



United States Department of Agriculture

Agricultural Marketing Service

National Organic Program

Idaho State Department of Agriculture

2270 Old Penitentiary Road, Boise, ID 83707 USA

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

7 CFR Part 205

as an Accredited Certifying Agent

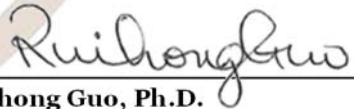
for the scope of

Crops, 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: **NP1161ZZA**
Effective Date: **April 29, 2012**
Expiration Date: **April 29, 2017**


Ruihong Guo, Ph.D.
Acting Deputy Administrator
National Organic Program



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NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

The National Organic Program (NOP) conducted a mid-term assessment of Idaho State Department of Agriculture. An onsite audit was conducted, and the audit report reviewed to determine Idaho State Department of Agriculture’s capability to continue operating as a USDA accredited certifier.

GENERAL INFORMATION

Applicant Name	Idaho State Department of Agriculture (ISDA)
Physical Address	2270 Old Penitentiary Road, Boise, ID 83712
Mailing Address	P.O. 790, Boise, ID 83701-0790
Contact & Title	Johanna Phillips, Organic Program Manager
E-mail Address	Johanna.Phillips@agri.idaho.gov
Phone Number	(208) 332-8539
Reviewer(s) & Auditor(s)	Renée Gebault King, NOP Reviewer; Miguel Caceres and Willy Horne, Onsite Auditors.
Program	USDA National Organic Program (NOP)
Review & Audit Date(s)	Corrective Action Review: December 15, 2014-January 15, 2015 NOP assessment review: September 30, 2014 Onsite audit: July 21-24, 2014
Audit Identifier	NP4202MMA
Action Required	Yes
Audit & Review Type	Mid-term Assessment
Audit Objective	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of ISDA’s certification
Audit & Determination Criteria	<i>7 CFR Part 205, National Organic Program as amended</i>
Audit & Review Scope	ISDA’s certification services in carrying out the audit criteria during the period: July 15, 2014 through July 24, 2014.

ORGANIZATIONAL STRUCTURE:

The Idaho State Department of Agriculture (ISDA) is a State government agricultural office that operates an accredited USDA organic certification program. ISDA has been accredited as a certifying agent since April 29, 2002, to the National Organic Program (NOP) for the scopes of crop, wild crop, livestock, and handling. ISDA currently has 211 certified clients certified to the NOP, which include 149 crop, 27 livestock, one wild crop, and 85 handling operations. The clients are certified in U.S., with the majority being in Idaho, and certification activities are only to the USDA organic regulations. All certification activities are conducted from the ISDA located in Boise, ID. Through the interviews conducted, a review of the personnel records, and observations of the witness inspection, the onsite auditors verified ISDA staff and contracted

inspectors had the necessary education, experience, and training to comply with and implement the organic certification program.

NOP DETERMINATION:

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

Noncompliances from Prior Assessments

There are no noncompliances from prior assessments.

Noncompliances 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.

NP4202MMA.NC1 – Accepted – 7 CFR §205.403(a)(1) states, "A certifying agent must conduct an initial onsite 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 onsite 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: In one of six files reviewed, the inspector did not visit the wild crop harvest area. Furthermore, ISDA did not follow-up to ensure the wild harvest area was inspected.

Corrective Actions: The operation in question identified as part of this audit was suspended in October 2014 for failure to renew their certification. ISDA updated its certification decision procedures in November 2014 to specify that a certificate may not be issued to an operation if the inspection report is incomplete. Furthermore, the certificate may not be issued until the missing information or other issues identified as part of the inspection or final review have been resolved. These updates were communicated to staff and inspectors via a policy memo issued November 17, 2014.



**Livestock and Seed Program
Audit, Review, and Compliance Branch
Quality System Audit Report**

AUDIT INFORMATION

Applicant Name:	Idaho State Department of Agriculture (ISDA)
Est. Number:	N/A
Physical Address:	2270 Old Penitentiary Road, Boise, ID 83701
Mailing Address:	Same
Contact & Title:	Brandon Lamb, Agricultural Program Manager
E-mail Address:	Brandon.Lamb@agri.idaho.gov
Phone Number:	208-332-8675
Auditor(s):	Corey D. Gilbert
Program:	USDA National Organic Program (NOP)
Audit Date(s):	June 10 – July 29, 2011
Audit Identifier:	NP1161ZZA
Action Required:	No
Audit Type:	Renewal Assessment
Audit Objective:	To verify continuing compliance to the audit criteria; and to verify the implementation and effectiveness of corrective actions in addressing the non-compliances identified during the Deferred and Mid-Term Audit.
Audit Criteria:	7 CFR Part 205 National Organic Program, Final Rule, dated December 21, 2000; as amended March 14, 2011.
Audit Scope:	ISDA's quality manual including personnel, processes, procedures, facilities and related records.
Location(s) Audited:	ISDA's office in Boise, ID; crop and livestock operation in Paul, ID; and handling operation in Twin Falls, ID.

