



## Certification Acknowledgement

This is to certify that  
**Great West Produce Inc**  
**2600 S. Eastern Ave**  
**Los Angeles, CA 90040**  
**United States**

is Certified Organic by Oregon Tilth to the  
USDA Organic Regulations, 7 CFR Part 205

**Scope:** NOP-Handling

**Client Identification Number:** OT-021109

**Certified Organic Products:** Per attached System Plan Summary

**Certified by OTCO since:** 01/07/2016

**NOP effective date:** 01/07/2016

**NOP ID:** 8150001952

**Anniversary Date:** 01/01/2023

Once certified, a production or handling operation's organic certification  
continues in effect until surrendered, suspended or revoked.

**Certificate Issue Date:** 12/02/2022

Authorized by:

Connie Karr, Certification Director

Certificate Number: Z-76232-2008

Doc - Certificate | Rev. 11/30/2021

**Oregon Tilth, Inc.**

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## System Plan Summary

**Great West Produce Inc**  
**2600 S. Eastern Ave**  
**Los Angeles, CA 90040**  
**United States**

**Client Identification Number:** OT-021109  
**NOP ID:** 8150001952  
**Certificate Issue Date:** 12/02/2022  
**Certified by OTCO since:** 1/7/2016

### Location(s) and Facilities Inspected:

Location/Facility Name	Address
Facility - Great West Gourmet 1961 Jerrold Ave	1961 Jerrold Ave, San Francisco, CA 94124
Facility - Great West Gourmet 2001 Jerrold Ave	2001 Jerrold Ave, San Francisco, CA 94127
Great West Produce	2600 S. Eastern Ave, Los Angeles, CA 90040

### Certified Product (100% Organic)

Product	Compliance
<b>Fruit:</b>	
Fresh > Apples Braeburn	NOP-Handling
Fresh > Apples Fuji	NOP-Handling
Fresh > Apples Gala	NOP-Handling
Fresh > Banana	NOP-Handling
Fresh > Blueberry	NOP-Handling
Fresh > Grapefruit	NOP-Handling
Fresh > Limes	NOP-Handling
Fresh > Orange	NOP-Handling
Fresh > Pineapple	NOP-Handling
Fresh > Raspberry	NOP-Handling

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**Certified Product (100% Organic)**

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<b>Product</b>	<b>Compliance</b>
Fresh > Strawberry	NOP-Handling
<b>Vegetables:</b>	
Fresh > Arugula Baby	NOP-Handling
Fresh > Asparagus	NOP-Handling
Fresh > Carrots Mini-Peeled	NOP-Handling
Fresh > Corn White	NOP-Handling
Fresh > Kale	NOP-Handling
Fresh > Kale Lacinato	NOP-Handling
Fresh > Various Fresh Vegetables Broccoli & Carrot	NOP-Handling
Fresh > Various Fresh Vegetables Broccoli Coleslaw	NOP-Handling
Fresh > Various Fresh Vegetables Broccoli Wokly	NOP-Handling
Salad Mix > Baby Spinach	NOP-Handling
Salad Mix > Whole Romaine Hearts	NOP-Handling

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**Certified Product (Organic)**

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<b>Product</b>	<b>Compliance</b>
<b>Fruit:</b>	
Fresh > Apples Pink Lady	NOP-Handling
Fresh > Apricot	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Aprium	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Avocado	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Blackberry	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Blueberry	US/Canada Equivalence-Handling
Fresh > Cantaloupe	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Coconut	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Grape Thomcord Seedless	NOP-Handling, US/Canada Equivalence-Handling

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**Certified Product (Organic)**

