



United States Department of Agriculture

Agricultural Marketing Service
National Organic Program

OHIO ECOLOGICAL FOOD AND FARM ASSOCIATION

150 East Wilson Bridge Rd, Suite 230, Worthington, Ohio, 43085, 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-37-24**

Effective Date: **04/29/2022**

Expiration Date: **04/29/2027**

Issue Date: **12/10/2024**

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

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CERTIFICATE OF ACCREDITATION



NATIONAL ORGANIC PROGRAM: AUDIT & CORRECTIVE ACTION REPORT

GENERAL INFORMATION

- **Certifier Name** Ohio Ecological Food and Farm Association, (OEFFA)
- **Physical Address** 41 Crosswell Road, Columbus, Ohio 43214, U.S.A.
- **Audit Type** Renewal Audit
- **Auditors & Audit Dates** Joshua Lindau, Emily Prisco, 11/07/2022 to 11/15/2022
- **Audit Identifier** NOP-36-22

CERTIFIER OVERVIEW

The National Organic Program (NOP) conducted a remote Renewal Audit of Ohio Ecological Food and Farm Association (OEFFA)'s USDA organic certification program covering the period November 13, 2020, to November 15, 2022. The purpose of the audit was to verify OEFFA's compliance with the Organic Foods Production Act of 1990 (OFPA), the USDA organic regulations (7 CFR Part 205), and the NOP Handbook. Audit activities included a review of certification activities, interviews with OEFFA personnel, a records audit, and three onsite witness audits. The three witness audits consisted of annual onsite inspections of a livestock, crops, and handling operations. The livestock operation was located in Iowa and the crops and handling operations were located in Wisconsin.

OEFFA is a nonprofit agency initially accredited on April 29, 2002. OEFFA is accredited to the crops, wild crops, livestock, and handling scopes. OEFFA's office is in Columbus, Ohio. OEFFA certifies 1,147 operations and offers certification services in 12 states. Certification activities are performed by 35 employees, 29 contract inspectors and 1 contract certification reviewer.

NOP DETERMINATION:

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

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

Noncompliances from Prior Assessments

AIA-2001-20 – Cleared.

AIA-3234-20 – Cleared.

AIA-5772-21 - Cleared.

AIA-7815-21 – Cleared.

AIA-3236-20 - Accepted. 7 C.F.R. §205.501(a)(3) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670;”

Comments: *OEFFA does not fully carry out the provisions of §205.201 in the following manner:*

- 1. Specifically, OEFFA does not ensure all operators provide a description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented. This is a requirement of §205.201(a)(3).*
- 2. For the Wild Crop scope, OEFFA does not verify all management components listed in NOP 5022 Wild Crop Harvesting, section 5.2.*

Corrective Action: OEFFA updated the noncompliant organic system plan (OSP) templates and began using the new templates at the start of the 2022 certification cycle. OEFFA conducted training on the template updates March 2, 2022. OEFFA submitted to the NOP blank copies of the updated organic system plan templates, inspection templates, training agenda, materials, and attendance log. The following updates were made:

- OEFFA updated the Crops, Processing and Livestock OSP templates to include descriptions of the certified operation conducting monitoring activities and the frequency with which the activity will be performed. Inspectors will verify monitoring activities during inspections.
- OEFFA updated the Wild Crop section of the OSP to align with the guidance of NOP 5022 Guidance Wild Crop Harvesting. Updates made to the OSP template Wild Crop Collection section include new questions to gather information on specialized training for collectors, descriptions of the natural environment of the harvest area, listing endangered, rare or threatened plants/animals in the harvest area, frequency of monitoring, and rating the effectiveness of the operator’s sustainability practices.

Verification of Corrective Action: The auditor reviewed certification files and verified OEFFA’s updated Crops, Processing and Livestock OSP templates include descriptions of the certified operations’ monitoring activities and the frequency with which the activity will be performed. However, the auditor reviewed OEFFA’s Wild Crops inspection report template and found the template still does not require inspectors to verify all management components as required by NOP 5022 Guidance Wild Crop Harvesting.

2023 Corrective Action: OEFFA updated its Producer Inspection Report to include the management components of NOP 5022, which address the monitoring activities and frequency with which the activity will be performed. OEFFA trained personnel on these updates via the recorded 2023 Annual Inspector Training and Staff Recalibration Training on March 1, 2023.

AIA-4313-20 - Accepted. 7 C.F.R. §205.501(a)(5) states “A private or governmental entity accredited as a certifying agent under this subpart must: Ensure that its responsibly connected persons, employees, and contractors with inspection, analysis, and decision-making responsibilities have sufficient expertise in organic production or handling techniques to successfully perform the duties assigned.”

Comments: *OEFFA does not use adequately trained personnel to comply with and implement its USDA organic certification program. The auditor's review of certification files identified the following:*

- 1. Inspectors do not consistently and thoroughly conduct mass balance and traceback exercises to verify compliance. The auditors viewed audit exercises that lacked the following important information: units of measure, projected yield, purchased feed amounts, beginning and ending inventories, time frame chosen, and quantity sold.*
- 2. Inspectors do not consistently identify incomplete and inaccurate OSP's when there are inconsistencies between the information in the plan and actual practices.*
- 3. Rebuttal Accepted.*

Corrective Action: OEFFA updated their inspection report templates and conducted training on performing mass balance/traceback exercises and identifying and rectifying incomplete organic system plans and inspection reports. The following was submitted to the NOP:

- OEFFA updated their inspection report templates to prompt inspectors to provide more detail when conducting mass balance and traceback exercises. OEFFA's producer, livestock and handler inspection reports now contain a records and audit section, where inspectors will list the documents reviewed, the linking element of each document, the timeframe of the audit, yield, inventory status, and a determination of whether the mass balance and traceback exercises were successful. OEFFA's Certification Specialists completed the Organic Integrity Learning Center (OILC) Traceability Techniques course on January 19, 2021, and then conducted an in-house training titled Traceback and Mass Balance Audits at Inspection for all OEFFA staff and contract inspectors on March 9, 2021. OEFFA submitted the updated producer, livestock and handler inspection report templates, OILC training attendance log, and the in-house training agenda and attendance list.
- OEFFA conducted training February 23, 2021, and March 2, 2022, for review staff and inspectors. One of the topics covered at each training was identifying and correcting incomplete and inaccurate organic system plans during the inspection and review process. OEFFA submitted the training agenda, training materials, and attendance log.

