

General Information

GENERAL INFORMATION				
CERTIFIED ENTITY	Name Client ID: PLc-OR			
Inspected location where this on site visit was conducted	Name (if different from certified entity): Exact address:			
Inspector name:				
Inspector contact information:	Telephone e-mail			
Date Inspected:				
Inspection duration:	Time arrived: Time departed:			
Please confirm that you have received prior to the inspection the following documents:	Organic System Plan Specific instructions within this report format Previous inspection report Last certification decision documents Yes No Yes No			
Please confirm that during the inspection you had a copy of the NOP Standards NOP Guidances, Policy Memos and Instructions applicable to this inspection.	☐ Yes ☐ No - if No, explain why:			
Who was the authorized representative knowledgable of the operation with whom you conducted the inspection and the exti interview?				
Person(s) Interviewed (name and position)				
Were there any limitation(s) that difficulted the activities and objectives of this inspection	☐ No☐ Yes If Yes, please describe,			
Did you see any aspects of the crop management plan that might not be manageable with available equipment or resources?	☐ No ☐ Yes If yes, please describe,			
Did you find any serious organic integrity issues that deserve immediate attention and a rush review?	Yes needs a RUSH review If yes, please describe,			
Date this report was <u>submitted</u> to Primus Auditing Ops:				
Brief Narrative Description of the operation as	nd this audit:			

Primus Auditing Ops Observe. Report.

INSPECTION REPORT- CROPS

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Follow up on previous non compliances or requirements for certification continuation

Please describe how each one of the non compliances or additional requiremenst identified in the certification decision letter have been corrected and implemented.

Non compliance / additional requirements	Inspector verification			
Specific Instructions				
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:				
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:				



INSPECTION REPORT- CROPS General Information

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Inspection Report based on the verification of the different sections of the Organic System Plan

SECTION 1: General Information	IOP Rule 205.401
Please confirm that the information of this OSP section was verified as current and correct. Comment a	ny
discrepancies/changes:	
Did the applicant have a current copy of the NOP standards? Yes No If No, please explain	
Did the applicant demonstrate comprehensive understanding of and commitment to follow National Organical Commitment and Commitment to follow National Organical Commitment and Commitment	ganic
Standards? Yes No If No, please explain	
Specific Instructions	
Insert more Specific Instructions here by typing over this text or delete this row	
r	
Inspector verification:	
Insert more Specific Instructions here by typing over this text or delete this row	
Inspector verification:	



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SECTION 1: Scope verificatiON: LAND, CROPS, PRODUCTS NOP Rule 205.201(a) and 205.202(a) and (b) PLEASE BE VERIFY CAREFULLY OSP SECTIONS 1a, 1b AND 1c AS THEY REPRESENT THE SCOPE OF THE AUDIT AND WILL DETERMINE WHAT WILL BE LISTED IN THE CERTIFICATE. **CHANGES TO CERTIFICATE:** Please compare with applicant current certificate with these sections 1a, 1b and 1c and clearly identify anything that has been added or removed: ■ No changes from current certificate ☐ The following changes are being requested to be made to certificate: 1.a: Fields - LAND TO BE CERTIFIED Please confirm that the information of this OSP section was verified as current and correct. Comment any discrepancies/changes. If there are any changes, please note them in the table 1a of the OSP, sign and date this table, have applicant do the same and attach it to your report. ■ No changes in OSP Table 1a The following changes were made in OSP Table 1a and a modified, signed and dated version is attached to this report: Specific Instructions Insert more Specific Instructions here by typing over this text or delete this row Inspector verification: Insert more Specific Instructions here by typing over this text or delete this row Inspector verification: 1.b: Crops - TO BE LISTED IN THE FARM CERTIFICATE

Please confirm that the information of this OSP section was verified as current and correct. Comment any				
discrepancies/changes. If there are any changes, please note them in the table 1b of the OSP, sign and date this table, have applicant do the same and attach it to your report				
☐ No changes in OSP Table 1b				
☐ The following changes were made in OSP Table 1b and a modified, signed and dated version is attached to this report:				
Have all crops requested for certification been planted? Yes No If No, explain.				
Comment upon the crops inspected, including any general conditions of crops and other general observations:				
Specific Instructions				
Insert more Specific Instructions here by typing over this text or delete this row				
Inspector verification:				

