



# United States Department of Agriculture

Agricultural Marketing Service  
National Organic Program

## **CCOF CERTIFICATION SERVICES**

**2155 Delaware Avenue, Suite 150, Santa Cruz, California, 95060, 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, 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-92-23](#)  
Effective Date: [04/29/2022](#)  
Expiration Date: [04/29/2027](#)  
Issue Date: [07/03/2023](#)

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

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CERTIFICATE OF ACCREDITATION



## NATIONAL ORGANIC PROGRAM: AUDIT & CORRECTIVE ACTION REPORT

### GENERAL INFORMATION

- **Certifier Name** CCOF Certification Services, (CCOF)
- **Physical Address** 2155 Delaware Avenue, Santa Cruz, California 95060, U.S.A.
- **Audit Type** Renewal Audit
- **Auditors & Audit Dates** Jessica Walden, Alicia Hudson  
Desk Audit: 02/07/2022, 03/1/2022 to 03/04/2022  
Witness Audits: 02/09/2022, 02/15/2022, 02/24/2022, 02/28/2022
- **Audit Identifier** NOP-6-22

### CERTIFIER OVERVIEW

During February 7 to March 4, 2022, representatives of the United States Department of Agriculture (USDA), Agricultural Marketing Service (AMS), National Organic Program (NOP), completed an audit of the CCOF Certification Services' (CCOF) organic certification program as part of its USDA Renewal Accreditation Assessment. The NOP Auditors conducted four witness audits as a part of the renewal assessment: one crop and wild crop operation, one crop and post-harvest handling operation, one handling operation, and one livestock operation.

CCOF is a wholly owned subsidiary of CCOF, Inc. and was initially accredited as a USDA certifying agent on April 29, 2002. CCOF's main office is located in Santa Cruz, California. CCOF also has a one-person office in Zapopan, Jalisco, Mexico. The Mexico office is accredited by SENASICA and does not make any final decisions of certifications for the NOP program. NOP inspections are assigned from that office.

CCOF certifies 4,096 operations to the following certification scopes: Crops (2,773), Wild Crop (13), Livestock (172), and Handling (2,269). CCOF does not certify any grower groups. Certification services are provided to operations in the United States, Canada, and Mexico.

Certification activities are performed by 42 Farm/Handler Specialists and Coordinators, 78 Inspectors, 21 Team Leads/Managers/Supervisors, seven Certification Operations Assistants and Certification Specialists, four Executive Assistants, and three Materials/Business Information Specialists.

## **NOP DETERMINATION:**

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

### **Noncompliances from Prior Assessments**

**AIA-1152-20 - Cleared.**

### **Noncompliances Identified during the Current Assessment and Corrective Actions**

**AIA-519-22 - Accepted.** 7 C.F.R. §205.403(c)(1) states, “The onsite inspection of an operation must verify: The operation's compliance or capability to comply with the Act and the regulations in this part;”

**Comments:** *During the witness audit of a crops and wild crops inspection, the auditor observed that the inspector did not fully verify the operation's compliance with the USDA organic regulations. The inspector did not verify the operator's ability to maintain harvest and sales records that indicate crop quantities harvested and sold. This was a specific condition on the CCOF compliance report that was to be verified at inspection. Additionally, the inspector did not consistently verify records related to purchased inputs.*

**Corrective Action:** CCOF reviewed the performance of the inspector in question, including inspection reports, performance reviews, and field evaluations, and found that the inspector's shortcomings in this case were isolated and not part of a larger pattern. CCOF informed the inspector of the finding and reminded the inspector of the requirement to verify harvest and sales records via email. The inspector acknowledged the notification and confirmed understanding in writing. CCOF submitted the pertinent email communications to the NOP.

**AIA-520-22 – 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:** *CCOF's Organic System Plan (OSP) templates do not fully verify an operation's compliance with the USDA organic regulations. The OSP templates do not address the requirements of §205.201(a)(3), which require 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:** CCOF updated its certification contracts, renewal contract, and inspection checklist in November of 2022 to add questions that verify ongoing compliance with the requirements of §205.201(a)(3), which require operators to provide a description of their monitoring practices. On October 24, 2022, CCOF notified reviewers of the upcoming changes using the Cert Staff Weekly Digest. Inspectors were trained on the updates on February 6, 2023. As a result, CCOF now confirms details related to OSP monitoring at three different stages of the certification process: during the evaluation of new applications, during the inspection, and at contract renewal. CCOF submitted their revised CCOF Certification Contract, Inspection

Checklist, and CCOF Renewal Contract to the NOP as controlled documents. They also submitted the Weekly Digest excerpt that was circulated to staff and the training presentation delivered to inspectors.

**AIA-521-22 – Accepted.** 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:** *CCOF does not send operations a copy of their inspection report. The auditor’s interviews with certification staff found that, although inspection reports are made available on-line to clients, those clients that do not have access to email or the internet are not sent their inspection reports, only a notification that their inspection reports are available online.*

**Corrective Action:** CCOF began attaching a PDF of the inspection report to their “Inspection Finished” auto-email in June 2022. For clients who do not have email or internet access, staff now print the inspection report and mail it to the client. CCOF trained their staff on the new process via their Certification Staff Digest, which they submitted to the NOP. CCOF also submitted to the NOP an example of the “Inspection Finished” auto-email that contains an inspection report attachment.

