject to an annual witness audit. Copies of these documents, as well as *Inspector Evaluation Form Annual F026F*, *Inspector Evaluation Form Certification F026B* and *Inspector Evaluation Form Operation F026C* were provided to the NOP for review. GOA has contracted with the International Organic Inspectors Association (IOIA) to conduct inspector witness audits to help GOA meet their goal for 100% annual evaluations.

NP416800A.NC8 – 7 CFR §205.404(b)(1) states, “The certifying agent must issue a certificate of organic operation which specifies the... Name and address of the certified operation...” Furthermore, NOP 2603, Organic Certificates, Section 3.2, states that “Certifying agents must identify only one “person” (typically a farm or business as defined in 7 CFR § 205.2) on the organic certificate...”

Comments: *GOA certified operations that are in a contractual selling relationship with a certified buyer have the name of certified buyer listed on their certificate, as well as the certified operation's name.*

Corrective Action: GOA has discontinued listing the contractor's name on the certificate; it will now be listed on the Certificate Profile that accompanies the certificate. The certificate now only lists the actual certified operation. GOA changed its template and its outside contract computer programmer set up the certificates so none can be changed or altered by in house staff. As a result, no "additional/new" training of staff was required. GOA's Policy Manual reflects that the certificate lists the name and address of the certified operation. A copy of an operation's certificate was provided to the NOP to verify this change.

NP416800A.NC9 – 7 CFR §205.403(c)(1) states, “The on-site inspection of an operation must verify the operation's compliance or capability to comply with the Act and the regulations in this part.”

Comments: *It was observed during the livestock inspection that fields used for pasturing the animals had no shade structures or trees that could provide shade. The operator indicated that animals were allowed access to the barn; however, this seems unlikely for the majority of the fields since the distance was too large for the cows to move back and forth to the barn. The inspector did not note this as a concern and GOA did not identify this as a noncompliance.*

Corrective Action: Rebuttal accepted. GOA respectfully rebutted this noncompliance; the inspector, who is well-versed in dairy animals, noted that the animals appeared in good health. Additionally, the President of GOA, also an expert in livestock, noted that adult dairy animals with access to indoors during the heat of the summer will not stray far from the shelter, preferring to graze in the pasture only during the very early morning and evening hours.

AUDIT INFORMATION

Applicant Name:	Global Organic Alliance (GOA)
Est. Number:	N/A
Physical Address:	3185 Township Road 179, Bellefontaine, OH 43311-0530
Mailing Address:	3185 Township Road 179, Bellefontaine, OH 43311-0530
Contact & Title:	Betty Kananen, President/Chief Executive Officer
E-mail Address:	goaorg@centurylink.net
Phone Number:	937.593.1232
Auditor(s):	Betsy Rakola
Program:	USDA National Organic Program (NOP)
Audit Date(s):	January 10 – January 22, 2013
Audit Identifier:	NP2219NNA
Action Required:	No
Audit Type:	Corrective Action Assessment
Audit Objective:	To verify continuing compliance to the audit criteria; and to verify the implementation and effectiveness of corrective actions in addressing the previous non-compliances identified during the Mid-term audit and a NOP Appeal Review.
Audit Criteria:	7 CFR Part 205, National Organic Program; Final Rule, dated December 21, 2000, updated March 15, 2012.
Audit Scope:	GOA’s quality manual including personnel, processes, procedures, facilities, and related records.
Location(s) Audited:	Desk

The USDA National Organic Program (NOP) conducted a Renewal of Accreditation Assessment of Global Organic Alliance (GOA) from August 6 & 8, 2012, September 17- 20, 2012. The NOP issued GOA a Notice of Noncompliance based on the findings from this assessment on December 20, 2012. On January 4, 2013 and January 22, 2013, GOA submitted proposed corrective actions for review. The NOP Accreditation Committee considered these corrective actions on February 1, 2013 and recommended that the NOP renew GOA’s accreditation as a USDA organic certifying agent.

GENERAL INFORMATION

GOA is a for-profit, privately owned organization incorporated by the state of Ohio in 1997. GOA offers organic certification to organic producers and processors/handlers. GOA has been accredited to the National Organic Program (NOP) as a certifying agent since April 29, 2002, for the scopes of crop, wild crop, livestock and handling. GOA has 782 certified clients, which include 424 crop, 272 livestock, 2 wild crop, and 40 handling operations certified to the NOP. Clients are located throughout the US, mainly

in the Midwestern sections of the country. All certification activities are conducted at the Bellefontaine office.

GOA is also an accredited body to administer the Japan Agricultural Standard (JAS), Canada Organic Regime (COR) and the USDA/MAFF Export Arrangement. A USDA ISO Guide 65 Program Surveillance Assessment was conducted concurrently with the NOP Renewal Assessment.

FINDINGS

Observations made, interviews conducted, and procedures and records reviewed verified that GOA is currently operating in compliance to the requirements of the audit criteria except as noted below. Corrective actions for the non-compliances identified during the Mid-Term Audit were verified and found to be implemented and effective and the non-compliances were therefore cleared. Four new non-compliances were identified during the renewal assessment.