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1c: Products - TO BE LISTED IN CERTIFICATE BY ID MARK AND MARKET NOP Rule 205.201(a)				
Please confirm that the information of this OSP section was verified as current and correct. Comment any discrepancies/changes. If there are any changes, please note them in the table 1c of the OSP, sign and date this table, have applicant do the same and attach it to your report				
☐ No changes in OSP Table 1c				
☐ The following changes were made in OSP Table 1c and a modified, signed and dated version is attached to this report:				
Did you verify which labels are in use (including but not limited to label binder review, interview, physical inspection of packaging material and label storage area, and physical inspection of finished product warehouse)? Yes No - If no, please explain				
Are some labels used or to be used different from those approved by Primus Auditing Ops?				
Are some labels non compliant with NOP labeling requirements?				
Specific Instructions				
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:				
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:				



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SECTION 2: Land requ	irements	N	OP Rule 205.201(a) and 20	05.202(a) and (b)	
FOR ALL NEW FIELDS: N/A - No new fields					
Please confirm the acc	curacy of the Field Histo	ry Affidavits, describe any	y change or difference.		
FOR ALL NEW FIELDS	S: N/A - No new fie	elds			
		rate that no prohibited su	bstance has been used in	n the previous 3 years	
of all newly rented or p	ourchased fields.				
THE FOLLOWING QUE	STIONS ARE APPLICAE	BLE TO ALL FIELDS:			
Did you see any evide	nce of prohibited input ι	ıse this year or residual fr	om previous years?	Yes No	
		s and evidence and clearl			
		easily distinguishable in current adjoining land use)		ly reflected in their	
Yes No If No,		current adjoining land use,	1:		
		early defined for each field	d and consistent among r	maps, Field Histories,	
Annual Field Informati	ion, and this Organic Sys	stem Plan?			
100 1100 1110	, accombo in actain				
Have buffer zones bee	n established? (adequa	cy of buffer zones is discuss	sed in section 7)		
Yes, and inspector of	considers them sufficient to	o prevent unitentional drift			
Yes, but inspect	or considers they are not s	sufficient to prevent unitenti	onal drift (refer to section 7	for more details)	
	· · · · · · · · · · · · · · · · · · ·	nspector considers they are			
		ector considers they are need		more details).	
Please explain in section	n 7 your answer describing	g all objective facts and evid	dence.		
Maps for each field mus	st be current and dated. Ar	n updated (revised or new) i	map must be submitted wh	enever information on	
the map changes (field	numbers, acres, buffers, a	ndjoining land use, etc.). S	Show boundaries and area	to be certified. The map	
		el map, Farm Service Agenc copied. The map should inc			
		n arrow, □adjoining land use			
or woodlands, and land	lmarks such as buildings,	farm or public roads, railroa	d tracks		
Are there accurate and	d complete maps for eac	h field?			
Yes No. If No	= = =				
	,				
Please confirm that the discrepancies/change		P section was verified as	current and correct. Com	ment any	
discrepancies/change	5.				
Incort more Checific In	ostructions have by tomic	Specific Instructions		_	
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:					
Insert more Specific In	structions here by typin	g over this text or delete	this row		
Inspector verification:			M. 10. 1 00/10/00		
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SECTION 3:	Seeds and	Planting Stock	
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NOP Rule 205.204

