



CERTIFICATE OF ACCREDITATION



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**

Effective Date: **09/02/2022**

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

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NATIONAL ORGANIC PROGRAM: AUDIT & CORRECTIVE ACTION REPORT

GENERAL INFORMATION

- **Certifier Name** SRS Certification GmbH, (SRS)
- **Physical Address** Friedlaender Weg 20, Goettingen, 37085, GERMANY
- **Audit Type** Initial Assessment
- **Auditor(s) & Audit Dates** Kelley Belina, Colleen O'Brien 08/19/2024 to 08/28/2024
- **Audit Identifier** NOP-25-24

CERTIFIER OVERVIEW

The National Organic Program (NOP) conducted an onsite Initial Assessment audit of SRS Certification GmbH's (SRS) USDA organic certification program covering the period April 8, 2022 to August 28, 2024. The purpose of this audit was to verify SRS'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 SRS personnel, a records audit, and two onsite witness audits. Audit activities occurred at the main office in Gottingen, Germany. The witness audits consisted of a two-day inspection of a handling operation and a one-day inspection of a crop operation; both operations are located in China.

SRS is a for-profit entity with a principal office in Gottingen, Germany and was initially accredited on September 9, 2022. SRS has a certification office in Shanghai, China, and has contract staff in India. SRS is accredited to the crops, wild crops, and handling scopes. SRS has applied for accreditation to the livestock scope, however, SRS did not have an applicant for the livestock scope at the time of the audit and therefore a witness audit was not conducted. SRS certifies 262 operations in China, India, Belgium, Togo and Ghana. SRS's NOP certification activities are performed by nine staff in the main office in Germany, three staff in the Shanghai office, and one contracted staff in India. SRS employs approximately 12 contracted inspectors in China and India. NOP certification decisions are made in the Germany office.

NOP DETERMINATION:

NOP reviewed the audit results to determine whether SRS' corrective actions adequately addressed previous noncompliances. The 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-830-22 – Cleared.

AIA-831-22 – Cleared.

AIA-832-22 – Cleared.

AIA-833-22 – Cleared.

AIA-834-22 – Cleared.

AIA-5564-23 – Cleared.

AIA-5805-23 – 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.

2022 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.

2024 Verification of Corrective Action: SRS is applying for accreditation for the livestock scope; however, at the time of the audit, SRS did not have an applicant for the livestock scope. The auditors will verify SRS' compliance with all applicable livestock requirements at a future audit, once SRS has an applicant for the livestock scope.

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.

Verification of Corrective Action: SRS is applying for accreditation for the livestock scope; however, at the time of the audit, SRS did not have an applicant for the livestock scope. The auditors will verify SRS' compliance with all applicable livestock requirements at a future audit, once SRS has an applicant for the livestock scope.

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. For example, 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.

Verification of Corrective Action: SRS is applying for accreditation for the livestock scope; however, at the time of the audit, SRS did not have an applicant for the livestock scope. The auditors will verify SRS' compliance with all applicable livestock requirements at a future audit, once SRS has an applicant for the livestock scope.

Noncompliances Identified during the Current Assessment

AIA-3027-24 – Rebuttal Accepted.

AIA-3032-24 - 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: *SRS does not carry out the provisions of the Act and regulations. The auditors reviewed certification files and found SRS allowed the use of a purchased pesticide without reviewing all ingredients.*

Corrective Action: SRS contacted the operations regarding the use of the noncompliant pesticide and, due to failure to respond, both operations were suspended. SRS trained appropriate staff on April 2, 2025 on cross checking inputs listed on an operations OSP for compliance.

AIA-3033-24 - 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: *SRS does not carry out the provisions of § 205.273. The auditors reviewed certification files and found the following:*

1. *SRS issued an NOP Import Certificate for an operation to export a product to Canada that did not qualify with the terms of the U.S.-Canada Organic Equivalency Arrangement, which is not in alignment with § 205.273(b).*

2. *SRS issued an NOP Import Certificate on the paper Import Certificate form (NOP 2110-1) after March 19, 2024 without due cause, as required by 205.273(c).*
3. *SRS has not implemented an organic document control system for intaking and approving or rejecting the validity of an NOP Import Certificate request, as required by § 205.273(b).*

Corrective Action: SRS submitted the following Corrective Action:

1. SRS conducted training on August 20, 2024 to staff who issue transaction certificates where they were trained to include cross-checks of Canadian equivalency. In addition, SRS updated their Work Instruction “Issuance of Transaction Certificates” on January 31, 2025, which now states, “For exports to Canada, the product must be NOP certified and approved according to the USCOEA...”
2. SRS confirmed that they are no longer issuing NOP Import Certificates on the paper Import Certificate form (NOP 2110-1).
3. SRS updated their Work Instruction “Issuance of Transaction Certificates” on January 31, 2025 which now includes section 2.2.2. “Rejecting TC application.” The work instruction states that when an application for export is incomplete or reveals that the import certificate cannot be issued, the application must be rejected. In addition, the work instruction clarifies approving import certificates in section 2.2.3 “Approval of TC application.”

AIA-3034-24 - Accepted. 7 CFR 205.501(a)(6)(i) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Conduct an annual performance evaluation of all persons who conduct inspections, certification review, or implement measures to correct any deficiencies in certification services. Witness inspections—certifying agents must ensure that each inspector is evaluated while performing an inspection at least once every three years, or more frequently if warranted. Inspectors with less than three years of inspection experience must undergo a witness inspection annually. Witness inspections must be performed by certifying agent personnel who are qualified to evaluate inspectors.”