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**Product****Compliance**

Fresh > Kiwi	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Lemons	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Lemons Meyer	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Mandarin	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Mango	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Melons Honeydew	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Nectarine	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Orange Clementine	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Orange Mandarin	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Orange Navel	NOP-Handling
Fresh > Orange Valencia	NOP-Handling
Fresh > Peaches	NOP-Handling
Fresh > Pears	NOP-Handling
Fresh > Plum	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Pomegranate	NOP-Handling
Fresh > Raspberry	US/Canada Equivalence-Handling
Fresh > Strawberry	US/Canada Equivalence-Handling
Fresh > Various Fresh Fruit Pomelo	NOP-Handling
Fresh > Watermelons	NOP-Handling, US/Canada Equivalence-Handling
Misc > Figs	NOP-Handling, US/Canada Equivalence-Handling
<b>Herbs_Spices_Seasonings:</b>	
Fresh Herbs_Spices > Basil	NOP-Handling
Fresh Herbs_Spices > Chives	NOP-Handling
Fresh Herbs_Spices > Dill	NOP-Handling, US/Canada Equivalence-Handling
Fresh Herbs_Spices > Mint	NOP-Handling

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**Certified Product (Organic)**

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**Product****Compliance**

Fresh Herbs\_Spices &gt; Rosemary

NOP-Handling

Fresh Herbs\_Spices &gt; Sage

NOP-Handling

Fresh Herbs\_Spices &gt; Tarragon

NOP-Handling

Fresh Herbs\_Spices &gt; Thyme

NOP-Handling

Herbs\_Spices &gt; Anise

NOP-Handling, US/Canada  
Equivalence-Handling

Herbs\_Spices &gt; Chicory

NOP-Handling, US/Canada  
Equivalence-Handling

Herbs\_Spices &gt; Cilantro

NOP-Handling, US/Canada  
Equivalence-Handling

Herbs\_Spices &gt; Dandelion

NOP-Handling, US/Canada  
Equivalence-Handling

Herbs\_Spices &gt; Oregano

NOP-Handling

Herbs\_Spices &gt; Parsley

NOP-Handling, US/Canada  
Equivalence-Handling**Nuts\_Seed Products:**

Nut Products &gt; Almonds

NOP-Handling, US/Canada  
Equivalence-Handling**Vegetables:**

Fresh &gt; Artichoke

NOP-Handling, US/Canada  
Equivalence-Handling

Fresh &gt; Arugula

NOP-Handling, US/Canada  
Equivalence-Handling

Fresh &gt; Asparagus

US/Canada Equivalence-Handling

Fresh &gt; Beans

NOP-Handling

Blue Lake

Fresh &gt; Beets

NOP-Handling, US/Canada  
Equivalence-Handling

Fresh &gt; Beets

NOP-Handling

Red

Fresh &gt; Bell Pepper

NOP-Handling

Red

Fresh &gt; Bok Choy

NOP-Handling, US/Canada  
Equivalence-Handling

Fresh &gt; Bok Choy

NOP-Handling, US/Canada  
Equivalence-Handling

Baby

Fresh &gt; Broccoli

NOP-Handling, US/Canada  
Equivalence-Handling

Fresh &gt; Brussels Sprouts

NOP-Handling, US/Canada  
Equivalence-Handling

Fresh &gt; Cabbage

NOP-Handling, US/Canada  
Equivalence-Handling

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**Certified Product (Organic)**

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<b>Product</b>	<b>Compliance</b>
Fresh > Cabbage Green	NOP-Handling
Fresh > Cabbage Napa	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Carrots	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Carrots Rainbow	NOP-Handling
Fresh > Carrots Table	NOP-Handling
Fresh > Cauliflower	NOP-Handling
Fresh > Celery	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Chard	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Collard Greens	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Cucumber	NOP-Handling
Fresh > Daikon	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Eggplant	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Endive	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Escarole	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Frisee	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Garlic	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Ginger	NOP-Handling
Fresh > Green Beans	NOP-Handling
Fresh > Green Beans	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Kale	US/Canada Equivalence-Handling
Fresh > Kohlrabi	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Kohlrabi	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Leek	NOP-Handling
Fresh > Lettuce	NOP-Handling, US/Canada Equivalence-Handling

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**Certified Product (Organic)**

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**Product****Compliance**

Fresh > Lettuce Braising Mix	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Lettuce Butter Lettuce	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Melon	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Mushrooms	NOP-Handling
Fresh > Mustard Greens	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Okra	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Onion	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Parsnip	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Peas	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Peas Sugar Snap	NOP-Handling
Fresh > Peppers	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Potatoes Red	NOP-Handling
Fresh > Potatoes Russet	NOP-Handling
Fresh > Potatoes Yellow	NOP-Handling
Fresh > Pumpkin	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Radicchio	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Radish	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Radish Daikon	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Rhubarb	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Rutabaga	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Shallots	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Spinach	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Squash	NOP-Handling, US/Canada Equivalence-Handling

