



1400 Independence Avenue, SW.
Room 2648-S, STOP 0268
Washington, DC 20250-0268

Accreditation Status Confirmation

November 8, 2017

To Whom This May Concern:

Pro-Cert Organic Systems Ltd. (PRO) is a United States Department of Agriculture (USDA), National Organic Program (NOP) accredited certifying agent. Furthermore, PRO is authorized to issue USDA NOP organic certification to agriculture producer and processor operations that comply with Title 7 Code of Federal Regulations (CFR) Part 205.

PRO accreditation certificate indicates a renewal date of May 23, 2017; however, its accreditation is in good standing and continues to be valid. USDA NOP granted PRO an accreditation term extension until its accreditation renewal assessment is completed. USDA NOP expects the assessment process to conclude during 2017.

For questions concerning PRO's status, please contact the NOP at 202-720-3252.

Sincerely,

A handwritten signature in blue ink that reads "Cheri Courtney". The signature is written in a cursive, flowing style.

Cheri Courtney
Director, Accreditation & International Activities Division
National Organic Program



United States Department of Agriculture

Agricultural Marketing Service

National Organic Program

Pro-Cert Organic Systems, Ltd.

RR #3, 475 Valley Road, Saskatoon, Saskatchewan, Canada

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: **NP222600A**
Effective Date: **May 24, 2012**
Expiration Date: **May 24, 2017**

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 mid-term assessment of Pro-Cert Organic Systems, Ltd. An onsite audit was conducted, and the audit report reviewed to determine Pro-Cert's capability to continue operating as a USDA accredited certifier.

GENERAL INFORMATION

Applicant Name	Pro-Cert Organic Systems, Ltd. (Pro-Cert)
Physical Address	475 Valley Road, Saskatoon, Saskatchewan, S7K3J6, Canada
Mailing Address	Same
Contact & Title	J. Wallace Hamm, President
E-mail Address	Byron.Hamm@pro-cert.org
Phone Number	306-382-1299
Reviewer & Auditor	Janna Howley, NOP Reviewer Rick Skinner, On-site Auditor
Program	USDA National Organic Program (NOP)
Review & Audit Dates	NOP assessment review: February 27, 2015 Onsite audit: June 24-26, 2014
Audit Identifier	NP4174EEA
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 Pro-Cert's certification system.
Audit & Determination Criteria	<i>7 CFR Part 205, National Organic Program as amended</i>
Audit & Review Scope	Pro-Cert's certification services in carrying out the audit criteria during the period: September 5, 2012 through June 26, 2014.

Pro-Cert Organic Systems, Ltd. (Pro-Cert) is a for-profit organization, initially accredited as a certifying agent as OCPP/Pro-Cert Canada, Inc. (OCPP) on May 24, 2002 to the USDA National Organic Program (NOP) for the scopes of crop, livestock, wild crop, and handling. In 2013, Pro-Cert had 159 clients certified to the NOP, including 122 crop, 97 livestock, 1 wild crop, and 35 handling operations. Pro-Cert no longer certifies grower groups under the NOP. Pro-Cert NOP clients are certified in the United States.

Pro-Cert has two offices from which certification activities are conducted. The main office is in Saskatoon, Saskatchewan, and a subsidiary office is located in Cambray, Ontario. Pro-Cert staff consists of a General Manager, 2 Certification Managers, 2 Processor Certification Coordinators,

2 Producer Certification Coordinators, 13 Certification/Evaluation Committee members, and 8 staff and 6 contract inspectors. The Saskatoon office was the location of this assessment; however, certification files from both locations were assessed.

NOP DETERMINATION:

NOP reviewed the onsite audit results to determine whether Pro-Cert'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.

NP2226OOA.NC1 – Cleared

NP2226OOA.NC2 – Cleared

Non-compliances Identified during the Current Assessment

Any noncompliance labeled as "**Accepted**," indicates that the corrective actions for the noncompliance are accepted by the NOP and will be verified for implementation and effectiveness during the next onsite audit.

NP4174EEA.NC1 – Accepted. 7 CFR §205.501(a)(21) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary." NOP §205.500(c)(2) states, "The foreign government authority that accredited the foreign certifying agent acted under an equivalency agreement negotiated between the United States and the foreign government." NOP 2403 states, "When exported to Japan and Taiwan, U.S Department of Agriculture (USDA) organic products must be accompanied by an organic export certificate (TM-11)." The agreement requires the certifier to assign a unique identification number to each export certificate and for all export certificates that were issued under the Taiwan arrangement for processed products and crops have the required statement, "Organic agricultural products and organic processed products, accompanied by this certificate, were produced or processed using zero prohibited substances."

Comments: *The review of two TM-11 documents issued in March 2013 did not contain the unique identifier for Pro-Cert Organic Systems Ltd (PRO) provided on the list of Certifying Agents Approved to Issue TM-11 Export Certificates under an Export Arrangement between the USDA and a Foreign Government. Additionally, the certificates did not contain the statement, "Organic agricultural products and organic processed products, accompanied by this certificate, were produced or processed using zero prohibited substances."*

Corrective Action: Pro-Cert developed a guidance document (*Instruction: Use of Export Certificates (TM-11) Under Export Arrangements with the USDA NOP (Doc #1501)*) that outlines the procedures for the completion of the Export Certificate Document. Pro-Cert distributed the document and conducted training with its staff in February 2015. Pro-Cert has now assigned responsibility for the completion of the certificates to the Certification Coordinators and their Administrative Assistants; a review of the certificates by the Certification Manager is required before final signature.