Comments: *SRS’ procedure for conducting witness audits does not demonstrate compliance with § 205.501(a)(6)(i). The auditors reviewed SRS’ SOP-3 Personnel Management and found that it allows for inspectors to receive witness audits once every five years instead of once every three years.*

Corrective Action: SRS updated their SOP-3 Personnel Management on January 19, 2025 which now states, “at least one witness audit for each inspector is conducted every two years, but ideally every year.”

AIA-3035-24 - Accepted. 7 CFR § 205.663 states, “(a) A certifying agent must submit with its administrative policies and procedures: decision criteria for acceptance of mediation, and a process for identifying personnel conducting mediation and setting up mediation sessions per § 205.504(b)(8). (b) A certified operation or applicant for certification may request mediation to resolve a denial of certification or proposed suspension or proposed revocation of certification issued by a certifying agent or State organic program. (1) A certified operation or applicant for certification must submit any request for mediation in writing to the applicable certifying agent or State organic program within 30 calendar days of receipt of the notice of proposed suspension or proposed revocation of certification or denial of certification. (2) A certifying agent or State organic program may accept or reject a request for mediation based on the decision criteria required in paragraph (a) of this section. Certifying agents must document these criteria and how

the certifying agent applied the criteria to the request. (3) If a certifying agent rejects a mediation request, it must provide this rejection, and the justification for the rejection, in writing to the applicant for certification or certified operation. The rejection must include the right to request an appeal, pursuant to § 205.681, within 30 calendar days of the date of receipt of the written notification of rejection of the request for mediation. (4) When an operation appeals a rejection of mediation, the adverse action which is contested must not be finalized during the appeal proceeding [...] (e) The parties to the mediation have a maximum of 30 calendar days from the start of mediation to reach an agreement. Successful mediation results in a settlement agreement agreed to in writing by both the certifying agent and the certified operation. If mediation is unsuccessful, the applicant for certification or certified operation has 30 calendar days from receipt of a written notice of termination of mediation to appeal the denial of certification or proposed suspension or revocation pursuant to § 205.681.”

Comments: *SRS does not have policies or procedures as required by § 205.663. The auditors reviewed certification files and interviewed staff and found the following:*

1. *SRS’ policies and procedures do not include decision criteria for acceptance of mediation or a process for identifying personnel to conduct mediation, as required by § 205.663(a).*
2. *SRS’ template for settlement agreements (ORG-T2.9 Mediation Result) is not compliant with the USDA organic regulation, including with § 205.663(b). ORG-T2.9 includes the option to file an appeal within 30 days, which is not appropriate to offer unless mediation fails.*
3. *Upon failing to reach a settlement agreement, SRS reissued an operation a Notice of Denial without offering the option to appeal as required by § 205.663(e).*

Corrective Action: SRS submitted the following corrective actions:

1. SRS updated Work Instruction “Review and Certification” section 5.6 Requesting Mediation or Filing Appeals on January 20, 2025. This section includes criteria for acceptance of mediation and criteria for identifying personnel to conduct mediation. SRS updated their “Rejection of Mediation Request” template, which requires the reviewer to document the reason for rejection of mediation. SRS also updated the “Notice of Termination of Mediation” template, which correctly states that the operation can appeal the reissued adverse action.
2. SRS updated their templates and replaced the old template (ORG-T2.9 Mediation Results) with a combined template NOP-T2.9.1. “Mediation Results-Settlement Agreement” which no longer states that the client has an option to file an appeal within 30 days.
3. SRS updated template “Notice of Termination of Mediation” to state that the client may file an appeal within 30 calendar days from the date of the notice. SRS also updated Work Instruction “Review and Certification” section 5.6 Requesting Mediation or Filing Appeals on January 20, 2025. This section includes a step for if mediation is rejected or if a settlement agreement is not signed; the reviewer is to communicate of the client’s right to appeal via the “Notice of Termination of Mediation” template.

AIA-3076-24 - Accepted. 7 CFR § 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 fully comply with the requirements for producer group certification. The auditors reviewed producer group certification files and found SRS lacks a procedure for*

determining high-risk group members, and thus inspectors are not inspecting such members, as required by § 205.403(a)(2)(iii).

Corrective Action: SRS updated Work Instruction “Review of Organic Project Description (OPD Feedback),” which now states that “high risk producers must be determined” and documented in form T3.12 “Assigned & Report Review.” The work instruction also includes details about what would make a producer group member high risk. SRS updated T3.12 “Assigned & Report Review” to include an area for inspection time allotment for producer group high risk members and an area to document high risk producer group members. SRS notified staff of the updates to the documents on March 29, 2025.

AIA-3721-24 - 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: *SRS does not fully comply with the requirements for producer group certification. The auditors reviewed producer group certification files and found:*

- 1. SRS did not ensure producer group operations met all the requirements of § 205.400(g).*
- 2. SRS did not ensure producer group organic system plans (OSP) met all the requirements of § 205.201(c).*

Corrective Action: SRS created document F3.7.2. “OPD ICS,” which is a checklist for all producer groups to complete. Producer groups are required to declare that all operations meet the requirements of § 205.400(g) and there are questions for producer groups to describe how they meet the requirements of § 205.201(c). SRS notified staff of the updates to the documents on March 29, 2025.

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 WI1.2 *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.