



CERTIFICATE OF ACCREDITATION



# United States Department of Agriculture

Agricultural Marketing Service

National Organic Program

**ONMARK CERTIFICATION SERVICES, LLC**

**23833 County Road 16, Elkhart, Indiana, 46516, U.S.A.**

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, Livestock 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-9-25**

Effective Date: **07/03/2024**

Expiration Date: **07/03/2029**

Issue Date: **02/27/2025**

**Christopher Purdy**  
**Acting Deputy Administrator**  
**National Organic Program**

The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or because all or part of an individual's income is derived from any public assistance program.



National Organic Program  
1400 Independence Avenue, SW.  
Room 2642-South, STOP 0268  
Washington, DC 20250-0268

## NATIONAL ORGANIC PROGRAM: AUDIT & CORRECTIVE ACTION REPORT

### GENERAL INFORMATION

- **Certifier Name** OnMark Certification Services, LLC, (ONM)
- **Physical Address** 23833 County Road 16 Elkhart, Indiana, 46516 U.S.A.
- **Audit Type** Renewal Audit
- **Auditor(s) & Audit Dates** Kelly Skoda, Emily Prisco, Joshua Lindau, Sherry Aultman, 09/16/2024 to 09/21/2024
- **Audit Identifier** NOP-18-24

### CERTIFIER OVERVIEW

The National Organic Program (NOP) conducted an onsite Renewal Audit of OnMark Certification Services LLC (ONM)'s USDA organic certification program covering the period March 27, 2021, to September 20, 2024. The purpose of the audit was to verify ONM'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 ONM personnel, a records audit, and two onsite witness audits. The two witness audits consisted of one additional onsite inspection of a handling operation and one annual onsite inspection of a crops and livestock operation; both operations are in Indiana.

ONM is a limited liability company initially accredited on July 3, 2019. ONM is accredited to the crops, livestock, and handling scopes. ONM's office is in Elkhart, Indiana. ONM certifies 639 operations and offers certification services in 22 states. Certification activities are performed by 31 employees and contractors.

## **NOP DETERMINATION:**

NOP reviewed the audit results to determine whether ONM's corrective actions adequately addressed previous noncompliances. The NOP also reviewed the findings identified during the audit to determine whether noncompliances should be issued to ONM.

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 onsite audit.

### **Noncompliances from Prior Assessments**

**AIA-2053-20 - Cleared.**

**AIA-2533-22 - Cleared.**

**AIA-6188-21 - Cleared.**

**AIA-6189-21 - Cleared.**

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

**AIA-3287-24 - Accepted.** 7 CFR § 205.663(f) states, “Any settlement agreement reached through mediation must comply with the Act and the regulations in this part. The Program Manager may review any mediated settlement agreement for conformity to the Act and the regulations in this part and may reject any agreement or provision not in conformance with the Act or the regulations in this part.”

**Comments:** *ONM’s settlement agreements do not comply with the requirements of the USDA organic regulations. The auditors reviewed settlement agreements established by ONM and found agreements do not consistently include a defined period of time for the terms to be completed.*

**Corrective Action:** ONM updated the Settlement Agreement template in order to clarify that a defined period of time for the terms must be included. ONM notified staff on November 27, 2024 of the updates to the Settlement Agreement template. In addition, ONM included an agenda item to discuss the changes to the Settlement Agreement template on the 2025 Annual Training Agenda for certification decision makers in December 2024.

**AIA-3292-24 - 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:** *ONM does not consistently carry out the provisions of the USDA organic regulations. The auditors reviewed certification files and interviewed certification personnel and identified the following issues:*

- 1. ONM approved a retail display case that contained a blue USDA seal which does not comply with the requirements of § 205.311(b)(2).*
- 2. An operation’s file contained a retail label that does not identify organic ingredients as ‘organic’ in the ingredient statement, as required by § 205.303(b)(1).*

**Corrective Action:** ONM reviewed the noncompliant labels identified by the auditors and requested compliant labels be submitted for approval prior to use. ONM revised the label review checklist on November 20, 2024 to include verification points that ensures that USDA seals are

compliant with § 205.311 and that organic ingredients are identified in compliance with § 205.303. ONM notified staff on November 28, 2024 of the revisions to the Label Review Checklist. In addition, ONM included an agenda item to discuss the changes to the Label Review Checklist on the 2025 Annual Training Agenda for certification decision makers in December 2024.

