

New CCOF Compliance Report



CCOF

Organic Certification Education & Outreach Political Advocacy Promotion

Jane Doe
Fresh Test Client (zz997)
1234 Organic St.
Santa Cruz, CA 95060

May 10, 2016
Reference #: OM-631516-16
Jane.Doe@freshtest.com
CC: manager@freshtest.com

RE: Noncompliance – Response Required

Dear Jane Doe,

We have reviewed your 2016 annual inspection, conducted by WIT Test Inspector on April 6, 2016. We found serious issues that could directly affect your certification and may result in additional expenses or inspections. Please review the information requested on the attached Compliance Report by the indicated due date(s).

Thank you for maintaining such detailed records and having them available at your inspection. After these issues are resolved, CCOF will issue certificates to your operation. Your current Materials List is attached. Please review it to see your list of approved materials and instructions for changes and updates.

If you need more time or have questions, please contact us. You can find your inspection report, Compliance Report, Materials List and action items at MyCCOF: www.ccof.org, or contact us anytime for a copy.


We appreciate your participation in the CCOF Organic Certification Program.

Sincerely,

Sarah Reed
Handler Certification Director
sarah@ccof.org
(831) 423-2263
CCOF Certification Services, LLC

Encl: Compliance Report, OSP Materials List

2155 Delaware Avenue, Suite 150, Santa Cruz, CA 95060 • (831) 423-2263 • fax (831) 423-4528 • ccof@ccof.org • www.ccof.org



CCOF Compliance Report

Fresh Test Client (zz997), Generated on 03/10/2016-01:12

Jane Doe, kady@ccof.org USDA-AMS- Administrator c/o NOP Appeals Team
CC: Molly Lippsett, molly@ccof.org NOPACAAdverseActions@ams.usda.gov
CC Adverse Actions: Jake Lewin, jake@ccof.org Administrator, CDFA State Organic Program
dcarlson@cdfa.ca.gov

Compliance Summary: Open: 4; Overdue: 0; Closed in last 30 days: 1
See the Resolved Items Notification for 1 items closed in last 7 days

Questions or concerns? Contact your Certification Service Specialist, Alexandra "Gamai" Gregory: ggregory@ccof.org, 831-346-6234 or Inspection Supervisor, Kari Murray: kari@ccof.org, 831-346-6251.

Immediate Action items: National Organic Program (NOP)
Please respond to the items below by their due date using Action Item Tracker (beta) in MyCCOF for online submission, by sending an email to inbox@ccof.org, or mailing your response to CCOF at the address below.

Noncompliance
Address noncompliances to avoid proposed suspension or revocation of your certification.

Due: 05/30/2016 (#131057-16)
Action item: Revise labels and submit color drafts to CCOF for review prior to printing. You may use up remaining label inventory for a maximum of 90 days.

Placement of the "Certified Organic by (certifier)" statement on Fresh Test brand Broccoli retail labels is noncompliant. The statement "Certified Organic by (certifier)" must be placed directly below (with no intervening text or graphics) the contact information for the final handler listed (e.g. Distributed by XYZ Company). NOP 205.303(b)(2); 205.304(b)(2); NOP Policy Memo 12-2
Annual Inspection on 04/06/2016 with WIT Test Inspector (16-028513)

Administrative Noncompliance (#133835-16)
Address noncompliances to avoid denial of certification for your operation or portions of your operation.

Due: 06/02/2016
Amount owed: \$750.00

Condition of Ongoing Certification
Response required.

Due: 05/30/2016 *Response Received by CCOF and awaiting review.* (#127475-16)
Action item: Update OSP form G6.0 section A to describe the parcel's adjoining land uses, the type and width of buffer, and whether a buffer crop is grown in the buffer area.

Your OSP does not fully describe buffers, noted as 50 feet on the south side of parcel ABC. Buffers must be sufficient to prevent organic land and crops from contamination by drift of prohibited materials applied to adjacent lands and to prevent contact with genetically engineered crops and products. Buffer crop zones may be required. Buffer crops must be managed organically but sold as conventional. Records must document that buffer crops were kept separate from organic crops from harvest through sale and were not marketed as organic. NOP 205.202
Annual Inspection on 04/06/2016 with WIT Test Inspector (16-028513). Facility: Fresh Test Client

Reminders: National Organic Program (NOP)
Information to help you be successful. Submit updates before changing practices.


