



# United States Department of Agriculture

Agricultural Marketing Service

National Organic Program

***Oregon Tilth Certified Organic***

**2525 SE 3rd Street, Corvallis, OR 97333 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: **NP2219BBA**  
Effective Date: **April 29, 2017**  
Expiration Date: **April 29, 2022**

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



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## NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

### AUDIT AND REVIEW PROCESS

An onsite Mid-term assessment of the Oregon Tilth Certified Organic (OTCO) organic program was conducted on September 23 – 27, 2019. The National Organic Program (NOP) reviewed the auditor’s report to assess OTCO’s compliance to the USDA organic regulations. This report provides the results of NOP’s assessment and review of OTCO’s corrective actions.

### GENERAL INFORMATION

<b>Applicant Name</b>	Oregon Tilth Certified Organic (OTCO)
<b>Physical Address</b>	2525 SE 3 <sup>rd</sup> Street, Corvallis, OR 97333
<b>Mailing Address</b>	As above
<b>Contact &amp; Title</b>	Connie Karr – Certification Director
<b>E-mail Address</b>	connie@tilth.org
<b>Phone Number</b>	(503) 378-0690
<b>Reviewer(s) &amp; Auditor(s)</b>	Jessica Walden, NOP Reviewer; Rebecca Claypool, On-site Auditor.
<b>Program</b>	USDA National Organic Program (NOP)
<b>Review &amp; Audit Date(s)</b>	NOP assessment review: October 10, 2019 Onsite audit: September 23 – 27, 2019
<b>Audit Identifier</b>	NOP-34-19
<b>Action Required</b>	None
<b>Audit &amp; Review Type</b>	Mid-Term Assessment
<b>Audit Objective</b>	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of OTCO’s certification
<b>Audit &amp; Determination Criteria</b>	<i>7 CFR Part 205, National Organic Program as amended</i>
<b>Audit &amp; Review Scope</b>	OTCO’s certification services in carrying out the audit criteria during the period: October 7, 2016 through September 27, 2019.

Oregon Tilth Certified Organic (OTCO) is a non-profit organization and was accredited on April 29, 2002 to the scopes of crops, wild crops, livestock and handling. OTCO currently certifies operations to the following scopes: 1092 crops; 21 wild crops; 374 livestock; 1044 handling; 11 grower groups. OTCO has one main office located in Corvallis, OR and has one small office in Mexico, which oversees inspection assignments in Latin America. This office functions primarily to help answer calls and direct operations to proper information in Latin America. All certification activities take place in the main office in Corvallis, Oregon.

The OTCO main office staff consists of approximately 70 individuals (not all positions are currently filled). There are eight members in Certification Operations; three Staff Inspectors; 18 Certification Officers; nine Managers; one Executive Director; three members conducting work

in international, investigation, and quality control; and seven administrative staff members. OTCO contracts with 60-70 contract inspectors.

Witness audits were conducted of two operations during the onsite office audit. One witness audit was of the annual inspection of a split crops/livestock operation in Junction City, OR. The second witness audit was the annual inspection of a crops/wild crops operation in Oregon City, OR.

## **NOP DETERMINATION**

The NOP reviewed the onsite audit results to determine whether OTCO'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**

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.

**AP-126-18.NC1 – Cleared**

**AP-126-18.NC2 – Cleared**

**AP-126-18.NC3 – Cleared**

**AP-126-18.NC4 – Cleared**

**NP6217ADA.NC1 – Cleared**

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

**NOP-34-19.NC1 – Accepted.** 7 C.F.R. §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."

**Comments:** *OTCO does not consistently issue its certified operations a Notice of Noncompliance, even though the review of the inspection report finds that the operation does not comply with the USDA organic regulations. The auditor's review of certification files found instances where OTCO did not provide operations with a notice of noncompliance for issues identified during the operation's inspection. Instead OTCO addresses the issues as "reminders" in the Certification Letter or through requests for information (RFI) to the operators.*

**Corrective Action:** OTCO submitted a copy of the training that was presented to all certification staff in November 2019 on how to appropriately issue noncompliances, reminders, and requests for information (RFIs). OTCO plans to conduct another internal audit during the first half of

2020 to follow up on the issuance of noncompliances, reminders and RFIs to verify that the training was effective and that reviewers are making appropriate decisions.

