REVISION: March 2025

Georgia Crop Improvement Association
Organic Certification Program

Administration and Policy Manual

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Introduction

The Georgia Crop Improvement Association is an established organization comprising farmers and other stakeholders dedicated to the cultivation and distribution of high-quality seeds and propagating materials. Through certification processes such as known sources of seed, field inspections, and analytical testing, the association ensures the genetic purity and identity of superior varieties. The Georgia Crop Improvement Association was founded in 1946 and became the legal certifying agency following the passage of House Bill #104 in 1956. This bill was later superseded by Senate Bill #583 in July 1997. Both legislative actions authorized the Dean of the University of Georgia College of Agriculture and Environmental Sciences to designate the Georgia Crop Improvement Association as the official certifying agency in Georgia.

Crop Improvement Associations emphasize more efficient crop production by encouraging the use of high-quality seed of superior varieties. Larger yields per acre and better-quality products have always been essential for the most profitable returns from crop production.

The Georgia Crop Improvement Association's Organic Certification Program (GCIAOCP) is a natural extension of third-party certifying activities regularly performed for seed, Quality Assurance and Identity Preserved Programs currently offered.

The GCIA Organic Certification Program is committed to environmentally sound and economically viable production of food and encourages the preservation of natural resources, the improvement of soil quality and health through organic and sustainable farming practices and to foster the production of healthy livestock and poultry production.

The GCIAOCP is based on the requirements of the Department of Agriculture and Agricultural Marketing Service 7CFR Part 205 NATIONAL ORGANIC PROGRAM.

This manual references NOP Guidance Documents which can be found at www.ams.usda.gov/NOP Guidance.

Program Administration

I. TEAM ROLES & RESPONSIBILITIES

1. Program Administrator

The Executive Director of the Georgia Crop Improvement Association is responsible for the daily operations of the program and for the purpose of this publication will be known as the Program Administrator.
Should the Executive Director of the Georgia Crop Improvement Association not meet the minimum qualifications, as listed below, the Executive Director of the Georgia Crop Improvement Association may appoint a person to serve as the Program Administrator who does have the required qualifications.

Qualifications:

- Must have a working knowledge of NOP 205.501
- Must have completed an IOIA basic training program
- Must not have a conflict of interest with clients and is bound to maintain confidentiality regarding information on the application and information obtained as part of the inspection process. The Program Administrator will use, as a guide, NOP 205.501(a)10 & 11.
- Must not act as consultants or endorse items or products.

Duties and Responsibilities:

- Hears appeals. (See section IX)
- Conducts all Mediation meetings. (See section X and Appendix N.)
- Responsible for completion of Annual Program Review using NOP 205.501(a) (7), and NOP Guidance Document 2025.
- Make available to any member of the public information as provided for in NOP 205.501 and 205.504 (b)(5).

The Program Administrator, in consultation with the Program Manager, has responsibility for assigning unannounced inspections to inspectors and determining the scope of inspections which may be limited in scope, depth and breadth, and may cover only certain aspects of the operation, such as parcels, facilities, products, etc. The scope will be noted on the inspection report form and communicated in advance to the inspector.

Program Administrator and Program Manager, using Appendix B, will determine the number of unannounced inspections to be conducted. (Use Risk Assessment Scorecard as a resource)

In the event that an inspector reports to the Program Administrator that a facility has marketed more product than received, the Program Administrator will report the discrepancy to the National Organic Program contact within two working days. The Program Administrator will document the quantity of organic product received and the quantity shipped.

Records:
Assure that records obtained from applicants for certification and certified operations must be maintained for not less than 5 years beyond their receipt per NOP 205.510(b)(1).

Assure that records created by GCIAOCP regarding applicants for certification and certified operations must be maintained for not less than 10 years beyond their creation per NOP 2.05.510 (B)(2).

Assure that records created or received by the GCIAOCP pursuant to the accreditation requirement of the NOP Subpart F, excluding any records covered by NOP §205.510(b)(2) must be maintained for not less than 5 years beyond their creation or receipt per NOP 205.510 (b)(3).

Review of:
Reviews and approves any policy and fee changes before submission to the NOP.

Training:
The Program Administrator will conduct or see that training is conducted for GCIAOCP staff per NOP 205.501, General requirements and NOP 205.501 (a) (4) (i) (b&c); NOP 205.501 (a) (4) (ii) (b); NOP 205.501 (a) (6) (iii).

The Program Administrator will review the "Yearly Training Log" of each staff member prior to conducting yearly evaluation.

Investigations:
The Program Administrator will or may appoint a qualified staff member to investigate complaints about abuses in the production and sale of GCIAOCP certified crops or products, determine settlement of the complaint, and may access a fee for the cost of the investigation.

The Program Administrator will utilize Appendix D "Policy and Procedures for Conducting Investigations of Certified Operations for Possible Noncompliance Concerns" & Section VI of this manual for guidance.

Evaluations of Program and Personnel:
The Program Administrator will evaluate personnel who conduct inspections, conduct certification reviews and or implement measures to correct any deficiencies in certification process annually Per Appendix L. (Personnel Performance Evaluation) of this manual.

The Program Administrator will review the "Yearly Training Log" of each staff member prior to conducting yearly evaluation.

The Program Administrator will submit an annual report to the NOP Administrator as required in Section 205.501of the NOP and NOP Guidance Document NOP 2027 (Personnel Performance Evaluations).

Upon completion of the two shadow audits and two witness audits, the assigned inspector, Program Administrator and Program Manager will review the witness audit reports completed by the new inspector. Upon such review, the Program Administrator may recognize the new inspector as proficient or develop and implement a training program to correct any noted deficiencies. Upon completion of said program, the Program Administrator will reevaluate the inspector using NOP Guidance Document 2027 (Personnel Performance Evaluations) as a reference.

Should a person(s) be identified during an evaluation as needing improvement, the Program Administrator will identify the specific areas(s) the individual needs additional training in and the Program Administrator will design a training program to address the area(s) Per Appendix L. (Personnel Performance Evaluations).

The Program Administrator will be evaluated each year by the GCIA Executive Committee per the "GCIAOCP Program Administrator Evaluation Work Sheet" found in the GCIAOCP operations manual, Appendix R.

Should the GCIA Executive Committee determine that the Program Administrator needs improvement the Executive Committee will task the Program Manager and Certification Reviewer to develop and implement a training program to cover the needed evaluated deficiency(s).

2. Program Manager

Qualifications:

- Must have a working knowledge of NOP 205.501 and 205.402.
- Must not have a conflict of interest with clients and is bound to maintain confidentiality regarding information on the application and information obtained as part of the inspection process. The Program Manager will use, as a guide, NOP 205.501(A)10 & 11.
- Must not act as consultants or endorse items or products.

Duties and Responsibilities:

- The Program Manager is responsible for distributing to the organic staff any policy and/or changes to the QMS after approval by the Program Administrator.
- The Program Manager is responsible for tracking annual organic staff evaluations performed by the Program Administrator.
- The Program Manager is responsible for tracking OSPs and inspections to ensure that an on-site audit is conducted once per year.
- The Program Manager is responsible for updating document(s) tracking shadow and witness audits
- Assign audits based on inspector expertise in scope and training.
- Per Appendix B (Policy and Procedures for Conducting Unannounced Inspections or Certified Organic Operations) of the GCIAOCP Administrative and Policy Manual, determine the number of clients to receive unannounced inspections and pesticide samples to be taken.

The number of operations to receive planned residue and unannounced inspections will be determined by applying the 5% inspection requirement to the number of Certified Operations listed on the OID as of January 2 of the current year

The Program Manager, consulting with the Program Administrator, has responsibility for assigning unannounced inspections to inspectors and determining the scope of inspections which may be limited in scope, depth and breadth, and may cover only certain aspects of the operation, such as parcels, facilities, products, etc. The scope will be noted on the inspection report form and communicated in advance to the inspector.

Unannounced inspections reports will be sent to the certification reviewer.

Report any findings of the Certification Reviewer to the client receiving the audit.
Submit any revisions to the fee schedule approved by the Program Administrator to NOP for approval prior to implementation.

Responsible for scheduling Internal Program Review per NOP Guidance Document 2025 (Internal Program Review) and report to the NOP any findings and corrective actions no later than April 1 of the calendar year after the Internal Review.

Responsible for conducting or cause conducting of risk-based supply chain traceability audits as described in the criteria and procedures for supply chain audits per205.504(b)(7) and share audit findings with other Certifying Agents as needed to determine compliance, per paragraph (13) of 205.501 and Appendix M & P.

After an inspector completes the International Organic Inspectors Association (IOIA) basic training course, he/she will shadow a recognized, experienced inspector (assigned by the Program Manager) on two audits, and an appointed inspector will witness at least two audits performed by the new inspector.

Upon completion of the two shadow audits and two witness audits, the assigned inspector, Program Administrator and Program Manager will review the witness audit reports completed by the new inspector. Upon such review, the Program Administrator may recognize the new inspector as proficient or develop and implement a training program to correct any noted deficiencies. Upon completion of said program, the Program Administrator will reevaluate the inspector using NOP Guidance Document 2027 (Personnel Performance Evaluations) as a reference.

Responsible for scheduling Mediation meetings per Appendix N.

Will Ensure:
GCIAOCP staff, when reviewing operations which use Synthetic Algicides, Disinfectants, and Sanitizers in Organic Crop Production, will utilize NOP Policy Memo 13-3 (Synthetic Algicides, Disinfectants, and Sanitizers in Organic Crop Production) for determining compliance.

GCIAOCP staff, when reviewing operations which use Aquatic Plant Extracts, will utilize NOP Policy Memo 14-1 (Aquatic Plants Extracts) for determining compliance.

GCIAOCP staff, when reviewing operations which use Chlorine in egg breaking operations, will utilize NOP Policy Memo 14-2 (Chlorine Use in Egg Breaking Facilities) for determining compliance.

GCIAOCP staff, when reviewing operations which use Nanotechnology in their operation, will utilize NOP Policy Memo 15-2 (Nanotechnology) for determining compliance.

GCIAOCP staff, when reviewing operations which use imported grain in their operation, will utilize NOP Policy Memo 18-1 (Impact of Fumigation and Irradiation Requirements on Organic Imports) for determining compliance.

GCIAOCP staff, when reviewing operations which use imported grain in their operation, will utilize NOP Policy Memo 18-1 (Impact of Prohibited Grain Seed Regulations on Organic Imports) for determining compliance.

GCIAOCP staff, when reviewing operations which use Sodium Nitrate in Organic Crop Production, will utilize NOP Policy Memo 12-1 (Sodium Nitrate Use in Organic Crop Production) for determining compliance.

GCIAOCP staff, when reviewing the Labeling of nonretail containers, will utilize section 205.307.

GCIAOCP staff, when reviewing OSPs that note the use of Sodium Nitrate in Organic Crop Production will refer to 205.602(h) and NOP Notice 12-1 (Sodium Nitrate Use in Organic Crop Production). The OSP must contain a protocol for testing Sodium Nitrate levels to assure and document that no more than 20% of the crop's total nitrogen requirement is provided by Sodium Nitrate. See Appendix F.

GCIAOCP staff, when reviewing OSPs for "closed systems" that use Sodium Nitrate, the OSP must contain protocols for disposing of water that may contain high levels of Nitrates in a manner that will not harm water, soil or the environment.

3. Organic Certification Specialist

Qualifications:

- Must have a working knowledge of NOP 205.501 and 205.402.
- Must not have a conflict of interest with clients and is bound to maintain confidentiality regarding information on the application and information obtained as part of the inspection process. The Organic Certification Specialist will use, as a guide, NOP 205.501(A)10 & 11.
- Must not act as consultants or endorse items or products.

Duties and Responsibilities:
Initial review of OSP/Application for completeness Utilizing NOP Guidance Documents 2615 and 3012 (revised 01,3-24)

Upon completion of the pre-audit by the Organic Certification Specialist and/or Program Manager, any incomplete, incorrect or unanswered questions on the OSP will be addressed by sending the "Incomplete OSP Notification" to the applicant.

During the review of each OSP, either initial or renewal, review any websites listed as advertising or promoting organic products by the client for compliance; in particular, ensure correct usage of the organic seal. Note any violations of NOP rules as a noncompliance. NOP Guidance Document 4012 (Use of Brand or Company Names Containing the words "Organic") will be utilized in the process.

Send OSP applications to the appropriate inspector as assigned by the Program Manager. If a renewal, the previous year's audit will be included, plus previous unannounced inspections and any corrective actions to non-compliances issued to the operation during the current or previous

certification cycle. (Utilizing the " Checklist for files sent to auditor.)