Verification of Corrective Action:

- The auditors' review of inspection reports found that inspectors are not conducting accurate trace back and mass balance exercises. During a witness audit of a livestock operation, the inspector did not use actual feed records to conduct the mass balance exercise. The inspector used a grazing log that only had information for one field and one class of animal to determine if all animals had the appropriate dry matter intake.
- The auditors' review of dairy certification files found that the operations did not include a feed ration for calves as required per §205.237(c)(2). The inspector did not note this lack of rations for calves as an issue of concern during the inspection.

2023 Corrective Action: OEFFA provided training to inspectors and staff to remind them of mass balance requirements and updated the livestock inspection report template to indicate that dry matter intake calculations are to be calculated using as-fed records and reference all classes of animals. The inspection report also includes a request to verify feed rations for all classes of animals. OEFFA trained inspectors and reviewers on these topics during the 2023 annual inspector training and the 2023 staff recalibration training.

AIA-5868-21 - Accepted. 7 C.F.R. §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: *OEFFFA did not conduct an annual inspection of all its certified operations in 2020. A review of a January 19, 2021 analysis provided by OEFFFA and interview with certification staff found that OEFFFA had completed only 30% of its 2020 inspections and had not assigned 664 of its 2020 renewal inspections to inspectors.*

Corrective Action: OEFFFA implemented a new applicant deadline of March 15, 2021 to limit new applications and ensure staff can focus on existing operations for the 2021 season. For operations that missed inspections in 2020, OEFFFA created a “combined inspection process” in which OEFFFA will review both the 2020 and 2021 updates from these operations, and will create a single inspection packet for both years. OEFFFA inspectors will review records for both years at the combined inspection. OEFFFA submitted a copy of the combined inspection procedure, including a schedule of target dates to result in OEFFFA to being current on all 2020 inspections by January 1, 2022 and all 2021 inspections by March 15, 2022. OEFFFA Inspectors were trained on this process on February 23, 2021, and OEFFFA staff were trained on this process during the annual recalibration training on March 9, 2021; OEFFFA submitted the training agendas and training records as evidence. As of April 22, 2021, OEFFFA also hired additional certification review staff, for a net increase of 3 full time employees, to help address the backlog of 2020 reviews and inspections and improve capacity for future seasons; OEFFFA provided a copy of the job announcement as evidence of the hiring process. In 2022, OEFFFA will implement an earlier producer renewal application deadline of June 15th to allow OEFFFA staff to start reviewing applications and assigning inspections earlier in the season.

Verification of Corrective Action: OEFFFA did not complete all annual inspections in 2021. Due to timing of the audit, the auditors could not confirm whether all 2022 annual inspections would be completed by the end of 2022.

2023 Corrective Action: On January 11, 2023, OEFFFA reported to the NOP that all 2022 annual inspections due by the end of the year had been completed, except for a small number of operations that had either surrendered their certification, or that had unusual delays in scheduling, which resulted in OEFFFA issuing notices of noncompliance to the operation when appropriate. OEFFFA’s revised renewing producer deadline of June 15, described in the previous corrective actions, remains in effect to ensure a lengthier window of opportunity for completing inspections in future years.

Noncompliances Identified during the Current Assessment and Corrective Actions

AIA-2578-22 - Accepted. 7 C.F.R. §205.501(a)(2) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Demonstrate the ability to fully comply with the requirements for accreditation set forth in this subpart.”

Comments: *OEFFFA does not fully implement the NOP’s international organic trade arrangement policies and procedures, which are outlined in the NOP’s International Trade Policies resources. The auditors’ review of operations that import or export under USDA equivalence arrangements found that OEFFFA is not consistently verifying compliance to the terms of each arrangement as follows:*

1. *OEFFFA approved products for trade under the US-Canada Organic Equivalence Arrangement (USCOEA) that were not verified to be compliant with the terms of the arrangement.*
2. *OEFFFA approved the export of EU-certified products from non-EU member states to the United States under the US-EU Organic Equivalence Arrangement, which is not compliant with the terms of the Arrangement.*
3. *OEFFFA approved the relabeling of EU-certified products produced in non-EU member states as ‘USDA Organic’ under the US-EU Organic Equivalence Arrangement even though no further processing and/or handling of the products occurred in an EU member*

state.

Corrective Actions: OEFFA added checkpoints and additional requirements to their inspection report review checklist to ensure reviewers verify compliance with each international equivalency arrangement for all products planned for export. Reviewers are required to review products for export against OEFFA's International Trade Policies Chart or per the NOP's Trade and Policy Materials. OEFFA also created a new product review checklist that reviewers complete for each new or changed product intended for export. OEFFA submitted both checklists to the NOP along with agendas and training logs for personnel trainings, which took place in fall of 2023 and again during the annual spring training for staff and inspectors in 2024. Additionally, OEFFA is in the process of re-reviewing the affected products and communicating with the affected operations to ensure compliant OSP updates.

AIA-2579-22 - 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 audits of crops, livestock, wild crops and handling inspections, the auditor observed that the inspector did not fully verify the operation's compliance with the USDA organic regulations in the following manner:*

1. *The OEFFA inspector did not conduct a full annual inspection and did not verify compliance of all areas of the operation. The inspector concluded the inspection and conducted the exit interview without inspecting the entire operation.*
2. *The OEFFA inspectors did not verify through on-site observations and on-site records review the accuracy of the activities described in the organic system plan (OSP) and the materials used by the operation. The inspectors only verbally confirmed this information.*
3. *The OEFFA inspector did not verify ruminant dry matter demand (DMD) values and dry matter intake (DMI) from pasture using the producer's records and did not verify the operation's documentation of each type of actual feed fed, as required by §205.237(d)(2). The OEFFA inspector used estimated rations from the producer's organic system plan OSP to calculate the ruminants' DMD values and DMI from pasture during the grazing season, which is not compliant with §205.237(d)(1)(2).*
4. *The OEFFA inspector did not verify DMD values for all classes of animals. The producer's calculation sheets had the same reported DMD value for all animals, which is not compliant with §205.237(d)(1)(2) and §205.201(a).*
5. *The OEFFA inspector did not verify that all classes of ruminant animals grazed throughout the entire grazing season as required per §205.237(c)(1). The OEFFA inspector did not verify the producer's grazing season, including start dates, end dates, total days grazed, and confinement dates for each class of animal.*
6. *The OEFFA inspector did not verify a handling operation's procedures and materials used for cleaning cheese-making equipment.*

Corrective Actions: OEFFA revised their inspection reports to request the inspector confirm that all areas of the operation have been inspected, including input storage areas. The livestock inspection report now contains additional verification points addressing the grazing season and dry matter intake verification as described. OEFFA's handler OSP now includes additional prompts to ensure that inspectors verify materials and cleaning procedures. OEFFA trained staff and contractors during OEFFA's annual training in the spring of 2023 and 2024 and submitted the agenda and training logs.