GENERAL INFORMATION:

ISDA was accredited as a certifying agent on April 29, 2002, to the USDA National Organic Program (NOP) for crops, wild crops, livestock, and handling operations. ISDA is currently certifying operations in Idaho, Wisconsin, and Wyoming. The ISDA client list as of July 25, 2011, had 160 crop, 0 wild crop, 26 livestock, and 78 handling operations certified to the NOP standards. ISDA has never certified a wild harvest operation.

FEES:

The ISDA fee schedule is available to clients via the ISDA website and is sent as part of the application packet for any client that requests information. All fees are non-refundable and include base fees, inspection fees, and graduated fees based on sales. The fees appear to be reasonable and the fee schedule is clear in the amount charges and what is nonrefundable. ISDA sends an estimate of costs for certification in a pre-inspection letter to each client.



Livestock and Seed Program Audit, Review, and Compliance Branch Quality System Audit Report

PERSONNEL:

The ISDA Organic Program office is located in Boise, ID within the Division of Agricultural Inspections. The staff consists of the Division Director, Section Manager, Program Manager, 2 program specialists, 3 Senior Agriculture Investigators, and 2 State Dairy Inspectors. ISDA also uses 3 contractors for file reviews, material reviews, and inspections. Interviews conducted, records reviewed, and observations made during the witness inspections and office audit verified personnel were qualified and knowledgeable for their assigned duties. Records reviewed verified that ISDA was meeting the requirements for annual performance evaluations, confidentiality, and conflicts of interest disclosure reports. ISDA staff completed additional IOIA organic training in 2010/2011 along with other external training on pest management, pesticide residue testing, and processing.

CERTIFICATION PROCESS:

Certification information and application material can be obtained on the ISDA website (www.agri.idaho.gov) or by contacting the ISDA office in Boise, ID. New applicants are sent a certification packet with the ISDA Standard Operating Procedure for the Organic Program, instructions for certification, fee schedule, application form, appropriate organic system plan forms, and the NOP Rule. Initial and annual update reviews are primarily conducted by ISDA staff; although, they may also be conducted by contractors. Inspections are conducted by staff (majority) or subcontracted inspectors based qualifications, location, and availability. The Program Manager is responsible for assigning the appropriate reviewer and inspector. ISDA staff conduct material reviews with assistance from contractors as needed, and they also reference the Organic Materials Review Institute (OMRI) and Washington State Department of Agriculture material lists. The inspection report and complete operator file is reviewed for compliance by a staff reviewer and forwarded with a recommendation to the Program Manager. The Program Manager is currently making all of the final certification decisions, and all certificates are signed by the Director of Agriculture. Records show that in all cases the certification decision was made by someone different from the one that conducted the initial review, secondary review, and/or the inspection.

Annual updates to the organic system plans and annual inspections are required in accordance with the NOP Rule. Labels and inputs are reviewed and approved by qualified ISDA staff, and their use is verified by inspectors during inspections.

ADMINISTRATIVE PROCEDURES:

Records reviewed verified that notification of denial of certification, notification of non-compliances, notifications of proposed suspension/revocation, and actual suspension/revocation requirements were in accordance with the NOP Rule. All notices of non-compliances issued are forwarded to the NOP Appeals Team.

ISDA has conducted an annual program review and Annual updates are submitted to the Administrator as required. ISDA has procedures in place to issue Export Certification Certificates (TM-11) for Japan and Taiwan. They have only issued one export certificate (Taiwan). A review of the procedures and files verified ISDA is operating in compliance to the USDA procedures for issuing export certificates.



**Livestock and Seed Program
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WITNESS INSPECTIONS:

The assessment included observations of three renewal inspections by ISDA. The crop and livestock operation was a dairy in Paul, ID; and the handling operation was a cheese processor in Twin Falls, ID. All required areas of the certified operations, including inputs and labels, were reviewed and verified by the inspectors. Three staff inspectors conducted the inspections. The crop and livestock operation was inspected by two different inspectors on two separate days. An exit interview which included identification of issues of concern was conducted with the operation representative at the end of all three inspections.

FINDINGS

Observations made, interviews conducted, and procedures and records reviewed verified that ISDA is currently operating in compliance to the requirements of the audit criteria. The corrective actions for the non-compliances identified during the Deferred and Mid-Term Audit were verified and found to be implemented and effective; therefore, the non-compliances were cleared. No non-compliances were identified during this assessment.

- NP9110DDA.NC1 – Cleared**
- NP9110DDA.NC2 – Cleared**
- NP9110DDA.NC3 – Cleared**
- NP9110DDA.NC4 – Cleared**
- NP9110DDA.NC5 – Cleared**
- NP9110DDA.NC6 – Cleared**
- NP9110DDA.NC7 – Cleared**
- NP9110DDA.NC8 – Cleared**
- NP9110DDA.NC9 – Cleared**
- NP9110DDA.NC10 – Cleared**