**NOP-34-19.NC2 – Accepted.** 7 C.F.R. §205.404(b)(1) – (4) states, “The certifying agent must issue a certificate of organic operation which specifies the: Name and address of the certified operation; Effective date of certification; Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation; and Name, address, and telephone number of the certifying agent.;

**Comments:** *OTCO’s organic certificates are missing the required elements identified in NOP 2603 Organic Certificates. The auditor’s review of certification files found that some certificates used a PO Box instead of a physical address, the scope wild crop was identified as wild harvest, and the statement “Certified to the USDA organic regulations, 7 CFR Part 205” was incorrectly referenced.*

**Corrective Action:** OTCO provided their updated NOP certificate template, which demonstrates the correction of the “Certified to the...” statement and the replacement of “Wild Harvest” with “Wild Crop”. OTCO clarified that its organic certificates list the mailing address (which may be a P.O. Box or a physical location) for the operation on the first page of the certificate. The addresses for all physical locations inspected, including parcels and facilities, are included on subsequent pages. Sample certificates, including the pages stating the physical address(es), were provided.

**NOP-34-19.NC3 – Accepted.** 7 C.F.R. §205.403(c)(2) states, “The on-site inspection of an operation must verify: That the information, including the organic production or handling system plan, provided in accordance with §§205.401, 205.406, and 205.200, accurately reflects the practices used or to be used by the applicant for certification or by the certified operation;”

**Comments:** *During the witness audit of a crops/livestock inspection, the auditor observed that the inspector did not fully verify the accuracy of the operation’s organic system plan. Examples of information not accurately described in the organic system plan included livestock housing, feed rations, equipment cleaning between organic and nonorganic uses, material use, and all nonorganic livestock production.*

**Corrective Action:** OTCO issued noncompliances to the operator for having an out of date OSP and failing to notify OTCO of changes to their feed rations, labels, acreages, and inputs. OTCO submitted evidence of the mandatory inspector training OTCO conducted in January 2020. The training included the inspector’s role in verifying the organic system plan while on-site. In addition, OTCO provided their updated Field Witness Evaluation form, which now includes a question that captures whether the inspector verified that the organic system plan and supporting documentation are complete and accurate. OTCO’s Inspections Department will include this as a point of focus for evaluation, feedback and additional training as needed for individual inspectors.

**NOP-34-19.NC4 – Accepted.** 7 C.F.R. §205.403(e)(2) states, “A copy of the on-site inspection report and any test results will be sent to the inspected operation by the certifying agent.”

**Comments:** *OTCO does not always send operations a copy of their inspection report after an unannounced inspection is conducted. The auditor’s review of certification files found that in one instance the unannounced inspection report was not sent to the operation inspected.*

**Corrective Action:** OTCO provided evidence that they sent the unannounced inspection report to the operator with an explanation of what had occurred. OTCO also carried out a refresher training to the relevant staff on the requirements to send inspection reports to clients. OTCO provided evidence that the relevant staff had reviewed and understood the applicable work instructions.

**NOP-34-19.NC5 – 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:** *OTCO’s farm and livestock organic system plans and inspection reports do not demonstrate that OTCO fully complies with the requirements of 205.201(a)(6). The farm and livestock organic system plans include questions about export to Canada, but do not ask operators about their import and export activities to other countries. The farm and livestock inspection report also does not include verification of import and export activities.*

**Corrective Action:** OTCO provided copies of their updated organic system plan modules and inspection report templates for crops and livestock to demonstrate that questions regarding import/export activities with other countries have now been added. OTCO staff have been notified of the changes to these forms, and a review of the revisions will be included in the upcoming mandatory OTCO inspector training webinar.

## NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

### AUDIT AND REVIEW PROCESS

The National Organic Program (NOP) conducted a renewal assessment of the Oregon Tilth Certified Organic (OTCO). An onsite audit was conducted and the audit report reviewed to determine OTCO's capability to continue operating as a USDA accredited certifying agent. This report provides the results of the renewal assessment and review of OTCO's corrective actions

### GENERAL INFORMATION

<b>Applicant Name</b>	Oregon Tilth Certified Organic (OTCO)
<b>Physical Address</b>	2525 SE 3rd Street Corvallis, OR 97333
<b>Mailing Address</b>	2525 SE 3rd Street Corvallis, OR 97333
<b>Contact &amp; Title</b>	Connie Karr, Certification Director
<b>E-mail Address</b>	connie@tilth.org
<b>Phone Number</b>	(503) 378-0690
<b>Reviewer &amp; Auditors</b>	Rebecca Claypool, NOP Reviewer; Niki Adams, Penny Zuck, On-site Auditors. Graham Davis, Observer.
<b>Program</b>	USDA National Organic Program (NOP)
<b>Review &amp; Audit Dates</b>	NOP corrective action: January 20, 2017 NOP assessment review: December 15, 2016 Onsite audit: October 3 – 6, 2016
<b>Audit Identifier</b>	NP6217ADA
<b>Action Required</b>	None
<b>Audit &amp; Review Type</b>	Renewal Assessment
<b>Audit Objective</b>	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of OTCO's certification
<b>Audit &amp; Determination Criteria</b>	<i>7 CFR Part 205, National Organic Program as amended</i>
<b>Audit &amp; Review Scope</b>	OTCO's certification services during the period: August 26, 2014 through October 3, 2016

Oregon Tilth Certified Organic (OTCO) is a non-profit organization whose mission is to support and promote sustainable agriculture through education, research, advocacy, and certification. OTCO provides certification services for agricultural producers, product manufacturers, and other handlers of organic products. OTCO has one main office located in Corvallis, OR and has one small office in Mexico, which oversees inspection assignments in Latin America. This office functions primarily to help answer calls and direct to proper information for operations in Latin America. All certification activities, however, take place in the main office in Corvallis, Oregon.

Initial accreditation by the NOP was granted on April 29, 2002 in the scopes of crops, wild crops, livestock, and handling. OTCO also maintains accreditation for COR, EU, Mexico, and ISO 17065. OTCO certifies operations in the United States, Canada, Costa Rica, Panama, Iceland, and Mexico. The current client list identifies 1,576 NOP certified operations (785 crop, 18 wild crop, 286 livestock, and 846 handlers). OTCO has 11 grower groups, all of which are in Mexico.

## **NOP DETERMINATION:**

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

### **Non-compliances from Prior Assessments**

Any noncompliance labeled as "**Cleared**," indicates that the corrective actions for the noncompliance are determined to be implemented and working effectively. Any noncompliance labeled as "**Outstanding**" indicates that either the auditor could not verify implementation of the corrective actions or that records reviewed and audit observations did not demonstrate compliance. Any noncompliance labeled as "**Accepted**" indicates acceptance of the corrective actions and verification of corrective action implementation will be conducted during the next onsite audit.

**NP4155ADA.NC1 – Cleared**

**NP4155ADA.NC2 – Cleared**

**AIA15244RKA.NC2 – Cleared**

**AIA15244RKA.NC3 – Cleared**

### **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.

**NP6217ADA.NC1 – Accepted. 7 C.F.R. §205.403(c)(1)** states that "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:** *The inspector did not verify compliance to international trade arrangement requirements when conducting a review of vendor ingredient certificates:*

- *Several certificates indicated certification to the European Union (EU) organic standard. These certificates did not demonstrate compliance with the US/EU organic equivalency since the products were handled in non-EU member states.*
- *For one EU certificate where the ingredient was handled and shipped from an EU member state, the inspector did not verify that the operator maintained a record of the NOP Import Certificate.*

**2017 Corrective Action:** OTCO reviewed the operation's file and issued a notice of noncompliance for supplier certificates. The inspector was interviewed and reminded that trade arrangement requirements are to be verified during inspections. OTCO also reviewed their inspection report to ensure it asks the necessary questions for trade arrangements and determined it was adequate. A training was held for staff on October 25, 2016 covering organic trade arrangements and the key points needing verification during review. Staff also watched the public webinar on importing and exporting organic crops presented by WSDA and the Organic Trade Association in July of 2016. All documents were submitted to the NOP for review. OTCO provided the training documents and resources to its inspectors, and added international trade arrangement requirements to their inspector training agenda for April 2017.



## NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

### AUDIT AND REVIEW PROCESS

An onsite mid-term assessment of the Oregon Tilth Certified Organic (OTCO) organic program was conducted on August 25-29, 2014. On December 18, 2014, the National Organic Program (NOP) issued a Noncompliance Report to OTCO. This report provides the results of NOP's review of the corrective actions submitted by OTCO in response to the Noncompliance Report.

### GENERAL INFORMATION

<b>Applicant Name</b>	Oregon Tilth Certified Organic (OTCO)
<b>Physical Address</b>	2525 SE 3 <sup>rd</sup> Street, Corvallis, OR 97333
<b>Mailing Address</b>	2525 SE 3 <sup>rd</sup> Street, Corvallis, OR 97333
<b>Contact &amp; Title</b>	Connie Karr, Certification Director
<b>E-mail Address</b>	<a href="mailto:connie@tilth.org">connie@tilth.org</a>
<b>Phone Number</b>	503-566-3022
<b>Reviewer(s) &amp; Auditor(s)</b>	Penny Zuck, NOP Reviewer Mike Lopez, Lead Auditor
<b>Program</b>	USDA National Organic Program (NOP)
<b>Review &amp; Audit Date(s)</b>	Corrective Action Review Date: May 20, 2015 Audit Review Date: November 17, 2014 Onsite Assessment date: August 25-29, 2014 Witness Inspections: July 15, and August 27, 2014
<b>Audit Identifier</b>	NP4237AKA
<b>Action Required</b>	None
<b>Audit &amp; Review Type</b>	Mid-term (12.5 year) Assessment
<b>Audit Objective</b>	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of OTCO's certification system.
<b>Audit &amp; Determination Criteria</b>	<i>7 CFR Part 205, National Organic Program as amended</i>
<b>Audit &amp; Review Scope</b>	Assessment of OTCO's certification services in carrying out the audit criteria.

Oregon Tilth Certified Organic (OTCO) is a non-profit organization whose mission is to support and promote sustainable agriculture through education, research, advocacy, and certification. OTCO provides certification services for agricultural producers, product manufacturers, and other handlers of organic products. OTCO is accreditation by the NOP in the scopes of crops, wild crops, livestock, and handling. OTCO provides export certification for Canada, the European Union, Japan, and Taiwan. OTCO also maintains accreditation for the Global Organic Textile Standard (GOTS). OTCO certifies operations in the United States, Canada, Chile, China,

Costa Rica, Guatemala, and Mexico. The current client list identifies 1,334 NOP certified operations (737 crop, 16 wild crop, 262 livestock, and 756 handlers). OTCO certifies eleven grower groups in Chile, Guatemala, and Mexico.

OTCO has recently opened an office in Mexico, which oversees inspection assignments in Latin America. All certification activities, however, take place in the main office in Corvallis, Oregon. OTCO currently has a staff of 39 individuals, of which 22 are involved in certification, 12 are administrative, and 5 conduct research and education activities. There is also a Board of Directors to govern the business side of the organization. OTCO uses 39 contract and 17 staff inspectors.

### **NOP DETERMINATION:**

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

There are no **Outstanding** or **Cleared** noncompliances from previous audits.

### **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.

**NP4155ADA.NC1 – Accepted** - 7 CFR §205.501(a)(3) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §205.402 through 205.406 and 205.670."

**Comments:** *Two cosmetic product labels approved by OTCO were found to be non-compliant. One "Made with organic (specified ingredients)" label was not compliant with §205.304(a)(1)(iii) because the percentage statement on the panel was highlighted with bold type. For the other product label, the percentage statement did not comply with §205.304(a)(2) because the "Made with" statement was 56% of the largest type on the panel when it should not exceed more than one-half the largest type size.*

**Corrective Action:** OTCO submitted a revised and approved label for the product that was noncompliant because the percentage statement was highlighted. The percentage statement has been removed from the new product label. OTCO plans to address and request correction of the

other labeling issue at the client's next renewal/update for the product with the "made with" statement at 56% of the largest type on the panel. OTCO has documented this in a memo that will notify the inspector through the Inspection Work Order (IWO) and the reviewer through their workflow of the issue and the need to address it with the client during their 2015 audit. OTCO staff underwent training on the made with label reviews in December 2014. In 2015 OTCO plans to conduct random internal audits with a focus on made with labels and their compliance with the regulations.