AIA-2580-22 - Accepted. 7 C.F.R. §205.501(a)(2) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Demonstrate the ability to fully comply with the requirements for accreditation set forth in this subpart."

Comments: *OEFFA does not consistently demonstrate the ability to fully comply with the requirements for accreditation. The auditors' review of certification files and interview with OEFFA certification staff found that OEFFA's organic system plans (OSPs) and inspection reports for ruminant livestock operations do not capture adequate information to determine if animals are eligible for organic slaughter.*

Corrective Actions: OEFFA submitted updated livestock lists, that were implemented in 2023, which request the information necessary to determine eligibility for organic slaughter. OEFFA trained staff and inspectors on the updates and the requirements for operators to have complete and accurate livestock lists during their spring trainings in 2023 and 2024. OEFFA submitted the revised livestock list template, training log, and training agenda.

AIA-2581-22 - Accepted. 7 C.F.R. §205.501(a)(5) states “A private or governmental entity accredited as a certifying agent under this subpart must: Ensure that its responsibly connected persons, employees, and contractors with inspection, analysis, and decision-making responsibilities have sufficient expertise in organic production or handling techniques to successfully perform the duties assigned.”

Comments: *OEFFA does not consistently ensure that its contractors with inspection, analysis, and decision-making responsibilities have sufficient expertise in organic production or handling techniques prior to performing the duties assigned. During the witness audit of an inspection of a crops and wild crops operation, the auditor found that the OEFFA inspector did not cite the correct regulations for issues of concern identified during the inspection. Specifically, the OEFFA inspector cited the USDA organic regulations for wild crops, §205.207. However, the violations were related to the operation's record keeping and the records available at the time of inspection and should have been cited to §205.103.*

Corrective Actions: OEFFA submitted revisions to the producer inspection report template to clarify record keeping requirements for cultivated mushroom production. The training also provided clarifications regarding the need to reference the appropriate regulations for record keeping as opposed to production regulations. OEFFA trained personnel on this during the 2024 Annual Training and submitted the training log for that.

AIA-2582-22 - Accepted. 7 C.F.R. §205.501(a)(2) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Demonstrate the ability to fully comply with the requirements for accreditation set forth in this subpart.”

Comments: *OEFFA's Organic System Plan (OSP) templates and inspection reports do not demonstrate that OEFFA fully complies with the requirements of §205.237 and §205.240, pasture practice standards. The auditors' review of the OSP and inspection report templates found they do not require an operation to adequately describe the grazing season for each class of animal.*

Corrective Actions: OEFFA updated the livestock OSP to request operations to provide additional details if different classes of animals have different grazing season start dates, and for the operation to explain the reason the season and end dates are different. OEFFA also added to the existing grazing season question in the livestock OSP to request the inspector to provide grazing season start and end dates, along with a request for an explanation if the grazing season is not continuous. OEFFA notified staff and inspectors of these updates during trainings in the spring of 2023 and submitted training agendas and training logs to the NOP. OEFFA also submitted the revised livestock OSP.

NATIONAL ORGANIC PROGRAM: AUDIT & CORRECTIVE ACTION REPORT

GENERAL INFORMATION

- **Certifier Name** Ohio Ecological Food and Farm Association (OEFFA)
- **Physical Address** 41 Croswell Road, Columbus, Ohio 43214, U.S.A.
- **Audit Type** Mid-term Assessment
- **Auditors & Audit Dates** Alison Howard, Jessica Walden; 11/09/2020 - 11/13/2020
- **Audit Identifier** NOP-36-20

CERTIFIER OVERVIEW

The National Organic Program (NOP) conducted a mid-term audit of Ohio Ecological Food and Farm Association (OEFFA)'s certification activities during the period April 29, 2017, to November 8, 2020. The purpose of the audit is to verify OEFFA's conformance to the USDA organic regulations. Audit activities included a records audit and interviews with staff. No witness audits were conducted.

OEFFA is a nonprofit agency accredited on April 29, 2002. OEFFA's office is in Columbus, Ohio. OEFFA is accredited to the following scopes: Handling, Crops, Livestock, and Wild Crop.

OEFFA certifies 1,339 operations to the following certification scopes: Crops (1231), Wild Crop (21), Livestock (470), and Handlers (179).

Certification services are conducted in Ohio, Indiana, Kentucky, Michigan, New York, Pennsylvania, West Virginia, Iowa, Illinois, Missouri, Virginia and Wisconsin.

Certification activities are performed by 11 employees in addition to contracted inspectors.

NOP DETERMINATION:

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

Any noncompliance labeled as "**Cleared**," indicates that the corrective actions for the noncompliance are determined to be implemented and working effectively. Any noncompliance

labeled as “**Accepted**” indicates acceptance of the corrective actions, and verification of corrective action implementation will be conducted during the next audit.

Noncompliances from Prior Assessments

AIA-2002-20 - Cleared.

AIA-2003-20 - Cleared.

AIA-2004-20 - Cleared.

AIA-2005-20 - Cleared.

AIA-2006-20 - Cleared.

AIA-2007-20 - Cleared.

AIA-2001-20 - Accepted. (NP7114LLA.NC2) - 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 2613 Instruction Responding to Results from Pesticide Residue Testing Section 5.2a states, “If tests detect residues of prohibited pesticides at less than 0.01 parts per million (ppm), which is the same as 10 parts per billion (ppb): Notify the certified operation of the test results and indicate that the product may be sold as organic.”

Comments: *The review of one certification file with a positive residue result revealed that the notice sent to the operation with the test results did not indicate whether the product could be sold as organic.*

Corrective Action: OEFFA revised their “Residue Sample Results Letter – Request for Information” letter template to include the sentence, “This means the [crop/product] from the sample area may be sold as organic because the residues are below the threshold set by the NOP.”

