



National Organic Program Accreditation Assessment Checklist	
Date:	
Assessment Identifier:	
Assessment Activity: (select one)	<input type="checkbox"/> Documentation Adequacy Review <input type="checkbox"/> Pre-decisional Assessment <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Mid-Term Assessment <input type="checkbox"/> Renewal Assessment <input type="checkbox"/> Corrective Action Review <input type="checkbox"/> Corrective Action Assessment <input type="checkbox"/> Other _____
Company Information	
Name of Company:	
Company Address:	
City, State, Zip:	
Contact Name:	
Title:	
Phone #:	
Email:	
Location(s) of Program Activities:	
Standards Applied:	
Scope of Program Activities:	
Countries of Operations:	
Assessment Team	
Team Leader:	
Second Auditor:	
Other (Identify Role):	



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PLANNING AND SCHEDULING OF THE ASSESSMENT

- Send email using the appropriate template to schedule the on-site assessment. This should be conducted as early as possible. Planning of foreign assessments should start at least 6 months prior to the anticipated assessment date. Scheduling of domestic assessments should commence no later than 3 months prior to the anticipated assessment date.
- Once assessment date is scheduled with the ACA, select satellite offices and witness audit sites to be visited during the assessment.
- After assessment sites and on-site schedule has been finalized, complete the audit plan, cost estimate, and appropriate letter regarding the assessment.
- Send the above information via email using the appropriate template. *Remember to include attachments in the email and CC all of the personnel listed on the "Letter".*

PRE-ASSESSMENT ACTIVITIES

- Verify that LS-313 Application for Service is on file and is the current version; not applicable for the pre-decisional assessment.
- Obtain & review the most recent copy of program documentation from the company.

Title of documentation:	
Date or revision number of documentation:	

- Review previous audit report.
- Review previous corrective actions report, as applicable.
- Review previous notices of noncompliance issued to the ACA.
- Receive approval to conduct the assessment activity by obtaining a signed copy of the audit plan and cost estimate from the client.



ON-SITE ASSESSMENT ACTIVITIES

OPENING MEETING

The purpose of the opening meeting is to confirm the assessment plan, provide a short summary of how the assessment activities will be undertaken, confirm communication channels, and provide an opportunity for the client to ask questions.

- Introduction of participants and their roles.
- Confirmation of assessment objectives, scope, and criteria.
- Confirmation of assessment timetable and other relevant arrangement.
- Review the assessment plan. Have there been any changes since it was approved?
No Yes - What are the changes?
- Review program documentation. Have there been any changes since the last assessment?
No Yes - What are the changes?
- Have findings from previous assessments been addressed? (if applicable)
Yes No
- Methods and procedures to be used to conduct the assessment.
- Confirmation of auditee's representative and formal communication channels.
- Confirmation that auditee will be kept informed of assessment process during the assessment.
- Confirmation that the resources and facilities needed by the assessment team are available.
- Confirmation of confidentiality matters.
- Confirmation of relevant work safety, emergency, and security procedures for the assessment team.
- Confirmation of the availability, roles, and identities of guides.
- The method of reporting, and explain that non-compliances (if any are identified) will not be classified as to severity.
- Provide an opportunity for the client to ask questions.
- Explain the conditions under which the audit would be terminated.
- Explain that audit findings and associated information is releasable under FOIA.
- Explain the audit appeal process.



Complete the following Attendance List:

Name	Title or Position	Opening	<u>Closing</u>



CHECKLIST SECTION I – General Information on Certification Process Table of Contents Closing Meeting Findings		
1	List locations of offices where key activities occur including key activities performed.	
2	Note the number of operations certified to the NOP at the time of the assessment.	Total: _____ NOP certified operations Crop: _____ Wild-crop: _____ Livestock: _____ Handlers: _____ Grower Groups: _____ Approximate Handler Types (optional): Processors: _____ Distributors: _____ Traders: _____ Retailers: _____
3	What does the ACA submit to applicants on initial application? §205.501(a)(8)	
4	How is the information, documents and or forms provided to those inquiring about certification (hard copy/electronic)?	
5	Who (job title/position description) conducts the initial review for completeness and ability to comply? Table 8	
6	Who (job title/position description) reviews labels and material inputs?	
7	How are inspectors selected / assigned for inspections?	
8	Are they staff inspectors or subcontracted?	
9	Who (job title/position description) makes the certification decision?	
10	Provide a brief description of the annual update process. §205.406 Table 3	
11	Who (job title/position description) reviews the inspection report, results of analysis conducted (as applicable), and information requested from and provided by the applicant? Table 8	
12	Who (job title/position description) makes the determination on whether to issue a notice of minor issues or non-compliance? Table 8	



CHECKLIST SECTION I – General Information on Certification Process		
Table of Contents Closing Meeting Findings		
13	When operations submit corrective actions or a rebuttal, who (job title/position description) reviews the materials and makes the determination if they are adequate? Table 8	
14	Are there any operations certified or undergoing the certification process which were re-instated after having been suspended or revoked?	
15	Does the ACA have a material evaluation program for liquid nitrogen fertilizers (LNF) with a nitrogen content greater than 3%?	
16	Does the ACA certify grower groups?	

PROGRAM REQUIREMENTS

- ⁽¹⁾ *Complies:* For each requirement, identify whether the certifying agent complies, does not comply, or that a requirement is not applicable with an “X”.
- ⁽²⁾ *Remarks:* Provide explanations and/or comments to present evidence of compliance or non-compliance, as applicable. If a requirement is not applicable include why it does not apply.

Exclusions: Sections not included or addressed in checklist
<p>§205.502 Applying for Accreditation – procedural requirements not addressed by auditors. §205.505 Statement of Agreement – Reference only. If requirements are not met, cite to the appropriate section(s) of §205.501. §205.510(c) – (e) NOP Administrator procedural requirements not addressed by auditors.</p>

§§205.400, 205.401 & 205.402 General Requirements, Application, and Review				
For audit purposes, §205.400 or §205.401 are to be referenced, as applicable. These are requirements for certified operations and not the ACA. If requirements are not met, cite to the appropriate section §205.402(a)(1) or (3) and <u>reference</u> this section. The application requirements are reviewed when completing the Certification File Review Worksheets. An overall assessment based on all files reviewed, information gathered during review of certification process, interviews, and Witness Audit Checklists should be made, then identify findings under appropriate requirement.				
CHECKLIST SECTION II	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
References: NOP 2605 Reinstating Suspended Organic Operations NOP Policy Memo 11-4 Verification of Materials NOP 5031 Certification Requirements for Handling Unpackaged Organic Products				
§§205.400(c) and 205.670(a) Is there any evidence that a certified operation denied				



§§205.400, 205.401 & 205.402 General Requirements, Application, and Review

For audit purposes, §205.400 or §205.401 are to be referenced, as applicable. These are requirements for certified operations and not the ACA. If requirements are not met, cite to the appropriate section §205.402(a)(1) or (3) and reference this section. The application requirements are reviewed when completing the Certification File Review Worksheets. An overall assessment based on all files reviewed, information gathered during review of certification process, interviews, and Witness Audit Checklists should be made, then identify findings under appropriate requirement.

CHECKLIST SECTION II	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
access to a representative of the Administrator, State, or ACA? Table of Contents				
§205.401 Are all applications complete and do the OSPs meet the requirements for an OSP? Table of Contents				Yes – as documented on Table 3 all applications reviewed were complete and met the requirements for an OSP. No – as documented on Table 3 all applications reviewed were not complete and/or did not meet the requirements for an OSP. As appropriate NC's have been identified on the Table 3.
§205.402(a)(1) Upon accepting applications does the ACA review the application for completeness? Table of Contents				Yes – as documented on Table 3 the ACA reviewed all applications for completeness. No – as documented on Table 3 the ACA did review not all applications for completeness. As appropriate NC's have been identified on the Table 3.
§205.402(a)(2) Does the review include making a determination if the applicant is in compliance or can comply with the requirements? Table of Contents				Yes – as documented on Table 3 all applications reviewed were reviewed by the ACA for compliance or the ability to comply. No – as documented on Table 3 not all applications were



§§205.400, 205.401 & 205.402 General Requirements, Application, and Review

For audit purposes, §205.400 or §205.401 are to be referenced, as applicable. These are requirements for certified operations and not the ACA. If requirements are not met, cite to the appropriate section §205.402(a)(1) or (3) and reference this section. The application requirements are reviewed when completing the Certification File Review Worksheets. An overall assessment based on all files reviewed, information gathered during review of certification process, interviews, and Witness Audit Checklists should be made, then identify findings under appropriate requirement.

CHECKLIST SECTION II	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
				reviewed by the ACA for compliance or the ability to comply. As appropriate NC's have been identified on Table 3, Tables 6a , 6b , or 6c .
<p>§205.402(a)(3) Does the ACA verify that an applicant, who previously applied to another certifying agent and received a notification of noncompliance or denial of certification, has submitted documentation to support the correction of any noncompliances identified in the notification of noncompliance or denial of certification? Table of Contents</p>				<p>Yes – as documented on Table 3 the ACA verified previous certification activities and results.</p> <p>No – as documented on Table 3 the ACA did not verify previous certification activities and the results on all applications received. As appropriate NC's have been identified on the Table 3.</p>
<p>§205.402(b)(1) Is the time from receiving the application materials and the review reasonable? Table of Contents</p>				<p>Yes – as documented on Table 1 the time from receiving the application materials and the reviews were reasonable.</p> <p>No – as documented on Table 1 the time from receiving the application materials and the reviews were not always reasonable.</p>
<p>§205.402(b)(1) Is the time between receiving an application and communicating the results of the review to an applicant reasonable? Table of Contents</p>				<p>Yes – as documented on Table 1 the time from receiving the application materials and communicating the results were reasonable.</p>



§§205.400, 205.401 & 205.402 General Requirements, Application, and Review				
<p>For audit purposes, §205.400 or §205.401 are to be referenced, as applicable. These are requirements for certified operations and not the ACA. If requirements are not met, cite to the appropriate section §205.402(a)(1) or (3) and <u>reference</u> this section. The application requirements are reviewed when completing the Certification File Review Worksheets. An overall assessment based on all files reviewed, information gathered during review of certification process, interviews, and Witness Audit Checklists should be made, then identify findings under appropriate requirement.</p>				
CHECKLIST SECTION II	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
				No – as documented on Table 1 the time from receiving the application materials and communicating the results were not always reasonable.
<p>§§205.402(b)(2) and 205.403(e)(2) Is a copy of the inspection report as approved by the ACA provided to that operation by the ACA? Table of Contents</p>				
<p>§205.402(c) Do any clients withdraw their application and if so, was the process in accordance with the requirements? Table of Contents</p>				

§205.403 Inspection				
<p>Based on review of Certification File Review Worksheets, information gathered during review of certification process, interviews, and Witness Audit Checklists.</p>				
CHECKLIST SECTION III	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
<p>§205.403(a)(1) Does the ACA conduct initial on-site inspections of each production unit, facility, and site that produces or handles organic products and that is included in the operation for which certification is requested, on all applicants? Also see Continuing Certification (205.406(b)) Table of Contents</p>				
<p>§205.403(b)(1) Are all inspections conducted within a reasonable time after the determination that the applicant appears to comply or can comply with the requirements? Table of Contents</p>				<p>Yes – as documented on Table 1 inspections were conducted within a reasonable time after the determination that the applicant appears to comply or could comply with the requirements.</p> <p>No – as documented on Table</p>



§205.403 Inspection				
Based on review of Certification File Review Worksheets, information gathered during review of certification process, interviews, and Witness Audit Checklists.				
CHECKLIST SECTION III	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
				<u>1</u> inspections were not always conducted within a reasonable time after the determination that the applicant appeared to comply or could comply with the requirements.
§205.403(b)(2) Are all inspections conducted when an authorized representative of the operation who is <u>knowledgeable</u> about the operation was present <u>and</u> at a time when land, facilities, and activities that demonstrate the operation's compliance with or capability to comply with the applicable provisions of subpart C could be observed? Table of Contents				
§205.403(c)(1) Do all inspections verify the operation's compliance or capability to comply with the Act and the regulations? Table of Contents				
§205.403(c)(2) Do all inspections verify that the information (including the OSP), provided in accordance with §§205.401, 205.406, and 205.200, accurately reflect the practices used or to be used by the applicant or certified operation? Table of Contents				
§205.403(c)(3) Do all inspections verify that prohibited substances had not been and were not being applied to the operation? Table of Contents Table 3				
§205.403(d) Do inspectors conduct an exit interview with an authorized representative of the operation, who is knowledgeable about the inspected operation, <u>to confirm the accuracy and completeness</u> of inspection observations and information gathered during the on-				



§205.403 Inspection

Based on review of Certification File Review Worksheets, information gathered during review of certification process, interviews, and Witness Audit Checklists.