3.a: Seeds and Seed Treatments
NOP Rule requires the use of organically grown seeds, unless the variety is not commercially available. If using non-organic seeds, producer must have records of attempts to source organic seed. Synthetic seed treatments are prohibited unless included on the National List. Genetically engineered/modified (GMO) seeds and inoculants are prohibited in organic production. NOP Rule uses the phrase "excluded methods" to refer to GMO products. It is advised that producer saves all seed and inoculant labels, and documentation of commercial unavailability of organic seeds to show the inspector.
Please confirm that the information of this OSP section was verified as current and correct. Comment any
discrepancies/changes:
Are records available detailing sources, varieties and purchases for all seeds and inoculants? Yes No
If this is not available for all seed, please list which seed or inoculant is missing documentation
Does the applicant maintain commercial availability forms for non-organic seed used? Yes No Please list non-
organic seed used for which there is no commercial availability documentation:
Is any non-organic seed used treated with synthetic seed treatments? Yes No
- If so, please list which seed and the treatment compound, and note if the use of the treatment is the result of Federal or State phytosanitary regulations.
Did you see any indication that any genetically engineered/modified (GMO) seeds or inoculants are used by the applicant anywhere in the operation? Yes No
- If so, which crops are GMO or grown using genetically modified inoculant?
- If Non-GMO Affidavits are not available for seed used in non-organic portions of the operation, please list the developer and variety of seed missing Non-GMO Affidavits.
Please conduct a mass balance for certified prganic seed purchased vs acreage planted. Choose one or more crops and
verify all seed purchase documents (invoice, BoL) and compare them with planting records. Verify if total acreage is consistent with total seed purchased. Explain your findings and show your calculations
Specific Instructions
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:
Insert more Specific Instructions here by typing over this text or delete this row
Inspector verification:

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3b: Source of Seedlings 205,204	and Perennial Stock			NOP Rule	
Annual seedlings must be produced according to organic standards. Non-organic perennial plants (planting stock) must be managed organically for at least one year prior to harvest of crop or sale of the plant as certified organic planting stock. Organic planting stock must be used if commercially available. A prohibited treatment may be used only if such treatment is a Federal or State phytosanitary requirement. Annual seedlings or transplants must <u>always</u> be organic per § 205.204(a)(3), unless producer has been granted a temporary variance by the Agricultural Marketing Services (AMS) Administrator in accordance with § 205.290(a)(2) due to an extreme weather event or business disruption beyond the control of the producer.					
A. IF SEEDLING IS PUR	RCHASED			lot applicable	
Please confirm that the discrepancies/changes		section was verified as c	urrent and correct. Comn	nent any	
Are records available de	etailing sources, varietie	es, and non-GMO status fo	or all seedlings and/or pe	rennial stock?	
☐ Yes ☐ No - If this is not available	, please list which seedl	ing/planting stock is miss	ing documentation:		
Did you see documenta	tion that verifies that an	nual seedlings are purcha	ased or obtained from a c	ertified facility?	
☐ Yes ☐ No					
- If yes, please cite the fa	cility and certification body	for all certified organic see	edlings		
and verify all seedlings p	urchase documents (invoi	ganic seedlings purchased ce, BoL) and compare them your findings and show yo	with planting records. Ve		
If conventional seedling organic annual seedling seedling used	gs are used), does the a gs as an emergency mea	oplicant have documentat sure (temporary variance	ion from the USDA permi e)?.	itting the use of non- N/A , no conventional	
Specific Instructions					
Insert more Specific Ins Inspector verification:	structions here by typing	over this text or delete the	nis row		
Insert more Specific Instructions here by typing over this text or delete this row					
Inspector verification:					
B. IF ORGANIC SEEDLINGS ARE GROWN ON-FARM:					
Please confirm that the information of this OSP section was verified as current and correct. Comment any					
discrepancies/changes:					
Please conduct a mass balance for certified organic seedlings produced on farm vs acreage planted. Choose one or more crops and verify all seedlings production records and compare them with planting records. Verify if total acreage is consistent with total seedlings produced. Explain your findings and show your calculations					
		Chasifia Instructions			
		Specific Instructions			
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Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:
C. IF BOTH ORGANIC AND NON-ORGANIC PLANTS ARE GROWN IN THE GREENHOUSE: Not applicable
Please confirm that the information of this OSP section was verified as current and correct. Comment any discrepancies/changes:
Specific Instructions
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:
D. PLANTING STOCK FOR PERENNIAL CROPS:
Please confirm that the information of this OSP section was verified as current and correct. Comment any discrepancies/changes:
Have non organic perennial planting stock been managed organically for at least one year before harvest?
☐ Yes ☐ No ☐ N/A , no non organic planting stock used
Specific Instructions
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:



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SECTION 4: Soil and Crop Fertility Management NOP Rule 205.203 and 205.205 A. GENERAL INFORMATION AND EVALUATION:						
A. GENERAL INFORM	MATION AND E	VALUATIO	N:			
	Please confirm that the information of this OSP section was verified as current and correct. Comment any discrepancies/changes:					
			Specific Instructions			
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Inspector verification:	natuustiana ka		, aver this tast or delete	thin many		
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List all fertility input	s used or inten	ded for use	e in the current season o	n proposed organic and	transitional fields	
Please confirm that the discrepancies/change		of this OSP	section was verified as	current and correct. Com	nment any	
				warehouse, application r		
the Organic System P		ertility inpu	ts being used in the orga	anic farm operation that	ARE NOT included in	
3						
Brand name	Supplier	Reason	to use Where Use	d When Used	Comments	
(provide specific formulation used)			(field and cro	pp) (last application)		
iormulation used)						
Attach legible copy/pi	cture of labels	for all prod	lucts listed here.			
			Specific Instructions			
Insert more Specific I	nstructions he	e by typing	over this text or delete			
Inspector verification:	notruotiona hai	o by typino	over this text or delete	thic row		
Inspector verification:	nstructions nei	e by typing	over this text of delete	uns row		
·						
P ON FARM COMPO	STING.			□ Na	et applicable	
B. ON-FARM COMPOSTING: Not applicable NOP Rule 205.203(c)(2) requires that the composting process include a C:N ration of between 25:1 and 40:1, frequent turning						
and maintenance of temperatures between 131°F. and 170°F for a specific number of days, depending on the method of composting.						
NOP Guidance 5021 provides further information.						
Please confirm that the information of this OSP section was verified as current and correct. Comment any						
discrepancies/change	95:					
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Please describe the composting process including any documentation maintained verifying the process is compliant with NOP 205.203 requirements and/or NOP Guidance 5021. Be specific on which documentation was reviewed and give
examples.
Specific Instructions
Insert more Specific Instructions here by typing over this text or delete this row
Inspector verification:
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:
C. MANURE USE:
NOP Rule 205.203(c)(1) requires that raw manure be fully composted unless applied to fields with crops not for human consumption or incorporated into the soil 120 days prior to harvest for crops whose edible portions has direct contact with the soil, or 90 days prior to harvest for all other crops for human consumption.
NOP Guidance 5006 provides further information for the use of processed (dried and heated) uncomposted manure.
Please confirm that the information of this OSP section was verified as current and correct. Comment any discrepancies/changes:
If uncomposted manure is used, please verify its use is compliant with NOP 205.203 requirements (pre-harvest interval) and/or to NOP Guidance 5006. Please do a spot check of records and report the specific documents reviewed and the evidence obtained (field, crop, application date, harvest date).
Specific Instructions
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:
D. NATURAL RESOURCES:
NOP Rule 205.200 and 205.203(a) requires that production practices maintain or improve the natural resources of the operation, including soil and water quality. Practices must minimize erosion.
Please confirm that the information of this OSP section was verified as current and correct. Comment any
discrepancies/changes:
Did you see any evidence of erosion? ☐ Yes ☐ No - If YES, please list which fields, describe the situation. Explain if it is a systematic/extended problem or an isolated one (give a sense of proportion):
Specific Instructions
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:

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SECTION 5: Crop Rotation

NOP Rule 205.205

NOP Rule requires a crop rotation plan that maximizes soil organic matter content, prevents weed, pest, and disease problems, and manages deficient or excess plant nutrients. Crop rotation may include sod, cover crops, green manure crops, and catch crops. Producers must utilize sanitation measures to remove disease vectors, weed seeds, and habitat for pests. Cultural practices, including selection of plant species and varieties adapted to site-specific conditions, must be used to enhance crop health.

Please confirm that the information of this OSP section was verified as current and correct. Comment any discrepancies/changes:

Please describe in detail the primary rotation being used for the fields to be certified and if it meets the NOP rotation objectives as.