Verification of Corrective Action: The auditors’ review of pesticide residue sample results notifications indicates OEFFA does not consistently utilize the updated template. This corrective action is not adequately implemented.

2022 Corrective Action: OEFFA reviewed and updated their process for generating and issuing the template Residue Sample Results Letter – Request for Information. A training was provided via email on October 22, 2021, for all staff conducting NOP certification activities. OEFFA conducted a second training March 2, 2022, on the generation and issue process for the template. OEFFA submitted to the NOP the agenda, training materials, attendance log, and email notification for both trainings, as well as a Residue Sample Results Letter – Request for Information generated from Intact using the updated process

Noncompliances Identified during the Current Assessment and Corrective Actions

AIA-3234-20 – Accepted. 7 C.F.R. §205.405(d)(1) – (3) states, “A notice of denial of certification must state the reason(s) for denial and the applicant’s right to: Reapply for certification pursuant to §§205.401 and 205.405(e); Request mediation pursuant to §205.663 or, if applicable, pursuant to a State organic program; File an appeal of the denial of certification pursuant to §205.681 or, if applicable, pursuant to a State organic program.”

Comments: *OEFFA’s notices of denial of certification do not consistently include the applicant’s*

right to reapply for certification. The auditor's review of a notice of denial found that OEFFA advised the applicant of their right to request mediation and to appeal the denial, but not of the right to reapply for certification.

Corrective Action: OEFFA updated their Denial of Certification letter templates to include notification of an operation's right to reapply for certification. Training on the updated templates was conducted March 2, 2022, for staff conducting NOP certification activities. OEFFA has not issued a Notice of Denial since updating the templates February 2, 2022. OEFFA submitted to the NOP the updated blank templates, training agenda, training materials and attendance log.

AIA-3236-20 – Accepted. 7 C.F.R. §205.501(a)(3) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670;”

Comments: *OEFFA does not fully carry out the provisions of §205.201 in the following manner:*

- 1. Specifically, OEFFA does not ensure all operators provide a description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented. This is a requirement of §205.201(a)(3).*
- 2. For the Wild Crop scope, OEFFA does not verify all management components listed in NOP 5022 Wild Crop Harvesting, section 5.2.*

Corrective Action: OEFFA updated the noncompliant organic system plan (OSP) templates and began using the new templates at the start of the 2022 certification cycle. OEFFA conducted training on the template updates March 2, 2022. OEFFA submitted to the NOP blank copies of the updated organic system plan templates, inspection templates, training agenda, materials, and attendance log. The following updates were made:

- OEFFA updated the Crops, Processing and Livestock OSP templates to include descriptions of the certified operation conducting monitoring activities and the frequency with which the activity will be performed. Inspectors will verify monitoring activities during inspections.
- OEFFA updated the Wild Crop section of the OSP to align with the guidance of ***NOP 5022 Guidance Wild Crop Harvesting***. Updates made to the OSP template Wild Crop Collection section include new questions to gather information on specialized training for collectors, descriptions of the natural environment of the harvest area, listing endangered, rare or threatened plants/animals in the harvest area, frequency of monitoring, and rating the effectiveness of the operator's sustainability practices.

AIA-4313-20 – Accepted. 7 C.F.R. §205.501(a)(5) states “A private or governmental entity accredited as a certifying agent under this subpart must: Ensure that its responsibly connected persons, employees, and contractors with inspection, analysis, and decision-making responsibilities have sufficient expertise in organic production or handling techniques to successfully perform the duties assigned.”

Comments: *OEFFA does not use adequately trained personnel to comply with and implement its USDA organic certification program. The auditor's review of certification files identified the following:*

1. *Inspectors do not consistently and thoroughly conduct mass balance and traceback exercises to verify compliance. The auditors viewed audit exercises that lacked the following important information: units of measure, projected yield, purchased feed amounts, beginning and ending inventories, time frame chosen, and quantity sold.*
2. *Inspectors do not consistently identify incomplete and inaccurate OSP's when there are inconsistencies between the information in the plan and actual practices.*
3. ***Rebuttal Accepted.***

Corrective Action: OEFFA updated their inspection report templates and conducted training on performing mass balance/traceback exercises and identifying and rectifying incomplete organic system plans and inspection reports. The following was submitted to the NOP:

1. OEFFA updated their inspection report templates to prompt inspectors to provide more detail when conducting mass balance and traceback exercises. OEFFA's producer, livestock and handler inspection reports now contain a records and audit section, where inspectors will list the documents reviewed, the linking element of each document, the timeframe of the audit, yield, inventory status, and a determination of whether the mass balance and traceback exercises were successful. OEFFA's Certification Specialists completed the Organic Integrity Learning Center (OILC) Traceability Techniques course on January 19, 2021, and then conducted an in-house training titled Traceback and Mass Balance Audits at Inspection for all OEFFA staff and contract inspectors on March 9, 2021. OEFFA submitted the updated producer, livestock and handler inspection report templates, OILC training attendance log, and the in-house training agenda and attendance list.
2. OEFFA conducted training February 23, 2021, and March 2, 2022, for review staff and inspectors. One of the topics covered at each training was identifying and correcting incomplete and inaccurate organic system plans during the inspection and review process. OEFFA submitted the training agenda, training materials, and attendance log.

NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

AUDIT AND REVIEW PROCESS

An onsite renewal assessment of Ohio Ecological Food and Farm Association (OEFFA) organic program was conducted on April 24 – 28, 2017. The National Organic Program (NOP) reviewed the auditor’s report to assess Ohio Ecological Food and Farm Association’s compliance to the USDA organic regulations. This report provides the results of NOP’s assessment.