CHECKLIST SECTION III	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
site inspection? Does the exit interview(s) address the need for any <u>additional information</u> as well as any <u>issues of concern</u> ? Table of Contents Table 3				

§205.404 Granting Certification

Based on review of Certification File Review Worksheets, information gathered during review of certification process, interviews, and Witness Audit Checklists.

CHECKLIST SECTION IV	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
References: <i>NOP 2603 Organic Certificates</i> <i>NOP 2605 Reinstating Suspended Organic Operations</i> <i>NOP Policy Memo 11-4 Verification of Materials</i>				
§205.404(a) Does the ACA meet the requirements of 205.404(a) by: reviewing the inspection report, sample results, and any additional information within a <u>reasonable time</u> after the inspection; granting certification in all cases where it is determined that the OSP and the applicant's operation are in compliance and is able to conduct operations in accordance with the plan; and (if the certification is granted and included requirements for the correction of minor noncompliances) <u>indicating</u> they have to be addressed within a specified time period as a condition of continued certification? Table of Contents				Yes – as documented on Table 1 and Table 3 the ACA met the requirements of 205.404(a) by reviewing the inspection report and additional documents within a reasonable time; granting certification when the applicants were in compliance; and indicating minor NC's had to be addressed within a specified time period. No – as documented on Table 1 and/or Table 3 the ACA did not meet the requirements of 205.404(a)...
§205.404(b) Does the ACA issue a certificate of organic operation in all cases where certification was granted?				Yes – as documented on Table 3 the ACA issued a certificate in all cases where



§205.404 Granting Certification

Based on review of Certification File Review Worksheets, information gathered during review of certification process, interviews, and Witness Audit Checklists.

CHECKLIST SECTION IV	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
Table of Contents				certification was granted. No – as documented on Table 3 the ACA did not issue a certificate in all cases where certification was granted.
<p>§205.404(b)(1) – (4) Do certificates issued by the ACA contain the required information?</p> <p>Do certificates issued by the ACA contain the additional information and statements recommended by NOP 2603? Table of Contents</p>				<p>Yes – as documented on Table 3 all certificates reviewed contained the required information.</p> <p>No – as documented on Table 3 not all certificates contained the required information. (b)(1) Name and Address (b)(2) Effective Date (b)(3) Category (b)(4) Certifying Agent Information</p> <p>Although not identified as a NC as documented on Table 3 not all certificates contained the additional information and statements as recommended by NOP 2603</p>

§205.405 Denial of Certification

Based on review of Certification File Review Worksheets (including Table 4 - Notice of Noncompliance/Adverse Action Worksheet). Document on Certification File Review Worksheet, “Table 5 - Notice of Noncompliance/Denial of Certification”.

CHECKLIST SECTION V	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	

References:
 NOP 2607 Disclosure of Information concerning USDA Accredited Certifying Agents and Certified Operations to the NOP
 NOP 4002 Enforcement Policy
 NOP Policy Memo 11-4 Verification of Materials

§205.405(a)				Yes – as documented on
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§205.405 Denial of Certification				
Based on review of Certification File Review Worksheets (including Table 4 - Notice of Noncompliance/Adverse Action Worksheet). Document on Certification File Review Worksheet, "Table 5 - Notice of Noncompliance/Denial of Certification".				
CHECKLIST SECTION V	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
<p>Does the ACA provide a written notification of <u>noncompliance</u> to all applicants in cases where there was a reason to believe, based on the review, that the applicant was not able to comply or was not in compliance with the requirements? Table of Contents</p>				<p>Table 5 the ACA provided a written notification of noncompliance to all <u>applicants</u> who were not able to comply or were not in compliance with the requirements.</p> <p>No – (state objective evidence, including NC’s identified on Tables 6a, 6b, or 6c)</p>
<p>§205.405(a) If the ACA issued any <u>combined notice</u> of noncompliance and denial of certification, does it meet the requirements for both notifications? Table of Contents</p>				<p>Yes – as documented on Table 5 the combined notice(s) of noncompliance and denial of certification which were issued met the requirements for both notifications.</p> <p>No – as documented on Table 5 the combined notice(s) of noncompliance and denial of certification which were issued did not meet the requirements for both notifications.</p> <p>NA – there were no combined notice(s) of noncompliance and denial of certification issued by the ACA.</p>
<p>§205.405(a)(1) – (3) Do all notices of noncompliance that were issued</p>				<p>Yes – as documented on Table 5 notices of</p>



§205.405 Denial of Certification				
Based on review of Certification File Review Worksheets (including Table 4 - Notice of Noncompliance/Adverse Action Worksheet). Document on Certification File Review Worksheet, "Table 5 - Notice of Noncompliance/Denial of Certification".				
CHECKLIST SECTION V	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
<p>contain the required information in accordance with §205.405(a)(1) – (3)? Table of Contents</p>				<p>noncompliance that were issued contained the required information.</p> <p>No – as documented on Table 5 notices of noncompliance that were issued did not contain the required information.</p>
<p>§205.405(c)(1) In cases when the applicant provided corrective actions or a rebuttal, does the ACA:</p> <p>evaluate the rebuttal or corrective actions taken and supporting documentation;</p> <p>issue the applicant an approval of certification if the corrective action or rebuttal is sufficient for the applicant to qualify for certification; or</p> <p>issue the applicant a written notice of denial of certification when the corrective action or rebuttal, <u>is not</u> sufficient for the applicant to qualify for certification? Table of Contents</p>				<p>Yes – as documented on Table 5 in cases when the <u>applicant</u> provided corrective actions or a rebuttal the ACA took appropriate action in accordance with 205.405(c)(1).</p> <p>No – as documented on Table 5 in cases when the <u>applicant</u> provided corrective actions or a rebuttal the ACA did not always take appropriate action in accordance with 205.405(c)(1).</p>
<p>§205.405(c)(2) Does the ACA issue a written notice of denial of certification to all applicants that failed to respond to the notification of noncompliance? Table of Contents</p>				<p>Yes – as documented on Table 5 the ACA issued a written notice of denial of certification to applicants that failed to respond to the notification of noncompliance.</p> <p>No – as documented on Table 5 the ACA did not issue a written notice of denial of certification to applicants that failed to respond to the notification of</p>



§205.405 Denial of Certification				
Based on review of Certification File Review Worksheets (including Table 4 - Notice of Noncompliance/Adverse Action Worksheet). Document on Certification File Review Worksheet, "Table 5 - Notice of Noncompliance/Denial of Certification".				
CHECKLIST SECTION V	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
				noncompliance.
§205.405(c)(3) Does the ACA provide all notices of approval or denials to the Administrator? Table of Contents				Yes – as identified under §205.501(a)(15)(i) all notices of approval or denials were submitted to the Administrator. No – as identified under §205.501(a)(15)(i) not all notices of approval or denials were submitted to the Administrator.
§§205.405(d) and 205.405(d)(1) – (3) Do all issued denials of certification contain the required information in accordance with §§205.405(d) and 205.405(d)(1) – (3)? Table of Contents				Yes – as documented on Table 5 all denials of certification contained the required information. No – as documented on Table 5 not all denials of certification contained the required information. NA – the ACA did not issue any denials of certification.
§205.405(f) If the ACA received new applications for certification, which included a notification of noncompliance or a notice of denial of certification, does the ACA <u>treat the application as a new application</u> and begin a new application process? Table of Contents				



§205.406 Continuation of Certification

Based on review of Certification File Review Worksheets, information gathered during review of certification process, interviews, and Witness Audit Checklists. Describe the annual update process under “General information on Certification Process”, Checklist Section I. Document requirement evaluations on the Certification File Review Worksheets and “Table 4 - Notice of Noncompliance/Adverse Action Worksheet” as applicable.

CHECKLIST SECTION VI	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
References: <i>NOP 2607 Disclosure of Information concerning USDA Accredited Certifying Agents and Certified Operations to the NOP</i> <i>NOP 4002 Enforcement Policy</i> <i>NOP Policy Memo 11-4 Verification of Materials</i> <i>NOP 5031 Certification Requirements for Handling Unpackaged Organic Products</i>				
§205.406(a)(1) – (4) Do all certified operations submit an updated OSP and pay the annual certification fees as required by §205.406(a)(1) – (4)? Table of Contents				Yes – as documented on Table 3 all certified operations submitted an updated OSP and paid their annual certification fees as required. No – as documented on Table 3 not all certified operations submitted an updated OSP and/or pay their annual certification fees as required.
§205.406(b) Following the receipt of an updated OSP does the ACA review it to see if the requirements of §205.406(a) have been met? Table of Contents				Yes – as documented on Table 1 after receipt the ACA reviewed all updated OSP’s to see if they met the requirements. No – as documented on Table 1 the ACA did not review all updated OSP’s received to see if they met the requirements.
§§205.406(b) and 205.403(a)(1) Following the receipt of an updated OSP does the ACA within a reasonable time arrange and conduct an on-site inspection? Also see Onsite Inspection (205.403(a)(1)) Table of Contents				Yes – as documented on Table 1 after receipt of updated OSP’s the ACA conducted an on-site inspection within a reasonable time. No – as documented on Table



§205.406 Continuation of Certification

Based on review of Certification File Review Worksheets, information gathered during review of certification process, interviews, and Witness Audit Checklists. Describe the annual update process under “General information on Certification Process”, Checklist Section I. Document requirement evaluations on the Certification File Review Worksheets and “Table 4 - Notice of Noncompliance/Adverse Action Worksheet” as applicable.

CHECKLIST SECTION VI	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
				<u>1</u> after receipt of updated OSP’s the ACA did not conduct all on-site inspections within a reasonable time.
<p>§205.406(c) Does the ACA provide a written notification of noncompliance to all operations in accordance with §205.662 if the ACA had 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? Table of Contents §205.662(a) Table 3</p>				<p>Yes – as documented on Table 4 and §205.662(a) of this checklist; after the on-site inspection and a review of the information specified in §205.404 the ACA issued a notification of noncompliance to operations which were not in compliance with the requirements.</p> <p>No – as documented on Table 4 or Tables 6a, 6b, 6c, and §205.662(a) of this checklist; after the on-site inspection and a review of the information specified in §205.404 the ACA did not issue a notification of noncompliance to all operations which were not in compliance with the requirements.</p>
<p>§205.406(d) Does the ACA issue an updated certificate for all certified operations that were in compliance with the Act and the regulations if any information specified on the previous certificate changed? Table of Contents</p>				<p>Yes – as documented on Table 3 the ACA issued updated certificates for all certified operations that were in compliance with the Act when any information specified on the previous certificate changed.</p> <p>No – as documented on Table</p>



§205.406 Continuation of Certification				
Based on review of Certification File Review Worksheets, information gathered during review of certification process, interviews, and Witness Audit Checklists. Describe the annual update process under “General information on Certification Process”, Checklist Section I. Document requirement evaluations on the Certification File Review Worksheets and “Table 4 - Notice of Noncompliance/Adverse Action Worksheet” as applicable.				
CHECKLIST SECTION VI	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
				3 the ACA did not issue updated certificates for all certified operations that were in compliance with the Act when any information specified on the previous certificate changed.