**NP4155ADA.NC2 – Accepted** - 7 CFR §205.403(a)(2)(ii) states, "The Administrator...may require that additional inspections be performed by the certifying agent for the purpose of determining compliance with the Act and the regulations in this part."

**Comments:** *The percentage of unannounced inspections (4.5%) conducted in 2013 did not achieve the 5% benchmark described in the NOP 2609 instruction.*

**Corrective Action:** OTCO performed 5.7% unannounced inspections in 2014 and plans to conduct unannounced inspections of more than 5% of their certified operations in 2015. OTCO submitted their unannounced inspection plan for 2015, which documents the requirement for unannounced inspection of NOP certified operations at 5%.

**AUDIT INFORMATION**

<b>Applicant Name:</b>	Oregon Tilth Certified Organic (OTCO)
<b>Est. Number:</b>	N/A
<b>Physical Address:</b>	260 SW Madison Avenue, Suite 106, Corvallis, OR 97333
<b>Mailing Address:</b>	Same
<b>Contact &amp; Title:</b>	Chris Schreiner, Executive Director
<b>E-mail Address:</b>	<a href="mailto:organic@tilth.org">organic@tilth.org</a> ; <a href="mailto:chris@tilth.org">chris@tilth.org</a>
<b>Phone Number:</b>	(503) 378-0690
<b>Auditor(s):</b>	Lars Crail, NOP AIA Accreditation Manager
<b>Program:</b>	USDA National Organic Program (NOP)
<b>Audit Date(s):</b>	October 3, 2012
<b>Audit Identifier:</b>	NP2129BBA
<b>Action Required:</b>	No
<b>Audit Type:</b>	Correct Action Audit (CA) – Accreditation Renewal Assessment
<b>Audit Objective:</b>	To review certifying agent submitted noncompliance corrective actions and determine if the measures should be accepted by the NOP.
<b>Audit Criteria:</b>	7 CFR Part 205, National Organic Program, Final Rule, dated December 21, 2000; updated March 15, 2012. NOP 2608, Instruction – Responding to Noncompliances.
<b>Audit Scope:</b>	The results of OTCO’s Renewal Assessment Audit NP2219BBA issued by USDA AMS Grading and Verification Division on August 27, 2012.
<b>Location(s) Audited:</b>	Desk

Oregon Tilth Certified Organic (OTCO) is a non-profit company that conducts certification activities for agricultural producers, product manufacturers and other handlers of organic products. OTCO was accredited as a certifying agent on April 29, 2002 to the National Organic Program (NOP) for crops, wild crops, livestock, and handling operations. OTCO is currently certifying operations in the U.S., Canada, Chile, China, Costa Rica, and Mexico. The OTCO client list as of August 8, 2012, had 721 crop, 10 wild crop, 261 livestock, and 633 handling operations certified to the NOP standards. During the audit, it was discovered that OTCO does certify some grower groups and currently has 9 Grower Groups (Cooperatives) certified in Mexico. During the period of August 6 through 16, 2012, NOP conducted witness inspections and an on-site office audit of OTCO as a requirement of the accreditation renewal assessment process and to determine its compliance to NOP regulations.

**FINDINGS**

Observations made, interviews conducted, and procedures and records reviewed verified that OTCO is currently operating in compliance to the requirements of the audit criteria. The corrective actions for the five non-compliances identified during the Mid-Term Audit and two non-compliances from the NOP Investigation Assessments were verified and found to be implemented and effective; therefore, the non-compliances were cleared. There were no new noncompliances identified during the renewal assessment.

**NP9253ZZA.NC1 – Cleared**

**NP9253ZZA.NC2 – Cleared**

**NP9253ZZA.NC3 – Cleared**

**NP9253ZZA.NC4 – Cleared**

**NP9253ZZA.NC5 – Cleared**

**NOPC-098-10 – Cleared**

**NOPC-101-10 - Cleared**