**AIA-3407-24 - 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:** *ONM does not carry out the provisions of the Act and regulations. The auditors reviewed certification files and interviewed certification personnel and found that ONM does not sufficiently verify ruminant operations’ compliance with § 205.237(c)(1) in the following manner:*

- 1. ONM does not properly or consistently calculate dry matter intake (DMI) from pasture during the grazing season for ruminant livestock operations. The auditors found that ONM allows some of its operations to let their ruminants forage outside of the grazing season in order to meet grazing requirements. ONM uses the forage consumed in this ‘secondary grazing season’ towards the calculation of DMI from pasture for the grazing season.*
- 2. ONM does not calculate DMI from grazing for all classes of animals. In some cases, dry cows and lactating cows are calculated as one class of animal.*

**Corrective Action:** ONM reviewed all clients who may have been impacted by this noncompliance and determined that the noncompliant operation identified by the auditor was an isolated case. ONM issued a Notice of Minor Issue to the operation on November 27, 2024 with a request to submit revised dry matter demand, rations and grazing information for all animal groups. ONM previously updated its OSP in 2023 to remove a reference to a secondary grazing season. ONM updated the Annual Livestock Summary template on November 1, 2024 to include separate lines for different animal groups to ensure that all animal group rations are documented. In addition, ONM notified appropriate staff on November 27, 2024 that the grazing season for all classes of livestock must be the same, that “secondary grazing seasons” are not compliant and that there is only one grazing season for all animal groups.

**AIA-3408-24 - 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:** *ONM is not consistently verifying that operations are compliant with § 205.237(b)(8), § 205.239(a)(1), and § 205.239(b) and (c). The auditors reviewed certification files and interviewed certification personnel and found that operations’ records did not sufficiently identify grazing season dates, confinement periods, reasons for confinement, and confinement from grazing for all classes of animals.*

**Corrective Action:** ONM determined that their documents were inconsistent and unclear because ONM’s templates included grazing and confinement on the same template. ONM created two new documents, Grazing Log and Temporary Confinement Log, both published on November 27, 2024 which replaces the previous Grazing Log/Confinement template. ONM notified staff of the new documents on November 27, 2024. In addition, ONM trained certification decision makers, initial reviewers and inspectors on the new forms at the 2025 Annual Training.

**AIA-3409-24 - 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:** *ONM does not consistently carry out the provisions of the Act and regulations. During a witness audit of a crops and livestock inspection, the auditor observed that ONM’s inspector did not fully verify the operation’s compliance with crop and livestock practice standards §205.205, §205.238, §205.239, and §205.272. Examples of practices the inspector did not verify include crop rotation, livestock health care, livestock living conditions, and prevention of commingling and contamination for a split livestock operation.*

**Corrective Action:** ONM revised several items on the Inspection Report Livestock Add On, Inspection Report Poultry (Crops Add On) and Inspection Report Poultry and Outside Access Only documents on November 26, 2024. These revisions included verification of no commingling and contamination with non-organic production, adequate living space for all groups, ammonia levels, clean water, temporary confinement, preventative healthcare practices, physical alterations and origin of poultry. In addition, ONM revised the Inspection Report Crops on November 26, 2024 to include verification of crop rotation and adequate measures to prevent commingling and contamination of products, feed and other materials. ONM notified staff on November 28, 2024 of the changes of the documents.