GENERAL INFORMATION

Applicant Name	Ohio Ecological Food and Farm Association (OEFFA)
Physical Address	41 Crowell Road Columbus, Ohio 43214
Mailing Address	41 Crowell Road Columbus, Ohio 43214
Contact & Title	Andy Hupp, Certification Program Manager
E-mail Address	andy@oeffa.org
Phone Number	614-947-1624
Reviewer(s) & Auditor(s)	Graham Davis, NOP Reviewer; Alan Kohles and Penny Zuck, Onsite Auditors.
Program	USDA National Organic Program (NOP)
Review & Audit Date(s)	Corrective actions review: November 17, 2017 NOP assessment review: August 23, 2017 Onsite audit: April 24 -28, 2017
Audit Identifier	NP7114LLA
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 OEFFA’s certification system.
Audit & Determination Criteria	<i>7 CFR Part 205, National Organic Program as amended</i>
Audit & Review Scope	OEFFA’s certification services in carrying out the audit criteria during the period: August 14, 2014 through April 28, 2017

The Ohio Ecological Food and Farm Association (OEFFA) has been accredited by the National Organic Program (NOP) as a certifying agent since April 29, 2002 for the scopes of crops, wild crops, livestock, and handling. OEFFA currently certifies 1,111 operations under the USDA organic regulations – 1,025 crops operations, 444 livestock operations, 22 wild crops operations, and 130 handling operations. During the renewal assessment, four witness audits were conducted to cover the four scopes OEFFA is accredited for.

The OEFFA certification program staff consists of an Executive Director, Program Manager, Administrative Specialist, Certification Program Assistant (2), Compliance and Quality

Assurance Coordinator, Senior Processing Certification Specialist, Inspection Coordinator, Senior Certification Specialist, Materials Specialist, Certification Specialist (9), and Contract Inspector (33). All certification activities are conducted at the Columbus, OH office.

NOP DETERMINATION:

NOP reviewed the onsite audit results to determine whether OEFFA'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

None

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.

NP7114LLA.NC1 – 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 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: *OEFFA's Notices of Noncompliance do not include the option for the certified operation or applicant to rebut.*

2017 Corrective Actions: OEFFA revised all of their letter templates that include a noncompliance to include the sentence, "If you wish to rebut this noncompliance, please submit evidence supporting your rebuttal to OEFFA Certification by the deadline." OEFFA also submitted a notice of noncompliance they issued to an operation that includes the option to rebut.

NP7114LLA.NC2 – Accepted. 7 C.F.R. §205.501(a)(21) states, "A private or governmental entity accredited as a certifying agent under this subpart must:...comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary." NOP 2613 Instruction Responding to Results from Pesticide Residue Testing Section 5.2a states, "If tests detect residues of prohibited pesticides at less than 0.01 parts per million (ppm), which is the same as 10 parts per billion (ppb): Notify the certified operation of the test results and indicate that the product may be sold as organic."

Comments: *The review of one certification file with a positive residue result revealed that the notice sent to the operation with the test results did not indicate whether the product could be sold as organic.*

2017 Corrective Actions: OEFFA revised their “Residue Sample Results Letter – Request for Information” letter template to include the sentence, “This means the [crop/product] from the sample area may be sold as organic because the residues are below the threshold set by the NOP”.

NP7114LLA.NC3 – Accepted. 7 C.F.R. §205.662(c) 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.”

Comments: *The review of two appeals files revealed that OEFFA did not issue notifications of proposed suspension or revocation to the operations when they did not rebut or correct new/subsequent noncompliances.*

2017 Corrective Actions: OEFFA clarified that at the time of the audit, both operations had responded to the new noncompliances with corrective action plans. OEFFA reviewed the proposed corrective actions from these clients and issued a certification decision letter for both producers. Upon approval of these corrective actions by the NOP, OEFFA plans to train its staff that the renewal process should not be stopped to wait for an appeal decision from the NOP. OEFFA submitted an agenda for the training it plans to provide its staff and indicated that the training will occur within two weeks of the NOP’s acceptance of its corrective actions.

NP7114LLA.NC4 – Accepted. 7 C.F.R. §205.662(c) states, “...When correction of a noncompliance is not possible, the notification of noncompliance and the proposed suspension or revocation of certification may be combined in one notification.”

Comments: *One certification file reviewed included a combined notification of noncompliance and partial denial of certification for a portion of the operation (certain fields). The operation and fields were certified, and therefore OEFFA should have issued the operation a combined notification of noncompliance and proposed suspension.*

2017 Corrective Actions: In order to delineate a clear difference between a proposed suspension and denial in the area where an adverse action is approved, OEFFA has created a more detailed certification decision form that provides specific direction in the “Adverse Action” section for the file reviewer to recommend an action and receive final sign-off. This new form has been in use since February 2017. OEFFA submitted a certification decision form and notice of proposed suspension sent to an operation to demonstrate the effectiveness of their revised form.

NP7114LLA.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 2603 Instruction Organic Certificates Section 3.4 states, “Certifying agents should issue a new organic certificate each year...These updated certificates may be issued after reviewing the annual update or after the annual inspection is completed.”

Comments: *The review of two appeals files revealed that the operations were not issued new organic certificates for the year.*

2017 Corrective Actions: OEFFA issued new certificates to the two operations. Upon approval of

these corrective actions by the NOP, OEFFA plans to train its staff that the renewal process should not be stopped to wait for an appeal decision from the NOP. OEFFA submitted an agenda for the training it plans to provide their staff and indicated that the training will occur within two weeks of the NOP's acceptance of its corrective actions.

NP7114LLA.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.” NOP 2025 Instruction Internal Program Review Section 3.1 states, “Qualified program reviewers must have the expertise to conduct such reviews, including knowledge of certification, auditing, and the USDA organic regulations. Internal program reviews are conducted by personnel different from those who perform certification activities.”

Comments: *The 2016 and 2017 OEFFA annual program reviews were conducted by the Certification Program Manager who performs certification activities.*

2017 Corrective Actions: The Program Manager will continue to complete the annual internal program review but will no longer conduct certification activities including initial review, post inspection review, inspections, or make certification decisions. OEFFA submitted a revised job description of the program manager that no longer includes certification activities in the job description.

NP7114LLA.NC7 – Accepted. 7 C.F.R. §205.501(a)(6) states, “A private or governmental entity accredited as a certifying agent under this subpart must:…Conduct an annual performance evaluation of all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and implement measures to correct any deficiencies in certification services;…” NOP 2027 Instruction Personnel Performance Evaluations Section 3.2b states, “Field evaluations involve evaluating inspectors while they are conducting inspections and are considered the most effective method to assess inspector performance. Each inspector should be subject to a regular field evaluation. The field evaluation system should be developed using best practices, such as a risk-based approach (i.e., inspector experience, annual number of inspections, work product assessment, etc.) or another approach sufficient to determine inspector competency. Inspectors who have demonstrated full competency may be field evaluated less regularly but still require an annual performance evaluation.”