Specific Instructions

Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:

Auditing Ops Observe Report

INSPECTION REPORT- CROPS

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SECTION 6: Crop pest, weed and disease management 205.206

NOP Rule

NOP Rule requires management practices to prevent phytosanitary problemas Producers must utilize sanitation measures to remove disease vectors, weed seeds, and habitat for pests. Cultural practices, including selection of plant species and varieties adapted to site-specific conditions, must be used to enhance crop health.

Approved synthetic materials on the National List 205.601 may only be used when management practices are documented to be insufficient to prevent or control problems. All weed, pest, and disease inputs must be approved. A "restricted" input has specific annotations for its use. If you use a "restricted" material, you must provide evidence of how you address the materials' annotation.

A. WEED MANAGEMENT PLAN:

Please confirm that the information of this OSP section was verified as current and correct. Comment any discrepancies/changes:

Specific Instructions

Insert more Specific Instructions here by typing over this text or delete this row

Inspector verification:

Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:

B. PEST MANAGEMENT PLAN:

Please confirm that the information of this OSP section was verified as current and correct. Comment any discrepancies/changes:

Specific Instructions

Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:

Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:

List all pest control products used or intended for use in the current season on organic and transitional fields.

Please confirm that the information of this OSP section was verified as current and correct. Comment any discrepancies/changes:



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Based on purchase records, inventory records, physical verification of warehouse, application records and other relevant documents, please list all pest contrtol inputs being used in the organic farm operation that ARE NOT included in the Organic System Plan:

Brand name (provide specific formulation used)	Supplier	Reason to use	Where Used (field and crop)	When Used (last application)	Comments

Attach legible copy/picture of label for all products listed in this table.

Specific Instructions

Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:

Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:

C. DISEASE MANAGEMENT PLAN

Please confirm that the information of this OSP section was verified as current and correct. Comment any discrepancies/changes:

Specific Instructions

Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:

Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:

List all disease management inputs used or intended for use on your organic and transitional fields/crops.

Please confirm that the information of this OSP section was verified as current and correct. Comment any discrepancies/changes:



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Based on purchase records, inventory records, physical verification of warehouse, application records and other relevant documents, please list all disease management inputs being used in the organic farm operation that ARE NOT included in the Organic System Plan:

Brand name (provide specific formulation used)	Supplier	Reason to use	Where Used (field and crop)	When Used (last application)	Comments

Attach legible copy/picture of label for all products listed in this table.

Specific Instructions

Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:



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SECTION 7: Maintenance of Organic Integrity

NOP Rule 205.201(a)(5) and 205.202(c)

A. ADJOINING LAND USE:

NOP RULE requires that organic production areas have distinct boundaries and buffer zones to prevent the unintended application of a prohibited substance or contact with a prohibited substance that is applied to adjoining land not under organic management. Adjoining land includes crop land, pastures, residential property, fallow land, etc. Buffer areas may change annually, depending on contamination potential from adjoining land uses. The width of the minimum buffer is dependent on certifying agent policy. The NOP Rule requires that the buffer must be sufficient in size or other features (windbreaks, diversion ditches) to prevent the unintended contact by prohibited substances applied to adjacent land areas. Crops within the required buffer must be left unharvested or harvested, stored, and disposed of as nonorganic crop, with records kept of crop disposition. Indicate buffer zones and show all adjoining land uses on your field maps.

Buffer areas (continuation from section 2, land requirements)

Please conduct a risk assessment for contamination from adjoining land use and list the main contamination risks currently present.

Please describe main buffer areas in terms of size and other features:

Please explain why do you think your buffer areas are / are not sufficient as described in section 2 of this report.

If crop is harvested from buffer areas, describe use (sale, non-organic livestock feed, seed, etc) and describe if commingling risk is adequately managed.

Please confirm that the information of this OSP section was verified as current and correct. Comment any discrepancies/changes:

Specific Instructions

Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:

Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:

B. SPLIT PRODUCTION:

Please confirm that the information of this OSP section was verified as current and correct. Comment any discrepancies/changes:

If parallel production is occurring, the non-organic fields in parallel production with the organic crops must be inspected. List non organic fields visited here:

Describe the documentation reviewed (including audits of production and sales records for the organic and nonorganic crop) indicating that practices are in place that will assure contamination of the organic crop from parallel production will not occur during production and handling

Does the applicant appear to have the management, administrative ability and audit trail (input sourcing, production, harvest, storage, and disposition records) to track the organic and non-organic crops from seed to sale?