The Organic Certification Specialist will utilize NOP Guidance Document 2601 (The Organic Certification Process), sections 3.1; 3.2; 3.3;3.6;3.7.

When a Certification Reviewer's decision results in an "identified concern" or "noncompliance", the Organic Certification Specialist (at the direction of the program manager) will issue an appropriate notification to all parties and document any corrective actions to the OSP and enter onto spreadsheet.

Will:
When reviewing labels that contain the word "Organic" as a brand name or company name, will utilize NOP Guidance Document 4012 (Use of Brand or Company Names Containing the Word "Organic" and 7 CFR 205.660 (c) to determine compliance.

When reviewing products and labels in the "Made with Organic" *** category, will utilize NOP Guidance Document 5032 (Products in the "Made with Organic *** Labeling Category").

GCIAOCP staff, when reviewing Labeling of nonretail containers, will utilize section 205.307 and Appendix Q

4. Inspector

Inspector Qualifications:

- All inspectors must be in compliance with 205.501 (4)(B) and (C).
- Inspectors must have completed an IOIA basic training program.
- Inspectors must not have a conflict of interest with parties they are inspecting, and they are bound to maintain confidentiality regarding information on the application and information obtained as part of the inspection process. Inspectors will use, as a guide, NOP 205.501(A)10 & 11.
- Inspectors must not act as consultants or endorse items or products.

After an inspector completes the International Organic Inspectors Association (IOIA) basic training course, he/she will shadow a recognized, experienced inspector (assigned by the Program Manager) on two audits, and an appointed inspector will witness at least two audits performed by the new inspector.

Upon completion of the two shadow audits and two witness audits, the assigned inspector, Program Administrator and Program Manager will review the witness audit reports completed by the new inspector. Upon such review, the Program Administrator may recognize the new inspector as proficient or develop and implement a training program to correct any noted deficiencies. Upon completion of said program, the Program Administrator will reevaluate the inspector using NOP Guidance Document 2027 (Personnel Performance Evaluations) as a reference.

Duties and Responsibilities

Perform assigned audits and complete required inspection reporting, etc.

The organic system plan will be reviewed for compliance by the inspector prior to inspection and auditing. The inspector will contact the client regarding compliance issues prior to scheduling the audit.

The inspector will utilize NOP Guidance Document 2601 (The Organic Certification Process), section 3.4.

The inspector may take samples of water, soil, plant tissue, plants, etc. for testing. A receipt will be given to the producer; the producer will not charge GCIAOCP for the sample taken. The cost of testing, unless required due to a NOP settlement agreement, will be paid by the GCIAOCP and the applicant will receive a copy of the analysis by email. ***(See Appendix A: GCIAOCP Procedures for Sampling and Residue Testing.)***

All inspections will be made when organic production, handling, and processing activities best represent compliance or noncompliance with the NOP.

GCIAOCP inspectors, when encountering a Health or Safety Violation will refer to NOP Policy Memo 11-6.
GCIAOCP inspectors will utilize NOP Guidance Document "Natural Resources and Biodiversity Conservation" 5020 to aid in determining compliance with section 205.2 of the NOP.

The inspector will review monitoring practices and procedures that the operation uses to verify effective implementation of the OSP utilizing 205.201 (a)(3) as a guide and reference.

GCIAOCP inspectors will ensure that operations monitor and document monitoring the chlorine levels at the point where the water last contacted the organic product in a direct application. A description of the operations monitoring procedure will be identified in the appropriate OSP. Inspectors will conduct an exit interview with the applicant or authorized representative upon completion of the inspection process utilizing NOP 205.403 On-site inspections(e).

GCIAOCP inspectors, when reviewing labels that contain the word "Organic" as a brand name or company name, will utilize NOP Guidance Document 4012 (Use of Brand or Company Names Containing the Word "Organic" and 7 CFR 205.660 (c) to determine compliance.

GCIAOCP inspectors, when reviewing products and labels in the "Made with Organic" *** category, will utilize NOP Guidance Document 5031 (Products in the "Made with Organic *** Labeling Category").

The inspector will review product labels for compliance with 205.300 and 205.311.

GCIAOCP inspectors, when reviewing materials for use in organic crop production, will utilize NOP Guidance Document 5034 (Materials for Organic Production).

GCIAOCP inspectors will utilize NOP Guidance Document 5034-2 (revised 3-24, Appendix of

Prohibited Materials for Organic Crop Production"), when reviewing prohibited Materials for Organic Production.

GCIAOCP inspectors will utilize NOP Guidance Document 5036 (Treated Lumber), to determine treated lumber compliance.

GCIAOCP inspectors will utilize NOP Policy Memo 10-2 (Sulfur Dioxide in wind made with organic fruit) to determine the compliance of Sulfur Dioxide in wine making operations.

GCIAOCP inspectors, when reviewing operations which make or use natural flavors, will utilize NOP Policy Memo 11-1 (Use of Natural Flavors).

GCIAOCP inspectors, when reviewing operations which make or use an Alcoholic Beverage, will utilize NOP Policy Memo 11-3 (Labeling of Alcoholic Beverages with Organic References) for labeling compliance.

GCIAOCP inspectors, when reviewing operations which use Humic Acid, will utilize NOP Policy Memo 13-2 (Humic Acid Extraction) for determining compliance.

GCIAOCP inspectors, when reviewing operations which use Synthetic Algicides, Disinfectants, and Sanitizers in Organic Crop Production, will utilize NOP Policy Memo 13-3 (Synthetic Algicides, Disinfectants, and Sanitizers in Organic Crop Production) for determining compliance.

GCIAOCP staff, when reviewing operations which use Aquatic Plant Extracts, will utilize NOP Policy Memo 14-1 (Aquatic Plants Extracts) for determining compliance.

GCIAOCP inspectors, when reviewing operations which use Chlorine in egg breaking operations, will utilize NOP Policy Memo 14-2 (Chlorine Use in Egg Breaking Facilities) for determining compliance.

GCIAOCP inspectors, when reviewing operations which use Nanotechnology in their operation, will utilize NOP Policy Memo 15-2 (Nanotechnology) for determining compliance.

GCIAOCP inspectors, when reviewing operations which use imported grain in their operation, will utilize NOP Policy Memo 18-1 (Impact of Fumigation and Irradiation Requirements on Organic Imports) for determining compliance.

GCIAOCP inspectors, when reviewing operations which use imported grain in their operation, will utilize NOP Policy Memo 18-2 (Impact of Prohibited Grain Seed Regulations on Organic Imports) for determining compliance.

GCIAOCP inspectors, when reviewing operations which use Sodium Nitrate in Organic Crop Production, will utilize NOP Policy Memo 12-1 (Sodium Nitrate Use in Organic Crop Production) for determining compliance.

GCIAOCP inspectors, when reviewing Labeling of nonretail containers, will utilize section 205.307.

GCIAOCP inspectors, when reviewing OSPs that note the use of Sodium Nitrate in Organic Crop

Production will refer to 205.602(h) and NOP Notice 12-1 (Sodium Nitrate Use in Organic Crop Production). The OSP must contain a protocol for testing Sodium Nitrate levels to assure and document that no more than 20%of the crop's total nitrogen requirement is provided by Sodium Nitrate.

GCIAOCP inspectors, when reviewing OSPs for "closed systems" that use Sodium Nitrate, the OSP must contain protocols for disposing of water that may contain high levels of Nitrates in a manner that will not harm water, soil or the environment.

5. Senior Inspector/ Certification Reviewer

Duties and Responsibilities:
All inspectors must be in compliance with 205.501 (4)(B) and (C) and completed all requirements noted in "Inspector Qualifications".

Perform assigned audits and complete required inspection reports, etc.

The inspector will utilize NOP Guidance Document 2601 (The Organic Certification Process), section 3.4.

The organic system plan will be reviewed for compliance by the senior inspector prior to inspection and auditing. The senior inspector will contact the client regarding compliance issues prior to scheduling the audit.

The inspector may take samples of water, soil, plant tissue, plants, etc. for testing. A receipt will be given to the producer; the producer will not charge the GCIAOCP for the sample taken. The cost of testing will be paid by the GCIAOCP, and the applicant will receive a copy of the analysis by email. ***(See Appendix A: GCIAOCP Procedures for Sampling and Residue Testing.)***

All inspections will be made when organic production, handling, and processing activities best represent compliance or noncompliance with the NOP.

GCIAOCP inspectors will utilize NOP Guidance Document "Natural Resources and Biodiversity Conservation" 5020 to aid in determining compliance with section 205.2 of the NOP.

The inspector will review monitoring practices and procedures that the operation uses to verify effective implementation of the OSP utilizing 205.201 (a)(3) as a guide and reference.

GCIAOCP senior inspectors, when inspecting will ensure that operations monitor and document monitoring the chlorine levels at the point where the water last contacted the organic product in a direct application. A description of the operations monitoring procedure will be identified in the appropriate OSP.

GCIAOCP senior inspectors, when encountering a Health or Safety Violation, will refer to NOP Policy Memo 11-6.

Inspectors will conduct an exit interview with the applicant or authorized representative upon

completion of the inspection process. Should the facility market more products than received, this discrepancy will be reported to the Program Administrator immediately. The Program Administrator will report the discrepancy to the National Organic Program contact within two working days. The Inspector will document on the exit interview the quantity of organic product received and the quantity shipped. The inspector will cover all potential problem areas noted on the inspection form.

GCIAOCP inspectors, when reviewing labels that contain the word "Organic" as a brand name or company name, will utilize NOP Guidance Document 4012 (Use of Brand or Company Names Containing the Word "Organic" and 7 CFR 205.660 (c) to determine compliance.

GCIAOCP senior inspectors, when reviewing products and labels in the "Made with Organic" *** category, will utilize NOP Guidance Document 5031 (Products in the "Made with Organic *** Labeling Category").

The inspector will review product labels for compliance with 205.300 and 205.311.

GCIAOCP senior inspectors, when inspecting and reviewing materials for use in organic crop production, will utilize NOP Guidance Document 5034 (Materials for Organic Production).

GCIAOCP senior inspectors will utilize NOP Guidance Document 5034-2 (revised 3-24, Appendix of Prohibited Materials for Organic Crop Production"), when inspecting and reviewing prohibited Materials for Organic Production.

GCIAOCP senior inspectors will utilize NOP Guidance Document 5036 (Treated Lumber), to determine treated lumber compliance.

GCIAOCP senior inspectors will utilize NOP Policy Memo 10-2 (Sulfur Dioxide in wind made with organic fruit) to determine the compliance of Sulfur Dioxide in wine making operations.

GCIAOCP senior inspectors, when inspecting and reviewing operations which make or use natural flavors, will utilize NOP Policy Memo 11-1 (Use of Natural Flavors).

GCIAOCP senior inspectors, when inspecting and reviewing operations which make or use an Alcoholic Beverage, will utilize NOP Policy Memo 11-3 (Labeling of Alcoholic Beverages with Organic References) for labeling compliance.

GCIAOCP senior inspectors, when inspecting and reviewing operations which use Humic Acid, will utilize NOP Policy Memo 13-2 (Humic Acid Extraction) for determining compliance.

GCIAOCP senior inspectors, when inspecting and reviewing operations which use Synthetic Algicides, Disinfectants, and Sanitizers in Organic Crop Production, will utilize NOP Policy Memo 13-3 (Synthetic Algicides, Disinfectants, and Sanitizers in Organic Crop Production) for determining compliance.

GCIAOCP senior inspectors, when inspecting and reviewing operations which use Aquatic Plant Extracts, will utilize NOP Policy Memo 14-1 (Aquatic Plants Extracts) for determining compliance.

GCIAOCP senior inspectors, when inspecting and reviewing operations which use Chlorine in egg breaking operations, will utilize NOP Policy Memo 14-2 (Chlorine Use in Egg Breaking Facilities) for determining compliance.

GCIAOCP senior inspectors, when inspecting and reviewing operations which use Nanotechnology in their operation, will utilize NOP Policy Memo 15-2 (Nanotechnology) for determining compliance.

GCIAOCP senior inspectors, when inspecting and reviewing operations which use imported grain in their operation, will utilize NOP Policy Memo 18-1 (Impact of Fumigation and Irradiation Requirements on Organic Imports) for determining compliance.

GCIAOCP senior inspectors, when inspecting and reviewing operations which use imported grain in their operation, will utilize NOP Policy Memo 18-2 (Impact of Prohibited Grain Seed Regulations on Organic Imports) for determining compliance.