Comments: *OEFFA does not perform annual field evaluations of all its inspectors, nor does their policy define “regular” field evaluation. Additionally, their current policy does not include an evaluation system using best practices or another approach sufficient to determine inspector competency.*

2017 Corrective Actions: OEFFA submitted a risk-based field evaluation proposal, which was approved by the NOP on October 18, 2017. OEFFA revised their quality manual and procedures to include this plan.

NP7114LLA.NC8 – Accepted. 7 C.F.R. §205.663 states, “Any dispute with respect to denial of certification or proposed suspension or revocation of certification under this part may be mediated at the request of the applicant for certification or certified operation and with

acceptance by the certifying agent. Mediation shall be requested in writing to the applicable certifying agent... If mediation is accepted by the certifying agent, such mediation shall be conducted by a qualified mediator mutually agreed upon by the parties to the mediation...The parties to the mediation shall have no more than 30 days to reach an agreement following a mediation session.”

Comments: *OEFFA offers its certified operations proposed settlement agreements without first requiring the operation to request mediation. OEFFA’s proposed settlement agreement template states, “If you wish to request mediation with OEFFA, by accepting this Proposed Settlement Agreement, and you agree to the terms listed, please sign”*

2017 Corrective Actions: OEFFA submitted modified proposed settlement agreement template, which make it clear that requesting mediation is distinct from entering into a settlement agreement and that the request for mediation must come before entering into mediation and/or settlement agreement. OEFFA will issue a notice of proposed suspension which includes the options to request mediation in writing or appeal the notice. If OEFFA receives a written request for mediation, they will send their revised acceptance of mediation request/proposed settlement agreement. This is the point at which OEFFA will offer a settlement agreement if that is the path warranted by the situation. Upon approval of this corrective action by the NOP, OEFFA will implement the modified templates. OEFFA’s staff will be trained on their use and the training will occur within two weeks of the NOP’s acceptance of its corrective actions.

NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

AUDIT AND REVIEW PROCESS

The National Organic Program (NOP) conducted a mid-term assessment of Ohio Ecological Food and Farm Association (OEFFA). An onsite audit was conducted, and the audit report reviewed to determine OEFFA’s capability to continue operating as a USDA accredited certifier.

GENERAL INFORMATION

Applicant Name	Ohio Ecological Food and Farm Association (OEFFA)
Physical Address	41 Crosswell Road; Columbus, OH 43214
Mailing Address	41 Crosswell Road; Columbus, OH 43214
Contact & Title	Kate Schmidt Blake, Certification Program Manager
E-mail Address	kate@oeffa.org
Phone Number	614-262-2022
Reviewer(s) & Auditor(s)	Robert Yang, NOP Reviewer; David Hildreth, Onsite Auditor.
Program	USDA National Organic Program (NOP)
Review & Audit Date(s)	NOP assessment review: November 14, 2014 Onsite audit: August 11-14, 2014
Audit Identifier	NP4223ACA
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 OEFFA’s certification
Audit & Determination Criteria	7 CFR Part 205, National Organic Program as amended
Audit & Review Scope	OEFFA’s certification services in carrying out the audit criteria during the period: June 21, 2012 through August 14, 2014.

ORGANIZATIONAL STRUCTURE:

The Ohio Ecological Food and Farm Association (OEFFA) is a not-for-profit 501(c)(5) corporation that was accredited by the National Organic Program (NOP) on April 29, 2002 for the scopes of crop, wild crop, livestock, and handling. OEFFA currently has 775 NOP-certified clients, which include 339 crops, 347 livestock, 17 wild crops, and 96 handling operations. OEFFA’s certified operations are mostly located in the Midwest. All certification activities are conducted at the Columbus, Ohio office.

OEFFA organic certification program staff consists of the Executive Director, Certification Program Manager, Program Associate, Certification Operations Coordinator/Specialist, Certification Specialist/Materials Reviewer, Certification Specialist/Livestock Coordinator, 10

Certification Specialists, 2 Certification Program Assistants, and 30 contracted inspectors. The Certification Program Manager, Program Associate, Materials Reviewer, and Certification Operations Coordinator are also staff inspectors.

CERTIFICATION PROCESS:

Parties seeking organic certification are provided with a packet that includes a fee sheet, applicable OSP, NOP regulations, OEFFA's Certification Policies and Procedures, OEFFA's Approved Product List, and a current certification bulletin. Once the application is received, it is assigned to a certification specialist who reviews the application for completeness and compliance with the NOP regulations. If the operation appears to comply, the certification operations coordinator assigns a qualified inspector. Inspector selection is based on experience, scope and geographical location. Upon completion of the inspection, the inspector submits a report to OEFFA. The certification specialist reviews the report and any submitted documentation. The certification final decision is made by the certification program manager. In the absence of the certification program manager, a certification specialist who has not been involved in the certification review or inspection will make the final decision for certification.

For continuation of certification, OEFFA sends letters annually to all its certified clients as a reminder to submit updated OSP's. A copy of the applicable OSP template is included in the mailing. The procedures for the review of renewal applications are the same as those for new applicants.

OEFFA allows the use of materials that have been approved by OMRI or WSDA. OEFFA also has an internal material review program in place. Materials approved by OEFFA are listed on the Approved Product List, which is compiled and sent out as a publication to OEFFA's certified operators annually. OEFFA does not review liquid nitrogen fertilizers with a nitrogen analysis greater than 3%, and only allows products that have been approved by OMRI.

Labels and inputs are reviewed by the certification specialist/materials reviewer, and then verified by the inspector during the on-site inspection.

OEFFA is approved to issue TM-11 export certificates to Taiwan, and has received requests to do so.

ADMINISTRATIVE RECORDS AND PROCESSES:

The OEFFA Quality Manual includes the procedures and forms OEFFA uses for its NOP certification activities. OEFFA conducts internal audits and has an annual program review relating to NOP-specific requirements. Non-conformances are identified and corrective actions are implemented as needed. Both internal and external training is conducted. Refresher and additional training is conducted as needed.

SUMMARY OF WITNESS AND REVIEW AUDITS CONDUCTED:

One witness audit of an inspection covering two scopes of accreditation, livestock and crops, was

conducted. Pasture on the dairy operation was used only for the dairy cattle, and all other feed was verified to be organic and purchased by the owner. An exit interview that included the identification of issues of concern was conducted with the operation representative at the end of the inspection.