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**Certified Product (Organic)**

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<b>Product</b>	<b>Compliance</b>
Fresh > Squash Butternut	NOP-Handling
Fresh > Sunchoke	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Sweet Potatoes	NOP-Handling
Fresh > Tomatillos	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Tomatoes	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Tomatoes Grape	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Tomatoes Roma	NOP-Handling
Fresh > Turmeric	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Turnips	NOP-Handling, US/Canada Equivalence-Handling
Fresh > Various Fresh Vegetables Vegetable Medley	NOP-Handling
Fresh > Various Fresh Vegetables Vegetable Platter	NOP-Handling
Fresh > Various Fresh Vegetables Vegetable Tray	NOP-Handling
Fresh > Yams Jewel	NOP-Handling
Salad Mix > Baby Kale	NOP-Handling
Salad Mix > Salad Mix	NOP-Handling
Salad Mix > Salad Mix Arcadian Harvest	NOP-Handling
Salad Mix > Salad Mix Spring Mix	NOP-Handling
Salad Mix > Salad Mix Super Blend	NOP-Handling



Business Information	
Client ID and Service Team	OT-021109   Orange
Legal Business Name	Great West Produce Inc
DBA (if any)	
Legally Responsible Contact	Sean Villa
Primary Contact	Joe Segura
Mailing Address	2600 S. Eastern Ave Los Angeles, CA 90040 United States
Business Contact Info	P: (323) 622-2500   M: (562) 302-9799   E: foodsafetyteam@greatwestproduce.com
Parent Production Partner	

Inspection Information	
Inspector Name	Megan Allen
Audit Details	2022 - Mandatory Audit (33624)
Audit Services and results	Risk Assessment (Concerns), NOP-Handling (Concerns)
Priority and Type	Normal - On-Site
Inspection Date	08/19/2022
Location Details	Los Angeles, CA
Assigned sites	
General Info	Great West Product operates as a distributor for finished goods from three warehouses observed by Oregon Tilth. One location (Las Angeles) and two smaller storage distribution sites (located in San Francisco). These two inspections were performed as a complete onsite presence for the Las Angeles location and remote inspection (with in person review of documents) for the San Francisco location.
Auditee Participants	Kenneth E. Ewalt Jr. – Executive Vice President Joe Segura – Operations and Food Safety Micaela Luna – Food Safety Coordinator
Audit finished on	08/21/2022

<b>Inspection Checklist (v 1.4)</b>				
<b>1, General</b>				
<b>1.1 Misc.</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[1.1.1] Are the total organic sales identified during the inspection consistent with sales reported in the OSP, Fee Worksheet and Inspection Work Order?		✓		Gross Organic Sales reported from the dates 01/01/2021 as \$5,986,657.82 which is inconsistent with the amount submitted to OTCO on 12/31/2022 (different periods of time dates submitted for 01/01/2020 To: 12/31/2020 as \$7,546,051.45) this was noted on the Exit Interview.
[1.1.2] Is this operation certified in production partnership with another, in agreement with the OTCO Fee Schedule?		✓		The organic system plan update application submitted 12/31/2022 identifies no selection regarding production partnership under number 3: Renewal Type. It was verbally verified by operator Kenneth E. Ewalt Jr. this operation is not in a production partnership as defined by OTCO.
[1.1.3] Is the section of the OSP requesting information about the partnership complete?			✓	
[1.1.4] If the operation is in a production partnership, does the percentage of total organic sales sold to the production partner meet the minimum requirement, as required by the OTCO Fee Schedule?			✓	
[1.1.5] Were all facilities/growing sites (e.g., field, circle, etc.) listed on the Inspection Work Order (IWO) inspected?			✓	
<b>1.2 Background Information</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[1.2.1] Are the services requested for certification listed on the IWO accurate?	✓			
[1.2.2] Does the operator demonstrate knowledge of how to access all applicable organic certification standards and procedures?		✓		Purchasing department (corporate representatives) were not present as well as the third party company (Ceres) who is responsible for holding certificates. this is further described in this report below..