**AIA-523-22 – 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:** *CCOF’s inspection report template for handling operations does not fully verify an operation’s compliance with the USDA organic regulations. The auditors’ review of the handler mass balance worksheet completed by inspectors showed that the worksheet is not adequate to record and verify that the quantities of organic products manufactured and sold balance with organic ingredients received and used in processing.*

**Corrective Action:** CCOF now requires that when an operation has both starting ingredient inventory and finished product inventory, the inspector must complete two mass balance worksheets: one for organic ingredients received and one for organic products manufactured and sold. CCOF updated their handler mass balance inspection checklist question to instruct inspectors in this regard. CCOF submitted to the NOP the checklist update and two Inspector Bulletins describing the new requirements. CCOF also submitted a link to recorded training that was provided on this topic on July 11, 2022, as well as samples of mass balance exercises submitted by an inspector since the new requirement was implemented.

**AIA-525-22 – Accepted.** 7 C.F.R. §205.403(c)(1) states, “The onsite inspection of an operation must verify: The operation's compliance or capability to comply with the Act and the regulations in this part;”

**Comments:** *During the witness audit of dairy inspection, the auditors observed that the inspector did not fully verify the operation’s compliance with the USDA organic regulations. The auditors observed the following issues:*

- 1) *The inspector did not calculate dry matter intake from actual days grazed or actual dry matter fed. The inspector accepted a nutritionist’s ration sheet in place of as-fed records for the milking group and did not note a concern that the operation did not have records of amount of feed fed for milking cows. Additionally, the auditor observed that inspection report templates do not ask inspectors to confirm the actual number of days grazed.*
- 2) *The inspector did not verify the operation’s compliance related to temporary confinement of cattle prior to calving.*

3) *The inspector did not conduct any traceback exercises for either the crop or livestock scopes. The livestock inspection report template does ask the inspector to carry out these exercises but does not ask the inspector to provide the data.*

**Corrective Action:** CCOF added new checkpoints to their inspection checklists in order to ensure verification of dry matter intake from pasture, including checkpoints for the inspector to note the number of days grazed and dry matter fed and a checkpoint for the inspector to confirm reasons for temporary confinement. CCOF also updated the inspector checklist to request that the inspector provide the data from the traceback audit exercises in order to verify that the audits were conducted according to the requirements. CCOF conducted training for livestock inspectors and reviewers on the updates on April 24, 2023.

**AIA-526-22 – 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:** *CCOF’s policy on pheromone traps does not demonstrate that CCOF fully complies with the requirements for accreditation. CCOF’s policy position #280 incorrectly states that pheromone traps/lures that do not have contact with soil or plants do not require review. Materials used for crop pest control must comply with all the requirements of §205.206 and therefore must be reviewed for compliance with all the requirements.*

**Corrective Action:** CCOF will update their material review policy on hormones to properly distinguish between pheromone use for pest monitoring and pheromone use for pest control. CCOF will require that if the pheromone material is used for pest control within parcel boundaries, it must comply with §205.206. CCOF staff will be required to review of 100% of the ingredients in these products. CCOF submitted the draft policy to the NOP and will train Farm Department staff on the revised policy May 11, 2023, with immediate implementation of the policy.

**AIA-527-22 – 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:** *CCOF’s material review instructions do not demonstrate CCOF’s ability to fully comply with the requirements for accreditation. The CCOF’s Handler Department – Material Review Handler work instructions allow review staff to use the Nonorganic Processing Material Affidavit to confirm whether materials listed on §205.605(a) are nonsynthetic. The Nonorganic Processing Material Affidavit allows ingredient manufacturers to self-determine the nonsynthetic status of an ingredient without providing the manufacturing process of the ingredient.*

**Corrective Action:** CCOF revised its Nonorganic Processing Material Affidavit so the manufacturer is required to provide additional details about the specific manufacturing processes that lead to nonsynthetic status. As a result, CCOF reviewers now determine the synthetic or nonsynthetic status, not the manufacturer. The revised affidavit is used for all new reviews of material inputs as well as periodic re-reviews of materials that have already been reviewed. CCOF submitted the affidavit along with the Certification Staff Weekly Digest #199, which notified staff of the new requirements and affidavit update.

**AIA-528-22 – Accepted.** 7 C.F.R. §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:** *CCOF does not always verify sufficient information to determine the compliance of input materials. A CCOF reviewer determined the nonsynthetic status of a pesticide active ingredient based on the manufacturer's self-determination of nonsynthetic status. CCOF did not review the manufacturing process information for the ingredient.*

**Corrective Action:** On March 9, 2022, CCOF updated the status of the material in their database and notified all operations linked to this material to inform them of the material's status change by email. CCOF submitted screenshots of the updated master material record from their database and email correspondence to affected clients. CCOF updated the Material Review Farm chapter of the Farm Work Instructions to state that reviewers must verify the synthetic or nonsynthetic status of an ingredient or material a manufacture states is nonsynthetic. CCOF also updated the email template reviewers use to request information from material manufacturers during material reviews; the template now includes a request for descriptions of manufacturing or extraction processes for ingredients contained in the material. CCOF submitted the revised material review section of the Farm Work Instructions and an example of an email information request to a manufacturer. CCOF also submitted the agenda for the February 2023 Farm Department Meeting, where staff received training on this topic.