Guidance
No response required

(#132844-16)

If you plan to use new materials that are not included on your OSP Materials List, follow the instructions at the top of the list to request the addition of new materials. Access your OSP Materials List and request the

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CCOF Compliance Report

Fresh Test Client (zz997), Generated on 03/10/2016-01:12

addition of new materials online at MyCCOF. All materials should be approved on your OSP Materials List prior to use. You are allowed to use OMRI or WSDA listed materials without first notifying CCOF. However, we recommend that you ask CCOF to approve all inputs prior to use to avoid any potential problems. Use of an unapproved material may result in a noncompliance. NOP 205.105; 205.201
Annual Inspection on 04/06/2016 with WIT Test Inspector (16-028513)

Immediate Action items: Global Market Access (GMA)
Please respond to the items below by their due date using Action Item Tracker (beta) in MyCCOF for online submission, by sending an email to inbox@ccof.org, or mailing your response to CCOF at the address below. Your participation in the GMA program does not affect your USDA National Organic Program certification

Condition of Ongoing Certification
Response required

Due: 05/30/2016 (#127475-16)
Action item: Submit revised labels to CCOF for review. If labels for export do not meet U.S. labeling requirements, shipping containers and documents must clearly be marked "For Export Only", and proof of such marking must be maintained.
Your export labels do not comply with Canadian labeling requirements. The "Made with Organic (specific ingredients)" claim is not allowed in Canada. All international market labeling requirements can be found at www.ccof.org/documents/international-market-labeling-guide. US/EU, Japan, Canada, Korea, Swiss Equivalence Arrangement; NOP 205.201; NOP 205.201
Annual Inspection on 04/06/2016 with WIT Test Inspector (16-028513)
(Gregory Alexandra "Gamai" 05/16/2016) field of communication tested it is
If you do not respond, CCOF may issue a noncompliance and late fee.

Updates or Requests Awaiting Review by CCOF
(#130573-16) **Cat food label** 04/19/2016

Helpful Resources and Information
Visit www.ccof.org/comreport for help regarding this report.
Organic System Plan (OSP) documents are available at: www.ccof.org/documents. The NOP Standards are available at: www.ccof.org/clients/standards. Your inspection report is available at MyCCOF, contact us if you would like a copy mailed to you.
Cost Share – A Refund of Organic Certification Fees! Receive a reimbursement of 75% of your certification costs (up to \$750 per scope of certification).

General Information:
- You may surrender your certification or withdraw your application at any time, except for non-administrative proposed suspension or proposed revocation; NOP § 205.402(c); 205.404(c).
- If you apply to another certification agency, you must disclose all noncompliances with a description of the corrective actions taken; NOP § 205.401(c); 205.404 (c).
- All fees are non-refundable. You are responsible for all costs of services provided. NOP § 205.402(c), 205.406
- Keep a copy of your responses for your records

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A Compliance Summary: Open: 4; Overdue: 0; Closed in last 30 days: 1
See the Resolved Items Notification for 1 items closed in last 7 days

Compliance Summary: The top of every Compliance Report includes an overview of open, overdue, and closed items for your operation. Easily see everything that is outstanding.

Resolved Items Notification: If any major issues were closed in the last seven days you'll be notified here, and the item details will show up on the last page of the report, making it easier for you to see you've closed all outstanding major issues.

B Noncompliance
Address noncompliances to avoid proposed suspension or revocation of your certification.

Due: 05/30/2016 (#131057-16)
Action item: Revise labels and submit color drafts to CCOF for review prior to printing. You may use up remaining label inventory for a maximum of 90 days.

Placement of the "Certified Organic by (certifier)" statement on Fresh Test brand Broccoli retail labels is noncompliant. The statement "Certified Organic by (certifier)" must be placed directly below (with no intervening text or graphics) the contact information for the final handler listed (e.g. Distributed by XYZ Company). NOP 205.303(b)(2); 205.304(b)(2); NOP Policy Memo 12-2
Annual Inspection on 04/06/2016 with WIT Test Inspector (16-028513)

Action Item: This is one action item, clearly explaining any actions you need to take, and the details surrounding the item. By separating the action items out, you can scan the content and find the serious items that require immediate attention.

C Updates or Requests Awaiting Review by CCOF
(#130573-16) **Cat food label** 04/19/2016

Updates/Requests Awaiting Review by CCOF: Keep track of items you've submitted to CCOF for review. No more confusion about whether we've received the item.

D Helpful Resources and Information
Visit www.ccof.org/comreport for help regarding this report.
Organic System Plan (OSP) documents are available at: www.ccof.org/documents. The NOP Standards are available at: www.ccof.org/clients/standards. Your inspection report is available at MyCCOF, contact us if you would like a copy mailed to you.
Cost Share – A Refund of Organic Certification Fees! Receive a reimbursement of 75% of your certification costs (up to \$750 per scope of certification).

Helpful Resources and Information: This section makes communicating CCOF member benefits and other important organic news easier than ever.