[1.2.3] Does the operator appear to understand all applicable organic certification standards?		✓		Use of uncertified brokers/handlers does not present as clear for the teams responsible for supplier verification.
[1.2.4] Does this operation produce or handle organic products exclusively?		✓		
[1.2.5] If the operation has been inspected by other regulatory agencies, have all noted concerns been adequately addressed according to the regulatory agency that noted the concerns?	✓			Operator Information form (O1) letter C.5 identifies regulatory agencies Primus as additional regulatory agencies responsible for auditing this operation. The O1 on file is to represent all three locations. SQF audits occur at Los Angeles Location 10/29/2021 with score of 94%. One minor compliance observed while reviewing this report noted a "Minor. Supplier approval and monitoring SOP is not aligned with current approval monitoring practices. Another minor was listed as "One of the certificates of accreditation for lab is not current." The remainder of the minors were indicative of training for staff which will need to occur and physical
[1.2.6] If the operation is in California, does it have verification of California's State Organic Program (SOP) Registration?	✓			CDPH registration # 19-008391 presented with coordinating OTCO primary address (2600 S. Eastern Ave Los Angeles, CA 90040 listing both other sites at the bottom for 1961 and 2001 Jerrold Ave San Francisco, California 94127) and active registration with expiration date until 05/01/2023. This is not the same registration number reflected in the Operator Information Form (O1) letter E approved by OTCO 12/01/2016.
<b>1.3 Certification of New Clients</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[1.3.1] Is this an application for a new organic certification or an applicant applying for reinstatement?			✓	
[1.3.2] Is this operator requesting reinstatement?			✓	
[1.3.3] If yes, a) Have all prior outstanding non-compliances been adequately addressed, and all corrective actions been appropriately implemented and are effective?			✓	

[1.3.4] If yes, b) Was it verified that no product was sold as organic during the period of suspension?			✓	
[1.3.5] If yes, c) Was it verified that there has been a system in place to prevent commingling of noncompliant product(s) produced or inventoried during the suspension?			✓	
[1.3.6] Is documentation associated with a previous certification and/or denial and any subsequent corrective actions on file for review?			✓	
[1.3.7] Has the operation received a copy of the OSP Initial Review letter?			✓	
[1.3.8] Have all points listed in the OSP Initial Review letter been adequately addressed?			✓	
[1.3.9] On the IWO, is the information provided in both the General Operation Information and the services listed in the Inspection Details accurate?			✓	
[1.3.10] Did the operation provide complete, unfettered access to its facilities, including non-certified areas, structures, and offices?			✓	
<b>1.4 Certification History Renewal</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[1.4.1] Is this an application for renewal of an organic certification?	✓			
[1.4.2] Is the current certificate accurate?	✓			The certificate and MPL are designed to address all potential vegetables or fruits that may be sources, which may not reflect as purchased in the previous 12 months (or ever).
[1.4.4] On the IWO, is the information provided in both the General Operation Information and the services listed in the Inspection Details accurate?		✓		Updated contact change form collected and addressed on the Exit Interview.

<p>[1.4.5] Are corrective actions associated with previous noncompliance points still in effect?</p>	<p>✓</p>		<p>#0103965 – Noncompliance - Finished                  NOP §205.201(a)(1) states that a producer of a production operation must develop an organic production system plan that is agreed to by the producer and an accredited certifying agent, and NOP §205.406 (a)(1) requires that any deviations from, changes to, modifications to, or other amendments made to the previous year's Organic System Plan (OSP) during the previous year must be fully documented prior to implementing the changes. It was reported mid-year that a new facility was in use which had not been previously submitted or reviewed by OTCO.                  - Additional facility in construction – not yet ready for OTCO inspection but will be declared before production according to Joe Segura.</p>
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[1.4.6] Have previous reminders been acknowledged?