§205.501 General Requirements for Accreditation				
CHECKLIST SECTION VII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
References: NOP 2000 General Accreditation Policies and Procedures NOP 2026 Submitting Annual Lists of Certified Operations NOP 2606 Processing Requests for Temporary Variances NOP Appeals Procedure: Adverse Action Appeal Process – Certified Operation or Applicant for Certification Policy Memo 11-8 California State Organic Program, Additional Requirements Granted				
§205.501(a)(1) Does the ACA have <u>sufficient expertise</u> in organic production or handling techniques to fully comply with and implement the terms and conditions of the organic certification program? Table of Contents				Yes – as documented on Table 8 and personnel interviews conducted (auditor should revise statement as appropriate). No – as documented on Table 8 and personnel interviews conducted the ACA does not have sufficient expertise in organic production and handling techniques to fully comply with the terms and conditions of the organic certification program (auditor should revise statement as appropriate and be specific to area that is lacking).
§205.501(a)(2)				



§205.501 General Requirements for Accreditation				
CHECKLIST SECTION VII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
Does the ACA <u>demonstrate the ability</u> to fully comply with the requirements for accreditation? Table of Contents				
§205.501(a)(3) Does the ACA <u>carry out the provisions</u> of the Act and the regulations, including the provisions of §§205.402 through 205.406 and §205.670? Table of Contents				
§205.501(a)(4) Does the ACA use a <u>sufficient number of adequately trained personnel</u> , including inspectors and certification review personnel, to comply with and implement the organic certification program? Table of Contents				<p>Yes – as documented on Table 8 and/or personnel interviews conducted the ACA had a sufficient number of adequately trained personnel (auditor should revise statement as appropriate).</p> <p>No – as documented on Table 8 and/or personnel interviews conducted the the ACA did not have a sufficient number of adequately trained personnel (auditor should revise statement as appropriate and be specific to area that is lacking; inspectors, certification personnel, etc...).</p>
§205.501(a)(5) Does the ACA ensure certification personnel <u>have sufficient expertise</u> in organic production or handling techniques to successfully perform the duties assigned? Table of Contents				<p>Yes – as documented on Table 8 the ACA ensured certification personnel had sufficient expertise in organic production or handling techniques.</p> <p>No – as documented on Table 8 and/or personnel interviews conducted the the ACA did not ensure certification personnel had sufficient expertise in organic</p>



§205.501 General Requirements for Accreditation				
CHECKLIST SECTION VII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
				production or handling techniques (auditor should revise statement as appropriate and be specific to area that is lacking; inspectors, certification personnel, etc...).
<p>§205.501(a)(6) Does the ACA conduct annual <u>performance evaluations</u> of all certification personnel in accordance with §205.501(a)(6)? Table of Contents</p>				<p>Yes – as documented on Table 8 the ACA conducted performance evaluations of all certification personnel as required.</p> <p>No – as documented on Table 8 the ACA did not conduct performance evaluations of all certification personnel as required.</p>
<p>§205.501(a)(7) Does the ACA have an <u>annual program review</u> of its certification activities conducted by someone who has expertise to conduct the reviews?</p> <p>Does the ACA <u>implement measures to correct</u> any noncompliances that are identified in the evaluation? Table of Contents</p>				
<p>§205.501(a)(8) Does the ACA <u>provide sufficient information</u> to persons seeking certification to enable them to comply with the Act and the regulations? Table of Contents General Information Section</p>				
<p>§205.501(a)(9) Does the ACA <u>maintain all records</u> pursuant to §205.510(b) and make all such records available for inspection and copying during normal business hours? Table of Contents Table 7b</p>				
<p>§205.501(a)(10) Does the ACA <u>maintain strict confidentiality</u> with</p>				



§205.501 General Requirements for Accreditation				
CHECKLIST SECTION VII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
respect to its clients and not disclose to third parties any business-related information concerning any client obtained while implementing the regulations, except as provided for in §205.504(b)(5) ? Table of Contents §205.504(b)(4)				
<i>Does the ACA prevent conflicts of interest by:</i>	---	---	---	---
§205.501(a)(11)(i) Not certifying a production or handling operation if the <u>ACA</u> or a <u>responsibly connected party</u> of such ACA has or has held a commercial interest in the production or handling operation? Table of Contents Table 8 Table 8 Findings				
§205.501(a)(11)(ii) <u>Excluding any person, including contractors</u> , with conflicts of interest from work, discussions, and decisions in all stages of the certification process and the monitoring of certified operations for all entities in which such person has or has held a commercial interest. Table of Contents Table 8 Table 8 Findings				
§205.501(a)(11)(iii) Not permitting any employee, inspector, contractor, or other personnel <u>to accept payment</u> , gifts, or favors of any kind, other than prescribed fees, from any business inspected. Table of Contents				
§205.501(a)(11)(iv) <u>Not giving advice or providing consultancy services</u> , to certification applicants or certified operations, for overcoming identified barriers to certification. Table of Contents See NOP 2614, Technical Assistance , for guidance.				
§205.501(a)(11)(v) Requiring all certification personnel and responsibly connected parties to complete an <u>annual conflict of interest disclosure report</u> .				Yes – as documented on Table 8 the ACA required all certification personnel and responsibly connected parties



§205.501 General Requirements for Accreditation				
CHECKLIST SECTION VII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
Table of Contents				to complete an annual conflict of interest disclosure report. No – as documented on Table 8 the ACA did not require all certification personnel and responsibly connected parties to complete an annual conflict of interest disclosure report.
<p>§205.501(a)(11)(vi) Ensuring that the <u>decision to certify</u> an operation is made by a person different from those who conducted the review of documents and on-site inspection. Table of Contents</p>				<p>Yes – as documented on Table 1 the decision to certify an operation was made by a person different from those who conducted the review of documents and on-site inspection.</p> <p>No – as documented on Table 1 the decision to certify an operation was not always made by a person different from those who conducted the review of documents and on-site inspection.</p>
<i>A private or governmental entity accredited as a certifying agent (ACA) under this subpart must:</i>	---	---	---	---
<p>§205.501(a)(12)(i) <u>Reconsider a certified operation's application</u> for certification and, if necessary, perform a new on-site inspection when it is determined, within 12 months of certifying the operation, that any person participating in the certification process and covered under §205.501(a)(11)(ii) has or <u>had a conflict of interest</u> involving the applicant. Table of Contents Table 8 Table 8 Findings</p>				
<p>§205.501(a)(12)(ii) <u>Refer a certified operation</u> to a different ACA for recertification and reimburse the operation for the cost of the recertification when it is determined that</p>				



§205.501 General Requirements for Accreditation				
CHECKLIST SECTION VII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
any person covered under §205.501(a)(11)(i) at the time of certification of the applicant <u>had a conflict of interest</u> involving the applicant. Table of Contents Table 8 Table 8 Findings				
§205.501(a)(13) <u>Accept the certification decisions</u> made by another ACA accredited or accepted by USDA. Table of Contents				
§205.501(a)(14) <u>Refrain from making false or misleading claims</u> about its accreditation status, the USDA accreditation program for ACAs, or the nature or qualities of products labeled as organically produced. Table of Contents				
§205.501(a)(15)(i) <u>Submit to the Administrator</u> a copy of: Any notice of denial of certification (§205.405), notification of noncompliance, notification of noncompliance correction, notification of proposed suspension or revocation, and notification of suspension or revocation (§205.662) simultaneously with its issuance. Table of Contents §205.405(c)(3)				Yes – as documented in section §205.405(c)(3) of the checklist and on Table 4 the ACA submitted all notifications to the Administrator as required. No – as documented in section §205.405(c)(3) of the checklist and/or on Table 4 the ACA did not submit all notifications to the Administrator as required..
§205.501(a)(15)(ii) <u>Submit to the Administrator</u> a list, on January 2 of each year, including the name, address, and telephone number of each operation granted certification during the preceding year. Table of Contents				
§205.501(a)(16) <u>Charge applicants</u> for certification and certified production and handling operations only those fees and charges for certification activities that it has filed with the Administrator. Table of Contents				



§205.501 General Requirements for Accreditation				
CHECKLIST SECTION VII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
Also see Fee Schedule				
<p>§205.501(a)(17) Pay and submit fees to AMS in accordance with §205.640. Table of Contents</p>				
<p>§205.501(a)(18) <u>Provide the inspector</u>, prior to each on-site inspection, with previous on-site inspection reports and <u>notify the inspector</u> of its decision regarding certification of the operation site inspected by the inspector and of any requirements for the correction of minor noncompliances. Table of Contents</p>				
<p>§205.501(a)(19) <u>Accept all production or handling applications</u> that fall within its area(s) of accreditation and certify all qualified applicants, to the extent of its administrative capacity to do so without regard to size or membership in any association or group; Table of Contents</p>				
<p>§205.501(a)(20) Demonstrate its ability to <u>comply with a State's organic program</u> to certify organic production or handling operations within the State. Table of Contents</p>				
<p>§205.501(a)(21) Comply with, implement, and <u>carry out any other terms and conditions</u> determined by the Administrator to be necessary. Table of Contents</p>				
<p>§205.501(b)(1) A private or governmental entity accredited as a certifying agent under this subpart may establish a seal, logo, or other identifying mark to be used by production and handling operations certified by the certifying agent to indicate affiliation with the certifying agent. <i>Provided</i>, That, the certifying agent: <u>Does not require use of its seal, logo, or other identifying mark</u> on any product sold, labeled, or represented as organically produced as a condition of</p>				



§205.501 General Requirements for Accreditation				
CHECKLIST SECTION VII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
certification. Table of Contents				
§205.501(b)(2) Provided, That, the certifying agent: <u>Does not require compliance</u> with any production or handling practices <u>other than those provided</u> for in the Act and the regulations in this part as a condition of use of its identifying mark. Table of Contents				
<i>A private entity accredited as a certifying agent must:</i>	---	---	---	---
§205.501(c)(1) Hold the Secretary harmless for any failure on the part of the certifying agent to carry out the provisions of the Act and the regulations in this part. Table of Contents				
§205.501(c)(2) Furnish reasonable security, in an amount and according to such terms as the Administrator may by regulation prescribe, for the purpose of protecting the rights of operations certified by the ACA under the Act and the regulations. Table of Contents				
§205.501(c)(3) Transfer to the Administrator and make available to any applicable State organic program's governing State official all records or copies of records concerning the person's certification activities in the event that the certifying agent dissolves or loses its accreditation. Table of Contents				
§205.501(d) No private or governmental entity accredited as a certifying agent under this subpart shall exclude from participation in or deny the benefits of the National Organic Program to any person due to discrimination because of race, color, national origin, gender, religion, age, disability, political beliefs, sexual orientation, or marital or family status. Table of Contents				



§205.503 Applicant Information

This section of the checklist should be completed only if conducting an initial assessment, annual update assessment or renewal assessment. If during any on-site assessment there is objective evidence that required information was not submitted then cite under the appropriate requirement.