GCIAOCP senior inspectors, when inspecting and reviewing operations which use Sodium Nitrate in Organic Crop Production, will utilize NOP Policy Memo 12-1 (Sodium Nitrate Use in Organic Crop Production) for determining compliance.

GCIAOCP senior inspectors, when inspecting and reviewing Labeling of nonretail containers, will utilize section 205.307.

GCIAOCP senior inspectors, when inspecting and reviewing OSPs that note the use of Sodium Nitrate in Organic Crop Production will refer to 205.602(h) and NOP Notice 12-1 (Sodium Nitrate Use in Organic Crop Production). The OSP must contain a protocol for testing Sodium Nitrate levels to assure and document that no more than 20%of the crop's total nitrogen requirement is provided by Sodium Nitrate.

GCIAOCP senior inspectors, when inspecting and reviewing OSPs for "closed systems" that use Sodium Nitrate, the OSP must contain protocols for disposing of water that may contain high levels of Nitrates in a manner that will not harm water, soil or the environment.

Perform assigned certification decision reviews per Policy Manual Certification Reviewer Duties and Responsibilities. See "Certification Reviewer Duties and Responsibilities".
Provide support and training to GCIAOCP inspectors and staff as needed.
Schedule and supervise required Shadow and Witness Audits, per 205.501(a); 205(a)(6)(i); 205.501(a)(6)(ii); and NOP Guidance Document 2027, Personnel Performance Evaluation, Section 3.2 evaluation Criteria b,(i) and b(ii) and report completion of and supporting documents to the Program Manager and Program Administrator.
Conduct and/or assign unannounced inspections and pesticide residue sampling, as assigned by the Program Administrator/Program Manager, necessary to be in compliance with NOP requirement of 5% using Appendix A ,"Procedures for Sampling Residue Testing and Appendix B Unannounced Inspections".

7. Certification Reviewer

Qualifications:

- Must have two years of experience as an inspector.
- All reviewers must be in compliance with 205.501 (4)(B) and (C)
- Reviewers must not have a conflict of interest with parties they are reviewing, and they are bound to maintain confidentiality regarding information on the application and information obtained as part of the review process.
- Reviewers must not act as consultants or endorse items or products.

Duties and Responsibilities:

Provide support and training to GCIAOCP inspectors and staff as needed.
The GCIAOCP Staff will email the GCIAOCP Certification Reviewer the completed inspection report and will notify the applicant of the Certification Reviewer's decision.

The GCIAOCP Staff will supply, via email, the Inspector(s) a copy of the Certification Reviewer's Decision Checklist document.

Upon review of the Inspector's report, utilizing NOP Guidance Document 2601 (The Organic Certification Process), section 3.5, step 4, the Certification Reviewer may:

grant organic certification to the Applicant,
grant organic certification to the Applicant with areas of concern,
issue Notice of Noncompliance,
issue Notice of Noncompliance with Notice of Proposed Suspension,
or deny organic certification.

If Applicant is issued a Notice of Noncompliance, Notice of Noncompliance with Notice of Proposed Suspension or denied organic certification, the Program Manager will notify the Applicant.

Section §205.405 of the NOP protocol and NOP Guidance Document 4002 (Enforcement of the USDA Organic Regulations: Penalty Matrix) will be followed.

The Administrator of the NOP will be notified of a Notification of Proposed Suspension or Revocation, and Notification of Suspension or Revocation sent pursuant to Section §205.662 of the NOP. Per 205.662(e)(3) the issuing of a notification of suspension or revocation, or the effective date of an operation's surrender, the certifying agent must update the operation's status in the Organic Integrity Database within 3 business days. If the Applicant is granted certification, a certificate will be issued. The certificate will comply with Sections 205.404 (b) and (c) of the NOP and NOP Guidance Document 2603 (Instructions, Organic Certificate).

Utilize NOP Guidance Document 4012 (Use of Brand or Company Names Containing the Word "Organic" and 7 CFR 205.660 (c) to determine compliance.

Utilize NOP Guidance Document 5031 (Products in the "Made with Organic *** Labeling Category").

The Reviewer will review product labels for compliance with 205.300 and 205.311.

Utilize NOP Guidance Document 5034 (Materials for Organic Production).

Utilize NOP Guidance Document 5034-2 (revised 3-24, Appendix of Prohibited Materials for Organic Crop Production"), when reviewing prohibited Materials for Organic Production.

Utilize NOP Guidance Document 5036 (Treated Lumber), to determine treated lumber compliance.

Utilize NOP Policy Memo 10-2 (Sulfur Dioxide in wind made with organic fruit) to determine the compliance of Sulfur Dioxide in wine making operations.

Utilize NOP Policy Memo 11-1 (Use of Natural Flavors).

Utilize NOP Policy Memo 11-3 (Labeling of Alcoholic Beverages with Organic References) for labeling compliance.

Utilize NOP Policy Memo 13-2 (Humic Acid Extraction) for determining compliance.

Utilize NOP Policy Memo 13-3 (Synthetic Algicides, Disinfectants, and Sanitizers in Organic Crop Production) for determining compliance.

Utilize NOP Policy Memo 14-1 (Aquatic Plants Extracts) for determining compliance.

Utilize NOP Policy Memo 14-2 (Chlorine Use in Egg Breaking Facilities) for determining compliance.

Utilize NOP Policy Memo 15-2 (Nanotechnology) for determining compliance.

Utilize NOP Policy Memo 18-1 (Impact of Fumigation and Irradiation Requirements on Organic Imports) for determining compliance.

Utilize NOP Policy Memo 18- (Impact of Prohibited Grain Seed Regulations on Organic Imports) for determining compliance.

Utilize NOP Policy Memo 12-1 (Sodium Nitrate Use in Organic Crop Production) for determining compliance.

When reviewing Labeling of nonretail containers, will utilize section 205.307.

When reviewing OSPs that note the use of Sodium Nitrate in Organic Crop Production refer to 205.602(h) and NOP Notice 12-1 (Sodium Nitrate Use in Organic Crop Production). The OSP must contain a protocol for testing Sodium Nitrate levels to assure and document that no more than 20% of the crop's total nitrogen requirement is provided by Sodium Nitrate.

When reviewing OSPs for "closed systems" that use Sodium Nitrate, the OSP must contain protocols for disposing of water that may contain high levels of Nitrates in a manner that will not

harm water, soil or the environment.

Utilize NOP Guidance Document "Natural Resources and Biodiversity Conservation" 5020 to aid in determining compliance with section 205.2 of the NOP.

GCIAOCP Reviewer will verify (via the onsite inspection report provided by the inspector) that operations monitor and document monitoring the chlorine levels at the point where the water last contacted the organic product in a direct application. A description of the operations monitoring procedure will be identified in the appropriate OSP.

II. APPLICATION FOR CERTIFICATION AND INSPECTION

1. Application Process

Any producer, handler, processor, distributor of Organic Product may apply for certification. Application is made by submitting a complete form with the appropriate fee. Certification is an annual process, and each facility must be on site inspected at least once per calendar year. Every certified farm, handler, processor, or distributor must annually renew certification by updating their OSP to include but not limited to field/facility histories, affidavits, processing facility changes, Summary reports etc. and have a new certification compliance inspection.

Failure to submit an annual organic system plan and/or certification fees for example, will be addressed with a Notice of Noncompliance.

Acceptance of an application is defined as: payment is received with a completed Organic System Plan (OSP) is received.

Participation in this Program will not be denied 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.

An application is considered a legal document. Signing of the application attests to the truthfulness of the historical information presented, the desire to carry out the organic farm plan, permission to inspect the applicant's operation and records and to notify the inspector of any unusual hazards to his personal safety.

GCIAOCP will utilize NOP Guidance Document 4009 (rev. 2024) (Who needs to be Certified); 7 CFR 205.100-101 to determine applicability of the regulations and exemptions from organic certification.

Per 205.403 (b)(2) GCIAOCP must be able to conduct unannounced inspections of any operation they certify and must not accept applications or continue certification with operations located in areas where GCIAOCP is unable to conduct unannounced inspections.
The applicant must provide a knowledgeable authorized representative of the operation to be present with the inspector to answer questions, sign appropriate papers, and be present at the exit interview.

2. Consultants

The GCIAOCP understands the need for consultants. The process of submitting an Organic System Plan (OSP) and subsequent onsite inspection is designed to determine if the person responsible for the implementation and daily management of the OSP has adequate knowledge of and understands NOP rules, regulations, etc. to effectively manage the OSP as submitted. GCIAOCP will not communicate directly with consultants on issues specific to an OSP. GCIAOCP staff will communicate with consultants to answer non-client specific questions.

3. Reinstatement of an Operation

When a request for "Reinstating a Suspended Operations" is received, GCIAOCP will utilize NOP Guidance Document 2605 (Instruction, Reinstating Suspended Operations).

GCIAOCP will inform applicants of their responsibility to maintain or surrender their existing organic certificate with a previous certifier as described in NOP Guidance Document 2604 "Responsibility of Certified Operations Changing Certifying Agency".

The GCIAOCP will accept the certification decisions made by another certifying agent accredited or accepted by the USDA pursuant to Section §205.500 of the NOP and NOP Guidance Document 2604 (Instructions, Responsibilities of Certified Operations Changing Certifying Agents).

4. Fees

(filed with NOP on 8/18/23)
An estimate of fees charged will be provided to each applicant prior to inspection.

Organic Crop Operation (Grower/Producer)
$975.00 Initial Administration Fee with farms in excess of 20 acres add $7.00 per acre
$925.00 Annual Renewal Administration Fee with farms in excess of 20 acres add $7.00 per acre
Assessments calculations:
Assessment of 0.5% (one-half of one percent) of gross organic sales
2023 Minimum assessment $100.00. 2024 Minimum assessment $300.00. Maximum $20,000.00.
$100.00 Surcharge*

Organic Greenhouse, Hydroponic, Aquaponic Operations
$875.00 Initial Administration Fee
$825.00 Annual Renewal Administration
Assessments calculations:
Assessment of 0.5% (one-half of one percent) of gross organic sales
2023 Minimum assessment $100.00. 2024 Minimum assessment $300.00. Maximum $20,000.00.
$100.00 Surcharge*

Organic Livestock/Forage Operation
Please note: we no longer certify ruminant animal operations.
$975.00 Initial Administration Fee with farms in excess of 500 acres add $2.00 per acre
$925.00 Annual Renewal Administration Fee with farms in excess of 500 acres add $2.00 per acre

Assessments calculations:
Assessment of 0.5% (one-half of one percent) of gross organic sales
2023 Minimum assessment $100.00. 2024 Minimum assessment $300.00. Maximum $20,000.00.
$100.00 Surcharge*

Organic Processor/Handler Operation
$875.00 Initial Administration Fee
$825.00 Annual Renewal Administration Fee
Assessment calculations:
0.5% (one-half of one percent) of gross organic sales minus cost of raw certified organic product
2023 Minimum assessment $200. 2024 Minimum assessment $400. Maximum $20,000.
Operations that do not purchase or sell product will be assessed on fees paid for receiving, storing, shipping, etc.
$100.00 Surcharge*

Any monetary claim arising out of or relating to the administration of the program will be settled by arbitration. The GCIA Executive Committee will choose a representative, the person making the claim will choose a representative, and the two representatives will choose a third party for arbitration. The decision will be final. By signing of the Organic Application by the producer, handler, and/or processor is in agreement with the above.

THE GCIAOCP RESERVES THE RIGHT TO AUDIT SALES RECORDS ON ALL MENTIONED CATEGORIES.

5. Other Charges

Re-inspections: Re-inspections will be charged at the rate of $50.00 per hour.

Travel: Mileage will be charged to the applicant at the prevailing IRS rate when application is made.

Miscellaneous Charges: All other travel expenses such as lodging, meals and/or airfare will be charged to the applicant if incurred.

Transaction Certificates (For Export): $100.00 per certificate

Interest of 1.5% per month will be charged on all past due accounts. A Notice of Noncompliance will be sent to the USDA National Organic Program for failure to pay renewal fees or sales assessment within 30 days of invoice.

Certification Fee Refund Policy: Certification fees are non-refundable except in the following instance The withdrawal of initial application prior to the onsite inspection. A processing fee of $50.00 will be retained by GCIAOCP. Refunds will be made after the application has been withdrawn.

Label fees for initial applications, renewals and new products: Operations submitting more than 10 products/labels with initial application or renewal, there is a review fee of $10.00 per product/label. New products or labels submitted for review apart from renewal application incur a $50.00 fee for each product.

