



# United States Department of Agriculture

Agricultural Marketing Service  
National Organic Program

**SRS CERTIFICATION GMBH**

**Friedlaender Weg 20, Goettingen, 37085, GERMANY**

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, 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-93-23**

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CERTIFICATE OF ACCREDITATION



## NATIONAL ORGANIC PROGRAM: AUDIT & CORRECTIVE ACTION REPORT

### GENERAL INFORMATION

- **Certifier Name** SRS Certification GmbH, (SRS)
- **Physical Address** Friedländer Weg 20, Göttingen, 37083, GERMANY
- **Audit Type** Pre-Decisional Assessment
- **Auditor(s) & Audit Dates** Colleen O'Brien, Patricia Bursten 04/04/2022 to 04/08/2022
- **Audit Identifier** NOP-65-21

### CERTIFIER OVERVIEW

The National Organic Program (NOP) conducted an on-site pre-decisional audit of SRS Certification GmbH's (SRS) ability to comply with the requirements for USDA-NOP accreditation. SRS has applied for USDA-NOP accreditation for the scopes of crops, wild crops, livestock, and handling. Audit activities included two on-site witness audits. Witness audits consisted of two inspections of crops and handling operations. No witness audits of inspections of livestock and wild crops operations were conducted.

SRS is a for-profit entity with a principal office in Göttingen, Germany and satellite offices in Shanghai, China and Brazzaville, Republic of Congo. Final NOP certification decisions will occur in Germany, while the China and Congo offices will manage inspections and retain records.

SRS plans certify between 80 and 100 operations annually and to conduct certification activities in east and southeast Asia, Africa, and the E.U. SRS may open additional satellite offices in the future if business opportunities require it.

SRS employs 8 staff members, three of whom will perform NOP certification review: a General Manager, a Quality Manager, and a Certification Manager. In addition, there is an Administrative officer, a Global GAP scheme manager, JAS scheme manager, EU evaluation officer, and an intern who is training as an NOP reviewer. The General Manager and Certification Manager are also inspectors. In addition, there are 6 NOP-trained inspectors and 4 inspector trainees that operate out of the SRS Shanghai office and 2 inspector trainees that operate out of the SRS Brazzaville office.

## **NOP DETERMINATION:**

NOP reviewed the audit results to determine whether SRS' 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 "**Outstanding**" indicates the corrective actions were not effectively implemented. 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.

### **Noncompliances from Prior Assessments**

**AIA-3340-20 - Cleared.**

**AIA-3342-20 - Cleared.**

**AIA-3343-20 - Cleared.**

**AIA-3344-20 - Cleared.**

**AIA-3345-20 - Cleared.**

**AIA-3346-20 - Cleared.**

**AIA-3347-20 - Cleared.**

**AIA-3341-20 - Accepted.** (NOP-39-19.NC2) – 7 C.F.R. §205.237(a) states, "The producer of an organic livestock operation must provide livestock with a total feed ration composed of agricultural products, including pasture and forage, that are organically produced and handled by operations certified to the NOP, except as provided in §205.236(a)(2)(i), except, that, synthetic substances allowed under §205.603 and non-synthetic substances not prohibited under §205.604 may be used as feed additives and feed supplements, Provided, That, all agricultural ingredients included in the ingredients list, for such additives and supplements, shall have been produced and handled organically."

**Comments:** *ORG-F3.3.1 (OPD-Livestock Attachment, P4 Feed Recipe) and ORG-FR IR (Inspection report) suggest that SRS allows feeding of nonorganic feed if there is proof of commercial non-availability.*

**Corrective Action:** SRS submitted updated versions of its Livestock Attachment (ORG-F3.3 OPD livestock attachment) and control points list (ORG-F4 Organic Control points), which were revised to clarify that all feed must be certified organic under the NOP. In the Livestock Attachment, "L4 Organic Compound Feed Recipes, P4 Processed Organic Feedstuff" recipe form was amended to make clear that "in conversion" feed and non-organic feed do not apply under NOP. The control points list was amended to clarify that all feed must be organic under NOP and to refer to §§205.237(a), 205.237(c), 205.603; and 205.604.

**Verification of Corrective Action:** The auditor reviewed SRS' livestock organic system plan (OSP) and attachment and found that ORG-F3.3.1 (OPD-Livestock Attachment) asks, "If some of the pasture is in conversion or still conventional, then explain which % of the feed ration is in conversion and which % is conventional." This still suggests that SRS allows feeding of

nonorganic feed or pasture.

**Corrective Action:** SRS updated ORG-F3 *OPD Attachment*, sheet L (section L3.1 and L3.2) and sheet L3/P4 Feed Recipe to clarify that feeding livestock in-conversion or conventional feed is not allowed under the USDA organic regulations, except as allowed per § 205.236(a)(2)(iii). SRS will conduct training in September 2022 for all review and inspection staff that covers all updates to procedures and templates.

