



# 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 OF ACCREDITATION



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

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**