Sales assessments are due from every certified operation, including operations with the same owner (Crops/Processor-Handler).
• The Crops operation will submit the value of their organic product for assessment.
• The Processor/Handler may deduct the Crops operation organic sales value submitted from their gross organic sales, and be assessed on the net organic sales

* Georgia Crop Improvement Association's surcharge will be $100.00 for each application, initial and renewals, to cover: (1) The NOP requires that 5% of all clients be tested for residue compliance. (2) The NOP requires that 5% of all clients receive an unannounced inspection. (3) The NOP requires that GCIAOCP be audited by the USDA/AMS every 30 months for compliance to NOP Rules and Regulations.

III. NONCOMPLIANCE INVESTIGATIONS, REPORTING OF FRAUD AND MEDIATION

Noncompliance with the GCIAOCP may result in the loss of certification.

The GCIAOCP Administrator/Manager may investigate complaints of noncompliance with the act or regulations of this part concerning production and handling operations certified as organic. See Appendix D, "Investigating Possible Noncompliance Concerns".

The GCIAOCP Administrator/Manager will notify the NOP and the GCIAOCP Certification Reviewer of all non-compliance investigations/proceedings and actions taken. See Appendix O, "Reporting Fraud".

In addition, the NOP will be notified of any fraud, willful violations and the loss of certification. See Appendix O, "Reporting Fraud".

The GCIAOCP will use mediation as a means for dispute resolution. Section §205.663 of the NOP will be the guide for all mediations, if accepted by the GCIAOCP. See Appendix N, "Accepting Mediation" AND Section VI of this manual.

The Program Administrator may require the client requesting mediation to pay all expenses incurred by the GCIAOCP.

IV. LIABILITY

No GCIAOCP Staff Member, Inspector, Certification Reviewer, GCIA Board of Directors, may be held liable or responsible for any amount in excess of the administrative fees paid

The GCIAOCP will hold the Secretary of Agriculture harmless of any failure on the part of the certifying agent to carry out provisions of the NOP act.

V. CONFIDENTIALITY AND REQUEST FOR RECORDS

Documentation Requests by The Secretary of Agriculture, State Organic Programs or other Organic

Certification Agencies:
All GCIAOCP Staff, Contractors, Inspectors, Certification Reviewer and the GCIA Board of Directors must adhere to the principles of confidentiality. Pursuant to 7 C.F.R. Section §205.501(a)(10), GCIAOCP will, "Maintain strict confidentiality with respect to its clients under the applicable organic certification program and not disclose to third parties (with the exception of the Secretary or the applicable State organic program's governing State official or their authorized representatives) any business-related information concerning any client obtained while implementing the regulations in this part, except as provided for in §205.504(b)(5)."

Documentation Requests by the public
Pursuant to 7 C.F.R. Section §205.504(b)(5) the following information may be made available to any member of the public:

- Certification certificates are issued to operations during the current and three preceding calendar years.
- A list of producers and handlers whose operations GCIAOCP certified, including the name of the operation, type(s) of operation, products produced, and the effective date of the certification, during the current and three preceding calendar years.
- The results of laboratory analyses for residues of pesticides and other prohibited substances conducted during the current and three preceding calendar years.
- Other business information as permitted in writing by the producer or handler.

Any requests for the above listed information must be submitted in writing and the following fees will apply:
$50.00 per hour research time
$0.12 per copy
All applicable postage fees

GCIAOCP safeguards the confidentiality of any business-related information concerning any client, product. or supplier obtained during the course of certification. GCIAOCP does not disclose any proprietary information to third parties without the client's written consent prior to release, except to authorized representatives of the USDA Secretary, the applicable state Organic Program's Governing State Official, or other authorized representative of accreditation agencies where necessary to implement the NOP, the State Organic Program or the GCIAOCP certification program. GCIAOCP may disclose proprietary information as required by other laws of the United States or other countries in which it performs certification activities, state law or other laws or local governments. See Appendix P, "Supply Chain Traceability Audits and Information Sharing".

GCIAOCP makes public, upon request, all certificates, Client Profiles, and any results of laboratory analyses for residues or pesticide and other prohibited substances conducted during the current and 3 preceding calendar years, unless the testing is part of an on-going compliance investigation.

All Organic production and sales information is held strictly confidential except that GCIAOCP may make this information available to authorized representatives of the USDA Secretary, the applicable State Organic Program 's Governing State Official, or other authorized representatives of accreditation agencies where necessary to carry out its obligation under the NOP, State Organic Program, or the GCIAOCP. See Appendix P, "Supply Chain Traceability Audits and Information Sharing".

VI. CONFLICT OF INTEREST

Conflict of interest is defined as having an economic interest with a farm or processor under review for certification one year prior to, during or one year after work or employment was concluded. GCIAOCP Staff, Contractors, Inspectors, Certification Reviewer and the GCIA Board of Directors with a conflict of interest must make the conflict known and not participate in discussion or decisions regarding the farm or processor under review.

The GCIAOCP Staff, Contractors, Inspectors, Certification Reviewer and the GCIA Board of Directors must sign a conflict of interest statement annually.

Should a conflict of interest be found, corrective action outlined in Section §205.501, (12) (i) of the NOP will be followed.

GCIA staff, contractors and inspectors will refrain from making false or misleading claims about other agencies' accreditation status, the USDA accreditation program for certifying agents, or the nature or quality of products labeled as organic.

Consulting is expressly prohibited.

VII. APPEALS

A certified Operation, an applicant for certification, a suspended certified operation or other persons subject to the act who believe they are adversely affected by an adverse action may submit an appeal to the AMS Administrator in accordance with 205.681.

GCIAOCP will use NOP Guidance Document 4011 (Agricultural Marketing Service Office of the Administrator Adverse Actions Appeal Process for the NOP) when addressing appeals, with emphasis on "Operations and Certifier Status" during an appeal.

VIII. MEDIATION

A certified operation or applicant for certification may request mediation of a correctable action to resolve a denial of certification or proposed suspension or proposed revocation of certification issued by GCIAOCP. Refer to 205.663 for the proper procedure. See Appendix N, "Policy for Accepting Mediation".

APPENDICES

See attached appendices.

Appendix A: Procedures for Sampling and Residue Testing

Purpose and Intent:
To establish program procedures and develop a system to conduct periodic residue testing for at least 5% of our certified operations where agricultural products are sold or labeled as organically produced as outlined by USDA NOP regulation.

To satisfy the requirement of USDA NOP § 205.670(d); inspection and testing of agricultural product to be sold, labeled, or represented as "100% organic", "organic", or "made with organic (specified ingredients or food group(s))" and NOP § 205.504(b)(5)(iii).

Refer to NOP 2610 Guidance Document "Instructions – Sampling Procedures for Residue Testing" and NOP 2613 Guidance Document (Responding to Results from pesticide residue testing) and Appendix P, "Supply chain traceability Audits and Information Sharing".

The number of operations to receive planned residue inspections will be determined by applying the 5% inspection requirement to the number of Certified Operations listed on the OID as of January 2nd.

The sampling of many agricultural products (soybeans, corn, grain, etc.) may require the use of special equipment. Bulk / volume sampling may be hazardous. For many bulk items, GCIAOCP may utilize the services of D.R. Schaal Agency Inc., Federal Licensed Grain Inspectors (912-348-3952).

When a third party is used to take samples, a GCIAOCP inspector must be present to ensure that NOP Guidance Document 2610 is utilized, and a chain of custody is followed.

Procedures:

WHEN TO COLLECT SAMPLES

- When it is suspected that a prohibited substance has been applied.
- When it is suspected that contamination from genetically modified organisms, antibiotics, or prohibited substances may have occurred.
- When pesticide drift may have occurred.
- To gather evidence as part of an investigation.
- As part of a surveillance sampling program.
- Random selection of an operation.
- Testing operations that have a high volume of organic products.

SAMPLE SELECTION CRITERIA

GCIAOCP will collect a sample of a given organic agricultural product, selected from a single location in a field, bin, or pallet. A single sample analyzed for residues using sensitive test procedures should provide enough information to determine if residues are present. A sample of a crop could consist of the raw agricultural commodity (RAC) or processed commodity from the RAC (EPA Residue Chemistry Guidelines, Table 1). Samples may also include the collection and testing of soil, water, waste, seeds, or plant tissue, if appropriate. GCIAOCP may choose to select samples which attempt to detect contamination where it is most likely to occur due

to risk factors present at a given operation or a location within an operation.

An official sampling procedure both for the field inspection and sample collection should be followed. When collecting samples for pesticide residue testing the inspector should consider adjacent field use and potential contaminating sources. The volume of the sample will be determined by the inspector, but in all cases the total volume must be enough for laboratory analysis. The frequency of the sample will be determined using the following:

A five acre or less field requires five samples to be taken and one additional sample for each succeeding five acres.

For example:
< 5 acres = 5 samples
5 -10 acres = 6 samples
11 -15 acres = 7 samples
16 - 20 acres = 8 samples
21 - 26 acres = 9 samples
26 - 30 acres = 10 samples

No more than 20 samples per field are required if field is uniform. The sites for visual evaluation should be selected based on a specific travel pattern across the field to ensure a representative sample is collected.

SAMPLE AMOUNTS
GCIAOCP will obtain a sufficient sample to ensure the laboratories will have adequate amounts for processing and reanalysis if necessary (Table 1). The amounts shown are consistent with those instituted as part of the standard operating procedures (SOPs) for the USDA Agricultural Marketing Service (AMS) Pesticide Data Program. If collecting from multiple containers is needed to obtain the suggested amounts, GCIAOCP will confirm that the products being sampled are from the same lot.

Table 1: Suggested Sample Amounts by Commodity Type

Commodity Type	**Recommended Sample Amount**
Most fresh fruit and vegetables	3-5 pounds (approximately 1.5-2.5 kg); A single large melon or squash exceeding 5 pounds (approximately 2.5 kg) is acceptable.
Blended commodities or those smaller than a strawberry	
Berries	
Cherries	
Coffee beans	
Dried Commodities	
Flours	
Grains	
Herbs	

Garlic	1 pound (approximately 500 g)
Legumes	
Mushrooms (small)	
Nuts	
Teas	
Seeds	
Small jars/packages (i.e. baby food sized)	
Spices	
All liquids and semisolid foods (e.g. juices, oils)	16-32 ounces
Canned/jarred foods	(approximately 500 mL to 1000 mL)

Adapted from USDA AMS Pesticide Data Program SOPs and U.S. EPA Residue Chemistry Guidance.

For raw commodities, the portion which should be sampled is generally the whole commodity. Adhering soil, decomposed outer leaves, and inedible root and tuber vegetable tops should be excluded from the sample. In addition to the U.S. EPA Residue Chemistry Guidance, Codex has guidance on which portion of the commodity should be sampled and provides recommended sample preparation methods for the determination of residues.

Collection Sites:
Products will be obtained at farm gate level if growing season permits (i.e. field samples). If unable to collect at farm gate level due to growing season, sampling at other locations will be permitted (e.g. storage facility, warehouse, handler, etc.).

Sample Collection & Shipping
Sample collection and shipping methods utilized will be based on the USDA Pesticide Data Program sample collection requirements as provided by the *USDA NOP 2610*. Samples will be shipped the approved laboratory for analysis the same day collected or no later than the next day after collection. When possible, schedule collections to avoid weekend shipping delays.

Sample Handling and Shipping to USDA Lab
Sample handling and shipping methods utilized will be based on the USDA Pesticide Data Program sample collection requirements as provided by the *USDA NOP 2610*.

Sample Collection Information:
Sample information and description will accompany the sample to the lab.
A Residue Sampling Form will be utilized by GCIAOCP as provided by the *USDA NOP 2610*.
The Residue Sampling Form contains; Sample ID Number, commodity information, collection site information, shipping information, and sample receipt in lab confirmation.

Sample Analysis for Pesticide Residues:
A Residue Sampling Form will be used when testing samples.
Samples will be shipped to the National Science Laboratory in Gastonia, North Carolina.
The USDA lab will test commodities for pesticide residues under the Pesticide Data Program (PDP).
NOP samples will be analyzed “as received” as per USDA NOP.

Responding to Results from Pesticide Residue Testing
Procedure:

No Detected Residues:

- Notify the certified operation of the test results and indicate that the product may be sold as organic.
- Retain the test results, which must be made available to the public upon request and will be reviewed as part of the next audit.

Residues Detected at Less than 0.01 ppm

If tests detect residues of prohibited pesticides as less than 0.01 parts per million (ppm), which is the same as 10 parts per billion (ppb):

- Notify the certified operation of the test results and indicate that the product may be sold as organic.
- Assess why the residue is present and follow up with operation as appropriate.
- Retain the test results, which must be made available to the public upon request and will be reviewed as part of the next audit.