CHECKLIST SECTION VIII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
References: NOP 2000 General Accreditation Policies and Procedures NOP Appeals Procedure: Adverse Action Appeal Process – Certified Operation or Applicant for Certification				
A private or governmental entity seeking accreditation as a certifying agent must submit the following information:	---	---	---	---
§205.503(a) The business name, primary office location, mailing address, name of the person(s) responsible for the certifying agent's day-to-day operations, contact numbers (telephone, facsimile, and Internet address) of the applicant, and, for an applicant who is a private person, the entity's taxpayer identification number; Table of contents				
§205.503(b) The name, office location, mailing address, and contact numbers (telephone, facsimile, and Internet address) for each of its organizational units, such as chapters or subsidiary offices, and the name of a contact person for each unit; Table of contents				
§205.503(c) Each area of operation (crops, wild crops, livestock, or handling) for which accreditation is requested and the estimated number of each type of operation anticipated to be certified annually by the applicant along with a copy of the applicant's schedule of fees for all services to be provided under these regulations by the applicant; Table of contents				
§205.503(d)(1) The type of entity the applicant is (e.g., government agricultural office, for-profit business, not-for-profit membership association) and for: A governmental entity, a copy of the official's authority to conduct certification activities under the Act and the regulations in this part, Table of contents				
§205.503(d)(2)				



§205.503 Applicant Information				
This section of the checklist should be completed <u>only</u> if conducting an initial assessment, annual update assessment or renewal assessment. If during any on-site assessment there is objective evidence that required information was not submitted then cite under the appropriate requirement.				
CHECKLIST SECTION VIII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
The type of entity the applicant is (e.g., government agricultural office, for-profit business, not-for-profit membership association) and for: A private entity, documentation showing the entity's status and organizational purpose, such as articles of incorporation and by-laws or ownership or membership provisions, and its date of establishment; Table of contents				
§205.503(e) A list of each State or foreign country in which the applicant currently certifies production and handling operations and a list of each State or foreign country in which the applicant intends to certify production or handling operations. Table of contents				

§205.504 Evidence of Expertise and Ability				
This section of the checklist should be completed <u>only</u> if conducting an initial assessment, annual update assessment or renewal assessment. If during any on-site assessment there is objective evidence that required information was not submitted then cite under the appropriate requirement.				
CHECKLIST SECTION IX	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
References: <i>NOP 2000 General Accreditation Policies and Procedures</i> <i>NOP Appeals Procedure: Adverse Action Appeal Process – Certified Operation or Applicant for Certification</i>				
Personnel	---	---	---	---
§205.504(a)(1) A copy of the applicant's policies and procedures for training, evaluating, and supervising personnel; Table of Contents				
§205.504(a)(2) The name and position description of all personnel to be used in the certification operation, including administrative staff, certification inspectors, members of any certification review and evaluation				



§205.504 Evidence of Expertise and Ability				
This section of the checklist should be completed <u>only</u> if conducting an initial assessment, annual update assessment or renewal assessment. If during any on-site assessment there is objective evidence that required information was not submitted then cite under the appropriate requirement.				
CHECKLIST SECTION IX	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
committees, contractors, and all parties responsibly connected to the certifying agent; Table of Contents Table 8 Table 8 Findings				
§205.504(a)(3)(i) A description of the qualifications, including experience, training, and education in agriculture, organic production, and organic handling, for each inspector to be used by the applicant: Table of Contents Table 8 Table 8 Findings				
§205.504(a)(3)(ii) and for Each person to be designated by the applicant to review or evaluate applications for certification: Table of Contents Table 8 Table 8 Findings				
§205.504 (a) (4) A description of any training that the applicant has provided or intends to provide to personnel to ensure that they comply with and implement the requirements of the Act and the regulations in this part. Table of Contents				
<i>Administrative Policies and Procedures</i>	---	---	---	---
§205.504(b)(1) A copy of the procedures to be used to evaluate certification applicants, make certification decisions, and issue certification certificates; Table of Contents				
§205.504(b)(2) A copy of the procedures to be used for reviewing and investigating certified operation compliance with the Act and the regulations in this part and the reporting of violations of the Act and the regulations in this part to the Administrator; Table of Contents				



§205.504 Evidence of Expertise and Ability				
This section of the checklist should be completed <u>only</u> if conducting an initial assessment, annual update assessment or renewal assessment. If during any on-site assessment there is objective evidence that required information was not submitted then cite under the appropriate requirement.				
CHECKLIST SECTION IX	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
§205.504(b)(3) A copy of the procedures to be used for complying with the recordkeeping requirements set forth in §205.501(a)(9) ; Table of Contents §205.510(b)				
§205.504(b)(4) A copy of the procedures to be used for maintaining the confidentiality of any business-related information as set forth in §205.501(a)(10) ; Table of Contents				
§205.504(b)(5) A copy of the procedures to be used, including any fees to be assessed, for making the information required under this clause available to any member of the public upon request; Table of Contents §205.501(a)(10)				
§205.504(b)(6) A copy of the procedures to be used for sampling and residue testing pursuant to §205.670. Table of Contents				
<i>Conflicts of Interest</i>	---	---	---	---
§205.504(c)(1) A copy of procedures intended to be implemented to prevent the occurrence of conflicts of interest, as described in §205.501(a)(11). Table of Contents				
§205.504(c)(2) A conflict of interest disclosure report, identifying any food- or agriculture-related business interests, including business interests of immediate family members, that cause a conflict of interest for all personnel required by this section and §205.501(a)(11)(v). Table of Contents				
<i>An applicant who currently certifies production or handling operations must submit:</i>	---	---	---	---
§205.504(d)(1)				



§205.504 Evidence of Expertise and Ability

This section of the checklist should be completed only if conducting an initial assessment, annual update assessment or renewal assessment. If during any on-site assessment there is objective evidence that required information was not submitted then cite under the appropriate requirement.

CHECKLIST SECTION IX	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
A list of all production and handling operations currently certified by the applicant Table of Contents				
§205.504(d)(2) Copies of at least 3 different inspection reports and certification evaluation documents for production or handling operations certified by the applicant during the previous year for each area of operation for which accreditation is requested. Table of Contents				
§205.504(d)(3) The results of any accreditation process of the applicant's operation by an accrediting body during the previous year for the purpose of evaluating its certification activities. Table of Contents				
§205.504(e) Any other information the applicant believes may assist in the Administrator's evaluation of the applicant's expertise and ability. Table of Contents				

§205.510 Annual Report, Recordkeeping, and Renewal of Accreditation

CHECKLIST SECTION X	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
<i>An accredited certifying agent must submit annually to the Administrator, on or before the anniversary date of the issuance of the notification of accreditation, the following reports and fees:</i>	---	---	---	---
§205.510(a)(1) A complete and accurate update of information submitted pursuant to §§205.503 and 205.504; Table of Contents				
§205.510(a)(2) Information supporting any changes being requested in the areas of accreditation described in §205.500;				



§205.510 Annual Report, Recordkeeping, and Renewal of Accreditation				
CHECKLIST SECTION X	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
Table of Contents				
§205.510(a)(3) A description of the measures implemented in the previous year and any measures to be implemented in the coming year to satisfy any terms and conditions determined by the Administrator to be necessary, as specified in the most recent notification of accreditation or notice of renewal of accreditation; Table of Contents				
§205.510(a)(4) The results of the most recent performance evaluations and annual program review and a description of adjustments to the certifying agent's operation and procedures implemented or to be implemented in response to the performance evaluations and program review; and Table of Contents				
§205.510(a)(5) The fees required in §205.640(a). Table of Contents				
<i>Certifying agents must maintain records according to the following schedule:</i>	---	---	---	---
§205.510(b)(1) Records <u>obtained from</u> applicants for certification and certified operations must be maintained for <u>not less than 5 years</u> beyond their receipt; Table of Contents §205.501(a)(9)				
§205.510(b)(2) Records <u>created by</u> the ACA regarding applicants for certification and certified operations must be maintained for <u>not less than 10 years beyond</u> their creation; and Table of Contents				
§205.510(b)(3) Records <u>created or received</u> by the ACA pursuant to the accreditation requirements of subpart F, <u>excluding</u> any records covered by §205.510(b)(2), must be maintained for <u>not less than 5 years</u> beyond their creation or receipt. Table of Contents				



§205.510 Annual Report, Recordkeeping, and Renewal of Accreditation				
CHECKLIST SECTION X	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
<i>Amending Accreditation</i>				
<p>§205.510(f) Amendment to scope of an accreditation may be requested at any time. The application for amendment shall be sent to the Administrator and shall contain information applicable to the requested change in accreditation, a complete and accurate update of the information submitted pursuant to §§205.503 and 205.504, and the applicable fees required in §205.640. Table of Contents</p>				

§205.642 Fee Schedule				
Document on Certification File Review Checklist and Certification File Review Worksheets.				
CHECKLIST SECTION XI	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
<p>§205.642 Are the fees charged reasonable?</p>				
<p>§205.642 Is the fee schedule that was submitted to applicants the same as the one provided to the Administrator? Table of contents</p>				<p>Yes – As documented on Table 3 the fee schedule provided to applicants was the same as the one provided to the Administrator.</p> <p>No – As documented on Table 3 the fee schedule provided to applicants was not the same as the one provided to the Administrator.</p>
<p>§§205.501(a)(16) and 205.642 Are the fees charged to operations for certification consistent with the fee schedule filed with the Administrator? Table of contents §205.501(a)(16)</p>				<p>Yes – As documented on Table 3 the fees charged to operations for certification were consistent with the fee schedule filed with the Administrator.</p> <p>No – As documented on</p>



§205.642 Fee Schedule				
Document on Certification File Review Checklist and Certification File Review Worksheets.				
CHECKLIST SECTION XI	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
				Table 3 the fees charged to operations for certification were not consistent with the fee schedule filed with the Administrator.
§205.642 Are all applicants provided with an estimate of the total cost of certification and an estimate of the annual cost of updating the certification? Table of contents				Yes – As documented on Table 3 all operations were provided an estimate No – As documented on Table 3 all operations were not provided an estimate
§205.642 Are the nonrefundable portions of certification fees and the stages at which they become nonrefundable explained in the fee schedule submitted to the Administrator? Table of contents				
§205.642 Does the ACA provide a copy of the fee schedule to anyone inquiring about the application process? Table of contents				

§205.661 Investigation of Certified Operations				
§205.662 Noncompliance Procedure for Certified Operations				
Document on Certification File Review Worksheet, “Table 4 - Notice of Noncompliance/Adverse Action Worksheet”.				
CHECKLIST SECTION XII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
References: <i>NOP 2607 Disclosure of Information concerning USDA Accredited Certifying Agents and Certified Operations to the NOP</i> <i>NOP 4001 Complaint Handling Procedure</i> <i>NOP 4002 Enforcement Policy</i> <i>NOP Appeals Procedure: Adverse Action Appeal Process – Certified Operation or Applicant for Certification</i>				
§205.661(a) If the ACA conducts any investigations of complaints of noncompliance concerning production and handling operations certified as organic by the ACA, does the ACA notify the Program Manager of all compliance proceedings and actions taken? Table of Contents				



§205.661 Investigation of Certified Operations §205.662 Noncompliance Procedure for Certified Operations Document on Certification File Review Worksheet, “Table 4 - Notice of Noncompliance/Adverse Action Worksheet”.				
CHECKLIST SECTION XII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
§205.662(a) In all cases when an inspection, review, or investigation of a certified operation by the ACA or a State organic program reveals any noncompliance with the Act or regulations, is a written notification of noncompliance sent to the certified operation? Table of Contents §205.406(c)				Yes – As documented on Table 4 written notifications of NCs were sent to certified operations as appropriate. No – As documented on Table 4 written notifications of NCs were not sent to certified operations as appropriate.
NOP 2612 Penalty Matrix Do all Notifications of Minor Issues include: A description of each Minor Issue; The facts upon which the Minor Issue is based; and The date by which the certified operation must rebut or correct each Minor Issue and submit supporting documentation?				
§205.662(a)(1) – (3) Do all Notifications of Noncompliance include: A description of each noncompliance; The facts upon which the notification of noncompliance is based; and The date by which the certified operation must rebut or correct each noncompliance and submit supporting documentation? Table of Contents				Yes – As documented on Table 4 (Continuing) or Table 5 (Denial) written notifications of NCs included the required information. No – As documented on Table 4 (Continuing) or Table 5 (Denial) written notifications of NCs did not include all required information.
§205.662(b) Does the ACA send the certified operation a written notification of noncompliance resolution after the certified operation demonstrates that each noncompliance is resolved? Table of Contents				Yes – As documented on Table 4 a written notification of NC resolution was sent to certified operations after they demonstrated that each NC was resolved.