**AIA-529-22 – Accepted.** 7 C.F.R. §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:** *CCOF did not appropriately determine the compliant use of an input material. The auditor's review of certification files and interviews with certification staff found that CCOF inappropriately approved a pesticide containing a synthetic active ingredient that is not listed on the National List for use in pest control purposes.*

**Corrective Action:** CCOF reviewed all their approved materials under the relevant regulation, §205.601(e)(3), and determined that the approval in question was an isolated error. The source of the error was discussed with the reviewer who had erroneously approved the material to ensure their understanding of the mistake. On March 9, 2022, CCOF updated the status of the material in their database and notified all operations linked to this material to inform them of the material's status change by email. For each of those clients, CCOF added a notification to the inspection work order to ensure verification of compliance during the next inspection. CCOF submitted screenshots of the updated master material record from their database, email correspondence to client, and the action item that displays on inspection work orders for affected clients.



National Organic Program  
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**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>	CCOF Certification Services, LLC
<b>Physical Address</b>	2155 Delaware Avenue, Santa Cruz, California 95060
<b>Mailing Address</b>	2155 Delaware Avenue, Santa Cruz, California 95060
<b>Contact &amp; Title</b>	Ms. April Crittenden, Chief Certification Officer
<b>E-mail Address</b>	april@ccof.org
<b>Phone Number</b>	831-423-2263
<b>Reviewer(s) &amp; Auditor(s)</b>	Jon Frady, NOP Reviewer Jessica Walden, Onsite Auditor
<b>Program</b>	USDA National Organic Program (NOP)
<b>Review &amp; Audit Date(s)</b>	Review: 11/12/2020 - 2/11/2021 Audit: 04/20/2020 - 04/22/2020
<b>Audit Identifier</b>	NOP-12-20
<b>Action Required</b>	None
<b>Audit &amp; Review Type</b>	Mid-term Audit
<b>Audit Objective</b>	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of CCOF's certification system.
<b>Audit &amp; Determination Criteria</b>	<i>7 CFR Part 205, National Organic Program as amended</i>

CCOF Certification Services, LLC is a wholly owned subsidiary of CCOF, Inc. and was initially accredited as a USDA certifying agent on April 29, 2002. CCOF's accreditation scopes are Crops, Wild crop, Livestock, and Handling/processing. CCOF's main office is located in Santa Cruz, California. CCOF also has a one-person office in Zapopan, Jalisco, Mexico. The Mexico office is accredited by SENASICA and does not make any final decisions of certifications for the NOP program.

CCOF's list of certified operations at the time of the assessment consisted of 3,858 operations: Crops (2,620), Wild Crop (13), Livestock (166), and Handler/Processor (2,121). CCOF does not certify any grower groups. Certification services are provided to operations in the United States, Canada, and Mexico.

CCOF has 39 Farm/Handler Specialists and Coordinators, 86 inspectors (40 of those are staff inspectors), 20 Team Leads/Managers/Supervisors, seven Certification Operations Assistants and Certification Specialists, four Executive Assistants, and two Materials/Business Information Specialists.

#### **NOP DETERMINATION:**

NOP reviewed the onsite audit results to determine whether CCOF's corrective actions adequately addressed previous noncompliances. NOP also reviewed any corrective actions submitted as a result of noncompliances issued from Findings identified during the onsite audit.

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.

#### **Non-compliances from Prior Assessments**

**AIA-1030-20 – Cleared.**

**AIA-1031-20 – Cleared.**

**AIA-1032-20 – Cleared.**

**AIA-1033-20 – Cleared.**

**AIA-1034-20 – Cleared.**

**AIA-1046-20 – Cleared.**

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

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



**AIA-1152-20 – 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:** *CCOF does not fully implement the NOP’s international organic trade arrangement policies and procedures, which are outlined in the NOP’s International Trade Policies resources. The auditor identified the following issues:*

- *For products exported under the US – Japan Equivalency arrangement, the TM 11 export certificate does not include the statement: “Certified in compliance with the terms of the US Japan Organic Equivalency Arrangement.”*
- *For products exported under the US – Korea Equivalency arrangement, the NAQS Import certificate does not include the statement: “Certified in compliance with the terms of the US Korea Organic Equivalency Arrangement.”*
- *For one operation that exports wine under the US – EU Equivalency Arrangement, the retail labels did not include CCOF’s assigned EU code.*
- *For one processing operation importing certified EU organic ingredients, a review of the inspection report dated 8/08/2019 indicated that a NOP import certificate was signed by the exporter, not the certifier. A review of the 11/12/2019 CCOF Compliance Report issued to the operation revealed that CCOF did not identify this as an issue.*

**Corrective Action:** CCOF updated the TM-11 and NAQS documents to include the accurate statements in the Remarks field (TM-11) and Attestation field (NAQS) and notified their International Specialist where these statements were located on the NOP website. CCOF also updated their labeling guide to reflect the EU labeling requirements for NOP certified exported products. The updated International Labeling Guide was submitted with their corrective actions. CCOF followed up with their certified operator to ensure that they are aware that they need to add a certifier code going forward. CCOF re-trained the reviewer on the requirements of the NOP import certificate for organic products imported from the EU, and evidence regarding the reviewer’s awareness of the requirements was submitted to the NOP as verification. The updated TM-11 and NAQS documents are accurate and are available on CCOF’s website. The TM-11 and NAQS forms are quality controlled and any updates or potential removal of required statement would be prevented by the Quality Manager. CCOF will continue to monitor the USDA and other government body resources for changes to international trade arrangements and record those changes. In addition, CCOF plans to hire a staff person in their International program in 2021. A draft of the Job Description for this role was submitted. The Handler Department and the International Specialist completed the NOP’s Organic Integrity Learning Center’s “Import Oversight Essentials” trainings in May and June 2020. The training was discussed at a Handler Department meeting on June 10, 2020. Evidence of training was submitted with the corrective action.

## NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

### AUDIT AND REVIEW PROCESS

An onsite renewal assessment of CCOF Certification Services, LLC (CCOF) organic program was conducted on April 25-27, 2017. The National Organic Program (NOP) reviewed the auditor's report to assess CCOF's compliance to the USDA organic regulations. This report provides the results of NOP's assessment.

### GENERAL INFORMATION

<b>Applicant Name</b>	CCOF Certification Services, LLC (CCOF)
<b>Physical Address</b>	2155 Delaware Ave Suite 150, Santa Cruz, CA 95060
<b>Mailing Address</b>	2155 Delaware Ave Suite 150, Santa Cruz, CA 95060
<b>Contact &amp; Title</b>	Kelly Lehman Goswamy, Quality Manager; Jody Biergiel Colclough, Director of Certification Operations
<b>E-mail Address</b>	<a href="mailto:Accreditation@ccof.org">Accreditation@ccof.org</a>
<b>Phone Number</b>	(831) 423.2263, ext. 6255 & 6247
<b>NOP Reviewer On-Site Auditors</b>	Jason Lopez, NOP Reviewer Miguel Caceres, Lead Auditor; Rebecca Claypool, Second Auditor On-site Auditors.
<b>Program</b>	USDA National Organic Program (NOP)
<b>NOP Review Audit Dates</b>	NOP assessment review: October 26, 2017 Onsite audit: April 25-27, 2017 Review Audit: May 24, 2017
<b>Audit Identifier</b>	NP7115MMA
<b>Action Required</b>	None
<b>Audit &amp; Review Type</b>	Renewal Assessment
<b>Audit Objective</b>	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of CCOF's certification
<b>Audit &amp; Determination Criteria</b>	<i>7 CFR Part 205, National Organic Program as amended</i>
<b>Audit &amp; Review Scope</b>	CCOF's certification services in carrying out the audit criteria during the period: June 2014 through April 2017

The National Organic Program (NOP) conducted an on-site renewal assessment of the CCOF Certification Services, LLC (CCOF) organic certification program on April 25 – 27, 2017.

CCOF is a wholly-owned subsidiary of CCOF, Inc. and was initially accredited as a USDA certifying agent on April 29, 2002. CCOF's accreditation scopes are crops, wild crops, livestock, and handling/processing. CCOF's main office is located in Santa Cruz, California. CCOF also has a one-person office in Zapopan, Jalisco, Mexico. The Mexico office is solely accredited by SENASICA and does not make any final decisions of certifications. All certification services are performed at the CCOF main office in Santa Cruz, California.

CCOF's list of certified operations at the time of the assessment consisted of 3,380 operations: Crops (2,396), Wild Crops (7), Livestock (193), and Handler/Processor (1,724). CCOF does not certify any grower groups. Certification services are provided to operations in the following countries: United States, Canada, and Mexico.

As part of the onsite audit activities, two witness audits and one review audit was conducted. Witness audits of an annual, announced inspection of a livestock operation and an unannounced inspection of a crop operation were conducted. A review audit of a handling operation, which receives, processes, and repacks vegetable crops, was conducted.

## **NOP DETERMINATION**

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

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

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

**NP7115MMA.NC1 – Accepted** - 7 C.F.R. §205.662(c)(1) states, "When rebuttal is unsuccessful or correction of the noncompliance is not completed within the prescribed time period, the certifying agent or State organic program's governing State official shall send the certified operation a written notification of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the noncompliance.... The notification of proposed suspension or revocation of certification shall state: The reasons for the proposed suspension or revocation...."

**Comments:** *The following two issues were identified during a review of notifications of noncompliance and proposed suspension issued to an operation: (1) The notice of noncompliance had five issues the operation was to address and the notice of proposed suspension indicated 11 issues. (2) The notice of proposed suspension did not include the reason for the proposed suspension as it was included in the notice of noncompliance which was issued prior to the proposed suspension notification.*

**Corrective Action:** CCOF has amended its work instructions to state that only existing issues can be escalated to a proposed suspension/revocation. CCOF also created an Adverse Action Checklist for staff use when preparing a proposed adverse action, and retrained staff on the adverse action process on September 12, 2017.

**NP7115MMA.NC2 – Accepted** - 7 CFR §205.662(c)(3) and (4) states, "When rebuttal is unsuccessful or correction of the noncompliance is not completed within the prescribed time period, the certifying agent or State organic program's governing State official shall send the certified operation a written notification of proposed suspension or revocation of certification of the entire

operation or a portion of the operation, as applicable to the noncompliance.... The notification of proposed suspension or revocation of certification shall state: The impact of a suspension or revocation on future eligibility for certification; and the right to request mediation pursuant to §205.663 or to file an appeal pursuant to §205.681.”