Residues Detected at or above 0.01 ppm

If a test detects a residue of a prohibited pesticide at or above 0.01 ppm, GCIAOCP will first determine if
Environmental Protection Agency (EPA) has established a tolerance *for the pesticide for the tested commodity* (e.g., residues of imidacloprid in or on soybeans). Additional information on using EPA tolerances is provided below in "**EPA Tolerances"**.

Once GCIAOCP has identified whether EPA has established a tolerance for a given residue in the tested sample, GCIAOCP will use the following guidelines as outlined below to determine which reporting and adverse actions are appropriate.

EPA Tolerance is Established

If the EPA has established a tolerance for the detected pesticide in the tested sample, follow the appropriate instructions below based on the level detected.

A. If residue is detected at or below 5% of the EPA tolerance, GCIAOCP will:

1. Notify the certified operation of the test results.
2. Assess why the residue is present.
3. If appropriate, consider a notice of noncompliance for the following violations:
    a. *§205.202(b)*: application of prohibited substances. The notice will inform the operation that the product is not organic. At that time, GCIAOCP will have to consider suspending or revoking the operation's certification.
    b. *§205.202(c):* inadequate buffer zones to prevent the unintended application of prohibited substances. The notice will require corrective actions to prevent future contamination.
    c. *§205.272:* inadequate measures to prevent commingling or contamination of organic products. The notice will require corrective actions to prevent future contamination.

4. If residues are not a result of the application of prohibited pesticides, the product may be sold as organic.
5. If suspensions, revocations, or civil penalties are appropriate, coordinate adverse actions with the NOP.
6. Retain the test results, which must be made available to the public upon request and will be reviewed as part of the next audit.

B. If residue is detected above 5% of the EPA tolerance level, but not above the EPA tolerance level, GCIAOCP will:

1. *Immediately* notify the certified operation of the test results and indicate that the product may not be sold as organic.
2. Assess why the residue is present.
3. Issue a notice of noncompliance for violation of 7 CFR 205.671, having prohibited substances at levels greater than 5% of the EPA tolerance level. Additional violations may include:
    a. *§205.202(b)*: application of prohibited substances. The notice will propose to suspend or revoke the operation's certification.
    b. *§205.202(c):* inadequate buffer zones to prevent the unintended application of prohibited substances. The notice will require corrective actions to prevent future contamination.
    c. *§205.272:* inadequate measures to prevent commingling or contamination of organic products. The notice will require corrective actions to prevent future contamination.
4. If suspensions, revocations, or civil penalties are appropriate, coordinate adverse actions with the NOP.
5. Retain the test results, which must be made available to the public upon request and will be reviewed as part of the next audit.

C. If residue is detected above EPA tolerance level, GCIAOCP will:

1. *Immediately* notify the certified operation of the test results and indicate that the product may not be sold as organic.
2. *Immediately* report the violation to the appropriate agency.
3. Assess why the residue is present.
4. Issue a notice of noncompliance for violation of 7 CFR 205.671, having prohibited substances at levels greater than 5% of the EPA tolerance level. Additional violations may include:
    a. *§205.202(b)*: application of prohibited substances. The notice will propose to suspend or revoke the operation's certification.
    b. *§205.202(c):* inadequate buffer zones to prevent the unintended application of prohibited substances. The notice will require corrective actions to prevent future contamination.
    c. *§205.272:* inadequate measures to prevent commingling or contamination of organic products. The notice will require corrective actions to prevent future contamination.
5. If suspensions, revocations, or civil penalties are appropriate, coordinate adverse actions with the NOP.
6. Retain the test results, which must be made available to the public upon request and will be reviewed as part of the next audit.

No EPA Tolerance, but FDA Action Level Exists

If there is not an established EPA tolerance, GCIAOCP will check for a U.S. Food and Drug Administration (FDA) action level. FDA action levels are established for persistent pesticides, such as chlorinated hydrocarbons (e.g., DDT), that are no longer registered by EPA for use in crop or animal production, but continue to be detected in crops due to the persistent nature of these chemicals in the environment.

A. If residue is detected below the FDA action level, GCIACOP will:

1. Notify the certified operation of the test results.
2. Assess why the residue is present.
3. If appropriate, consider a notice of noncompliance for the following violations:
    a. *§205.202(b)*: application of prohibited substances. The notice will notify the operation that product is not organic and results will be reported as described below. GCIAOCP may decide to suspend or revoke the operation's certification.
    b. *§205.202(c):* inadequate buffer zones to prevent the unintended application of prohibited substances. The notice will require corrective actions to prevent future contamination.
    c. *§205.272:* inadequate measures to prevent commingling or contamination of organic products. The notice will require corrective actions to prevent future contamination.
4. If residues are not a result of the intentional or direct application of prohibited pesticides, the product may be sold as organic.
5. If suspensions, revocations, or civil penalties are appropriate, coordinate adverse actions with the NOP.
6. Retain the test results, which must be made available to the public upon request and will be reviewed as part of the next audit.

B. If residue is detected above the FDA action level, GCIAOCP will:

1. Immediately notify the certified operation of the test results and that the product may not be sold as organic. The FDA or a foreign equivalent may provide guidance on addressing these products.
2. Immediately report the violation to the appropriate agency as described below in "Reporting Violations".
3. Assess why the residue is present.
4. If appropriate, consider a notice of noncompliance for the following violations:
    a. §205.202(b): application of prohibited substances. The notice will propose to suspend or revoke the operation's certification.
    b. §205.202(c): inadequate buffer zones to prevent the unintended application of prohibited substances. The notice will require corrective actions to prevent future contamination.
    c. §205.272: inadequate measures to prevent commingling or contamination of organic products. The notice will require corrective actions to prevent future contamination.
5. If suspensions, revocations, or civil penalties are appropriate, coordinate adverse actions with the NOP.
6. Retain the test results, which must be made available to the public upon request and will be reviewed as part of the next audit.

No EPA Tolerance or FDA Action Level

Some testing results will indicate pesticide residues for which EPA has not established a tolerance and the FDA has not established an action level.

A. If testing detects a residue of prohibited pesticides above 0.01 parts per million (ppm), GCIAOCP will:

1. *Immediately* notify the certified operation of the test results and indicate that the product may not be sold as organic.
2. *Immediately* report the violation to the appropriate agency as described below.
3. If appropriate, the following violations will be considered for a notice of noncompliance:
    a. *§205.202(b)*: application of prohibited substances. The notice will propose to suspend or revoke the operation's certification.
    b. *§205.202(c):* inadequate buffer zones to prevent the unintended application of prohibited substances. The notice will require corrective actions to prevent future contamination.
    c. *§205.272:* inadequate measures to prevent commingling or contamination of organic products. The notice will require corrective actions to prevent future contamination.
4. If suspensions, revocations, or civil penalties are appropriate, coordinate adverse actions with the NOP.
5. Retain the test results, which must be made available to the public upon request and will be reviewed as part of the next audit.

Reporting Violations

In addition to the compliance and enforcement actions described above, GCIAOCP is responsible for reporting violations of EPA and/or FDA regulations to the proper authority. Violations include application of a pesticide which is prohibited by EPA (such as a pesticide without an EPA tolerance) or an allowed pesticide at levels exceeding regulatory tolerances. Depending on the operation's location and the results of GCIAOCP's assessment, the appropriate authority may include the EPA, FDA, or State food safety program.

A. Operations within the United States:

If the violation can be traced back to an application to a field, submit the violation, including its location and time, to the EPA by visiting http://www.epa.gov/tips . Reporting to EPA is indicated if:

1. The detected pesticide doesn't have an EPA tolerance established for the tested sample (meaning EPA doesn't permit that pesticide to be applied to organic or nonorganic varieties of the crop).
2. The detected pesticide has an EPA established tolerance for the tested sample, but oo much of the pesticide was applied (i.e., exceeding labeled application rates).

If the violation can't be traced to a direct, intentional application to a field or it is detected in the stream of commerce, submit the violation to the closest FDA district office: http://bit.ly/fda-office .

EPA Tolerances

A. About EPA Tolerances

After reviewing field study data, EPA established tolerances, or maximum residues, for each allowed pesticide. EPA tolerances generally exist for specific commodities within the following categories:

- Crops (e.g., grapes)
- Feedstuff derived from crops (e.g., hay)
- Certain processed commodities (e.g., raisins)
- Certain products derived from livestock (e.g., milk).

EPA has residue chemistry test guidelines that identify which form of the raw or processed product should be tested. For example, when testing sweet corn, laboratories should remove the husk and analyze the kernels and cob. For almonds, analysis should include both the almond nutmeat and hulls, while the hulls are removed on other nuts.

EPA tolerances are published in the Code of Federal Regulations (40 CFR part 180), which is also referenced below.

B. Using EPA Tolerances

In most cases, laboratories should prepare samples according to the residue chemistry test guidelines so that the data can be compared to EPA tolerances. Deviations from the standard sample preparations may be used at the discretion of GCIAOCP. For example, if GCIAOCP collects a field sample in response to a complaint that a certified operation has applied a prohibited substance, the inedible portion of the crop may be left intact for testing.

Unless field testing demonstrates that the residues increase in the final product, EPA doesn't establish tolerances for processed products. Unless a specific tolerance exists for the processed product, certifying agents should use the tolerance for the raw commodity.

For some pesticides, the EPA established tolerances that include the active ingredient and its breakdown products (metabolites). While not standard practice for every pesticide, if laboratories analyze metabolites, the residues of the active ingredient and its metabolites should be combined to determine the total pesticide residue.

The following data area an example of detected aldicarb residue and its metabolites in a sample of sugar beet tops:

- 0.90 ppm *Aldicarb (2-methyl-2-(methylthio)propionaldehyde 0 – (methylcarbamoyl) oxime)*
- 0.1 ppm Aldicarb sulfoxide *(2-methyl 2-(methylsulfinyl) propionaldehyde 0-(methylcarbamoyl) oxime)*
- 0.07 ppm Aldicarb sulfone *(2-methyl-2-(methylsulfonyl) propionaldehyde 0-(methylcarbamoyl) oxime)*

According to the tolerance established at 40 CFR 180.269 for aldicarb, these residues should be combined to determine the total residue for the sample. Since the total combined residue is ppm, this sample exceeds the 1 ppm tolerance for aldicarb in sugar beet tops and the violation should be reported as described in **"Reporting Violations".** This sample is also in violation of the USDA organic regulations and certifying agents should follow the steps outlined in **"EPA Tolerance is Established".**

Appendix B: Policy and Procedure for Conducting Unannounced Inspections of Certified Organic Operations

Policy

Unannounced inspections are one of the most effective and useful tools in the USDA organic regulations to ensure compliance across certified operations and give consumers additional reasons to trust the organic label. Unannounced inspections serve the dual purpose of giving the certifying agent the opportunity to observe the activities of a specific operation without the advance notice, as provided in the annual monitoring inspections, and acting as a deterrent to other operations who may consider violating USDA regulations.

In light of these benefits, GCIAOCP will conduct unannounced inspections of 5% of their total certified operations per year as a tool in ensuring compliance with the regulations. GCIAOCP will strive to conduct unannounced inspections broadly across all certified operations, including a broad spectrum of production types and products including all geographic locations and certification scopes.

Per 205.403 (b)(2) GCIAOCP must be able to conduct unannounced inspections of any operation they certify and must not accept applications or continue certification with operations located in areas where GCIAOCP is unable to conduct unannounced inspections.

The number of operations to receive planned unannounced inspections will be determined by applying the 5% inspection requirement to the number of Certified Operations listed on the OID as of January 2 of the current year.

Procedure

- Operations chosen for unannounced inspections may be random, risk based, or the result of a complaint or investigation. GCIAOCP will instruct inspectors to disclose to the operation the scope and purpose for the unannounced inspection. Criteria for conducting unannounced inspections may include, but are not limited to:
    - Previous noncompliance issues
    - Complaints
    - Organic and nonorganic production or handling, especially of visually indistinguishable products/varieties
    - Risk of contamination from adjoining land use or commingling, or contamination during handling
    - Complexity of operation

- Unannounced inspections may be employed to fulfill the requirements for annual onsite monitoring inspections as required by NOP § 205.403, but only if the inspector is able to conduct a full inspection of the operation as required by this section.

- Planned annual unannounced inspections may be limited in scope, depth and breadth, and may cover only certain aspects of the operation, such as parcels, facilities, products, etc. This will be determined by the Program Manager in consultation with the Program Administrator, noted on the inspection report form and communicated in advance to the

inspector.