Also, one review audit of a handling operation was conducted. All areas of the operation, including the results of the previous inspection, were reviewed and verified during the review audit. The review audit confirmed that OEFFA is reviewing and verifying updated changes to the OSP.

NOP DETERMINATION

The NOP reviewed the onsite audit results to determine whether OEFFA's corrective actions adequately addressed previous noncompliances. The NOP also reviewed the results of the onsite audit to determine whether noncompliances should be issued to OEFFA.

Noncompliances 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.

NP215800A.NC1 – Cleared. 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." *During the wild crop witness audit, the inspector did not verify compliance with §205.207(b) regarding harvesting practices and ensuring that "such harvesting or gathering will not be destructive to the environment and will sustain the growth and production of the wild crop". The inspector did review some of the area where wild crop trees grow, but harvesting was not occurring at the time of inspection and further information regarding specific harvest and gathering procedures were not discussed or reviewed.*

Corrective Action: OEFFA submitted a response indicating OEFFA has updated the Inspection Form for wild crop operations requiring the inspector to verify a plan for compliance with the wild crop standards is in place; that the plan for compliance has been verified through on-site inspection during a time of wild crop harvesting; and, should wild crop harvesting not occur at the time of inspection, how the inspector verified the operation was in compliance, provided in the inspection report in a narrative format. OEFFA also indicated they revised the Quality Manual and would provide training to inspectors at 2013 annual training. The revisions and training would address OEFFA's expectation of the inspectors and that "they will fully understand what they are expected to verify about these operations and how they are supposed to do so." A copy of the revised inspection form and Quality Manual were submitted as objective evidence; further, a copy of the training agenda for 2013 annual training was submitted as supporting documentation to the written response.

Verification of Corrective Action (August 2014): A review of copies of three inspection reports for wild crops indicated that the inspectors verified the client's plan for compliance. OEFFA conducted training on the revised inspection form and Quality Manual at its 2013 inspector training.

NP215800A.NC2 – Cleared. 7CFR §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.”

- *Section 4.2b of the OEFFA Quality Manual requires that approved materials be re-reviewed every 3 years. During an interview with the Materials Reviewer, it was determined that materials are not being re-reviewed in accordance with the requirements set forth in the quality manual.*

Corrective Action: OEFFA identified a lack of staff support available to the Materials Review Manager as a reason for the breakdown of this particular system. OEFFA hired a Certification Program Assistant for direct support to the Materials Review Manager, who began on July 30, 2012. The Certification Program Assistant has begun the work of updating material information, such as supporting documents from material manufacturers, review documentation and/or approval from OMRI or other accredited certifying agents, material labels, etc. After this first round of materials on OEFFA's “approved” list with more than 3 years passed since the last review is completed, the Certification Program Assistant will be tasked with reviewing the materials log quarterly to ensure OEFFA maintains its timeliness and this non-compliance does not reoccur.

Verification of Corrective Action (August 2014): The Certification Program Assistant has been helping the Materials Review Manager. Materials are being re-reviewed in accordance with requirements set forth in the OEFFA Quality Manual.

- *OEFFA policy regarding the approval and use of quaternary ammonia sanitizers, prohibited under §205.272 (i.e., not listed for use under §205.605) states, “cleaners containing quaternary ammonium compounds or “quats” must be followed by a test documenting less than 6ppm remains on the surface before contact with organic products”. Since the “quats” are not listed on §205.605, then these materials are prohibited without exception and the operation must demonstrate adequate protection measures that are in place to prevent contamination of organic products.*

Corrective Action: OEFFA's response indicates the Cleaners and Sanitizers policy represented in the Approved Materials List has been revised to indicate, “for quaternary ammonium cleaners, a zero test strip reading on all contact surfaces or a documented standard operating procedure that is proven to reliably produce a zero reading is required before contact with organic products.” A copy of this change was included in the supporting documents submitted with the written response. Clients were notified of this change in the OEFFA Certification Bulletin, sent to all clients in August 2012. This revised policy will also be given to all clients in January 2013, when OEFFA annually releases the “OEFFA Certification Policies and Procedures Manual.” Lastly, OEFFA

updated the inspection form all inspectors are required to use to that explains the new policy.

Verification of Corrective Action (August 2014): The auditor verified that the inspection form was updated and is in use. Also, the revised policy was given to clients in 2013.

NP215800A.NC3 – Cleared. 7CFR §205.501(a)(4) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Use a sufficient number of adequately trained personnel, including inspectors and certification review personnel, to comply with and implement the organic certification program established under the Act and the regulations in subpart E of this part.” *On 8 of the 10 files reviewed it was found that the certification process was not being done in a timely manner (some were over a year in process). Interviews with the certification program manager verified that they did not have enough personnel to be able to get all of the update clients done as needed in a timely manner.*

Corrective Action: OEFFA’s response indicated a change of responsibilities of current staff to better align with certification activities and priority. OEFFA has also hired one Certification Program Assistant to help out not only with the Materials Review Program, as noted under NC2 bullet 1 above; but also to assist generally with certification needs. Additionally, OEFFA has been approved to post a position for a processing certification file reviewer, an area of certification where OEFFA has identified a need, as the organization has few staff members that meet qualification criteria.

Verification of Corrective Action (August 2014): OEFFA hired one processing certification file reviewer and realigned staff responsibilities. It appears that OEFFA has a sufficient number of personnel to handle all certification duties and responsibilities.

Noncompliances Identified during the Current Assessment

No noncompliances were issued as a result of the recent onsite audit.

Applicant Name:	Ohio Ecological Food and Farm Association (OEFFA)
Est. Number:	NA
Physical Address:	41 Crosswell Road, Columbus, OH 43214
Mailing Address:	See above
Contact & Title:	Julia Barton, Certification Program Manager
E-mail Address:	Julia@oeffa.org
Phone Number:	(614) 262-2022
Auditor(s):	Meg Kuhn, RAM – East Region
Program:	USDA National Organic Program (NOP)
Audit Date(s):	September 20-21, 2012
Audit Identifier:	NP 215800A
Action Required:	No
Audit Type:	Corrective Action
Audit Objective:	To verify review and approve corrective actions addressing the non-compliances identified during the Renewal Assessment Audit.
Audit Criteria:	7 CFR Part 205, National Organic Program; Final Rule, dated December 21, 2000; revised March 15, 2012.
Audit Scope:	OEFFA's 9/7/12 response letter to the Renewal Assessment Audit NC report
Location(s) Audited:	Desk

GENERAL INFORMATION

The OEFFA Organic Certification Program is a non-profit corporation which has been established since the 1990's and was accredited as a certifying agent on April 29, 2002, to the National Organic Program (NOP) for crops, wild crops, livestock, and handling operations.