✓

#0101881 – Reminder – in Progress  
 Please be advised that your Organic System Plan (OSP) and supporting documentation must accurately represent practices and materials in use at your facility. In addition, 7CFR205.406 requires that any deviations from, changes to, modifications to, or other amendments made to the organic system plan must be fully documented in your Organic System Plan (OSP) Annual Update. It was noted during inspection that your Master Ingredient List (MIL) was no longer accurate and needed to be updated to remove a supplier. Please ensure that all OSP documents are kept current, and that updates are submitted to OTCO for review and approval.  
 - Addressed in this report and on the Exit Interview

#0113692 – Reminder – In Progress  
 NOP §205.103 (b)(4) requires that records be sufficient to demonstrate compliance with the Act and the regulations in this part (7CFR205). This includes ensuring that all organic ingredient supplier or manufacturer certificates are on file and current within 18 months of their issue date at the time that you receive ingredients, and that all traceability documentation from uncertified brokers is available during inspection. Effective September 28, 2017, operations that source organic products through uncertified operations are required to clearly identify the uncertified entities they are sourcing from, maintain organic certificates for the last certified source of the products received, collect and maintain all records associated with purchase and transport of the organic product through the supply chain from the last certified source, and have the documents mentioned available for OTCO staff and inspectors upon request. This information must be collected and maintained for each

				<p>shipment received through an uncertified broker. At inspection it was noted that your Master Ingredient List (MIL) does not list uncertified brokers or distributors but at inspection there were certificates provided to the auditor for review which did not appear on the MIL / MPL/Sales report reviewed (Fresh Organic King, Nagnar SPR De. Ri) identified operations in Mexico.</p> <p>- MIL inconsistent again this year.</p> <p>#0114971– Reminder – In Progress During the inspection it was observed that the sales of organic goods reported to OTCO in the annual Organic System Plan (OSP) update application were not consistent with the sales report generated while the inspector was on-site. Please ensure that future update applications contain accurate sales information for the organic products sold during the reported time frame.</p> <p>- Addressed above in this report and reflected on the Exit Interview.</p>
[1.4.7] As applicable, have any changes to the OSP during the previous year been documented in the OSP?		✓		See below in this report for supplier certificates.
[1.4.8] As applicable, have any intended changes to the OSP for the coming year been documented in the OSP?	✓			
[1.4.9] Did the operation provide complete, unfettered access to its facilities, including non-certified areas, structures, and offices?	✓			
[1.4.10] As applicable, has any application (including drift) of a prohibited substance to any production unit, site, facility or product that is part of this operation been reported to OTCO as required?			✓	
<b>3, Multi-scope</b>				
<b>3.2 Labeling</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>

[3.2.2] Have all labels been submitted to and approved by OTCO, including any labels for products the operation packages for others?		✓	All arrive in finished good packaging and remain in packaging until distribution, No labels maintained in E-Cert as they are certified through original supplier.
[3.2.21] Are the "100% organic," "organic", or "made with" claims confirmed by the operator and found to be correct?		✓	
[3.2.22] Is each organic ingredient in the product identified as organic in the ingredient statement that appears on the product's retail labels?		✓	
[3.2.23] For each product's retail label, as reviewed during the inspection, is the statement: "Certified Organic by Oregon Tilth" (or similar phrase) clearly indicated on the information panel beneath the information identifying the handler or distributor of the product?		✓	
[3.2.24] For each product's non-retail label reviewed during the inspection, is the production lot number displayed (if applicable)?		✓	
[3.2.25] If used on, "100% organic" or "organic" products, are the color combinations and size of the USDA seal in compliance with NOP regulations?		✓	
[3.2.26] If both the USDA Organic and OTCO logos are used on the same panel of a product, is the OTCO logo less prominent than the USDA Organic logo?		✓	
[3.2.27] Do the percentage claims made on retail labels conform to the size, style and color requirements?		✓	
[3.2.28] If this operation packages organic product(s) for other certified organic operations, are valid certificates for those companies on file to verify the label claim?		✓	
[3.2.29] If this operation packages its organic product(s) under labels owned by other companies that are not certified organic, is a private label agreement between the two entities on file?		✓	
[3.2.30] Are "made with" statements used on labels for products that list three or fewer of the requisite food groups?		✓	
[3.2.31] Do "made with" statements conform to print size, style, and color requirements?		✓	
[3.2.32] Is there evidence substantiated by the operator that claims being made regarding the composition of the products in the less than 70% organic content category are accurate?		✓	
[3.2.33] Does the operator have a monitoring system in place to ensure that all labels are submitted to OTCO for approval and continuously remain in compliance with applicable regulations?		✓	