- The GCIAOCP Policy and Procedure, Appendix B, for conducting unannounced inspections will be provided to all certified operations and inspectors.

- Unannounced inspections, by their very nature, will not include prior notification of the inspector's arrival. However, should there be extenuating circumstances that make it impossible to conduct an unannounced inspection of the operation without prior notification (e.g. biosecurity issues), GCIAOCP may notify the operation up to four (4) hours prior to the inspector arriving onsite to ensure that an appropriate representative is present.

- GCIAOCP inspectors may collect residue samples during an unannounced inspection.

- The GCIAOCP inspector should not enter private property without explicit permission of the operation. Inspectors are required to have adequate identification, such as a business card, and/or explanatory letter (written instructions by certifying agency) from the certifying agency, to demonstrate they are acting on behalf of the certifying agent.

- If an operation refuses to allow a GCIAOCP inspector access to any part of an operation, during normal business hours, including the nonorganic portions of the operation, the operation would be in violation of NOP §205.403, and GCIAOCP will immediately issue a Notice of Noncompliance to the operation.

- An inspection report will be prepared by the inspector, reviewed by the Program Manager

- who will forward the report to the Certification Reviewer.

- Upon receipt of the Certification Reviewers report the Program Manager will send the report to the client communicating the results pursuant to NOP §205.403(e) and §205.404(a).

- GCIAOCP may charge an operation for unannounced inspections provided such fees are clearly disclosed to all certified operations in advance. Fees charged must be filed with the NOP Administrator in accordance with NOP §205.642.

Revised 9-2024
Reference: NOP Guidance Document 2609.

Appendix C: Policy and Procedure for Reviewing and Verifying the Terms of US and Other Countries' Organic Equivalency Arrangements

Policy
To foster trade of organic products among countries, the US and other designated countries have developed equivalency standards that allow products to be represented as organic in each other's markets.

Procedure
When an OSP notes that a product may be exported to another country, the Program Manager, Organic Certification Specialist and Reviewer will identify the country(s) and review 5-25-12 MEMO "Exporting USDA Organic Products to the European Union" and the USDA NOP web site to determine what equivalency standards must be met. Whereas this MEMO addresses the EU, MEMO does list various web sites that can be used as resources.

When an OSP notes that a product may be imported from another country, the Program Manager, and Reviewer will identify the country(s) and review following documents: NOP 2110-1 "Instructions for Completing an NOP Import Certificate" and the USDA NOP web site to determine what equivalency standards must be met.

GCIAOCP staff, when reviewing operations which use imported grain in their operation, will utilize NOP Policy Memo 18-1 (Impact of Fumigation and Irradiation Requirements on Organic Imports) for determining compliance.

GCIAOCP staff, when reviewing operations which use imported grain in their operation, will utilize NOP Policy Memo 18- (Impact of Prohibited Grain Seed Regulations on Organic Imports) for determining compliance.

Organic Imports which have been fumigated or irradiated must comply with Policy Memo 18-1 and section 205 of the NOP.

Once the auditor has reviewed the documents as stated above, the auditor will note if the equivalency standards have been met and site the appropriate rule and/or guidance document and provide supporting materials.

Revised 5-2024
Reference:
NOP Memo 5-25-12 – Exporting USDA Organic Products to the European Union NOP 2110-1 – Instructions for Completing an NOP Import Certificate
USDA NOP website – www.ams.usda.gov/services/organic-certification/international-trade Policy Memo 13

Appendix D: Policy and procedure for conducting investigations of certified operations for possible noncompliance concerns

Policy

To maintain the integrity of the NOP, Certifying Agencies may need to conduct investigations of Certified Operations to determine if certain actions, products, etc. are in compliance with the submitted OSP and the NOP Act. Investigations may be, but not always, connected to complaints from the public or the NOP.

Authority for conducting investigations, and any subsequent actions, is authorized by NOP Policy Memorandum 10-1 and §205.661(a).

Procedures

When the GCIAOCP receives a complaint alleging a violation of the NOP Act, the Certified Operation will be contacted and any investigations will be conducted.

The NOP Program Manager will be informed of the complaint any plans for an investigation.

The NOP Program Manager will be notified of the issuances of any noncompliance or proposed adverse actions that are a result of the investigation.

The NOP 4002 "Instructions Enforcement of the USDA Organic Regulations: Penalty Matrix" and the Noncompliance and Adverse Actions Flow Chart will be used in determining corrective action(s) and procedures.

Reference: §205.661(a)
§204.504(b)(2) NOP Memo 10-1
NOP 4002
Noncompliance and Adverse Actions Flow Chart

Revised 8-29-24

Appendix E: Policy defining crop rotation

This policy is designed to aid the GCIAOCP staff in determining the adequacy of organic clients crop rotation practices either listed on the OSP or implemented.

The National Organic Program defines a crop rotation as:

The practice of alternating the annual crops grown on a specific field in a planned pattern or sequence in successive crop years so that crops of the same species or family are not grown repeatedly without interruption on the same field. Perennial cropping systems employ means such as alley cropping, intercropping, and hedgerows to introduce biological diversity in lieu of crop rotation.

The most operative phrase is "planned pattern or sequence in successive crop years".

"Planned pattern or sequence”- there should be a multiyear plan for crop rotation that takes in to account the use of different crop kinds that increase soil organic matter, break or disrupt weed, insect and disease cycles, etc. Cover crops can be a component of such a plan or other cash crops.

The term "successive" is straight forward (following in an uninterrupted sequence)

The term "crop years" can be confusing. It seems logical to many that a crop year is the time required to plant and harvest a specific crop, other define crop year depending on spring planted or fall planted.

The disruption of weed, insects, disease cycles and the need to increase soil organic matter should be the defining steps that determine if a particular crop rotation is adequate.

There may be situations whereby the above suggested cycle maybe altered. The client must submit a written request explaining the reasons for an exception or variance. The Certification Reviewer will be the final authority on such submitted requests.

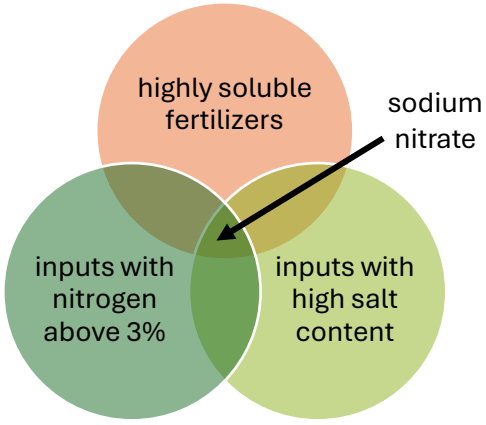
Rev. 8/18

Appendix F: Policy on the use of sodium nitrate, highly soluble fertilizers, inputs with N concentrations >3%, and/or inputs with known high salt content

Background

Per the §205.602(h) , use of sodium nitrate in cropping systems was formerly restricted to no more than 20% of the crop's total nitrogen requirement. However, this national restriction was nullified after the 21st of October 2012 sunset date of this input. The 11th of September 2012 USDA NOP Notice 20-1 states that "a proposed rule regarding the use of sodium nitrate is forthcoming." Until a formal ruling is issued, sodium nitrate will be judged as an input that overlaps the same categories as all additional *highly soluble fertilizers, inputs with nitrogen concentrations above 3%, and/or inputs with high salt content*.

The approval and use of all such inputs, including sodium nitrate, that are allowed by the National List are now encompassed by this revised policy.



Definitions

Highly soluble fertilizers: fertility inputs that can dissolve in water, allowing for nutrient delivery to plants through methods like fertigation or foliar application.

Inputs with nitrogen above 3%: an input with an available nitrogen percentage above 3% of total input weight. Manures, litters, and composts shall not be considered to be within this category as their nitrogen content is generally below 3%.

Inputs with high salt content: inputs with a tendency to increase the salt content of the soil. This includes sodium nitrate and potassium chloride.

Policy

1) Before being used on organic certified crops and/or fields, it is the client's responsibility to ensure that all inputs applied to organic certified crops and/or fields are included on the client's Materials List and approved in accordance with the GCIAOCP standard input material review procedures.

2) All clients that utilize *highly soluble fertilizers, fertilizers with nitrogen concentrations above 3%, and/or inputs with high salt content* must not use such inputs in a manner that harms the natural resources of the operation. Per §205.200, "Production practices implemented in accordance with this subpart must maintain or improve the natural resources of the operation, including soil and water quality."

3) Clients that utilize inputs with high salt content (sodium nitrate, potassium sulfate, etc.) must specifically address in their OSP and/or OSP attachments how salt buildup is prevented in soils. (Currently prompted by OSP Section 3.A. Question 11)

4) Per NOP 5012, GCIAOCP does not perform independent material review for any input with a nitrogen concentration above 3%. Such inputs can only be approved if the input is certified by a one of the following 3rd party MRO (material review organization) for use with NOP crops: OMRI, PCO, and/or WSDA. A current input certificate from one of these agencies must be provided for the input to be approved. The input must be used in a manner that is consistent with all relevant restrictions listed on the full MRO certificate.

5) GCIAOCP does not perform independent material review for any fertilizer blend. All fertilizer blends must be approved by a 3rd party MRO for use with NOP crops: OMRI, PCO, and/or WSDA. A current certificate from one of these agencies must be provided for the input to be approved. The input must be used in a manner that is consistent with all relevant restrictions listed on the full MRO certificate.

6) Farming operations that are seeking USCOEA certification must not apply any inputs with nitrogen level above 3% or fertilizer blend to crops or fields seeking Canadian equivalency unless a certificate is provided by a 3rd party MRO: OMRI, PCO, and/or WSDA. For such inputs, the certificate must specify that the input is approved to COR standards. Any relevant restrictions on the MRO certificate must be practiced by the operation.

Procedure
Material reviewers will require NOP-specific 3rd party MRO certificates for all of the following inputs that are intended for use on NOP-certified crops and/or fields:

- Inputs with nitrogen content above 3%
- Fertilizer blends

Material reviewers will require COR-specific 3rd party MRO certificates for all of the following inputs that are intended for use on USCOEA certified crops and/or fields:

- Inputs with nitrogen content above 3%
- Fertilizer blends

Reviewers will ensure that clients utilizing inputs with high salt content have identified how salt buildup is prevented on their OSP.

Inspectors and reviewers will evaluate if all inputs that are being used on organic crops and fields are currently listed on the client's approved materials list.

Annual on-site inspections will be performed for all fields that utilize highly soluble fertilizers, inputs with nitrogen levels above 3%, and inputs with high salt content. Based on observations and

analysis of farm records, the inspector will identify any areas of concern regarding the operation's compliance with §205.200, including salt build-up. Soils, nearby waterways, and underground water sources may be tested to evaluate compliance with this standard. Inspectors will also evaluate if the operation's record-keeping is sufficient to evaluate compliance with §205.200, consistency of farm practices with the OSP, and all adherence to all relevant restrictions of the input(s) in use.

REV. 03/2025

Appendix G: Determining buffer requirements

To aid inspection staff and producers in determining if adequate buffers are in place between non- GMO and GMO crops, utility poles and structures, road rights-of-way, fertilizer and pest applications, GCIAOCP recommends utilizing the isolation distances found in the U.S. Federal Seed Act for "Foundation Class Seed".

While the established isolation distances contained in the Act refer only to pollen movement, these isolation distances should be sufficient for our needs as related to pollen, spray drift, non-organic crops etc.

Distances can be adjusted with proper documentation justifying the change, such as buffer plantings, topography, and manmade structures. In addition, not all vegetable crops are covered by the federal Seed Act; comparison crops may have to be used.

To access this information, see section 201.76, Table 5 in the Federal Seed Act; click HERE.

Rev. 12-17

Appendix H: Policy defining the review of cleaners and sanitizers used

This policy is designed to aid the GCIAOCP staff in determining the adequacy and documentation of organic clients' use of Cleaners and Sanitizers per the clients OSP.

Handling; Cleaners and Sanitizers.
NOP205.201(a)(5) identifies the need for review and verification of all sanitizers and cleaners used in a handling system as noted in the OSP Section 5.

All handling OSP's must have a written Standard Operation Procedure that documents the following.

1. What materials are used and at what rate.
2. Removal of residues from materials not found on the National List.
3. How the equipment, product, etc. is tested for 0 residues.
   (Exception is chlorine which is allowed at 4 PPM)
4. Where and how the results of tests conducted above are recorded.

The review and verification of the SOP by the GCIAOCP Inspector will be recorded in Section 2, 3 &4 of the inspection report.