Currently, OEFFA has 694 clients certified to the NOP; 621 crops, 4 wild crops, 306 livestock (of which these are all crops also), and 98 handlers/processors of which 93 are processors, 2 are distributors, 2 are traders, and 1 is a retailer. OEFFA certifies to the NOP in the United States (AR, CA, IA, IL, IN, KY, MI, MO, NE, NY, and OH).

CORRECTIVE ACTION AUDIT INFORMATION

During the Renewal Assessment audit, the 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 cleared. There were three (3) non-compliances identified during this audit. NFC was notified of this finding in a notice from the NOP on August 8, 2012. A response with supporting documentation and objective evidence was received on September 7, 2012.

FINDINGS

Observations made, interviews conducted, and procedures and records reviewed verified that OEFFA is currently operating in compliance to the requirements of the audit criteria, except as identified below. The corrective actions for the noncompliances identified during the

Deferred/Mid-Term Audit were verified and found to be implemented and effective and the noncompliances were cleared. There were three noncompliances identified during the renewal assessment.

NP912400A.NC1 – Cleared

NP912400A.NC2 – Cleared

NP912400A.NC3 – Cleared

NP912400A.NC4 – Cleared

NP912400A.NC5 – Cleared

NP215800A.NC1 – Submitted and Accepted: NOP §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.” *During the wild crop witness audit, the inspector did not verify compliance with §205.207(b) regarding harvesting practices and ensuring that “such harvesting or gathering will not be destructive to the environment and will sustain the growth and production of the wild crop”. The inspector did review some of the area where wild crop trees grow, but harvesting was not occurring at the time of inspection and further information regarding specific harvest and gathering procedures were not discussed or reviewed. Corrective Action:* OEFFA submitted a response indicating OEFFA has updated the Inspection Form for wild crop operations requiring the inspector to verify a plan for compliance with the wild crop standards is in place; that the plan for compliance has been verified through on-site inspection during a time of wild crop harvesting; and, should wild crop harvesting not occur at the time of inspection, how the inspector verified the operation was in compliance, provided in the inspection report in a narrative format. OEFFA also indicated they revised the Quality Manual and would provide training to inspectors at 2013 annual training. The revisions and training would address OEFFA’s expectation of the inspectors and that “they will fully understand what they are expected to verify about these operations and how they are supposed to do so.” A copy of the revised inspection form and Quality Manual were submitted as objective evidence; further, a copy of the training agenda for 2013 annual training was submitted as supporting documentation to the written response. If effectively implemented, OEFFA’s response demonstrates capability to comply with NOP accreditation requirements.

NP215800A.NC2 – Submitted and Accepted: NOP §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.” **Corrective Action:** Please see the “corrective action” notes below, explaining OEFFA’s response to the specific pieces of evidence. If effectively implemented, OEFFA’s response demonstrates capability to comply with NOP accreditation requirements.

- *Section 4.2b of the OEFFA Quality Manual requires that approved materials be re-reviewed every 3 years. During an interview with the Materials Reviewer, it was determined that materials are not being re-reviewed in accordance with the requirements set forth in the quality manual. Corrective Action:* OEFFA identified a

lack of staff support available to the Materials Review Manager as a reason for the breakdown of this particular system. OEFFA hired a Certification Program Assistant for direct support to the Materials Review Manager, who began on July 30, 2012. The CPA has begun the work of updating material information, such as supporting documents from material manufacturers, review documentation and/or approval from OMRI or other accredited certifying agents, material labels, etc. After this first round of materials on OEFFA's "approved" list with more than 3 years passed since the last review is completed, the CPA will be tasked with reviewing the materials log quarterly to ensure OEFFA maintains its timeliness and this non-compliance does not reoccur.

- *OEFFA policy regarding the approval and use of quaternary ammonia sanitizers, prohibited under §205.272 (i.e., not listed for use under §205.605) states, "cleaners containing quaternary ammonium compounds or "quats" must be followed by a test documenting less than 6ppm remains on the surface before contact with organic products". Since the "quats" are not listed on §205.605, then these materials are prohibited without exception and the operation must demonstrate adequate protection measures that are in place to prevent contamination of organic products. **Corrective Action:** OEFFA's response indicates the Cleaners and Sanitizers policy represented in the Approved Materials List has been revised to indicate, "for quaternary ammonium cleaners, a zero test strip reading on all contact surfaces or a documented standard operating procedure that is proven to reliably produce a zero reading is required before contact with organic products." A copy of this change was included in the supporting documents submitted with the written response. Clients were notified of this change in the OEFFA Certification Bulletin, sent to all clients in August 2012. This revised policy will also be given to all clients in January 2013, when OEFFA annually releases the "OEFFA Certification Policies and Procedures Manual." Lastly, OEFFA updated the inspection form all inspectors are required to use to that explains the new policy.*

NP215800A.NC3 – NOP §205.501(a)(4) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Use a sufficient number of adequately trained personnel, including inspectors and certification review personnel, to comply with and implement the organic certification program established under the Act and the regulations in subpart E of this part." *On 8 of the 10 files reviewed it was found that the certification process was not being done in a timely manner (some were over a year in process). Interviews with the certification program manager verified that they did not have enough personnel to be able to get all of the update clients done as needed in a timely manner. **Corrective Action:** OEFFA's response indicated a change of responsibilities of current staff to better align with certification activities and priority. OEFFA has also hired one Certification Program Assistant to help out not only with the Materials Review Program, as noted under NC2 bullet 1 above; but also to assist generally with certification needs. Additionally, OEFFA has been approved to post a position for a processing certification file reviewer, an area of certification where OEFFA has identified a need, as the organization has few staff members that meet qualification criteria. If OEFFA is able to effectively implement staff changes and additions, OEFFA's response demonstrates capability to comply with NOP accreditation requirements.*