**AIA-3410-24 - 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:** *ONM does not consistently carry out the provisions of the Act and regulations. The auditors reviewed certification files and found that ONM did not verify the organic pullet and feed brokering activities of a ONM-certified poultry operation that was facilitating the sale of pullets and organic poultry feed. As a result, the operation was not certified for those activities. Interviews with certification staff confirmed that ONM did not recognize that the brokering activities of the operation required certification.*

**Corrective Action:** ONM evaluated clients impacted by the noncompliance and issued Notices of Noncompliances on November 27, 2024. Corrective actions included verification of responsibilities for pullet transfer, feed transfer and spent hen transfer, written procedures for transfers and feed management, a description of feed records and a description for how any non-contracted poultry may be sourced. ONM updated the Organic Certification Policy Manual on November 26, 2024 to include a statement that brokers who handle organic products not packaged for retail must be certified. ONM also updated the Poultry Organic System Plan on November 1, 2024, which now requires operations to declare if they receive certified organic birds through a handler or broker. ONM notified staff of the updates to the documents on November 28, 2024. In addition, ONM included the changes to the documents in the 2025 Annual Training in December 2024 for certification decision makers, initial reviewers and inspections.

## **NATIONAL ORGANIC PROGRAM: AUDIT & CORRECTIVE ACTION REPORT**

### **GENERAL INFORMATION**

- **Certifier Name** OnMark Certification Services, LLC, ONM
- **Physical Address** 60324 Missouri Avenue, Goshen, Indiana 46528, U.S.A.
- **Audit Type** Initial Audit
- **Auditor(s) & Audit Dates** Alison Howard, Sherry Aultman, 03/22/2021 to 03/26/2021
- **Audit Identifier** NOP-87-20

### **CERTIFIER OVERVIEW**

An initial audit was conducted of OnMark Certification Services, LLC (ONM). Audit activities included a remote desk audit. The USDA National Organic Program (NOP) assessed the certifier's conformance to the USDA organic regulations, during the period May 02, 2019 to March 26, 2021.

ONM was first accredited on July 3, 2019 and is accredited for Crops, Livestock, and Handling. ONM is a private agency located in Goshen, Indiana.

ONM certifies 252 operations to the following certification scopes: Crops (251), Livestock (149), and Handling (1). Certification services are conducted in Indiana, Michigan, Illinois, Ohio, Iowa, Kansas, Kentucky and Arkansas. Certification services are performed by the program manager and ten organic certification specialists.

### **NOP DETERMINATION:**

NOP reviewed the audit results to determine whether ONM'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 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-2052-20 - Cleared**

**AIA-3197-20 - Cleared**

**AIA-3200-20 - Cleared**

**AIA-3203-20 - Cleared**

**AIA-6184-21 - Cleared**

**AIA-2053-20 - Accepted.** (NOP-38-19.NC2) - 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:** *ONM did not demonstrate the ability to fully comply with the requirements for accreditation.*

- *The on-site inspection conducted during the witness audit did not include sufficient in/out mass balance and traceback audit activities.*
- *The exit interview conducted during the witness audit did not include citations of the USDA organic regulations for issues of concern identified during the inspection.*

**Corrective Action:** ONM updated their pre-inspection review procedures and templates to ensure the ONM Certification Officer/Reviewer provides clear direction for the products to be audited for traceback and mass balance. Their procedure now requires the Certification Officer/Reviewer to select a time period and commodity for mass balance and traceback activities. ONM also updated their policies and procedures to require their inspectors to submit traceback and mass balance documentation with their inspection report. If sufficient traceback and mass balance documentation is not collected at the time of the inspection, ONM will not accept the Inspection Report. ONM will require the inspector to obtain the information (which may include re-visiting the site at their own cost) in order to complete the inspection. ONM updated their exit interview template to include a section for the NOP regulations. Inspectors are required to cite the USDA NOP regulations next to any of the findings of issues or concerns.

ONM inspectors will be required to attend the 2019 ONM In-House Training on Crop and Livestock Audit Requirements which is scheduled for fall 2019. The training will include guidance from the NOP/ACA 2018 training on audit priorities, ACA Best Practices for Improving Traceability in the Supply Chain and relevant Organic Integrity Learning Center training. The training will also explain the proper use of ONM audit templates and clarify that exit interview/inspection reports are not accepted unless the NOP regulation citations are included.