**Comments:** *The following three issues were identified during a review of a proposed suspension issued to an operation: (1) The notice of proposed suspension issued to an operation did not include the impact of a suspension; (2) the option to request mediation; (3) and, the option to file an appeal.*

**Corrective Action:** CCOF changed its adverse action communication system to include all the required elements of a notification of proposed suspension in the CCOF Compliance Report issued to an operation. CCOF previously stated the impact of a suspension and the options to request mediation or file an appeal in the body of an email/cover letter that accompanied the compliance report.

## NATIONAL ORGANIC PROGRAM REPORT

### AUDIT AND REVIEW PROCESS

The U.S. Department of Agriculture, Agricultural Marketing Service, National Organic Program (NOP) conducted a mid-term accreditation assessment of CCOF Certification Services, LLC from June 10-12, 2014 in Santa Cruz, California. The auditor also conducted a witness audit on May 14, 2014 in Buda, Texas. The NOP reviewed the report on June 26, 2014 to determine CCOF's capability to operate as a USDA accredited certifier.

### GENERAL INFORMATION

<b>Applicant Name:</b>	CCOF Certification Services, LLC
<b>Physical Address:</b>	2155 Delaware Ave, Suite 150, Santa Cruz, CA 95060
<b>Mailing Address:</b>	2155 Delaware Ave, Suite 150, Santa Cruz, CA 95060
<b>Contact &amp; Title:</b>	Jake Lewin, Chief Certification Officer
<b>E-mail Address:</b>	<a href="mailto:jake@ccof.org">jake@ccof.org</a>
<b>Phone Number:</b>	831-423-2263
<b>Auditor(s) and Reviewer (s):</b>	Betsy Rakola, NOP Reviewer; Marty Friesenhahn, On-site Auditor(s).
<b>Program:</b>	USDA National Organic Program (NOP)
<b>Audit and Review Date(s):</b>	The NOP reviewed the audit report on June 26, 2014.
<b>Audit Identifier:</b>	NP4134BBA
<b>Action Required:</b>	None
<b>Audit and Review Type:</b>	Mid-Term Assessment
<b>Audit Objective:</b>	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of [ACA acronym]'s certification system.
<b>Audit and Determination Criteria:</b>	<i>7 CFR Part 205, National Organic Program as amended</i>
<b>Audit and Review Scope:</b>	CCOF's certification services in carrying out the audit criteria during the period: June 2012 – June 2014

### ORGANIZATIONAL STRUCTURE:

CCOF Certification Services, LLC (CCOF) is a wholly-owned subsidiary of CCOF, Inc. Both are distinct entities with CCOF, LLC as the organic certification agency and CCOF, Inc. as the organic advocacy foundation for providing educational and promotional outreach. CCOF, LLC is a non-profit organization currently approved as a certifying agent to the USDA National Organic Program (NOP) for the scopes of crops, livestock, handling/processing and wild crops. CCOF was accredited as a certifying agent to the NOP on April 29, 2002 and in June 2008 for

the wild crop scope. CCOF currently has 2,624 clients certified to the NOP standard; 1,934 for crops, 165 for livestock, 1,276 for handling, and 12 for wild crops. CCOF certifies clients to the USDA organic regulations in the United States, Canada, Mexico, and the United Kingdom. The majority of clients are certified in the state of California and other U.S. states. CCOF does not currently certify any grower groups. All certification activities are carried out of the main office in Santa Cruz, California.

CCOF also operates two programs accredited to ISO Guide 65 by the International Organic Accreditation Service (IOAS). The CCOF Canadian Organic Regime (COR) Compliance Program is for operations located in Canada. The CCOF International Standard Program (ISP) has been approved by the European Commission as equivalent to the EU criteria and standards for products originating from the U.S., Mexico, or Canada. This program has also been approved by the Federal Office for Agriculture (FOAG) of Switzerland for products being exported from Mexico to Switzerland. CCOF is currently reviewing their quality system and transitioning to ISO Guide 17065.

The CCOF personnel consists of the President, 21 Certification Specialists, 5 Certification Operations Assistants, 3 staff inspectors, 64 contract inspectors, a Quality Manager, and 12 various certification supervisors, coordinators and directors. CCOF also has a 5 member Management Committee, which acts as an advisory board over the President but has no certification decision making roles.

The current conflict of interest disclosure reports and confidentiality statements were available for certification staff members and subcontracted inspectors. A review of the files and interviews conducted verified that the organic certification staff had sufficient experience, training, and education or a combination thereof in agriculture, organic production, and organic handling. A review of training records indicated that all staff, inspectors, and sub-contracted inspectors had received current training on the NOP regulations and requirements.

### **CERTIFICATION PROCESS:**

The CCOF certification process begins with the “New Application Package” including certification information and documents which are provided by e-mail or through the CCOF website. The completed application documents including the organic system plans are reviewed by Certification Specialists for completeness and compliance. Once the application is approved the inspector is assigned by the Inspections Supervisor. The inspections are usually conducted by contract inspectors but could also be conducted by staff inspectors.

After inspection, the completed Organic System Plans (OSP), inspection reports, and other documents are reviewed by Certification Specialists which make the final certification decisions including any possible non-compliances or requests for additional information. Upon certification, organic certificates are issued which include a client profile listing products, parcels, or acreage certified as applicable.