§205.661 Investigation of Certified Operations				
§205.662 Noncompliance Procedure for Certified Operations				
Document on Certification File Review Worksheet, "Table 4 - Notice of Noncompliance/Adverse Action Worksheet".				
CHECKLIST SECTION XII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
				No – As documented on Table 4 a written notification of NC resolution was not sent to all certified operations after they demonstrated that each NC was resolved.
<p>§205.662(c) If rebuttal is unsuccessful or the correction of the noncompliance is not completed in the prescribed time period, does the ACA send the certified operation a written notice of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the noncompliance? Table of Contents</p>				<p>Yes – As documented on Table 4 a written notice of proposed suspension or revocation was sent to certified operations as appropriate.</p> <p>No – As documented on Table 4 a written notice of proposed suspension or revocation was not sent to all certified operations as appropriate.</p>
<p>§205.662(c)(1) – (4) Do all Notifications of Proposed Suspension / Proposed Revocations include: The reasons for the proposed suspension or revocation; The proposed effective date of such suspension or revocation; 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? Table of Contents</p>				<p>Yes – As documented on Table 4 all notifications of proposed suspension or revocation issued to certified operations contained the required information.</p> <p>No – As documented on Table 4 not all notifications of proposed suspension or revocation issued to certified operations contained the required information.</p>
<p>§205.662(d) If the ACA or State organic program has reason to believe that a certified operation willfully violated the Act or regulations, the ACA or State organic program shall send the certified operation a notification of proposed suspension or revocation of certification of</p>				Yes – As documented on Table 4 notification of proposed suspension or revocation was sent when the ACA had a reason to believe the certified operation



§205.661 Investigation of Certified Operations				
§205.662 Noncompliance Procedure for Certified Operations				
Document on Certification File Review Worksheet, "Table 4 - Notice of Noncompliance/Adverse Action Worksheet".				
CHECKLIST SECTION XII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
<p>the entire operation or a portion of the operation, as applicable to the noncompliance. Table of Contents</p>				<p>willfully violated the Act or regulations.</p> <p>No – As documented on Table 4 the ACA had reason to believe a certified operation willfully violated the Act or regulations but did not send a notification of proposed suspension or revocation as required.</p> <p>NA – there were no willful violations identified by the ACA.</p>
<p>§205.662(e)(1) Does the ACA or State program send the certified operation a written notification of suspension or revocation in all cases that a certified operation failed to correct the noncompliance, to resolve the issue through rebuttal or mediation, or to file an appeal of the proposed suspension or revocation of certification? Table of Contents</p>				<p>Yes – As documented on Table 4 a notification of suspension or revocation was sent to all certified operations which failed to: correct the NC; resolve the NC through rebuttal or mediation; or file an appeal.</p> <p>No – As documented on Table 4 a notification of suspension or revocation was not sent to all certified operations which failed to: correct the NC; resolve the NC through rebuttal or mediation; or file an appeal.</p>
<p>§205.662(e)(2) Has the ACA or State program sent a notice of Suspension / Revocation during the time a final resolution of either mediation or appeal is pending for a certified operation which requested either one? Table of Contents</p>				<p>Yes (ACA does not comply) – As documented on Table 4 a notification of suspension or revocation was sent to a certified operation during the time mediation and/or an</p>



§205.661 Investigation of Certified Operations				
§205.662 Noncompliance Procedure for Certified Operations				
Document on Certification File Review Worksheet, "Table 4 - Notice of Noncompliance/Adverse Action Worksheet".				
CHECKLIST SECTION XII	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
				<p>appeal was pending.</p> <p>No (ACA complies) – As documented on Table 4 a notification of suspension or revocation was not sent to any certified operation during the time mediation and/or an appeal was pending.</p> <p>NA – there were no requests for mediation or appeals filed.</p>
<p>§205.662(g) Violations of Act Has the ACA fined operations as a result of any noncompliance issues? Table of Contents</p>				
<p>§205.660(d) Are all notifications of noncompliance, rejections of mediation, noncompliance resolutions, proposed suspensions or revocations, and suspensions or revocations issued and each response to such notification sent to the recipient's place of business via a delivery service which provides dated return receipts? Table of Contents</p>				<p>Yes – As documented on Table 4 all notifications were sent to the recipient's place of business via a delivery service which provided dated return receipts.</p> <p>No – As documented on Table 4 not all notifications were sent to the recipient's place of business via a delivery service which provided dated return receipts.</p>

§205.663 Mediation		
Mediation procedures are applicable to certified operations that have received a denial of certification, notification of proposed suspension, a notification of proposed revocation or a notification of noncompliance <u>that is combined with</u> a denial, proposed suspension, or proposed revocation. Mediation procedures <u>do not apply</u> to operations that have received a notification of noncompliance with no adverse action.		
CHECKLIST SECTION XIII	Complies ⁽¹⁾	Remarks ⁽²⁾



	Yes	No	N/A	
<p>§205.663 In all instances where mediation is requested, is the request from the applicant or certified operation in writing? Table of Contents</p>				
<p>§205.663 If the ACA rejects the request, is the notification to reject the request of mediation sent to the operation in writing? Table of Contents</p>				
<p>§205.663 Does the notification to reject the request of mediation advise the operation of their right to request an appeal pursuant to §205.681? Table of Contents</p>				
<p>§205.663 Does the notification to reject the request of mediation advise the operation that an appeal must be requested within 30 days of the date of the written rejection of mediation? Table of Contents</p>				
<p>§205.663 If mediation was accepted by the ACA, is the mediation conducted by a qualified mediator mutually agreed upon by the parties to the mediation? Table of Contents</p>				
<p>§205.663 Is an agreement reached no more than 30 days following the mediation session? Table of Contents</p>				
<p>§205.663 If mediation is unsuccessful, is the operation informed they have 30 days from termination of mediation to appeal the certifying agent's decision pursuant to §205.681? Table of Contents</p>				

§205.670 Inspection and Testing §205.671 Exclusion from Organic Sale §205.504(b)(6) requires that the ACA have procedures for sampling and residue testing. Procedures should address the requirements of §205.670. Evaluate procedures under §205.504(b)(6) ; Checklist Section IX.				
CHECKLIST SECTION XIV	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	



§205.670 Inspection and Testing §205.671 Exclusion from Organic Sale				
§205.504(b)(6) requires that the ACA have procedures for sampling and residue testing. Procedures should address the requirements of §205.670. Evaluate procedures under §205.504(b)(6) ; Checklist Section IX.				
CHECKLIST SECTION XIV	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
References: <i>NOP 2610 Sampling Procedures for Residue Testing</i> <i>NOP 2611 Laboratory Selection Criteria For Pesticide Residue Testing</i> <i>NOP 2611-1 Prohibited Pesticides for NOP Residue Testing</i> NOP 2613 Responding to Results from Pesticide Residue Testing				
§205.403(e)(1) Does the inspector provide the operation with a receipt for the samples taken at the time of the inspection? Table 7b B Table of Contents				Yes – as documented on Table 7b operations were provided receipts for samples taken. No – as documented on Table 7b not all operations were provided receipts for samples taken.
§205.403(e)(1) Is there any objective evidence that inspectors were charged for the samples taken?				
§205.670(b) and (c) Was the testing paid for by the requesting official (Administrator or State) or the ACA? Table 7b H Table of contents				Yes – as documented on Table 7b testing was paid for by the requesting official and not the charged to the operations. No – as documented on Table 7b not all testing was paid for by the requesting official and was charged to the operation(s).
§205.670(d) Were at least 5% of certified operations sampled and tested on an annual basis (or at least one operation annually if certifying agent has fewer than thirty operations)? Table 7a Table of contents				Yes – as documented on Table 7a at least 5% of the certified operations were sampled and tested on an annual basis. or Yes – as documented on Table 7a at least one certified operation was sampled and



§205.670 Inspection and Testing				
§205.671 Exclusion from Organic Sale				
§205.504(b)(6) requires that the ACA have procedures for sampling and residue testing. Procedures should address the requirements of §205.670. Evaluate procedures under §205.504(b)(6) ; Checklist Section IX.				
CHECKLIST SECTION XIV	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
				<p>tested annually because the ACA has fewer than thirty operations.</p> <p>No – as documented on Table 7a at least 5% of the certified operations were not sampled and tested on an annual basis.</p> <p>or</p> <p>No – as documented on Table 7a the ACA has fewer than thirty operations and did not sample and test from at least one certified operation annually.</p>
<p>§205.670(e) Are samples collected by an inspector representing the ACA, State, or Administrator as applicable? Table 7b A Table of contents</p>				<p>Yes – as documented on Table 7b samples were collected by an inspector representing the ACA, State, or Administrator as applicable.</p> <p>No – as documented on Table 7b not all samples were collected by an inspector representing the ACA, State, or Administrator as applicable.</p>
<p>§205.670(e) Is chain of custody maintained? Table 7b C Table of contents</p>				<p>Yes – as documented on Table 7b chain of custody was maintained.</p> <p>No – as documented on Table 7b chain of custody was not maintained for all samples.</p>
§205.670(e)				Yes – as documented on



§205.670 Inspection and Testing				
§205.671 Exclusion from Organic Sale				
§205.504(b)(6) requires that the ACA have procedures for sampling and residue testing. Procedures should address the requirements of §205.670. Evaluate procedures under §205.504(b)(6) ; Checklist Section IX.				
CHECKLIST SECTION XIV	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
<p>Is the sample submitted to an ISO 17025 accredited lab? Table 7b D Table of contents</p> <p>Or an alternate standard approved by the NOP? NOP 2611 – Table 7b D</p>				<p>Table 7b samples were submitted to an accredited or NOP approved lab.</p> <p>No – as documented on Table 7b not all samples were submitted to an accredited or NOP approved lab.</p>
<p>§205.670(e) Is the sample tested in accordance with the methods described in the most current edition of the <i>Official Methods of Analysis of the AOAC International</i> or other current applicable validated methodology? Table 7b E Table of contents</p>				<p>Yes – as documented on Table 7b samples were tested in accordance with an approved AOAC or other validated methodology.</p> <p>No – as documented on Table 7b not all samples were tested in accordance with an approved AOAC or other validated methodology.</p>
<p>§§205.670(f) Are test results available for public access, unless the testing is part of an ongoing compliance investigation? Table of contents</p>				
<p>§§205.402(b)(3) and 205.403(e)(2) Is a copy of the test results provided to the applicant or certified operation? Table 7b F Table of Contents (§205.402) or Table of Contents (§205.403)</p>				<p>Yes – as documented on Table 7b a copy of the test results was provided to the applicants and/or certified operations.</p> <p>No – as documented on Table 7b copies of test results were not provided to all applicants and/or certified operations.</p>
<p>§205.670(g) If test results indicate a specific agricultural product contains pesticide residues or environmental contaminants that exceed the FDA's or the EPA's</p>				<p>Yes – as documented on Table 7b test results which exceeded the FDA's or the EPA's regulatory tolerances</p>



§205.670 Inspection and Testing §205.671 Exclusion from Organic Sale §205.504(b)(6) requires that the ACA have procedures for sampling and residue testing. Procedures should address the requirements of §205.670. Evaluate procedures under §205.504(b)(6) ; Checklist Section IX.				
CHECKLIST SECTION XIV	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
regulatory tolerances did the ACA promptly report such data to the applicable agency whose regulatory tolerance or action level was exceeded? <i>(Test results that exceed federal regulatory tolerances must also be reported to the appropriate State health agency or foreign equivalent.)</i> Table 7b I and J Table of contents				were promptly reported to the applicable agency and the appropriate State health agency whose regulatory tolerance or action level was exceeded. No – as documented on Table 7b not all test results which exceeded the FDA's or the EPA's regulatory tolerances were promptly reported to the applicable agency or appropriate State health agency whose regulatory tolerance or action level was exceeded. NA – as documented on Table 7b there were no test results which exceeded the FDA's or the EPA's regulatory tolerances.
§205.671 Is there a prohibited substance detected that is greater than 5% of the EPA tolerance for the residue or greater than the unavoidable residual environmental contamination (UREC) level and is the product allowed to be represented as organic? Table 7b K Table of Contents				Yes (ACA does not comply) – as documented on Table 7b when test results verified there was a prohibited substance detected that was greater than 5% of the EPA tolerance or greater than the UREC level the product was allowed to be represented as organic. No (ACA Complies) – as documented on Table 7b when test results verified