[3.2.34] For exported products under an NOP equivalency arrangement, is the operator ensuring that the product is labeled in accordance with the requirements of the destination country (as applicable)?			✓	
<b>3.5 Record Keeping</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[3.5.1] Are all records readily available for review during the inspection?	✓			Records requested were made available, but due to the complex nature and responsibilities outsourced, not readily auditable.
[3.5.2] Do records fully disclose all activities and transactions in sufficient detail to be readily understood and audited?		✓		
[3.5.3] Is the audit trail flow chart provided in the OSP accurate and complete?	✓			
[3.5.4] Is the lot coding system the operator uses consistent with that provided in the OSP?		✓		H8 8.3.1 identifies the broken down barcode recognition which is not truly represented by all current suppliers, or the lot coding system in place by Great West Product. Request to update OSP identified on "additional information requested" section of Exit Interview.
[3.5.6] Are receipts for purchased inputs available and consistent with materials used/to be used as listed in the OSP?		✓		See traceback exercise.
[3.5.13] Do sales records show date, product, and quantity sold?	✓			
[3.5.15] Are waste, spoilage and/or damaged product losses documented?			✓	
[3.5.17] Are records maintained for at least five years beyond their creation?	✓			
[3.5.18] For exported products under an NOP equivalency arrangement, is the operator ensuring that the appropriate export documents are requested from OTCO and accompany each shipment?			✓	
[3.5.35] For imported products (directly imported or purchased through uncertified brokers), does the operation maintain phytosanitary documentation that identifies whether any substances were applied to the product?		✓		
[3.5.36] For products purchased through excluded operations (brokers, traders, distributors), can the operation trace the products back to the last certified handler using authentic, understandable documents?		✓		

[3.5.37] For products directly imported or purchased through uncertified brokers to whom OTCO has not issued a lot specific approval letter, can the operation trace the products back to the last certified handler using authentic, understandable documents?		✓		
[3.5.39] Does the operator have a monitoring system in place to ensure that all records are continuously maintained as required by the applicable regulations?		✓		
[3.5.41] Conduct one trace-back as appropriate, for the operation. Show your work, including calculations and descriptions of records reviewed for the exercises. Explain the results and indicate whether they are reasonable for the crops that are subject of the audit. If audits are unsuccessful, describe the steps taken to perform the audit, the records that were reviewed, and specify any records or documents that were missing.	✓			
[3.5.42] Conduct one mass balance as appropriate, for the operation. Show your work, including calculations and descriptions of records reviewed for the exercises. Explain the results and indicate whether they are reasonable for the crops that are subject of the audit. If audits are unsuccessful, describe the steps taken to perform the audit, the records that were reviewed, and specify any records or documents that were missing.	✓			
<b>4, US/Canada Equivalency</b>				
<b>4.1 US/Canada Equivalency</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[4.1.2] Are the products to be assessed correctly listed in the Master Products List as applicable?	✓			<p>It was declared by staff Joe Segura no organic products are currently exported to Canada. There had been communication with a client for potentially shipping in the near future but no solid plans had been made.</p> <p>Currently all products listed on the MPL and organic certificate to allow the opportunity to export, however all products are simultaneously listed on MIL as US/Canada Equivalent which is not reflected to be true for each supplier. This auditor requested the last known date of export to Canada to ensure products are compliant with organic certificates when program resumes.</p>
[4.1.7] Are all labels used on organic products shipped to Canada on file with OTCO?			✓	
[4.1.8] Are all organic products exported to Canada that have been approved for US/Canada Equivalency on the operation's organic certificate?			✓	