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

**AIA-830-22 - 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:** *SRS does not consistently demonstrate the ability to fully comply with the requirements for accreditation. The auditor’s review of certification documents found that SRS’ organic system plan (OSP) and inspection report (IR) templates do not adequately verify how an operation complies with the requirements of:*

1. §205.272(b) – *SRS’ OSP forms do not ask operations for information on packaging materials or how reused containers pose no risk of contact with prohibited substances;*
2. §§205.271(d), (e) & (f) – *SRS’ OSP forms do not ask about operations to list inputs used for facility pest management, nor what measures are taken to prevent contact of the organically-produced products or ingredients with the substance used;*
3. §205.201(a)(6) – *SRS’ OSP and IR forms do not ask how the operation will ensure they comply with the International Trade arrangement terms. The forms do not ask operators if they are exporting organic products. SRS also has not developed procedures to ensure compliance to the terms of the U.S.-Canada Organic Equivalency Arrangement (USCOEA); and*
4. § 205.103 – *SRS’ IR forms do not prompt the inspector to complete traceback and mass balance audits that adequately test the operation’s recordkeeping system.*

**Corrective Action:** SRS added questions to their OSP forms and IR templates to address the missing information. Section G6.2 of ORG-F3.9 *Crops+Processing OPD* now asks the operation what material is used for packing their products, and section G6.5 asks how contamination is avoided in the cases of treated packaging materials and containers. SRS updated Section G6.2 of ORG-F3 *OPD Attachment* to ensure all types of inputs are covered, and to require the operation to explain how contamination is avoided in cases when prohibited substances are used. SRS expanded Section G4.3 of ORG-F3.9 *Crops+Processing OPD* to include a specific question regarding compliance to the terms of the USCOEA. SRS updated W11.2 *Organic Instruction Guide* to instruct inspectors to conduct both mass balance and trace-back audits at each organic inspection, and modified ORG-T3.12 *Inspection Assignment and Report Review for Organic Operations* to provide additional instructions to the inspector about what products and timeframes to select and where to record the results. Section G11 of ORG-F3.9 *Crops+Processing OPD* now asks the inspectors to record the results and findings of the traceability exercises. SRS also updated ORG-F4 *Organic Control Points*, which provides guidance to inspectors and reviewers in determining possible noncompliant practices; all requirements above are covered in this document. SRS will conduct training in September 2022 for all review and inspection staff that covers all updates to procedures and templates.

**AIA-831-22 - 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:** *SRS does not demonstrate the ability to fully comply with the requirements of § 205.403(a)(2)(ii) and NOP 2609 Unannounced Inspections. The auditor’s review of quality manual documents found that SRS does not have procedures to record how far in advance an operation is notified ahead of an unannounced inspection, nor what would be considered extenuating circumstances which would allow up to 4-hours’ notice prior to the unannounced inspection. The auditor’s interviews with SRS staff and review of certification templates also found that SRS has not defined procedures for disclosing to the operation the reason they were selected for an unannounced inspection.*

**Corrective Action:** SRS updated ORG-Wi6 *Unannounced Inspection* (chapter 5.1.3) to clarify that if advanced notice to an operation exceeds 4 hours, it cannot be considered an unannounced inspection. This document also clarifies what would be considered extenuating circumstances which would allow up to 4 hours’ notice prior to the unannounced inspection. In addition, ORG-Wi6 now instructs inspectors to record the time of prior announcement on ORG-T3.12 *Inspection Assignment and Report Review for Organic Operations*. SRS updated ORG-T3.12 to include a line that prompts inspectors to fill in the number of hours of prior notice given to the operation before arrival on site. ORG-T3.12 also includes the reason the operation was selected for an unannounced inspection. Although this document is not given to the operation, it prompts the inspector to verbally disclose the reason for selection. The operation is provided with a written justification in ORG-T1.1 *Notice of Additional Inspection*; SRS updated this letter template to include a place for the reviewers to explain the reason the operation was selected for an unannounced inspection. SRS will conduct training in September 2022 for all review and inspection staff that covers all updates to procedures and templates.

**AIA-832-22 – 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:** *SRS does not consistently demonstrate the ability to fully comply with the requirements for accreditation, including NOP 3012 Interim Instruction Material Review. The auditor’s review of material review procedures and interviews with certification staff found SRS has not developed written protocols and procedures outlining the expectations regarding the depth and frequency of the review. The auditor’s review also found that SRS does not provide its staff with adequate instructions on how to evaluate ingredients, sub-ingredients, processing aids and manufacturing methodologies for compliance with the USDA organic regulations and National List.*

**Corrective Action:** SRS updated ORG-POL-4 *Policy for Material Review* under the USDA Organic Regulations to clarify procedures and internal protocols for input material review and approval. The policy indicates material review of already approved inputs is done annually; the operator must submit a full disclosure of ingredients and proof of compliance of each ingredient, and this documentation is reviewed by an evaluation or certification officer. SRS also updated sheet G6.2 of ORG-F3 *OPD Attachment* to add the request to list CAS numbers for both active and inert ingredients, and for the inspector to list the conditions (i.e., restrictions) given by the

respective standard. SRS shared training materials presented to inspectors and reviewers in March 2022 that provided instructions on how to evaluate inputs and their ingredients. SRS will conduct training in September 2022 for all review and inspection staff that covers all updates to procedures and templates.