§205.670 Inspection and Testing				
§205.671 Exclusion from Organic Sale				
§205.504(b)(6) requires that the ACA have procedures for sampling and residue testing. Procedures should address the requirements of §205.670. Evaluate procedures under §205.504(b)(6) ; Checklist Section IX.				
CHECKLIST SECTION XIV	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
				<p>there was a prohibited substance detected that was greater than 5% of the EPA tolerance or greater than the UREC level the product was not allowed to be represented as organic.</p> <p>NA – as documented on Table 7b there were no test results where a prohibited substance was detected that was greater than 5% of the EPA tolerance or greater than the UREC level.</p>
§205.671 Are investigations conducted to determine the cause of the prohibited substance? Table 7b P				

§205.672 Emergency Pest or Disease Treatment				
If there is no instance of a prohibited substance applied due to a Federal or State emergency pest or disease treatment program identify with an “X” in NA column; and include a statement in Remarks column. These requirements only apply in the United States and not to other countries.				
CHECKLIST SECTION XV	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
§205.672 Is there any instance where a prohibited substance was applied to a certified operation due to a Federal or State emergency pest or disease treatment program? Table of Contents				
<i>If a prohibited substance is applied to a certified operation due to a Federal or State emergency pest or disease treatment program and the certified operation otherwise meets the requirements of this part, the</i>	---	---	---	---



§205.672 Emergency Pest or Disease Treatment				
<p>If there is no instance of a prohibited substance applied due to a Federal or State emergency pest or disease treatment program identify with an "X" in NA column; and include a statement in Remarks column. These requirements only apply in the United States and not to other countries.</p>				
CHECKLIST SECTION XV	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
<i>certification status of the operation shall not be affected as a result of the application of the prohibited substance: Provided, That:</i>				
§205.672(a) Any harvested crop or plant part to be harvested that has contact with a prohibited substance, cannot be sold, labeled, or represented as organically produced. Table of Contents				
§205.672(b) Any livestock that are treated with a prohibited substance or product derived from treated livestock, cannot be sold, labeled, or represented as organically produced. Table of Contents				
<i>Except that:</i>				
§205.672(b)(1) Milk or milk products may be sold, labeled, or represented as organically produced beginning 12 months following the last date that the dairy animal was treated with the prohibited substance; and Table of Contents				
§205.672(b)(2) The offspring of gestating mammalian breeder stock treated with a prohibited substance may be considered organic: <i>Provided that</i> , the breeder stock was not in the last third of gestation on the date that the breeder stock was treated with the prohibited substance. Table of Contents				

§205.500(c)(2) International Agreements				
<p>For certifiers involved in any of the International Agreements please provide details of the review process in place and include a summary of the certifier's participation in the arrangements in the body of the audit report, under the heading "International Agreements."</p>				
CHECKLIST SECTION XVI	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
EU – US Organic Equivalency Arrangement				
Please mark "NA" if the certifier does not have any current clients shipping to the EU or receiving product from the EU.				



§205.500(c)(2) International Agreements				
For certifiers involved in any of the International Agreements please provide details of the review process in place and include a summary of the certifier’s participation in the arrangements in the body of the audit report, under the heading “International Agreements.”				
CHECKLIST SECTION XVI	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
Are the certifier and applicable staff aware of the requirements for exporting to the EU? Program requirements can be accessed on the NOP website . Table of Contents				
Does the certifier have a system in place to review and verify the terms of the arrangement? Table of Contents				
Is the arrangement limited to organic products certified under the NOP which were produced or had final processing or packaging within the US? Table of Contents				
Does the certifier provide an EU Certificate of Inspection (EU Import Certificate) to certified operations wishing to export to the EU so that it is transferred with the product(s)? Table of Contents				
If applicable did the certifier verify that organic apples, pears, and organic ingredients from organic apples and pears were produced without the use of antibiotics (<i>streptomycin for fire blight control</i>) for at least 3 years prior to the harvest of the organic apples and pears? Table of Contents				
If applicable did the certifier verify that wine exported to the EU was 1) produced using organic varieties of grapes and organic ingredients; 2) contained only non-organic substances allowed under §205.605; and 3) were produced only using the wine making practices and substances detailed in the EU organic regulations ? Table of Contents				
For retail products did the certifier verify general EU labeling requirements and that the labels contained the code assigned to them by the EU? EU Certifier Codes EU Labeling Requirements Table of Contents				
For Bulk products did the certifier verify general EU labeling requirements and that there was a lot number				



§205.500(c)(2) International Agreements

For certifiers involved in any of the International Agreements please provide details of the review process in place and include a summary of the certifier’s participation in the arrangements in the body of the audit report, under the heading “International Agreements.”

CHECKLIST SECTION XVI	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
present to allow for a complete audit trail and to verify the product’s integrity? EU Labeling Requirements Table of Contents				
For certified operations which receive product from the EU did the certifier verify (either through file review and/or on-site inspection) that the NOP Import Certificate was received with the product(s) to provide verification that incoming product meets the terms of the arrangement and is, therefore, eligible for use as an ingredient or a product to repack or to be sold as is in the US? Table of Contents				

US – Canada Organic Equivalency Arrangement (USCOEA)

Please mark “NA” if the certifier does not have any current clients shipping to Canada or receiving product from Canada.

Are the certifier and applicable staff aware of the requirements for exporting to Canada? Program requirements can be accessed on the NOP website . Table of Contents				
Does the certifier have a system in place to review and verify the terms of the arrangement? Table of Contents				
Did the certifier verify agricultural products exported to Canada were not produced with the use of sodium nitrate? Table of Contents				
Did the certifier verify agricultural products exported to Canada were not produced by hydroponic or aeroponic production methods? Table of Contents				
Did the certifier verify agricultural products derived from animals (<u>with the exception of ruminants</u>) were produced according to livestock stocking rates as set out in CAN /CGSB32.310-2006 ? Table of Contents				
Does the certifier verify agricultural products being sold or shipped to Canada and received from Canada under the arrangement are accompanied by an attestation statement (<i>Certified in compliance with the</i>				



§205.500(c)(2) International Agreements

For certifiers involved in any of the International Agreements please provide details of the review process in place and include a summary of the certifier’s participation in the arrangements in the body of the audit report, under the heading “International Agreements.”

CHECKLIST SECTION XVI	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
<p><i>terms of the US-Canada Organic Equivalency Arrangement</i>), per NOP PM 10-3? Include how the requirement is met. Does the certifier include “USCOEA compliant” or some variation on the certified operation’s certificate or if the certifier provides attestation statements to the operation rather than allowing the operation to do so themselves. Table of Contents</p>				
<p>Does the certifier verify that labels meet the requirements of the destination country to include that for retail products, labels or stickers must state the name of the U.S. or Canadian certifying agent (may use the USDA Organic seal or the Canada Organic Biologique logo) and that all product labels are in English and French? US-Canada Agreement labeling requirements Table of Contents</p>				
<p>Does the certifier verify that labels meet the requirements of the destination country to include a lot number for wholesale products? US-Canada Agreement labeling requirements Table of Contents</p>				
Export Arrangement with Japan - Taiwan				
Please mark “NA” if the certifier does not have any current clients shipping to Japan or Taiwan.				
<p>If the certifier has issued any TM-11 Export Certificates are they on the NOP’s list of certifying agents approved to issue a certificate under an export arrangement? §205.501(a)(21) Table of Contents</p>				
<p>Were all TM-11 Export Certificates issued only to US certified operations selling and/or shipping to Japan or Taiwan? Table of Contents</p>				
<p>Are the certifier and applicable staff aware of the requirements for exporting to Japan and/or Taiwan? Program requirements can be accessed on the NOP website. Table of Contents</p>				
<p>Does the certifier have a system in place to review and verify the terms of the arrangement?</p>				



§205.500(c)(2) International Agreements

For certifiers involved in any of the International Agreements please provide details of the review process in place and include a summary of the certifier’s participation in the arrangements in the body of the audit report, under the heading “International Agreements.”

CHECKLIST SECTION XVI	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
Table of Contents				
Did the certifier incorporate the compliance requirements of the applicable export arrangement into its quality manual under the heading "Requirements for export of U.S. organic raw and processed agricultural products to (insert country name)? Table of Contents				
Did the certifier assign a unique identification number to each export certificate? The unique identification number must begin with an acronym designating the accredited certifying agent and the country code for the specific export arrangement. List of certifying agents Table of Contents				
Does the certifier keep a paper-based or electronic control log that records and tracks the disposition of each export certificate including those issued, voided or destroyed? Table of Contents				
Did the certifier designate a staff person to authorize the issuance of the export certificate and attest to its authenticity by affixing his/her signature to the Certificate and who is responsible for all aspects of the issuance of the export certificate, including ensuring security of blank export certificates and oversight of the control log? Table of Contents				
Did all export certificates which were issued under the <u>Taiwan</u> arrangement for processed products and crops have the required statement (<i>Organic agricultural products and organic processed products, accompanied by this certificate, were produced or processed using zero prohibited substances</i>)? Table of Contents				
Did all export certificates which were issued under the <u>Taiwan</u> arrangement for livestock and meat products have the required statement (<i>Organic</i>				



§205.500(c)(2) International Agreements

For certifiers involved in any of the International Agreements please provide details of the review process in place and include a summary of the certifier’s participation in the arrangements in the body of the audit report, under the heading “International Agreements.”

CHECKLIST SECTION XVI	Complies ⁽¹⁾			Remarks ⁽²⁾
	Yes	No	N/A	
<i>livestock products, accompanied by this certificate, were managed and produced without the use of systemic pain killers or analgesics, including the use of Lidocaine or Procaine)?</i> Table of Contents				
For products exported under the Japan export arrangement did the certifier verify they were not produced using alkali-extracted humic acid or lignin sulfonate, except as a binder or anti-caking agent? Table of Contents				



CLOSING MEETING

The purpose of the closing meeting is to present the assessment findings and conclusions in such a manner that they are understood and acknowledged by the client.