Processing aids are found in section 205.605 & 205.606.

The inspector will document that the cleaning/ sanitation and processing aids were reviewed and are compliant with NOP 205(a)(5).

The inspector will document that the pest management products used were reviewed and are compliant with 205.272.

GCIAOCP inspectors will ensure that operations monitor and document monitoring the chlorine levels at the point where the water last contacted the organic product in a direct application. A description of the operations monitoring procedure will be identified in the appropriate OSP.

Revised 5-24

Appendix I: Policy defining inputs for crop production, processors/handlers, and livestock operations

This policy is designed to aid the GCIAOCP staff in verifying and documenting organic clients' use of material inputs. NOP 3012 "Interim Instruction Material Review" (revised 03,2024), NOP 5034, 5034-2 Guidance Documents were used as a guide and should be used by staff when making material input decisions.

Materials Review
Only Inputs approved by a NOP recognized MRO will be accepted by GCIAOCP for use and/or those products listed in section 205.600 thru 205.606 of the National List of Allowable and Prohibited Substances.

Certificates must be submitted for all MRO approved inputs.

Material inputs are verified for compliance during the OSP Review and at inspection.

Each scope has a material input inventory form as part of the OSP. During the inspection the inspector will verify and document the use of inputs. The inspector should verify that the products and methods were reviewed and are compliant with each section of the applicable NOP standard.

Applicants must sign the Material Inputs form attesting to the fact that they understand any restrictions on the use of restricted inputs found either on the MRO Certificate or on the NOP National List of Allowable and Prohibited Substances.

Inputs used in Post Harvest Handling of Organic Products must be in compliance with 205.601,205.603,205.605, 205.606 (if applicable). GCIAOCP will use NOP Guidance Document 5023 (3-20-24), "Substances Used in Post Harvest Handling Organic Operations".

Revised 5-2024

Appendix J: Policy for on-site inspections of operations submitting an OSP but not anticipating organic production at initial certification or annual renewal

1. Should an operation not submit a completed product profile, listing organic ingredients or provide current organic certificates.

Steps to follow:

a. An on-site inspection will be conducted to determine if the operation has sufficient handling and recordkeeping practices to maintain organic integrity.
b. An Area of Concern may be attached to the certification approval, stating that supplier information must be submitted prior to organic production taking place, along with proof of purchase of organic products before processing.
c. The operation may be issued an organic certificate for "Facility Only"
d. The current organic product summary list does not identify products. Then, if the operation would like to begin producing products they will submit a completed Organic Product Summary, the Product Profile with supplier information, certificate and labels for approval.
e. Review the Organic Product Summary, Product Profile, supplier information, certificates and labels, to determine compliance.
f. Once approved, their Organic Certificate will be updated and approved products will be added to their Organic Certificate.
g. Organic production activity will be verified at the annual renewal audit.

2. The operation does submit a completed product profile, listing organic ingredients and provide current organic certificates.

Steps to follow:

a. An on-site inspection will determine if the operation has sufficient handling and recordkeeping practices to maintain organic integrity.
b. Review the Organic Product Summary, Product Profile, supplier information, certificate and labels to determine compliance.
c. Once approved, their Organic Certificate will be updated and approved products will be added to their Organic Certificate.
d. Organic production activity will be verified at the annual renewal audit and/or unannounced inspection

Appendix K: Preparing for mass balance & traceback audits during an organic inspection

The intent of the audit is to satisfy the requirements of §205.103;205.403 (d)(4)&(5) and NOP 2601 Instruction. These regulations require audits as an important tool for preventing fraud and ensuring sufficient recordkeeping to verify organic integrity. During the audit, the record keeping system as described in the Organic System Plan (OSP) will be verified with the client onsite. Also, clients are reminded to update their OSP throughout the year as changes are made and/or required.

For each operation's annual inspection, a minimum of one traceback audit will be conducted. If several different products or processes are present, two or three traceback audits may be conducted to demonstrate that the different types of products are fully traceable. If the results of the first audit are inconclusive or potentially noncompliant, an additional traceback audit will be conducted unless the reason for the audit failure is a system-wide record issue that would yield no different results upon another audit attempt.

In addition, one mass-balance audit will be conducted per operation at the annual update inspection. For processor/handler operations the mass balance audit will include a finished goods and raw ingredient mass balance, ideally with these two audits being tied together when possible.

If the client provides computer records for an audit, the inspector will verify some of the figures against actual records (field logs, weight tickets, etc.) during the audit to verify the client's audit trail system. Records should be assessed for completeness and ability to be audited.

NOTE: Records must include a BEGINNING and ENDING inventory (including ingredients, raw materials, finished product and/or crops produced) for a DEFINED period of time (example: month, quarter, growing season). Also, clients should prepare in ADVANCE of the audit all records/documentation necessary to conduct the mass balance and traceback audits.

Mass Balance Audit
The intent of the mass balance audit is to demonstrate that enough organic ingredients or products were purchased, produced, harvested or managed (livestock) to equate to the final product during the audited time period. This audit encompasses a window of time (sales quarter, growing season, etc.). A mass balance audit does not require that all ingredients/crops/feed types are encompassed in the audit; the audit should demonstrate a sampling of the ingredients/crops/feed types for a period of time to verify that the system is auditable.

Traceback Audit
The intent of the traceback audit is to demonstrate that an organic product can be traced back to its origin in the operation. A product sold or finished good or livestock is selected; the inspector attempts to identify linking elements on the client's documents (lot numbers, invoice numbers, etc.) to verify that the product (or ingredients or animal) can be traced back to the field of origin or supplier. These linking elements and numbers will be verified by the inspector and included in the inspection report.

* Should the client not have sales during the audited period, the inspector will verify and document

that the system the client plans to use for tracking will provide sufficient data to allow for mass balance and traceback audits to be performed.

Revised 5-24

Appendix L: Personnel performance evaluations

The intent of this appendix is to satisfy the requirements of §205.501(a), 205.501 (a)(6) and NOP Guidance Document 2027 (rev. 04) Regulations require that certifying agents conduct annual performance evaluations of all persons who conduct inspections, certification review, or implement measures to correct any deficiencies in certification services.

Personnel to be evaluated, evaluation criteria, references and terms defined are found in NOP Guidance Documents NOP 2027, 2005-4 and 2005-6.

Created 8-29-24

Appendix M: GCIAOCP policy for determining high-risk operations and agricultural products for supply chain traceability audits

A risk assessment to determine high-risk operations and agricultural products for supply chain traceability will be conducted on all GCIAOCP clients annually as a component of the annual OSP audit per NOP 205.501General Requirements for Accreditation and 205.504 Evidence of Experience and Ability (b) (7).

Risk assessments will be conducted by the "Risk Assessment Committee" composed of the Program Manager, who will act as the chair of the committee and all inspectors.

Risk assessments are conducted to assist staff in determining those areas and/or operations that may compromise the organic program and cross agency information sharing.

When sharing information/data with other agencies refer to 205.501 (a)(10) for guidance relating to confidentiality. The Accredited Certifiers Association (ACA) has a resource publication dated April 2024 "ACA Best Practices for Certifier Information Sharing and Supply Chain Traceability Audits" that may be used.

The "Risk Assessment Score Card" (attached) will be utilized. A copy of the score card will accompany each OSP renewal when submitted to the inspector for an onsite inspection. The inspector will refer to the Risk Assessment Score Card in preparation for the onsite inspection to help in identifying high risk situations.

The Risk Assessment Score Card will be utilized by the Program Administrator and Program Manger when selecting certified operations for unannounced inspection. High-risk operation should receive priority consideration for unannounced inspections.

See attached "Score Card"

Created 5-24
Revised 9-11-24

DETERMINING HIGH-RISK OPERATIONS AND AGRICULTURAL PRODUCTS FOR SUPPLY CHAIN TRACEABILITY AUDITS SCORE CARD

Date of assessment_____ Operation_____

Scope(s) assessed_____

Risk Score Scale

0-5	Low risk
6-10	Medium risk
11-15	High risk
N/A	Not applicable

The number 10 is assigned to high risk issues. Risk assessments are conducted to assist staff in determining those areas and/or operations that may compromise the organic program.

RISK CRITERIA	SCORE
New to Organic Program or recent changes in management or change in certifiers	_____
Split Operation (Organic and or Nonorganic production of products/crops)	_____
Parallel Production (organic and nonorganic	

of the same products/crops) _____

Open NCs for Noncompliant Practices _____

Crop is subject to GMO contamination or there
is parallel production with a non- organic GMO crop _____

Same ownership has separate nonorganic business
increasing contamination and or commingling risk _____

Potential for drift _____

2 or more GMO detections below 10% in the last
2 years _____

A GMO detection at or below 10%within the last 2 years _____

A detection of prohibited residues within the last 2 years _____

2 or more non-exclusion level detection of prohibited
residues in the last 2 years _____

An exclusion level detection of prohibited residues in
the last 2 years _____

Inclusive test _____

Inventory issues _____

Subject of current oversight efforts, investigation efforts, or NOP directive _____

Operation was reinstated within the last two years and loss of certification was not related to admin issues _____

Products processed as organic OR has products sold as organic _____

Unsually low price for organic products _____

Rapid growth or scaling up in past 12 months _____

Products with multiple ingredients _____

Inadequate supplier verification system _____

Inadequate receiving verification system _____

Inadequate OFPP _____

Production verification audits reveal questionable high yields _____

Handles grains, beans, seeds, etc. _____

Handles products certified by another certifier _____

Inspector or Reviewer suspicion must leave reviewer comment explain suspicion. _____

TOTAL _____

Other areas or issues of concern:

_____
_____
_____
_____

Comments:

_____
_____
_____
_____

Appendix N: Policy for accepting mediation

A certified operation or applicant for certification may request mediation to resolve a denial of certification or proposed suspension or proposed revocation of certification if the denial is based on a correctable action. Certified operation or applicant for certification must submit any request for mediation in writing to the GCIAOCP within 30 calendar days of receipt of the notice of proposed suspension or proposed revocation of certification or denial of certification.

Only correctable actions may be mediated.

GCIAOCP may accept or reject a request for mediation based on the decision criteria required in 205.663 (a). GCIAOCP must document these criteria and how the criteria were applied to the request.

The Program Manager will contact the certified operation or applicant within and establish an agreeable meeting time for both parties.

The minutes of the meeting will be recorded by the GCIAOCP Program Manager or Organic Certification Specialist.

Should GCIAOCP reject a mediation request, it must provide this rejection, and the justification for the rejection, in writing to the applicant for certification or certified operation. The rejection must include the right to request an appeal, pursuant to § 205.681.

When an operation appeals a rejection of mediation, the adverse action which is contested must not be finalized or implemented during the appeal proceeding.

The parties to the mediation have a maximum of 30 calendar days from the start of mediation to reach an agreement. Successful mediation results in a settlement agreement agreed to in writing by both the certifying agent and the certified operation. If mediation is unsuccessful, the applicant for certification or certified operation has 30 calendar days from receipt of a written notice of termination of mediation to appeal the denial of certification or proposed suspension or revocation pursuant to § 205.681.

The GCIAOCP Administrator will conduct all mediation hearings. The mediator must have completed IOIA training in at least one scope and have certificates attesting to their attending the annual NOP/ACA training and completed 20 hours of training using the Organic Integrity Learning Center.

Any settlement agreement reached through mediation must comply with the Act and the regulations in this part.

The NOP Program Manager may review any mediated settlement agreement for conformity to the Act and the regulations in this part and may reject any agreement or provision not in conformance with the Act or the regulations in this part.

The NOP Program Manager may propose mediation and enter into a settlement agreement at any time to resolve any adverse action notice.

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Revised 9-24

Appendix O: Reporting of credible evidence of organic fraud to the NOP administrator

When a GCIAOCP Staff member suspects or receives information from a credible source of an alleged act of fraud relating to any aspect of the organic program, the staff member will confer with the Program Manager and Administrator before reporting the act to the NOP.

When reporting "organic fraud" the staff will utilize "How to File a Complaint on Organic Regulations" found in the National Organic Handbook.

Created 5-2024

Appendix P: Supply chain traceability audits and information sharing

Regulatory Language: The NOP regulations do not define "supply chain traceability audit". The Preamble states: "The length, extent, and frequency of an SCT audit may vary and should be determined by the objective of the audit (i.e., an SCT audit ends when its objective is achieved). SCT audits may trace back to the origin (production site) of a product, or until a noncompliance is verified or cleared. For example, if a certifying agent's objective is to verify the production origin of an ingredient, the SCT audit should trace the ingredient through the entire supply chain to the farm or ranch where the ingredient was produced. In contrast, if an SCT audit is initiated to determine the source of a positive residue test, the SCT audit may conclude when the source of the contamination is identified (which may only be several "steps" back in the supply chain)."