**AIA-833-22 - 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:** *SRS' organic system plan and inspection report forms do not demonstrate that SRS fully complies with the requirements of § 205.201(a)(6). The forms do not ask operators if they are exporting organic products, nor how the operation will comply with the terms of international trade arrangements. SRS also has not developed procedures to ensure its operations' compliance with the terms of the U.S.-Canada Organic Equivalency Arrangement (USCOEA).*

**Corrective Action:** SRS added section 5 ‘Organic Trade Arrangements’ to S14-Pol2 *NOP Certification Program*; this section provides instructions for SRS staff on where to find current details on US organic trade arrangements, and what is necessary for an operation wishing to export NOP-certified product to Canada under the terms of the USCOEA. SRS expanded Section G4.3 of ORG-F3.9 *Crops+Processing OPD* to include a specific question regarding compliance to the terms of the USCOEA. This same form is used by the inspectors to verify compliance, and the inspector is asked to ensure the operation’s trade practices are compliant with USCOEA. SRS also added the option to include the proper compliance statement on the organic certificates of operations with products approved for export under the USCOEA. SRS will conduct training in September 2022 for all review and inspection staff that covers all updates to procedures and templates.

**AIA-834-22 - 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.”

**Comments:** *SRS does not complete annual performance evaluations for all certification staff according to the requirements of § 205.501(a)(6) and NOP 2027 Instruction Personnel Performance Evaluations. The auditor's review of SRS personnel records determined that review staff are not evaluated according to a defined competency system that assesses their complete knowledge, skills, and abilities to perform the duties assigned to them.*

**Corrective Action:** SRS created a new form, S3-F4.8 *Evaluation Officer / Certification Officer (EO/CO) Performance Evaluation*, which is a comprehensive evaluation of reviewers that summarizes their job performance. SRS also updated SOP-3 *Personnel Management* to include instructions to use the new form (S3-F4.8) and to indicate that this form and the inspector evaluation form (S3-F4.7 *Performance Evaluation Inspector*) are to be completed annually and the results of the evaluations will be discussed with the respective employee. SRS will conduct training in September 2022 for all review and inspection staff that covers all updates to procedures and templates.

**AIA-848-22 – Accepted.** 7 C.F.R. §205.501(a)(1) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Have sufficient expertise in organic production or handling techniques to fully comply with and implement the terms and conditions of the organic certification program established under the Act and the regulations in this part;”

**Comments:** *SRS does not have sufficient expertise in organic production or handling techniques to fully comply with and implement an USDA organic certification program. The auditor’s review of livestock certification templates and procedures, and interviews with staff found experience and knowledge are lacking regarding organic livestock production practices. SRS has one inspector trained in organic livestock production, and this person was unable to adequately answer questions posed by the auditor during the audit. SRS certification review staff do not have any documented experience with USDA organic livestock production.*

**Corrective Action:** SRS clarified that the inspector who answered the questions posed by the auditor during the audit was not approved to conduct livestock inspections under NOP and had not done so. SRS further confirmed that the inspector will be approved to conduct livestock inspections only after additional training and testing, and the person at SRS with documented organic livestock production and USDA organic regulations is the General Manager. SRS provided documentary evidence of the General Manager’s previous experience and expertise. SRS has finalized their livestock certification templates (see AIA-3341-20 and AIA-1359-22 for a summary of those changes) and will develop training for staff who will inspect or review livestock operations; they will also utilize the Organic Integrity Learning Center’s modules on livestock certification to supplement their internal training. SRS confirmed they are still seeking accreditation to certify livestock operations and are aware that SRS must undergo a livestock witness audit in order for the NOP to determine whether SRS can be accredited to certify livestock operations. SRS further declared they will not accept a livestock applicant until they have sufficient and knowledgeable staff to assess compliance of such operations. SRS will conduct training in September 2022 for all review and inspection staff that covers all updates to procedures and templates.

**AIA-1359-22 - 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:** *SRS’ livestock OSP and Attachment does not adequately address all of the livestock production requirements under the USDA organic regulations. The livestock OSP does not require the following information from the operator:*

1. *Provide information or a map that complies with the requirements of § 205.240;*
2. *Provide the method for calculating dry matter demand per § 205.237(d)(4);*
3. *Describe records maintained for as-fed livestock feed per § 205.237(d)(2);*
4. *Verify input use is in alignment with National List restrictions or annotations;*
5. *Describe how they will identify animals that are no longer eligible for organic status;*
6. *Describe practices for physical alterations as required per § 205.238(a)(5);*
7. *Describe their plan for animal confinement practices that meet the requirements of § 205.239(b), (c), and (d); or*
8. *Define their grazing season as required per § 205.240(c)(3).*

**Corrective Action:** SRS added to and updated several sheets of the document ORG-F3 *OPD Attachment* and updated ORG-F3.3 *Crop/Feed and Pasture, Livestock and Bees OPD* section L5 to include several additional options for types of records to be maintained by a livestock operator. SRS significantly amended sheet L Livestock of the OPD Attachment to obtain the information from the operator that had previously been missing in SRS' OSP templates. SRS will conduct training in September 2022 for all review and inspection staff that covers all updates to procedures and templates.