Yes No Describe.

Specific Instructions

Insert more Specific Instructions here by typing over this text or delete this row

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Inspector verification:
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:
C. EQUIPMENT:
To prevent commingling and contamination, all equipment used in organic crop production must be free of non-organic crops and prohibited materials, Equipment used for both organic and non-organic farming must be cleaned and flushed prior to use on organic fields or crops.
Please confirm that the information of this OSP section was verified as current and correct. Comment any discrepancies/changes:
Please verify that spray equipment being used for organic production is dedicated organic or that a documented clean- out program is in place. Is it sufficent to prevent contamination? Report your findings:
Did you see evidence (may include but is not limited to documentation) that equipment used on both organic and non-organic crops (including custom equipment) is cleaned prior to use on the organic fields? Yes No Explain:
Specific Instructions
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:
D. HARVEST: NOP Rule 205.272(b)(1) and (2) requires that containers, bins, and packaging materials must not contain synthetic fungicides, preservatives, or fumigants. All reusable containers must be thoroughly cleaned and pose no risk of contamination prior to use.
Please confirm that the information of this OSP section was verified as current and correct. Comment any discrepancies/changes:
Describe steps taken to protect organic crops from commingling and contamination during harvest.
Specific Instructions
Insert more Specific Instructions here by typing over this text or delete this row
Inspector verification: Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:
E. POST-HARVEST HANDLING:
NOP Rule 205.201(a)(5) requires that post-harvest handling procedures do not contaminate organic products with non-organic crops or prohibited materials. For on-farm processing, you may need to complete an Organic Handling Plan Questionnaire.
Please confirm that the information of this OSP section was verified as current and correct. Comment any discrepancies/changes:
If water comes into contact with organic products during post-harvest handling, is a current bacteriological and nitrate test available? Yes No List results if a current test (< 1 year old) is not attached to the OSP:



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If Chlorine is used, confirm the accuracy of this OSP section. Are NOP Guidance 5026 requirements met? Yes No N/A, chlorine not used If NO, explain:
Tes INO INA, chiomie not useu in NO, explain.
Please briefly describe pest control procedures used at all post-harvest and/or handling facilities, including a list of substances used and describe if they may pose a contamination risk
Specific Instructions
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:
F. CROP STORAGE: No organic crop storage
Operators must keep organic and non-organic crops in separate storage areas and prevent commingling and contamination. Storage records must be maintained
Please confirm that the information of this OSP section was verified as current and correct. Comment any discrepancies/changes:
Specific Instructions
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:
·
G. TRANSPORTATION:
Please confirm that the information of this OSP section was verified as current and correct. Comment any
discrepancies/changes:
Specific Instructions
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:



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SECTION 8: Rec	ord Keepir	la System
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NOP Rule 205.103

NOP Rule requires that records disclose all activities and transactions of the operation, be maintained for 5 years, and demonstrate compliance with the NOP Rule. Organic products must be tracked back to the field/location where they were produced/harvested. All records must be accessible to the inspector.

A. RECORDS:
Records must be available for the inspector for review and copying during normal business hours
Please list any records that were requested but were not available for your review and explain the situation
Please confirm that the information of this OSP section was verified as current and correct. Comment any discrepancies/changes:
Are records kept for at least 5 years? Yes No
- What evidence supports your answer?
Specific Instructions
Complete the Trace Back and the Mass Balance audit exercises attached to this section. If not done, please explain in detail why:
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:
B. MARKETING:
Please confirm that the information of this OSP section was verified as current and correct. Comment any discrepancies/changes:
Specific Instructions
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:
Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:



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Org-038

TRACE BACK:

Conduct at least one trace back analysis and report your results. Choose a product from title transfer document (invoice or BoL) and trace it back to field of origin. Verify if product can be traced back from sale, through storage, harvest, crop management practices, planting and seed. List all documents reviewed and identify in each document the piece of information that allows to link it to the next document