**Verification of Corrective Action:** The auditors’ review of exit interviews verified ONM inspectors included the correct regulatory citation for issues of concern identified during the inspection. However, the auditors identified that ONM inspectors were not consistently conducting mass balance and traceback exercises. When the ONM inspector did conduct a mass balance or traceback exercise, they did not always include sufficient information to allow the exercise to be verified by a reviewer.

**2021 Corrective Action:** ONM updated its post inspection checklist, “1200 Post Inspection Report Checklist (v.4 rev 081721),” to include an evaluation of the inspector’s mass balance and traceback exercises. In August 2021, ONM informed its certification team of corrective actions and conducted training on mass balance and traceback exercises. ONM submitted the post inspection report checklist, staff notification email, and staff training agenda, including an attendee list, to the NOP. ONM also submitted completed inspection reports and post inspection report checklists as evidence of corrective action implementation.

## **Non-compliances Identified during the Current Assessment**

**AIA-6188-21 - Accepted.** 7 C.F.R. §205.403(c)(2) states, “The on-site inspection of an operation must verify: That the information, including the organic production or handling system plan, provided in accordance with §§205.401, 205.406, and 205.200, accurately reflects the practices used or to be used by the applicant for certification or by the certified operation;”

**Comments:** *ONM’s inspectors do not fully verify the accuracy of an operation’s organic system plan. The auditor’s review of certification files found the following.*

- *For livestock files reviewed that contained both a crops Organic System Plan (OSP) and a livestock OSP, the crops OSP identified that the operation stored both organic and conventional hay while the livestock OSP identified storage as dedicated organic and did not include the areas where conventional hay was stored. The inspector did not verify whether organic and non-organic hay are stored by the operations and did not identify the discrepancy as an issue of concern in the exit interviews.*
- *An initial review conducted by ONM indicated the OSP was incomplete and needed to be updated. However, the OSP was not updated during the inspection and the inspector did not identify the missing information in the exit interview as an issue of concern.*
- *Organic transplants were listed on an organic certificate, but this activity was not recorded as being verified by the inspector on the inspection report.*

**Corrective Action:** ONM updated its initial review report, inspection report, inspection exit interview, and post inspection checklist. The initial review and inspection report templates include requests for verification of organic/conventional storage and transplants; the exit interview template includes a section for inspectors to note which sections of the organic system plan were updated during inspection; and the post inspection checklist includes an evaluation of both the initial reviewer and inspector in order to document any additional training needs and to determine if more information needs to be gathered as a result of an incomplete inspection report. In August 2021, ONM notified staff of the updates. ONM sent the updated documents and staff notification to the NOP.

**AIA-6189-21 - Accepted.** 7 C.F.R. §205.670(g) states, “If test results indicate a specific agricultural product contains pesticide residues or environmental contaminants that exceed the Food and Drug Administration's or the Environmental Protection Agency's regulatory tolerances, the certifying agent must promptly report such data to the Federal health agency whose regulatory tolerance or action level has been exceeded. Test results that exceed federal regulatory tolerances must also be reported to the appropriate State health agency or foreign equivalent.”

**Comments:** *ONM does not fully carry out the procedures of NOP 2613 Instruction Responding to Results from Pesticide Residue Testing. The auditor’s review of correspondence to operations of pesticide residue analysis results found ONM is not consistently informing operations that their product may be sold as organic when residues are not detected.*

**Corrective Action:** ONM updated the template titled, “1500 - Letter Results of Sample Event - None Detected,” to include a statement informing the producer the product may be sold/fed as organic. In August 2021, ONM notified staff to begin using the updated template when residues are not detected. ONM submitted the updated template and staff notification to the NOP.



## NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

### AUDIT AND REVIEW PROCESS

The National Organic Program (NOP) conducted an audit as part of NOP's assessment of the certifier's organic program. This report provides the results of NOP's review of the certifier's corrective actions and assessment of the certifier's capability to operate as a USDA accredited certifier.