NP911800A.NC1 – Cleared
NP911800A.NC2 – Cleared
NP911800A.NC3 – Cleared
NP911800A.NC4 – Cleared
NP911800A.NC5 – Cleared

NP2219NNA.NC1 – Accepted. NOP §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 NOP instruction, *Issuance of Export Certificates to Japan*, dated June 15, 2009, Section 1.04, *Requirements for Authorization*, states, “To be authorized to issue export certificates, a USDA accredited certifying agent must: 4. Assign a unique identification number to each export certificate... 5. Keep a paper-based or electronic control log that records and tracks the disposition of each export certificate including those issued, voided or destroyed.” *GOA has issued twelve certificates for export to Japan but has not assigned a unique number to each. Additionally, GOA is not maintaining a log of the certificates issued. Corrective action:* GOA now maintains an export log, which has been updated to include all export certificates included in 2012. GOA provided an example of this log to the NOP, demonstrating unique identification numbers for each certificate. The Executive Director assigned an alternate TM-11 signatory and provided her with instructions for the completion of an export certificate to prevent future errors.

NP2219NNA.NC2 – Accepted. NOP §205.406 (c) states, “If the certifying agent has reason to believe, based on the on-site inspection and a review of the information specified in §205.404, that a certified operation is not complying with the requirements of the Act and the regulations in this part, the certifying agent shall provide a written notification of noncompliance to the operation in accordance with §205.662.” *Seven of twelve files reviewed contained a certification assessment letter that included “opportunities for improvement” (OFI). These OFIs each included a citation from the USDA organic regulations for all OFIs noted on the assessment. There was no deadline for corrective actions; instead, the operator was given until the next inspection to correct the OFIs. GOA is therefore not providing a written notification of noncompliance after identifying an operation’s noncompliance with the requirements of the Act and/or the regulations in 7 CFR 205. Corrective action:* GOA stated that OFIs are similar to the category of “Minor Issues – Conditions for Certification” identified in the NOP’s 2612

Instruction, *Recommended Penalties for Violations of Specific Regulatory Requirements*. GOA revised its certification assessment template for its initial compliance reviews. The template includes a section to track updated information on previously issued Notices of Noncompliances, as well as Opportunities for Improvement (OFI), to note whether the issues were resolved. If an issue is outstanding, then GOA describes it in detail on the certification assessment form. GOA then requests additional information from the operator and informs him/her that failure to implement corrective actions may result in a delay in the certification process and/or an adverse action. GOA also revised its certification procedure, section 2.4, to state that operations who “fail to respond or submit requested additional information or documentation may be subject to an unannounced or additional inspection.” GOA will not move the file to the next stage of the certification process until the operator provides a response, as stated in section 5.2 of the certification procedure. The inspector evaluates the effectiveness of all corrective actions during the on-site inspection.

NP2219NNA.NC3 – Accepted. NOP §205.662 (a) states, “When an inspection, review, or investigation of a certified operation by a certifying agent or a State organic program's governing State official reveals any noncompliance with the Act or regulations in this part, a written notification of noncompliance shall be sent to the certified operation.” *GOA Certification Procedure P008 Section 4.1.1 states, “Production operations – April 15th is the deadline for submitting updated Organic System Plans (OSP) and pay applicable fees to avoid incurring additional late fees. Operations that fail to submit renewal documentation or a signed surrender/withdrawal will be subject to adverse actions applicable to the program.” As of September 2012, twenty-four operations had not submitted updated information or fees to GOA, which is required by the USDA organic regulations under § 205.406(a). At the time of the on-site assessment, GOA had not taken any adverse actions against these operators. Corrective action:* On September 18, 2012, GOA sent late application/reminder notices to the twenty-four outstanding operations. On October 18, 2012, GOA sent Notices of Noncompliance to the five operations who had not responded to the late application notice. In order to prevent the noncompliance from recurring, GOA updated their Certification Procedure, Section 2.3, to include due dates for annual OSP updates, penalties for late submission, and dates on which adverse actions will commence. GOA also updated their fee schedule to reflect additional fees for late submissions. GOA will send these documents to all their certified operations in January 2012 as part of its certification renewal packet. GOA also wrote about updated OSP and annual fee deadlines, as well as deadlines for adverse actions and late fees, in its October 2012 newsletter to clients. In 2013, GOA will send reminder notices in June, July, and August. Notices of Noncompliance will be sent in late August, and Notices of Proposed Suspension will follow in late September for any operations who have not responded to the reminder notices.

NP2219NNA.NC4 – Accepted. NOP §205.662 (a)(1) states, “... A written notification of noncompliance shall be sent to the certified operation. Such notification shall provide a description of each noncompliance.” *A review of seven noncompliance letters that had been issued by GOA showed that GOA was identifying the noncompliance to the client by listing only the NOP citation (i.e. §205.205), without providing a description of the noncompliance or the facts on which the noncompliance was based. Corrective action:* GOA submitted examples of modified Notices of Noncompliance and Notices of Noncompliance templates, which now include a description of each noncompliance and a citation of the relevant regulatory section(s). GOA discussed the requirements for this information with staff following the on-site assessment and will also address these requirements during its March 2013 annual training.