A SCTA may be simple or complex. Its extent is determined by its objective (defined by a risk assessment), and thus how far up and back along the supply chain it goes will be different in different situations.

- The objective of a routine SCTA is to verify whether a certified entity's records match with either its supplier's or customer's records one step forward or backward in the supply chain. **Such SCTAs may continue further into the supply chain if issues or concerns are identified.**
- A SCTA that carries all the way back to the grower will be initiated when tracing the product/verifying the transactions back to the grower is warranted. This will occur most frequently in the context of investigations and complaints. Other examples of where a SCTA may go all the way back to the grower: a routine SCTA uncovers suspicious activity, or tracing the source of a positive residue detection.

It is best practice for certifiers to respond in a timely fashion to these requests - even if that response is a back-and-forth to focus the request or align on timing. If a certifier fails to respond to requests in a timely manner, the requesting certifier may notify the National Organic Program.

Supply Chain Traceability Audits (SCTAs) are an integral part of the National Organic Program. Often data collected during a SCTA should be shared with other certifying agencies. To share information become agencies will increase the chances of finding fraudulent activity or other non compliant actions by operations. When information is shared with another agency care will be taken to not share any information/data that may be deemed as confidential by an operation. Section 205.501 in General requirements for accreditation (a)(10) states that an accredited certifier must:

> Maintain strict confidentiality with respect to its clients under the applicable organic certification program and not disclose to third parties (except for the Secretary or the applicable State organic program's governing State official or their authorized representative) any business related information concerning any client obtained while implementing the regulations in this part, except:
>
> For information that must be made available to any member of the public, as provided for in § 205.504(b)(5);

(ii) For enforcement purposes, certifying agents must exchange any compliance-related information that is credibly needed to certify, decertify, or investigate an operation, including for the purpose of verifying supply chain traceability and audit trail documentation; and

(iii) If a certified operation's proprietary business information is compliance-related and thus credibly needed to certify, decertify, or investigate that operation, certifying agents may exchange that information for the purposes of enforcing the Act, but the information in question still retains its proprietary character even after it is exchanged and all of the certifying agents that are involved in the exchange still have a duty to preserve the confidentiality of that information after the exchange.

GCIAOCP Staff will utilize "SUPPLY CHAIN TRACEABILITY AUDITS INFORMATION REQUEST FORM" when requesting information from a certifier.

GCIAOCP Staff will always refer to the GCIAOCP Administrative and Policy Manual, Section VII. Confidentiality, before proceeding with the sharing of information/data.

GCIAOCP Staff will refer to Accredited Certifiers Association (ACA) Best Practices for Certifier Information Sharing and Supply Chain Traceability Audits (April 2024) found at www.accreditedcertifiers.org when addressing issues related to:

Handling Results from Third Party Residue Testing
Supply Chain Traceability Audits

Created 5-2024

SUPPLY CHAIN TRACEABILITY AUDITS INFORMATION REQUEST FORM

The Strengthening Organic Enforcement final rule prompts certifiers to conduct supply chain traceability audits (SCTAs). These may involve cross-checks, traceback exercises, mass balance calculations, and other follow-up requests as applicable. This form serves as a cover sheet for these cross-certifier information requests. Please complete each section of the form per the instructions and fields below.

- **Certifier Sending the Request:** Complete sections A through E below and then send this completed form with (optional) applicable documentation to the other certifier.
- **Certifier Receiving the Request:** Complete sections F through I below. Submit the response requested and/or pursue additional verification based on your findings, as needed.

A. **Requesting Certifier:** The requester is the certifier who is requesting that another certifier provide information for a Supply Chain Traceability Audit. Complete Section A to provide your information and the urgency/timeline of the request.

1.	Person Completing This Form:	
2.	Certifier	
3.	Contact information (if not included in your email signature)	☐ Role at certifier: ☐ Phone number: ☐ Email address:
4.	Date Requested	
5.	Request Timeline	☐ **Not Urgent.** Please complete the requested verification exercise at the next annual inspection for the operation(s) you certify. ☐ **Needed on specific timeline.** ● Reason for need:

		• Requesting response by (date): ☐ **Part of current investigation.** • Provide details of the investigation in Section C: Request Information. • Requesting response by (date):

B. Information about Operations Involved: Complete Section B to inform the certifier receiving this request of which types of operations are involved.

Operation certified by requesting certifier:

Name:

NOP OID number:

Certification scope:

Operation(s) certified by receiving certifier:

Name:

NOP OID number:

Certification scope:

C. Supply Chain Diagram: Please attach a diagram or other description of the supply chain, as you understand it. Include any known existing SCTAs along this supply chain.

D. Requested Information: Complete Section D to describe the objective of this audit, what specific information you are seeking, and the specific date range in question. Please be specific in your request, and limit the scope of your request as applicable to the audit. The requesting certifier may ask for additional information in follow-up as needed.

1.	Date range of request:	
2.	What verification are you requesting that the certifier complete for this transaction?	☐ **Cross-Check.** I am requesting that the certifier receiving this request checks that the crop/product/animals in question are verified in corresponding records at the other site in the supply chain. This can include a mass balance, if needed. ☐ **Trace back/Trace forward:** I am requesting that the certifier receiving this request traces crop/product/animals back to their

		origin and/or previous supplier; and/or forward to the next certified entity. ☐ **Other:** Please describe.
3.	What is the objective of this SCTA?. Circle all that apply:	● 1.Investigate evidence or suspicion of fraud ● 2. Verify compliance of an organic product ● 3. Investigate patterns of activity ● 4. Trace the source of positive residue testing ● 5. Surveil high-risk supply chains or products ● 6. Address any other compliance related risk, activity or need identified.
4.	Provide any further detail and context to help better understand the request.	
5.	Requested Records:	If requesting specific records, identify them here: ☐ Organic certificates ☐ Sales/purchase invoices ☐ Verification of production capacity ☐ Other records (describe) ☐ No specific records requested.
6.	Records Enclosed/Compiled:	If you are not including applicable records with your request, please ex*plain why.* ☐ Applicable records are enclosed. ☐ Applicable records are not enclosed (include explanation):
7.	Total quantity (lbs/tons/gallons) of organic crop/product	Amount transferred:

	or number of organic animals sold/purchased by or transferred to/from your operation to/from our operation during the specified time frame. *When applicable*.	Unit of measure: From: To:
8.	Total dollar amount billed/paid to our operation by your operation for the organic crop/product/animals during the specified time frame, or total dollar amount billed/paid for services provided if no change in ownership occurred *When applicable*.	Amount transferred: Currency: From: To:

E. Sending the Request: Send an email to the appropriate certifier contact once this request form is complete and ready to be sent.

The information below this line is to be completed by the receiving certifier.

_____

_____

***The certifier receiving the request completes the following sections F, G, H, and I pertaining to their actions and findings*.**

1.	Person Completing This Form:	
2.	Certifier	
3.	Contact information (if not included in your email signature)	☐ Role at certifier: ☐ Phone number: ☐ Email address:
	Date Requested	

F. Certifier Findings: The certifier receiving this request should pursue the additional verification requested and document their actions taken, with any findings or prompts for additional consideration (such as additional links in the supply chain needing to be audited), in the below table. Were all requesting certifier questions/requests addressed? If not, why?

G. Supply Chain Diagram: Please attach a diagram or other description of the supply chain, as you understand it. Include any known existing SCTAs along this supply chain. If a supply chain diagram or description was started in section C (above), please add to it.

H. Resolution/Next Steps: The certifier receiving this request should document their completed analysis of the situation along with their recommendation for any additional follow-up tasks (such as additional links in the supply chain to be audited), in the below table.

I. **Sending the Response:** Respond to the appropriate certifier contact once this request form is complete and ready to be sent.

Please return this completed document, including your findings and supporting documentation, to the certifier who sent you this request. If necessary, provide a new request for verification to an additional certifier based on your findings.

Appendix Q: Labeling of nonretail containers and audit trail documentation

GCIAOCP Staff will utilize section 205.307 “Labeling of Nonretail Containers” and this appendix when determining proper labeling of nonretail containers.

Nonretail containers may include but not be limited to produce boxes, totes, bulk containers, bulk bags, flexible bulk containers, harvest crates and bins;

Boxes, crates, cartons, and master cases of wholesale packaged products, and;

Trailers, tanks, railcars, shipping containers, vessels, cargo holds, freighters, barges, grain, elevators, silos, grain bins, or other methods of bulk transport of storage.

Nonretail containers used to ship or store organic products must be labeled to identify the product(s) as organic and display the lot number, shipping identification, or other unique identification that links the container to the audit trail documentation.

Audit trail documentation for nonretail containers must identify the last certified operation that handled the organic product. Audit trail documentation must identify products as organic.

Labels must clearly identify the products as organic. The terms “ORG”, “OG”, “MWO”, “100% OG”, or “100% ORG” or the USDA Seal may be used. Temporary signs or labels may be used for containers that are difficult to label due to size, shape, etc.

If a nonretail container retainer of packaged product(s) with organic identification visible on the retail label, the nonretail container is not required to include organic identification. These include master cases, pallets, or other containers where the retail packages they hold indicate the product(s) are organic (for example. If he USDA Organic seal is visible. These types of containers must still include information linking back to audit trail documentation.

Nonretail label templates must be approved by GCIA before printing and use.

Created Sept 2024

Appendix R: Administrator's evaluation worksheet

The Program Administrator will be evaluated each year by the GCIA Executive Committee

Did the Program Administrator hear any appeals?

If yes, how many appeals and what was the disposition of each appeal?

_____
_____
_____
_____

Did the Program Administrator conduct mediation meetings?

If yes, how many mediations were conducted and what was the disposition of each mediation?

_____
_____
_____
_____

Was an annual program review conducted? _____

Were any non-compliances found? _____

If yes, what were the non-compliances?

_____
_____
_____
_____

Were unannounced inspections conducted? _____

Did the number of unannounced inspections conducted comply with the NOP requirements? _____

Does the Program Administrator ensure that records obtained from applicants for certification and certified operations are maintained for not less than 5 years beyond their receipt. _____

Does the Program Administrator ensure that records created by GCIAOCP regarding applicants for certification and certified operations are maintained for not less than 10 years beyond their creation. _____

Does the Program Administrator ensure that records created or received by the GCIAOCP pursuant to the accreditation requirement of the NOP Subpart F, excluding any records covered by NOP §205.510(b)(2) be maintained for not less than 5 years beyond their creation or receipt per NOP 205.510 (b)(3). _____

Review of:

Did the Program Administrator Review and approve any policy and fee changes before submission to the NOP. _____

Training:

Did the Program Administrator conduct or see that training was conducted for GCIAOCP staff per NOP 205.501, General requirements and NOP 205.501 (a) (4) (i) (b&c); NOP 205.501 (a) (4) (ii) (b); NOP 205.501 (a) (6) (iii). _____

Investigations:

Did the Program Administrator conduct or appoint a qualified staff member to investigate complaints about abuses in the production and sale of GCIAOCP certified crops or products? _____

If yes, List the investigation and disposition.

_____
_____
_____
_____

Evaluations of Program and Personnel:

Did the Program Administrator evaluate personnel who conduct inspections, conduct certification reviews and or implement measures to correct any deficiencies in certification process annually Per Appendix L. (Personnel Performance evaluation) of this manual? _____

Did the Program Administrator submit an annual report to the NOP Administrator as required in Section 205.501of the NOP and NOP Guidance Document NOP 2027 (Personnel Performance evaluations). _____

Did the Program Administrator ensure that new inspectors meet all qualifications in the

GCIAOCP quality Manual? _____

It is the opinion of the GCIA Executive Committee that the GCIA Executive Director has exhibited adequate knowledge of the USDA National Program Regulations.

GCIA Executive Committee:

_____
_____
_____
_____

It is the opinion of the GCIA Executive Committee that the GCIA Executive Director has not exhibited adequate knowledge of the USDA National Program Regulations.

Per the GCIA Quality Manual, I. Administration, Evaluation of Program and Personnel, Paragraph # 6,the Program Manager and Certification Reviewer have been tasked to develop and implement a training program to cover the needed evaluated deficiency.

GCIA Executive Committee:

_____
_____
_____
_____

*See GCIAOCP Program Manual, I., Program Administration, Program Administrator, Evaluation of Program and Personnel.