At the end of the calendar year, CCOF sends clients a “Continuation of Certification” contract and invoice for continuing certification. The changes to the Organic System Plans are required to be submitted annually at this time or can be submitted as required by changes throughout the

year. The Certification Specialists also review the updated information and make the decisions for continuing certification. Organic certificates are updated annually or as certificate information changes. Material inputs and labels are reviewed by Certification Specialists with the initial application, annual updates or through the year as needed. The certification process is completed and monitored through a computerized electronic system called “e Cert” which maintains checks and balances for the certification process. Certification Supervisors or Certification Directors are also qualified to conduct any of the certification reviews and for making final certification decisions.

CCOF also has procedures for verification and oversight activities of International exports and Import activities for Canada, Japan, Taiwan, and the European Union. A review of these activities and oversight were confirmed during the on-site audit.

#### **ADMINISTRATIVE RECORDS AND PROCESSES:**

CCOF has a Quality Management System Manual, Certification Services Program Manual, and additional forms, procedures, and documents used for NOP certification activities. Forms and letters reviewed for the NOP certification activities were found to meet NOP requirements. Organic System Plans can be completed electronically and include questions to direct the client to the applicable sections to be completed. CCOF conducts internal audits and has an annual program review relating to requirements that are specific to the NOP program. Non-conformances are identified and corrective actions are implemented as needed. Annual reports and updates are submitted to the NOP as required. Training is both internal and external, and both training records and documentation have been maintained. Refresher training or additional training is completed as needed. CCOF also includes and incorporates shadow and witness inspection training for all certification staff.

#### **SUMMARY OF WITNESS INSPECTIONS AND REVIEW AUDITS CONDUCTED:**

The audit included one review audit and a witness inspection. The witness inspection was a renewal inspection of an organic farm in Watsonville, CA that produces organic apples and berries. The renewal inspection was conducted by a contract inspector. A detailed inspection was observed including the verification of the Organic System Plan and the applicable NOP requirements. An exit interview was conducted providing a summary of the inspection results. The inspector was very knowledgeable of the NOP requirements and the process of conducting an organic inspection for CCOF.

The review audit included a processor in Buda, TX that had their initial organic certification through CCOF earlier in the year. This company produces 3 different types of organic salsas and also produces various conventional salsas and sauces. The review audit confirmed that CCOF completed the initial certification process as required and was reviewing and verifying the updated changes to the Organic System Plan. The review audit also confirmed the results of the initial inspection and the procedures and process listed in the organic system plan met the requirements of the NOP Standards.

#### **NOP DETERMINATION**

The NOP reviewed CCOF’s onsite audit report. The audit did not result in any noncompliances.



## Livestock and Seed Program Grading and Verification Division Quality System Audit Report

### AUDIT INFORMATION

<b>Applicant Name:</b>	CCOF Certification Services, LLC
<b>Est. Number:</b>	N/A
<b>Physical Address:</b>	2155 Delaware Avenue, Suite 150, Santa Cruz, CA 95060
<b>Mailing Address:</b>	2155 Delaware Avenue, Suite 150, Santa Cruz, CA 95060
<b>Contact &amp; Title:</b>	Jake Lewin, Certification Services Director
<b>E-mail Address:</b>	<a href="mailto:jake@ccof.org">jake@ccof.org</a>
<b>Phone Number:</b>	(831) 423-2263
<b>Auditor(s):</b>	Nikki Adams, Lead Auditor and Betsy Rakola, Auditor
<b>Program:</b>	USDA National Organic Program (NOP)
<b>Audit Date(s):</b>	March 2, 2012; April 5-6, 2012; April 30, 2012; and June 5-7, 2012
<b>Audit Identifier:</b>	NP2062ADA
<b>Action Required:</b>	Yes
<b>Audit Type:</b>	Corrective Actions/ Renewal Assessment
<b>Audit Objective:</b>	To verify continuing compliance to the audit criteria; and to verify the implementation and effectiveness of corrective actions in addressing the noncompliances identified during the 2009 Mid-Term Audit.
<b>Audit Criteria:</b>	7 CFR Part 205 National Organic Program, Final Rule, dated December 21, 2000; updated May 16, 2012.
<b>Audit Scope:</b>	The company's quality manuals including personnel, processes, procedures, facilities, and related records.
<b>Location(s) Audited:</b>	CCOF Certification Services in Santa Cruz, CA; Atlanta Farms in Ripon, CA (Crop); George Bianchi Dairy in Petaluma, CA (Livestock); McEvoy of Marin, LLC in Petaluma, CA (Wild Crop); and East Coast Fresh Cuts in Savage, MD (Handler).

**GENERAL INFORMATION:** CCOF Certification Services, LLC (CCOF) is a wholly owned subsidiary of CCOF, Inc. Both are distinct entities with CCOF, LLC as the organic certification agency and CCOF, Inc. as the organic advocacy foundation for providing educational and promotional outreach. CCOF, LLC is a non-profit organization accredited as a certifying agent on April 29, 2002 to the National Organic Program (NOP) for crops, livestock, and handling operations. In June 2008, CCOF was approved by the NOP to include wild crop to the scope of accreditation. The CCOF client list as of June 4, 2012, had approximately 2,974 certified clients with 1,908 crop, 150 livestock, 907 handling, and 9 wild crop operations certified to the NOP. The clients are certified in the U.S., Canada and Mexico. The majority of clients are certified in the State of California and other U.S. states.