### GENERAL INFORMATION

<b>Applicant Name</b>	OnMark Certification Services, LLC (ONM)
<b>Physical Address</b>	60324 Missouri Avenue, Goshen, Indiana 46528
<b>Mailing Address</b>	60324 Missouri Avenue, Goshen, Indiana 46528
<b>Contact &amp; Title</b>	Mr. Mark Seeley, President
<b>E-mail Address</b>	OnMarkCertification@gmail.com
<b>Phone Number</b>	269-689-7295
<b>Reviewer &amp; Auditor</b>	Sherry Aultman, NOP Reviewer; Sherry Aultman, Onsite Auditor
<b>Program</b>	USDA National Organic Program (NOP)
<b>Review &amp; Audit Dates</b>	Review: 01/06/2021 Audit: 08/17/2020 – 08/18/2020
<b>Audit Identifier</b>	NOP-75-20
<b>Action Required</b>	No
<b>Audit &amp; Review Type</b>	Pre-decisional Audit (Scope Extension)
<b>Audit Objective</b>	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of ONM's certification system.
<b>Audit &amp; Determination Criteria</b>	<i>7 CFR Part 205, National Organic Program as amended</i>

OnMark Certification Services (ONM) is accredited to the USDA organic regulations for the scopes of Crops and Livestock. ONM has applied for an extension to its scope of accreditation to include Handling.

ONM is an independent private organization located in Goshen, Indiana. As of 8/12/20, they certify 181 operations, including 181 operations under the Crops scope and 120 operations under the Livestock scope.

ONM has 18 staff members performing organic certification activities. They have six combined certification officers/inspectors, two certification officers and two inspectors. OnMark has a CEO, a NOP Program Director, and six program assistants and compliance officers.

ONM anticipates certifying more than 20 handling operations if approved for the scope extension. The majority of handling operations are existing crop or livestock operations adding the handling scope.

A remote Witness Audit of an initial inspection of a hay broker was conducted as part of the audit activities.

## **NOP DETERMINATION:**

NOP reviewed corrective actions submitted as a result of noncompliances issued from Findings identified during the onsite audit. Any noncompliance labeled as “**Accepted**” indicates acceptance of the corrective actions and verification of corrective action implementation will be conducted during the next audit.

### **Non-compliances Identified during the Current Assessment and Corrective Actions**

**AIA-3197-20 – NC. Accepted** 7 C.F.R. §205.406(c) states, “If the certifying agent has reason to believe, based on the on-site inspection and a review of the information specified in §205.404, that a certified operation is not complying with the requirements of the Act and the regulations in this part, the certifying agent shall provide a written notification of noncompliance to the operation in accordance with §205.662.”

**Comments:** *ONM did not issue an operation a Notice of Noncompliance even though the review of the inspection report found that the operation did not comply with the USDA organic regulations. The auditor’s review of certification files found that ONM did not provide an operation with a written notification of noncompliance for noncompliant practices identified during the operation’s onsite inspection. The noncompliant practices were incorrectly relayed to the operations as reminders in the Certification Determination Letter.*

**Corrective Action:** ONM submitted a revised and reissued certification decision letter to the operation with minor issues in alignment with NOP 4002 Penalty Matrix. ONM provided training on 12/17/20 to all certification officers to prevent "reminders" incorrectly being used in place of noncompliances. The training explained the distinction between minor and major noncompliances, the responsibility of ONM reviewers to reference NOP 4002 Penalty Matrix, and the procedures for ONM certification officers in assigning the appropriate type of noncompliance to an observation.