- Sign out on attendance list ([at beginning of checklist](#)).
- Present positive aspects of the certification program.
 - Positive Aspect (1) –
 - Positive Aspect (2) –
 - Positive Aspect (3) –
- Present any items that require further guidance and consideration by the NOP.
 - Pending Item (1) –
 - Pending Item (2) –
- Present the assessment findings and conclusions in a manner so they are understood and acknowledged by the auditee. For each finding, cite the specific requirement of the assessment criteria and allow the auditee to ask questions on any findings.
- Discuss the next steps in the process:
 - 1) The report is written and sent to Headquarters for review.
 - 2) The NOP reviews the report and determines the compliance / noncompliance of the program and makes all decisions concerning the accreditation. The NOP has the discretion to modify the assessment findings.
 - 3) The report is issued to the client by the NOP.
- Provide information about the NOP appeals process (§205.681(b)).
- Encourage feedback. Clients can submit feedback to AIAInBox@ams.usda.gov.
-

FINDINGS:

[Table of Contents](#) [Table 1](#) [Table 2](#) [Table 3](#) [Table 4](#) [Table 5](#) [Table 6a](#) [Table 6b](#) [Table 6c](#) [Table 7a](#) [Table 7b](#) [Table 8](#)



- NC1 –
- NC2 -
- NC3 -
- NC4 -
- NC5 -
- NC6 –

[Back to Closing Meeting process](#)



National Organic Program File Review Worksheets

Table 1 - General Certification File Review Information Table of Contents Table 2 Table 3 Table 6a Table 6b Table 6c											
File #	Name of applicant/certified operation sampled	A Date application received	B Date of review 205.402(b)(1) 205.406(b)	C Review conducted by	D Inspection date 205.403(b)(1) 205.406(b)	E Inspection conducted by	F Date of final review (for applicants: §205.404(a))	G Final review conducted by	H Date certification decision made	I Certification decision made by	J Date findings sent to operation 205.402(b)(1)
1											
2											
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15											
Instructions: Enter dates in the mm/dd/yy format.											
Remarks and Findings: Closing Meeting Findings §205.501(a)(11)(vi)											
XXX											



TABLE 2 - Summary of Certification File Review Information [Table of Contents](#) [Table 1](#) [Table 3](#) [Table 6a](#) [Table 6b](#) [Table 6c](#) [Table 7b](#)

File #	A Scope requested	B Scope granted (L, C, WC, H)	C IA/AU	D Sample (Y/N)	E Labels (Y/N)
1					
2					
3					
4					
5					
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10					
11					
12					
13					
14					
15					



TABLE 2 - Summary of Certification File Review Information [Table of Contents](#) [Table 1](#) [Table 3](#) [Table 6a](#) [Table 6b](#) [Table 6c](#) [Table 7b](#)

File #	A Scope requested	B Scope granted (L, C, WC, H)	C IA/AU	D Sample (Y/N)	E Labels (Y/N)
<p>Instructions: For each requirement (A-E), enter the appropriate information into Table 2. Make sure the information provided in Table 2 is entered into the corresponding File # in Table 1.</p> <p>A. Scope requested (L, C, WC, H)</p> <p>B. Scope granted (L, C, WC, H): <i>For crop operations, include a description about the type of crop and operation such as single crop, parallel production, split production, etc. For livestock operations, include a description about the type of livestock and operation. For handling operations, include a description of the type of products and operation such as single ingredient product, multi ingredient products, trader, distributor, etc. For wild crop operations, include a description of the type of products and operation such as single products, organic and non-organic of same product in collection area, single harvester or multiple harvesters, collection areas, staging areas, production areas, and management and oversight of harvester.</i></p> <p>C. Initial Application (IA) or Annual Update (AU)</p> <p>D. Was a sample pulled during the inspection? (Y/N) <i>If samples were pulled, include information in Table 7b. Sampling Worksheet - Sample and Reporting Information</i></p> <p>E. Are any labels used by the operation? (Y/N) <i>If there are labels, include information in Table 6a, 6b, or 6c Label Review Worksheet.</i></p>					
<p>Remarks and Findings: Closing Meeting Findings</p>					
<p>XXX</p>					



Table 3 - Summary of Full File Reviews [Table of Contents](#)

Instructions: This Checklist is used in conjunction with [Table 1](#) and [Table 2](#). This Checklist is used only to record the overall evaluation of files where a full file review was conducted.

Use the certification file number as recorded in the Certification File Review Worksheet to identify the certification file(s). If a requirement is not applicable, include relevant information in the "Remarks" for that section.

This Checklist is not used to record the overall evaluation of full file reviews for Grower Groups. Instead, the Certification File Review Checklist—Supplement for Grower Groups must be used.

Fees and other charges for certification §205.642

	Yes	No	Certification File Number(s)
Is the operation provided with an estimate? 205.642			
Are the fees charged consistent with the Fee Schedule submitted to the Administrator? 205.642 - same 205.642 – consistent §205.501(a)(16)			

Certificate §205.404(b)

Does the certificate include:	Yes	No	Certification File Number(s)
Name and address of the certified operation? §205.404(b)(1)			
“Effective date of certification”? §205.404(b)(2) (Date operation was initially certified to NOP Regulations)			
Scope -- Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation? §205.404(b)(3)			
Name, address, internet address, and telephone number of the certifying agent? §205.404(b)(4)			
Issue date of the certificate? NOP 2603			
Anniversary date? NOP 2603 (Date when certified operation is required to submit their next annual update)			
Label classification for processed organic products? (100% Organic, Organic, or Made with Organic (specified ingredients or food groups)) NOP 2603			
The statement “Certified Organic under the US National Organic Program 7 CFR Part 205”? NOP 2603			
The statement “Once certified, a production or handling operation's organic certification continues in effect until surrendered, suspended or revoked”? §205.404(c) NOP 2603			
Are certificates issued in English? NOP 2603			

Remarks and Findings: [Closing Meeting Findings](#)

XXX



Application §205.401			
Table of Contents Table 1 Table 2			
Does the application include:	Yes	No	Certification File Number(s)
The name of person completing the application; Applicant's business name; Applicant's address; Applicant's telephone number; and If a corporation, the name, address, and telephone number of the person authorized to act on the applicant's behalf? §205.401 – Application Requirement §205.402(a)(1) – Review for completeness §205.402(a)(2) – Review for compliance			
Information on previous certifications? §205.401(c) §205.402(a)(3) – ACA review for compliance			
Other information deemed necessary by the ACA to determine compliance with the ACT? §205.401(d)			
Remarks and Findings: Closing Meeting Findings			
XXX			
Organic System Plan (OSP) §205.401(a) and §205.406(a)			
Does the OSP include (§205.201(a)(1)-(6)):	Yes	No	Certification File Number(s)
A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed? §§205.200; 205.202 - 205.207; 205.236 – 205.240; and 205.270 – 205.272			
A list of each substance to be used as a production input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable?			
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?			
A description of the recordkeeping system implemented to comply with the requirements established in §205.103?			
Does the OSP include a description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and products with prohibited substances			



Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations?			
NOP 5031 – Guidance Certification Requirements for Handling Unpackaged Organic Products			
Does the OSP contain information on how organic product is transported to and from the organic operation as applicable?			
Does the the company bringing in or shipping the product handle <u>unpackaged</u> organic product?			
If the company handles unpackaged organic product and they take ownership of the product are they certified?			
If the company handles unpackaged organic product and they <u>do not</u> take ownership are they 1) a certified operation; or 2) part of the OSP of the certified seller or buyer?			
If the company is part of the OSP of the seller or buyer, does the seller/buyer have adequate records to document compliance with the organic regulations?			
Remarks and Findings: <u>Closing Meeting Findings</u>			
XXX			

Continuing Certification: Did the certified operation submit an updated OSP which includes: <u>§205.406(a)(1)-(4) Table of Contents General Information Section</u>	Yes	No	Certification File Number(s)
A summary statement, supported by documentation, detailing any deviations from, changes to, modifications to, or other amendments made to the previous year's organic system plan during the previous year?			
Any additions or deletions to the previous year's organic system plan, intended to be undertaken in the coming year, detailed pursuant to §205.200?			
Any additions to or deletions from the information required pursuant to §205.401(b)?			
An update on the correction of minor noncompliance's previously identified by the certifying agent as requiring correction for continued certification?			
Other information as deemed necessary by the certifying agent to determine compliance with the Act and the regulations			

Remarks and Findings: Closing Meeting Findings
 XXX

General Assessments:	Yes	No	Certification File Number(s)
Are the materials and inputs used in compliance with the NL and annotations? §§ <u>205.403(c)(3), 205.402(a)(2), 205.406(c)</u>			
Is the application and OSP complete? §§ <u>205.402(a)(1), 205.406(c)</u>			
Is there evidence that an exit interview was conducted? § <u>205.403(d)</u>			
Was information or issues of concern identified by the inspector in the			



exit interview, as evidenced in the inspection report? §205.403(d)			
Were there any notices of non-compliance, or adverse actions by the ACA and was the correct process followed? Table 4 , Table 5			
If this was a continuation of certification review and any information on the certificate changed, did the ACA provide the operation with an updated certificate? §205.406 (d)			
Remarks and Findings: Closing Meeting Findings			
XXX			

<p>Overall Determination Statement:</p> <p>Include a statement based on an overall determination on whether the operation meets the following as applicable: the crop production standards (§§205.200 through 205.206); wild crop production standards (§205.207); livestock production standards (§§205.236 through 205.240); handling production standards (§§205.270 through 205.272); and applicable guidance documents of the NOP Handbook.</p> <p>Include a statement on whether the initial review, inspection, and final decisions were in compliance with the requirements.</p>
XXX



Table 4 – Notice of Noncompliance / Adverse Action Worksheet [Table of Contents](#) [§205.406\(c\)](#) [§205.662\(a\)](#) [Table 3](#)

Name of Client and Scope	Notification of Minor Issues <i>Enter Yes, No, or NA as applicable</i>	Notification of Noncompliance <i>Enter Yes, No, or NA as applicable</i>				Type of Proposed Adverse Action:	Notification of Proposed Adverse Action				Adverse Action Taken:	Request for Mediation or Appeal and Remarks
		Description of NC §205.662(a)(1)	Facts of Each NC §205.662(a)(2)	Date to Rebut or Correct §205.662(a)(3)	Resolution Notice Sent §205.662(b)		Reasons for proposed action §205.662(c)(1)	Proposed Eff. Date §205.662(c)(2)	Impact of proposed action §205.662(c)(3)	Right of Mediation or appeal §205.662(c)(4)		
	Description of Minor Issue Facts of Each Minor Issue Date to Rebut or Correct Resolution					Proposed Suspension (PS) Proposed Revocation (PR) NA – none sent Enter PS, PR, or NA as applicable §205.662(c)					Suspension (Susp) Revocation (Rev) §205.662(e)(1) Enter Revocation or suspension if applicable Did the certified operation request mediation or file an appeal? If so did the ACA or State send the notice of Suspension / Revocation while final resolution of either mediation or appeal was pending? §205.662(e)(2) Enter Remarks as appropriate. <i>Document:</i> 1) when Notices were submitted to the client and method used (§205.660(d)); 2) when and if the notices were sent to the Administrator (§205.501(a)(15(i))).	



Table 4 – Notice of Noncompliance / Adverse Action Worksheet [Table of Contents](#) [§205.406\(c\)](#) [§205.662\(a\)](#) [Table 3](#)

Name of Client and Scope	Notification of Minor Issues <i>Enter Yes, No, or NA as applicable</i>	Notification of Noncompliance <i>Enter Yes, No, or NA as applicable</i>				Type of Proposed Adverse Action:	Notification of Proposed Adverse Action				Adverse Action Taken:	Request for Mediation or Appeal and Remarks
	Description of Minor Issue Facts of Each Minor Issue Date to Rebut or Correct Resolution	Description of NC §205.662(a)(1)	Facts of Each NC §205.662(a)(2)	Date to Rebut or Correct §205.662(a)(3)	Resolution Notice Sent §205.662(b)	Proposed Suspension (PS) Proposed Revocation (PR) NA – none sent Enter PS, PR, or NA as applicable §205.662(c)	Reasons for proposed action §205.662(c)(1)	Proposed Eff. Date §205.662(c)(2)	Impact of proposed action §205.662(c)(3)	Right of Mediation or appeal §205.662(c)(4)	Suspension (Susp) Revocation (Rev) §205.662(e)(1) Enter Revocation or suspension if applicable	Did the certified operation request mediation or file an appeal? If so did the ACA or State send the notice of Suspension / Revocation while final resolution of either mediation or appeal was pending? §205.662(e)(2) <i>Enter Remarks as appropriate. Document: 1) when Notices were submitted to the client and method used (§205.660(d)); 2) when and if the notices were sent to the Administrator (§205.501(a)(15(i))).</i>
Instructions: <ul style="list-style-type: none"> For livestock clients, identify the type of livestock (poultry, dairy, beef cattle, sheep, etc) Start with Notifications of Noncompliance (NC) and then move on to Adverse Actions (proposed suspension or revocation; and Actual suspension or revocation) Notifications of NC without Adverse Actions would have “NA” in the “Type of Proposed Adverse Action” column; all other columns after could remain blank if NA For Notifications of NC the response must be “Yes” for the first 3 columns. If the certified operation demonstrates that each NC has been resolved the response for the 4th column must also be “Yes”. For Notifications of Proposed Adverse Actions the response must be “Yes” for all 4 columns. Also See §§205.662(d) and 205.662(g) 												
Remarks and Findings: Closing Meeting Findings												