## **Livestock and Seed Program Grading and Verification Division Quality System Audit Report**

### **FINDINGS**

Observations made, interviews conducted, and procedures and records reviewed verified that CCOF is currently operating in compliance to the requirements of the audit criteria. The corrective actions for the noncompliances identified during the 2009 Mid-Term Audit were verified and found to be implemented and effective; therefore, the noncompliances were cleared. There were no noncompliances identified during the assessment.

**NP9257BBA.NC1 - Cleared NP9257BBA.NC2 – Cleared NP9257BBA.NC3 - Cleared**



**Livestock and Seed Program  
Audit, Review, and Compliance Branch  
Quality System Audit Report**

**AUDIT INFORMATION**

<b>Applicant Name:</b>	California Certified Organic Farmers (CCOF)
<b>Est. Number:</b>	N/A
<b>Physical Address:</b>	2155 Delaware Avenue, Suite 150; Santa Cruz, CA 95060
<b>Mailing Address:</b>	2155 Delaware Avenue, Suite 150; Santa Cruz, CA 95060
<b>Contact &amp; Title:</b>	Jake Lewin, Certification Services Manager
<b>E-mail Address:</b>	<a href="mailto:jake@ccof.org">jake@ccof.org</a>
<b>Phone Number:</b>	(831) 423-2263
<b>Auditor(s):</b>	Martin Friesenhahn
<b>Program:</b>	USDA National Organic Program (NOP)
<b>Audit Date(s):</b>	March 16, 2010
<b>Audit Identifier:</b>	NP9257BBA
<b>Action Required:</b>	No
<b>Audit Type:</b>	Corrective Action Audit
<b>Audit Objective:</b>	To verify that corrective actions adequately address the non-compliances identified during the mid-term audit.
<b>Audit Criteria:</b>	7 CFR Part 205 National Organic Program, Final Rule, dated December 21, 2000; revised February 17, 2010
<b>Audit Scope:</b>	The company's submitted corrective actions.
<b>Location(s) Audited:</b>	Desk

California Certified Organic Farmers (CCOF) submitted corrective actions dated October 20, 2009, for NP9257BBA.NC1 and NP9257BBA.NC2 that addressed the non-compliances from the on-site mid-term audit conducted September 14-17, 2009. These two corrective actions were received by the auditor on January 28, 2010. CCOF submitted corrective actions dated March 2, 2010, for the re-instated non-compliance NP9257BBA.NC3 from the mid-term audit. The corrective actions for the re-instated non-compliance were received by the auditor on March 4, 2010, with additional information received on March 5, 2010.

**FINDINGS**

The corrective actions submitted by CCOF adequately addressed the non-compliances identified during the mid-term audit.

**NP9257BBA.NC1 - Adequately Addressed** - NOP §205.403(c) Verification of information states, "The on-site inspection of an operation must verify: (1) The operation's compliance or capability to comply



## Livestock and Seed Program Audit, Review, and Compliance Branch Quality System Audit Report

with the Act and the regulations in this part; (2) That the information, including the organic production or handling system plan... accurately reflects the practices used or to be used by the applicant for certification or by the certified operation; and (3) That prohibited substances have not been and are not being applied to the operation..." *Some of the records and portions of the operation were not reviewed during the observation of the livestock inspection.*

- *The OSP on file for this operation did not list any inputs for poultry and the operation is also a conventional dairy. During the livestock (poultry) witness inspection it was observed that a pallet, as well as, a rack approximately 6x2x5' was filled with what appeared to be livestock health products. The inspector did not ask what the products were or look at on the rack to verify that none are used for the poultry operation.*
- *The inspector checked two feed tags and invoices for feeds that were listed in the OSP. The invoices stated organic and the feed tags included the USDA Organic seal and the word organic. The inspector did not however verify the organic certificates from the feeds to confirm that they were actually certified NOP organic. In addition, the section in the OSP was not checked off by the client that the Organic Certificates are obtained for the feed.*

**Corrective Action:** CCOF has determined the finding to be an individual performance issue instead of a systematic issue. Therefore, the CCOF Inspection Operations Director completed an Inspection Evaluation Form dated September 16, 2009, addressing the deficient areas that were observed during the livestock inspection. The Inspection Operations Director has also met with and reviewed the findings with the inspector to make sure that the inspector has the intent and capability to correct the oversights in future livestock inspections.

**NP9257BBA.NC2 – Adequately Addressed** - NOP§205.662(a)(1-3) states, "When an inspection, review, or investigation of a certified operation by a certifying agent or a State organic program's governing State official reveals any non-compliance... a written notification of non-compliance shall be sent to the certified operation. Such notification shall provide: (1) A description of the non-compliance; (2) The facts upon which the notification of non-compliance is based, and (3) the date by which the certified operation must rebut or correct each non-compliance and submit supporting documentation of each such correction when correction is possible."