**AIA-3200-20 – NC. 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:** *ONM issues notifications of major noncompliance and notifications of minor noncompliances, which are sometimes incorrectly identified as “reminders,” to implement the requirements of §205.404(a) and §205.662. The auditor’s review of a certification file and interviews with certification staff found that it is not clear which noncompliances result in the issuance of a notification of minor noncompliance and which result in the issuance of a notification of a major noncompliance. Additionally, ONM does not have a written policy/procedure for determining which types of noncompliances constitute a minor noncompliance or a major noncompliance.*

**Corrective Action:** ONM updated their "Organic Certification Policies & Procedures Manual" to state that all Noncompliances and Adverse Actions will be evaluated using NOP 4002 – Instruction Enforcement of the USDA Organic Regulations: Penalty Matrix. ONM conducted training on 12/17/20 for all certification officers on using the penalty matrix. A reminder was sent to all inspectors and certification staff on 12/28/20 about the importance of consistency between the NOP Penalty Matrix and its terminology.

**AIA-3203-20 – NC. 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:** *ONM’s organic system plan forms do not demonstrate that ONM fully complies with the requirements of §205.201(a)(3). The forms do not ask operators to provide a description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented.*

**Corrective Action:** ONM updated the Handling OSP application and reviewed the crops and livestock OSP applications to ensure that the operator indicates the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed. The OSP application initial reviewers were trained on 12/16/20 to verify this new section of the OSP application. A reminder was sent to all inspectors and certification officers on 12/28/20 about the importance of verifying operations' monitoring practices and procedures including the frequency with which they will be performed.

## NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

### AUDIT AND REVIEW PROCESS

An onsite Pre-decisional Audit of OnMark Certification Services' (ONM) organic program was conducted on April 29 – May 1, 2019. The National Organic Program (NOP) reviewed the auditor's report to assess ONM's compliance to the USDA organic regulations. This report provides the results of the NOP's assessment.

### GENERAL INFORMATION

<b>Applicant Name</b>	OnMark Certification Services (ONM)
<b>Physical Address</b>	60324 Missouri Avenue, Goshen Indiana 46528
<b>Mailing Address</b>	60324 Missouri Avenue, Goshen Indiana 46528
<b>Contact &amp; Title</b>	Mark Seeley, CEO/Director
<b>E-mail Address</b>	<a href="mailto:onmarkcertification@gmail.com">onmarkcertification@gmail.com</a>
<b>Phone Number</b>	269-689-7295
<b>Reviewer(s) &amp; Auditor(s)</b>	Graham Davis, NOP Reviewer Penny Zuck, On-site Auditor
<b>Program</b>	USDA National Organic Program (NOP)
<b>Review &amp; Audit Date(s)</b>	NOP Corrective Actions Review: June 12, 2019 NOP assessment review: May 21, 2019 Onsite audit: April 29 – May 1, 2019
<b>Audit Identifier</b>	NOP-38-19
<b>Action Required</b>	None
<b>Audit &amp; Review Type</b>	Pre-decisional Assessment
<b>Audit Objective</b>	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of ONM's certification system.
<b>Audit &amp; Determination Criteria</b>	7 CFR Part 205, National Organic Program as amended
<b>Audit &amp; Review Scope</b>	ONM's capability to carry out the audit criteria.

ONM has applied for USDA-National Organic Program accreditation for the scopes of crops, and livestock.

ONM is an independent private organization located in Goshen, Indiana. ONM expects to initially certify approximately 200 operations to the NOP in the Midwest.

ONM employs 2 staff members who perform the NOP certification activities. The staff includes a Program Director/Inspector and Company Accountant/Chief Certification Officer. Additional inspectors and other certification reviewers are contracted as needed.

The pre-decisional audit included a witness audit for initial inspection of a dairy operation (crops and livestock scopes).