Table 4 – Notice of Noncompliance / Adverse Action Worksheet [Table of Contents](#) [§205.406\(c\)](#) [§205.662\(a\)](#) [Table 3](#)

Name of Client and Scope	Notification of Minor Issues <i>Enter Yes, No, or NA as applicable</i>	Notification of Noncompliance <i>Enter Yes, No, or NA as applicable</i>				Type of Proposed Adverse Action:	Notification of Proposed Adverse Action				Adverse Action Taken:	Request for Mediation or Appeal and Remarks
		Description of NC §205.662(a)(1)	Facts of Each NC §205.662(a)(2)	Date to Rebut or Correct §205.662(a)(3)	Resolution Notice Sent §205.662(b)		Reasons for proposed action §205.662(c)(1)	Proposed Eff. Date §205.662(c)(2)	Impact of proposed action §205.662(c)(3)	Right of Mediation or appeal §205.662(c)(4)		
	Description of Minor Issue Facts of Each Minor Issue Date to Rebut or Correct Resolution					Proposed Suspension (PS) Proposed Revocation (PR) NA – none sent Enter PS, PR, or NA as applicable §205.662(c)					Suspension (Susp) Revocation (Rev) §205.662(e)(1) Enter Revocation or suspension if applicable Did the certified operation request mediation or file an appeal? If so did the ACA or State send the notice of Suspension / Revocation while final resolution of either mediation or appeal was pending? §205.662(e)(2) Enter Remarks as appropriate. <i>Document:</i> 1) when Notices were submitted to the client and method used (§205.660(d)); 2) when and if the notices were sent to the Administrator (§205.501(a)(15)(i)).	
	XXX											



Table 5 – Notice of Noncompliance / Denial of Certification [Table of Contents](#) [§205.405](#) [Table 3](#)

A.	B.	C.	D.	E.	F.	G.
Name of Client	Scope	Notification of Noncompliance Included: §205.405(a)	Applicant Response §205.405(b)	ACA Action Taken §205.405(c)(1) §205.405(c)(2)	Denial of Certification included: §205.405(d)	Identify if either of the two denial methods were used and if they were appropriate
<p>Instructions:</p> <p>C. Enter Yes if <u>all 3 requirements met</u>. (1) A description of each NC, (2) Facts upon which the notification of NC is based, and (3) Date for rebuttal or CA for each NC with supporting documentation.</p> <p>D. Enter the applicant’s response: (1) Corrected NC – submitted CA; (2) Corrected NC – applied to another ACA; (3) Rebutted NC; (4) No Response provided.</p> <p>E. Enter action taken by ACA: (1) Reviewed CA/Rebuttal and conducted inspection if necessary; (2) CA/Rebuttal accepted, issued cert; (3) CA/Rebuttal not accepted, issued Denial of certification; (4) No Response by Applicant – issued Denial of certification.</p> <p>F. Enter Yes if <u>all 4 requirements met</u>. If any is missing indicate which one and identify NC on main checklist. The reason(s) for denial §205.405(d); (1) right to Reapply for Certification §205.405(d)(1); (2) right to Request mediation §205.405(d)(2); (3) right to File an Appeal §205.405(d)(3).</p> <p>G. See main checklist for guidance notes Section V. (1) ACA issued combined notice of NC and Denial of certification §205.405(a), if correction of NC is not possible. Combined notice <u>must</u> include requirements of §§205.405(a) and 205.405(d); (2) ACA denied certification without issuing a notification of noncompliance §205.405(g), if ACA had reason to believe applicant willfully made a false statement or purposefully misrepresented the applicant's operation.</p>						
<p>Remarks and Findings: Closing Meeting Findings</p>						
<p>XXX</p>						



Table 6a - Label Review Worksheet – “100% Organic” or “Organic” §205.303

[Table of Contents](#) [Table 1](#) [Table 2](#) [Table 4](#) [Table 5](#)

Client File	Product	1	2	3	4	5	6	7	8	9	10	11	12	13 Complies	
														Yes	No

Instructions: For products labeled as “100% Organic” or “Organic”, review against the requirements and record on table using “Y”, “N”, or “NA” as applicable (Y = Yes / N = No). Indicate for each label if it complied with requirements. Insert more rows as needed.

- 1. For products labeled as “Organic”, does label contain the percentage of organic ingredients in the product? §205.303(a)(2) (if no, put NA for 2 and 3)**
- 2. Does the percentage statement exceed one-half the size of the largest type size on the panel on which the statement is displayed? §205.303(a)(2)**
- 3. Does the percentage statement appear in its entirety in the same type size, style, and color without highlighting? §205.303(a)(2)**
- 4. Is this a multi-ingredient Product labeled as 100% Organic? §205.303(a)(3)**
- 5. If product is labeled organic does it identify each organic ingredient in the ingredient statement? §205.303(b)(1)**
- 6. Does it identify water or salt as organic? §205.303(b)(1)**
- 7. Does the label (on the information panel) identify the name of the ACA that certified the handler of the finished product preceded by the statement, “Certified organic by * * *,” or similar phrase? §205.303(b)(2)**
- 8. Is the ACA identifying statement (#7 above) on the information panel and below the information identifying the handler or distributor of the product? §205.303(b)(2)**
- 9. Does the label use the ACA’s seal or logo? §205.303(a)(5)**
- 10. Is the ACA seal or logo individually displayed more prominently than the USDA seal? §205.303(a)(5)**
- 11. Does it contain the USDA Seal? §205.311(a)**
- 12. Does the Seal replicate the form and design of figure 1, is printed legibly and conspicuously, and meets all requirements of §205.311(b)?**
- 13. Are labels compliant? If ‘No’ and a NC was not issued, then [§205.402\(a\)\(2\)](#) or [§205.405\(a\)](#) for applicants, [§205.406\(c\)](#) for certified operations.**

Remarks and Findings: [Closing Meeting Findings](#)

XXX



Table 6b - Label Review Worksheet – “Made with Organic” (specified ingredients or food group(s))
 §205.303

[Table of Contents](#) [Table 1](#) [Table 2](#) [Table 4](#) [Table 5](#)

Client File	Product	1	2	3	4	5	6	7	8	9	10	11	12 Complies	
													Yes	No

Instructions: For products labeled as “*Made with organic* (specified ingredients)” review against the requirements and record on table using “Y”, “N”, or “NA” as applicable (Y = Yes / N = No). Indicate for each label if it complied with requirements. Insert more rows as needed.

1. Does the “Made with organic (specified ingredients)” statement list more than three organically produced ingredients? §205.304 (a) (1) (i)
2. Does the “Made with organic (specified ingredients)” statement list more than three of the following food groups: beans, fish, fruits, grains, herbs, meats, nuts, oils, poultry, seeds, spices, sweeteners, and vegetables or processed milk products? §205.304 (a) (1) (ii)
3. Does the “Made with organic (specified ingredients)” statement appear in letters that does not exceed one-half the size of the largest type size on the panel of which it appears and does it appear in its entirety in the same type size, style, and color without highlighting? §205.304 (a) (1) (iii)
4. Does the percentage of organic ingredients statement exceed one-half the size of the largest type size on the panel on which the statement is displayed? §205.304 (a) (2)
5. Does the percentage of organic ingredients statement appear in its entirety in the same type size, style, and color without highlighting? §205.304 (a) (2)
6. Does the label identify each organic ingredient in the ingredient statement? §205.304 (b) (1)
7. Does it identify water or salt as organic? §205.304 (b) (1)
8. Does the label (on the information panel) identify the name of the ACA that certified the handler of the finished product preceded by the statement, “Certified organic by * * *,” or similar phrase? §205.304 (b) (2)
9. Is the ACA identifying statement (#7 above) on the information panel and below the information identifying the handler or distributor of the product? §205.304 (b) (2)
10. Does the label use the ACA’s seal or logo? §205.304 (a) (3)
11. Does it contain the USDA Seal? §205.304 (c)
12. Are labels compliant? If ‘No’ and a NC was not issued, then [§205.402\(a\)\(2\)](#) or [§205.405\(a\)](#) for applicants, [§205.406\(c\)](#) for certified operations.

Remarks and Findings: [Closing Meeting Findings](#)



Table 6b - Label Review Worksheet – “Made with Organic” (specified ingredients or food group(s))
 §205.303

[Table of Contents](#) [Table 1](#) [Table 2](#) [Table 4](#) [Table 5](#)

Client File	Product	1	2	3	4	5	6	7	8	9	10	11	12 Complies	
													Yes	No
XXX														



Table 7a - Sample Testing Worksheet – General Information

[Table of Contents](#) [Table 1](#) [Table 2](#) [Table 3](#) [Table 4](#) [Table 5](#)

Provide information on sampling conducted by the ACA since the previous assessment.
(Number of certified operations; # of operations with samples pulled; number of samples pulled overall; types of samples (soil, tissue, product, water, etc...). Were 5% of the certified operations sampled and tested on an annual basis (or at least one operation annually if ACA has fewer than thirty operations)? §205.670(d)

XXX

Remarks and Findings: [Closing Meeting Findings](#)

XXX

Table 7b – Sample Testing and Reporting Information [Table of Contents](#) [Table 2](#)

File #	Name of applicant / certified operation sampled	A	B	C	D	E	F	G	H	I	J	K	L Type of Sample Pulled	M What was sample tested for?	N Why was the sample pulled?	O Provide info on test results	P Provide info on ACA decision & outcome	Complies			
																		Yes	No		
1																					
2																					
3																					
4																					
5																					
6																					
7																					
8																					
9																					
10																					

Instructions: Review the procedures and processes that describe how the sample was pulled and the reporting requirements. For requirements A – K, enter “Y” for “Yes” or “N” for “No”, as appropriate. Make an assessment on whether or not the requirements are met by entering an “X” under the appropriate response of



Table 7b – Sample Testing and Reporting Information [Table of Contents](#) [Table 2](#)

File #	Name of applicant / certified operation sampled	A	B	C	D	E	F	G	H	I	J	K	L Type of Sample Pulled	M What was sample tested for?	N Why was the sample pulled?	O Provide info on test results	P Provide info on ACA decision & outcome	Complies	
																		Yes	No
<p>the “Complies” column. If any requirement is not met, identify on Checklist Section XIV (§§205.670 & 205.671). For requirements L through P, enter the appropriate response.</p> <p>A. Was the sample collected by an inspector representing the ACA, Administrator, or State? §205.670(e)</p> <p>B. Was a receipt provided to the operation by the inspector? §205.403(e)(1)</p> <p>C. Was the chain of custody maintained? §205.670(e)</p> <p>D. Was an ISO 17025 accredited lab used or an alternate standard approved by the NOP? §205.670(e) and NOP 2611</p> <p>E. Was an approved AOAC or Validated Method used? §205.670(e)</p> <p>F. Were results sent to the operation? §§205.402(b)(3) and 205.403(e)(2)</p> <p>G. Were test results available for review during the assessment? <i>If results are not available assess why and if appropriate identify a NC to §205.501(a)(9). Availability of test results for review during assessments is also identified in NOP 2613.</i></p> <p>H. Was the operation charged for testing? §205.670(b)(c)</p> <p>I. Did results exceed FDA or EPA tolerances? §205.670(g)</p> <p>J. Was the applicable agency notified if “I” above is “Yes”? §205.670(g); <i>see NOP 2613 for further guidance</i></p> <p>K. Were any prohibited substances greater than 5% of EPA tolerance or higher than UREC? §205.671</p> <p>L. What type of sample was pulled? <i>(Soil, tissue, product, water, etc...)</i></p> <p>M. What was the sample tested for? <i>(Specific pesticide name or classification)</i></p> <p>N. Why was the sample pulled? <i>(Directed by ACA or NOP? Inspector decision)</i></p> <p>O. Provide information on test results. <i>(Positive, negative, etc.) NOP 2613</i></p> <p>P. Provide information on ACA decision and outcome. <i>(Was there an investigation?) §205.671; see NOP 2613 for further guidance</i></p>																			
Remarks and Findings: Closing Meeting Findings																			
XXX																			