If applicable, CCOF issues a Request for Information (RFI) with the letter for additional information or the continuation of certification letter. The letter includes a timeframe to submit the information which includes the NOP Section which applies to the requested information. The letter also states, "If you are unable to provide the information requested by the date then to please submit a written explanation of the reason. CCOF must receive a written response by the requested date or we are required to issue a Notice of Non-compliance." *In 4 of 11 files reviewed the clients had not responded to the certification letters or submitted the requested information within the 30 day period as requested by CCOF. In addition, there was no evidence that the required information was submitted in these four files or that CCOF issued any non-compliances to these clients. The requested information from these 4 files were from 4 to 5 months past due.* **Corrective Action:** CCOF has revised the letter template for requesting information to include that a non-compliance may be issued or that CCOF may require an additional inspection to verify the information at the client's expense. It was stated that this would allow CCOF to utilize deadlines to get requested information in the situations that would not require the issuance of non-compliances.



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CCOF submitted information pertaining to the status of the four clients and the actions and corrective actions that have taken place. CCOF has sufficiently followed up or has received the requested information pertaining to the previous four clients.

CCOF is in the process of implementing a detailed system for tracking and following up with clients on a monthly basis that have outstanding issues. The system tracks clients with outstanding requests and requires an e-mail reminder and phone call requests before the possible issuance of a Notice of Non-compliance. It was mentioned that this system had been in use for the Handler Department and is being expanded throughout both CCOF certification departments (Grower and Livestock). In addition, CCOF is increasing the Compliance Team from two to four members to follow up monthly on the overdue requests. CCOF will also require the inspectors to use digital cameras in 2010 to improve communication and to help avoid the requests for some additional information.

**NP9257BBA.NC3 - Adequately Addressed** - NOP § 205.239(a) states, "The producer of an organic livestock operation must establish and maintain livestock living conditions which accommodate the health and natural behavior of animals, including: (1) Access to the outdoors, shade, shelter, exercise areas, fresh air, and direct sunlight suitable to the species, its stage of production, the climate, and the environment." *A review of the on-site witness inspection and two of three additional poultry files reviewed showed that access to the outdoors was limited to a range of from 2 months to 4 ½ months of age.* **Reason for Withdrawal:** This non-compliance has been withdrawn pending further guidance from NOP. **Reason for Reinstatement:** After further discussion, the NOP has determined that this withdrawn finding is fact a non-compliance.

- *During the livestock (poultry-laying hens) witness inspection it was found that the client's Livestock OSP (L4.0, section A 7) Access to Outdoors/ Temporary Confinement states that access to the outdoors is limited for day old chicks to 2 months of age. The reason stated being 'the chicks are weak and need to be under heat lamps'. The inspector asked about confinement and the clients re-iterated the above and that the heat lamps are being turned on at night and that the temperature at night is around 52°F currently. The weather during the inspection was approximately 85°F. No non-compliance or issue was noted by the inspector regarding access to the outdoors for the poultry. **Corrective Action:** The operation submitted an updated OSP to more fully describe the conditions under which the pullets are kept in heated areas to protect their health. A letter dated November 25, 2009, from CCOF to the client verified that the updated OSP was consistent with the practices observed during the inspection. In addition, CCOF reminded the client to record any period when the poultry are temporarily confined and to update the OSP if the poultry are confined for any other reason not currently listed in their OSP.*
- *One client file reviewed (Layer) has two operation/sites under their certification. Both sites are based in Southern California and state in their OSP's section L4.0, A 2 that the weather is 'dry and warm'. Section L4.0, A,7 for one site states that the access is 'none at this time'. The inspection found that the no access was due to a recommendation of their corporate vet due to a Avian Influenza outbreak in the fall of 2008. CCOF issued a non-compliance report and the client responded immediately with corrective action stating that they feel the risk 'has lessened and the birds will be allowed access to the outdoor areas as soon as weather permits. Going forward the*



## Livestock and Seed Program Audit, Review, and Compliance Branch Quality System Audit Report

*birds will only be restricted from the outdoor area when AI has been detected in our local area and when weather conditions are cold and wet.* CCOF accepted this and issued a Letter of Non-Compliance Correction on 2/27/09. The 2009 inspection has not yet occurred and there is no unannounced inspection report in this client's file for follow-up. A second site under this client states in section L 4.0, section A 7 a that access to the outdoors is granted at '18 wks- Layer Age'. This is not noted as non-compliance or as an issue in the inspection report or reviews.

**Corrective Action:** CCOF conducted an unannounced inspection of the operation on October 5, 2009, and verified the operation to be in continued compliance with the NOP regulations. A letter dated November 25, 2009, from CCOF to the client confirmed the results of the unannounced inspection and stated that the OSP was updated to remove the second location and that the OSP included allowing layers to be confined due to inclement weather for approximately 14 days per year. The letter by CCOF also reminded the client to record any period when the poultry are temporarily confined and to update the OSP if the poultry are confined for any other reason not currently listed in their OSP. CCOF had also conducted the annual inspection on December 7, 2009, and the inspection report verified the operation to be in continued compliance to the NOP regulations.

- *A second client file's (Layer) Livestock OSP, section L4.0, A 2 Livestock Living Conditions description as 'Mediterranean Climate, 3000', winter temperatures 25F most seasons, variable snowfall. Section L 4.0, A 7a states the age when they are granted access as 'When over three months and weather allows'. Also, Hens are confined approximately 0-90 days based on age, health, and weather during the year. This is not noted as a non-compliance or as an issue in the inspection report or reviews. **Corrective Action:** The operation submitted an updated OSP and is no longer raising organic birds. A letter dated November 25, 2009, from CCOF to the client addressed the removal of livestock from the organic operation. The revised organic certificate and client profile dated January 27, 2010, did not include livestock.*