Number	Name of document	Linking information to previous and following document	Other comments (findings)
FIRST LINE	Start with an invoice or BoL (a title transfer document)		•
2			•
3			•
4			•
5			•
6	Insert more rows as needed		•
LAST LINE	End with planting in field of origin		

	Speci	tic I	Instr	uct	ions
--	-------	-------	-------	-----	------

Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:



General Information

Org-038

MASS BALANCE

Please conduct an annual inventory balance for crops sold as organic compared to crops planted (acreage) and harvested. Choose one crop based on a risk analysis (difficulty to grow organic, market demand, price premium, parallel production, etc). Please summarize the audit and results in a narrative fashion. Show your calculations

Specific Instructions

Insert more Specific Instructions here by typing over this text or delete this row Inspector verification:



General Information

SAMPLING	NOP Rule 205.403(c)(3), 205.670(b)			
	Specific Instructions			
Insert more Specific Instructions here by t Inspector verification:	yping over this text or delete this row			
Insert more Specific Instructions here by t Inspector verification:	yping over this text or delete this row			
Sampling Conducted:				
Were there any samples collected?	Yes □ No			
If yes, provide, as applicable, information rega	arding			
a. Number and type of samples collected				
b. Reason for sampling				
c. Name of person collecting samples				
d. Sample collection procedures Did the procedure used follow Primus Auditing Ops SOP for sampling? Yes No If No, explain why				
e. Sample preservation methods				
f. Copies of receipts for samples taken Did the applicant received a copy of receipt? Yes No If No, explain why				
g. Sample transportation				
h. Date submitted				
i. Chain of custody documentation j. Laboratory used				
k. Tests requested				
m. Test cost	Did the inspector had or will have to pay for this test? Yes No If Yes, explain why			
Sampling Recommended:				
The certifying agent may require preharvest or postharvest testing when there is a reason to believe that the agricultural input or product has come into contact with a prohibited substance or has been produced using excluded methods.				
Do you recommend any particular sampling to be conducted? Yes No				
If yes, please explain in detail why and describe what is your recommended sampling proposal (what to sample, when, where, what will be the requested tests, any other particular comment, etc):				



General Information

EXIT INTERVIEW					
INFORMATION ACCURACY AND COMPLETENESS					
Have you, during the exit interview, summarized your observations and information gathered during this on-site inspection with the applicant and confirmed its accuracy and completness Yes No					
Address the need for any additional information (be as specific as possible on what is missing)					
OSP SECTION		DESCR			
		ISSUES OF CONCERN			
OSP SECTION		DESCRIPTION	l	NOP	
				7CFR 205 citation	
				Citation	
Scope: All observations ar	nd compliance assessments r	nade are based on current NO	P regulations 7 CFR 205, and	are derived directly from	
Scope: All observations and compliance assessments made are based on current NOP regulations 7 CFR 205, and are derived directly from review of the Organic System Plan (including its supporting documents), and this on-site audit that included verbal information from the inspected party, review of records, and visual observation of fields, crops, equipment, inputs, facilities and surroundings.					
Conflict of Interest: I have had no conflict of interest, including an immediate family interest, or the provision of consultancy services, within					
the 16 months prior to this date. I have not accepted any payment, gifts or favors of any kind, other than my prescribed salary/fees from Primus Auditing Ops. I have not given advice or provided consultancy services to this applicant to overcome identified barriers to certification					
Confidentiality: I will keep the information contained in this report is confidential among the inspector, the inspected party and Primus Auditing Ops.					
Created: L. Brenes 08/04/2014	Reviewed: E. Garcia 02/22/2016	Approved: C.Cox 02/23/2016	Modified: 02/19/2016 Rev. 0	PAGE 23 of 24	



General Information

Inspector Name	Inspector Signature	Date		
Acknowledgement				
I understand that the information contained in this report is confidential among the inspector, the inspected party, Primus Auditing Ops, and its accrediting agency and that this report does not constitute certification or consultation, nor should it be used for promotional purposes. The information included in this form reflects what the inspector has discussed with me during the Exit Interview.				
Authorized Representative Name	Authorized Representative Signature	Date		