## **NOP DETERMINATION:**

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

**NOP-51-18.NC1 – Cleared.**  
**NOP-51-18.NC2 – Cleared.**  
**NOP-51-18.NC3 – Cleared.**  
**NOP-51-18.NC4 – Cleared.**  
**NOP-51-18.NC5 – Cleared.**  
**NOP-51-18.NC6 – Cleared.**  
**NOP-51-18.NC7 – Cleared.**  
**NOP-51-18.NC8 – Cleared.**  
**NOP-51-18.NC9 – Cleared.**  
**NOP-51-18.NC10 – Cleared.**  
**NOP-51-18.NC12 – Cleared.**  
**NOP-51-18.NC13 – Cleared.**  
**NOP-51-18.NC14 – Cleared.**  
**NOP-51-18.NC15 – Cleared.**  
**NOP-51-18.NC16 – Cleared.**  
**NOP-51-18.NC17 – Cleared.**  
**NOP-51-18.NC18 – Cleared.**  
**NOP-51-18.NC19 – Cleared.**  
**NOP-51-18.NC20 – Cleared.**  
**NOP-51-18.NC21 – Cleared.**  
**NOP-51-18.NC22 – Cleared.**  
**NOP-51-18.NC23 – Cleared.**

**NOP-51-18.NC11 – Accepted.** 7 CFR 7 C.F.R. §205.403(e)(2) states, “A copy of the on-site inspection report and any test results will be sent to the inspected operation by the certifying agent.”

**Comments:** *ONM’ policies and procedures do not state that the inspection report will be provided to the operation.*

**2018 Corrective Action:** ONM submitted an updated policies and procedures document that states a copy of an inspection report will be provided to the operations ONM inspects.

**Verification of Corrective Actions:** ONM’ certification procedure includes providing the operation with a copy of the inspection report and exit interview with the certification decision. However, ONM is only providing operations a summary of the inspection. The on-site inspection includes written verification on the operation’s organic system plan by the inspector; however, a copy of this is not provided to the operation from ONM’ office as part of the inspection report.

**2019 Corrective Action:** ONM updated their procedure to state that the complete Inspection Review Submission (including OSP updates) will be sent to the operator. The Inspection Review Submission will include a copy of the updated OSP, the inspection report referencing the OSP sections, the exit interview, and the certification decision letter. ONM submitted a copy of the inspection report, which complies with §205.403(e)(2).

#### **Non-compliances Identified during the Current Assessment and Corrective Actions**

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.

**NOP-38-19.NC1 – Accepted.** 7 C.F.R. §205.402(a)(2) states, “Upon acceptance of an application for certification, a certifying agent must: Determine by a review of the application materials whether the applicant appears to comply or may be able to comply with the applicable requirements of subpart C of this part.”

**Comments:** *ONM’ material review process does not include notification to the operation of all material decisions including restrictions.*

**Corrective Action:** ONM updated their policies and procedures to require a list of all the material review decisions, including any restrictions in use of those materials, be included in the certification decision letter sent to operations. ONM has an internal materials database to monitor the status of materials, compliance, and restrictions for use.

**NOP-38-19.NC2 – 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:** *ONM did not demonstrate the ability to fully comply with the requirements for accreditation.*

- *The on-site inspection conducted during the witness audit did not include sufficient in/out mass balance and traceback audit activities.*

- *The exit interview conducted during the witness audit did not include citations of the USDA organic regulations for issues of concern identified during the inspection.*

**Corrective Action:** ONM updated their pre-inspection review procedures and templates to ensure the ONM Certification Officer/Reviewer provides clear direction for the products to be audited for traceback and mass balance. Their procedure now requires the Certification Officer/Reviewer to select a time period and commodity for mass balance and traceback activities. ONM also updated their policies and procedures to require their inspectors to submit traceback and mass balance documentation with their inspection report. If sufficient traceback and mass balance documentation is not collected at the time of the inspection, ONM will not accept the Inspection Report. ONM will require the inspector to obtain the information (which may include re-visiting the site at their own cost) in order to complete the inspection. ONM updated their exit interview template to include a section for the NOP regulations. Inspectors are required to cite the USDA NOP regulations next to any of the findings of issues or concerns. ONM inspectors will be required to attend the 2019 ONM In-House Training on Crop and Livestock Audit Requirements which is scheduled for fall 2019. The training will include guidance from the NOP/ACA 2018 training on audit priorities, ACA Best Practices for Improving Traceability in the Supply Chain and relevant Organic Integrity Learning Center training. The training will also explain the proper use of ONM audit templates and clarify that exit interview/inspection reports are not accepted unless the NOP regulation citations are included.