Pro-Cert has also updated its electronic document control system, Pro-Cert System Documents, to include a file for “International Trade Documents.” This file includes additional sub-files for each foreign government that maintains an export arrangement with the USDA for organic produce and products. The Japan and Taiwan sub-files have been updated to include a revised Export Certificate template specific to the requirements of each export arrangement. The sub-files have also been updated to include copies of the new Instruction document (*Doc #1501*). Pro-Cert designated a format for certificate numbers issued to Export Certificates and included the required Certifier Code and Country Code on the templates for Japan and Taiwan. The templates for both Japan and Taiwan were also updated to include the language required by the TM-11 documents. Pro-Cert provided copies of the updated documents to the NOP.

AUDIT INFORMATION

Applicant Name:	Pro-Cert Organic Systems, Ltd.
Physical Address:	475 Valley Road, Saskatoon, Saskatchewan S7K3J6 Canada
Mailing Address:	Box 100A, RR #3 Saskatoon, Saskatchewan S7K3J6 Canada
Contact & Title:	J. Wallace Hamm, President
E-mail Address:	procertorganic@yahoo.com
Phone Number:	306-382-1299
Auditor(s):	Betsy Rakola
Program:	USDA National Organic Program (NOP)
Audit Date(s):	November 1 – December 18, 2013
Audit Identifier:	NP2226OOA
Action Required:	No
Audit Type:	Corrective action review
Audit Objective:	To verify review and approve corrective actions addressing the non-compliances identified during the August 14-16, 2012 renewal assessment.
Audit Criteria:	7 CFR Part 205, National Organic Program; Final Rule, dated December 21, 2000; as amended.
Audit Scope:	Pro-Cert's May 7 and December 13, 2013 response letter to the renewal assessment non-compliance report.
Location(s) Audited:	Desk

GENERAL INFORMATION

Pro-Cert Organic Systems, Ltd. (Pro-Cert) is a for-profit organization. Pro-Cert was originally accredited as a certifying agent as OCPP/Pro-Cert Canada, Inc. (OCPP) on May 24, 2002 to the USDA National Organic Program (NOP) for crops, livestock, wild crop, and handling operations. Currently, Pro-Cert has 120 clients certified to the NOP that includes 106 crop, 88 livestock, 1 wild crop, and 14 handling operations. Pro-Cert also had one grower group; however during a review of the file it was determined that the operation did not meet the requirements of a grower group (see Findings). The Pro-Cert NOP clients are certified in the United States (CA, CO, IN, IA, ME, NY, OH, OR, PA, and VT). In addition to the USDA NOP, Pro-Cert is also accredited to the European Union Regulations (EC 834 /2007 and EC 889/2008), the Canadian Organic Standards, Quebec Organic Standards, and Japanese Agricultural Standards (JAS/MAFF). Pro-Cert also assists applicants in obtaining Bio-Suisse (Switzerland) certification and certification to the Brazil Regulations and Standards.

AUDIT INFORMATION

During the August 2012 renewal assessment, the corrective actions for the non-compliances identified during the mid-term assessment were found to be implemented and effective. Those non-compliances were cleared. This audit identified two noncompliances. The NOP notified Pro-Cert of these findings in writing on April 12, 2013. Pro-Cert submitted a response to the

NOP on May 7 and December 10, 2013.

FINDINGS

NP910400A.NC1 – Cleared

NP910400A.NC2 – Cleared

NP222600A.NC1 – Accepted. NOP §205.404(b)(3) states, “The certifying agent must issue a certificate of organic operation which specifies the: (3) Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation.” *Certificates for 9 of the 10 certification files reviewed contained the type of products that were being certified but did not contain the correct categories of organic operation as defined in this section (crops, wild crops, livestock, or processed products).* **Pro-Cert corrective action:** Pro-Cert submitted a revised certificate template, showing the category of certification. Pro-Cert also submitted two examples of certificates issued on March 31, 2013. Both certificates correctly classified the products produced under one of the 4 NOP certification categories. As evidence of preventive actions, Pro-Cert submitted two emails from December 2012 and December 2013 instructing staff to use the new certificate template. The emails identified the following four categories of certification for NOP certificates: crops, livestock, wild crops, and processed products. In 2014, Pro-Cert plans to implement electronic certificate software to further reduce certificate errors.

NP222600A.NC2 – Accepted. NOP §205.501(a)(21) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.” *Review of 1 grower group file showed Pro-Cert is not in compliance with NOP Program Handbook Policy Memo (PM) 11-10, Certification of Grower Groups. Specifically, the evidence showed that the producers in the grower group were not operating under the guidance of the NOSB Recommendation 2002, Criteria for Certification of Grower Groups, Recommendation # 1: “The NOSB recommends that, in order to be certified as a grower group, the following conditions must be met: 1) The crops and farming practices of the producers must be uniform and reflect a consistent process or methodology, using the same inputs.” Review of the certification file showed 5 growers conducting a variety of production methods, such as dairy, beef cattle, laying hens, and crop and greenhouse production. It is unclear which producer is doing which activity; but it is clear that one, uniform OSP is not used. Pro-Cert management indicated that this operation was classified as a grower group because they used one singular marketing and distribution entity. Though this is a requirement of grower group certification; this type of certification begins with a uniform OSP for all producers.* **Pro-Cert corrective action:** In August 2012, Pro-Cert contacted the head of the grower group to state that the NOSB’s 2011 memo meant that they did not qualify as a grower group. Pro-Cert requested that each individual group member apply for certification. The responsible party submitted an application for individual certification, and the other four members applied to a different certifying agent. In May 2013, Pro-Cert sent a memo to its staff stating that grower groups must consist of uniform crops and farming practices, using the same inputs. The memo informed staff that all NOP grower group certification must follow the policies outlined in the NOSB policy. Pro-Cert no

longer has any NOP-certified grower groups. According to their policies, any future grower group applications must be evaluated by the certification manager.