[4.1.9] Do all products labeled for export to Canada comply with Canadian labelling requirements?			✓	
[4.1.10] If the Canadian Organic Seal is used, do the labels include the statement “Product of” immediately preceding the name of the country of origin or the statement “Imported” in close proximity to the product information panel?			✓	
[4.1.12] Is documentation on file confirming that all high-risk ingredients used in products shipped to Canada have been produced in compliance with the terms of the US-Canada Organic Equivalency Arrangement?		✓		
<b>6, Handling</b>				
<b>6.1 Processing</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[6.1.1] Are the process/handling flow charts and associated processing equipment listed in the OSP complete, accurate, and consistent with inspector observations?	✓			
[6.1.3] Is the floor plan diagram provided in the OSP accurate and consistent with inspector observations?	✓			
[6.1.6] Are measures described in the OSP to avoid any contamination or commingling adequately implemented in order to protect organic products at all stages of receiving, processing, storing, and shipping?	✓			Physical designation on facility map in H2 observed during on site tour of facility.
<b>6.2 Product Summary</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[6.2.1] Are all products and ingredients reviewed for compliance? If not, what percentage is not being reviewed?		✓		
[6.2.2] Are all products subject to this certification completely and accurately listed in the Master Products List of the OSP?	✓			
[6.2.3] Are Product Formulation Spreadsheets (PFS’s) in the OSP complete and accurate for each of subject products?			✓	
[6.2.5] Do PFS’s match batch records?			✓	
[6.2.6] For each product requesting certification as “100% organic”, “organic”, or “made with”, is the requested designation consistent with the product’s formulation?			✓	
[6.2.8] Is the master list of organic and non-organic ingredient suppliers current, complete and consistent with the OSP?		✓		One PDF was provided to this auditor at the beginning of the inspection with the Supplier Certificate but not the product summary. This operator functions as a distributor and so no h

<p>[6.2.9] For all organic ingredients, does the operator have on file valid documentation confirming the ingredients' acceptable organic status?</p>		<p>✓</p>	<p>The way the MIL is maintained is not easy to determine what tracks real movement. The MIL and MPL when compared to the gross organic sales list was not "readily auditable" per this auditor.s observations. Due to the third party management of certificates and purchasing department remotely located it is unclear if products are managed with oversight to import / exports as well as drop shipments as evidenced in the traceback exercise (products which do not enter inventory).</p>
<p>[6.2.10] For all organic ingredients, does the operator have an internal monitoring system to ensure that the certificates remain current and valid?</p>		<p>✓</p>	
<p>[6.2.11] For all non-organic ingredients, does the operator have an internal monitoring system to ensure that declarations and questionnaires remain current and valid?</p>		<p>✓</p>	
<p>[6.2.12] Are non-organic agricultural ingredients used in "organic" products listed in 205.606?</p>		<p>✓</p>	
<p>[6.2.14] For non-organic agricultural ingredients listed in 205.606, are the annotations appropriately addressed?</p>		<p>✓</p>	
<p>[6.2.15] For any non-organic ingredients found at 205.605 and which require a commercial availability search and for all non-organic ingredients found at 205.606, is their commercial unavailability documented and current?</p>		<p>✓</p>	
<p>[6.2.16] For all non-organic agricultural ingredients used in "made with" products, is there current documentation on file to establish agricultural status?</p>		<p>✓</p>	
<p>[6.2.17] For all non-organic ingredients or processing aids used in either "organic" or "made with" products, does the operator have documentation to verify compliance with 205.105(e),(f),(g) (i.e., dated, signed OTCO Non-Organic Ingredient Declarations)?</p>		<p>✓</p>	
<p>[6.2.19] For all non-synthetic flavors used in "organic" or "made with" products, are dated and signed OTCO Natural Flavor Questionnaires on file with the operator?</p>		<p>✓</p>	
<p>[6.2.20] Are non-agricultural ingredients used in "organic" or "made with" products listed as allowed pursuant to 205.605?</p>		<p>✓</p>	
<p>[6.2.21] For non-agricultural ingredients used in "organic" or "made with" products, is documentation on file with the operator to verify compliance with any applicable annotation from the National List?</p>		<p>✓</p>	

[6.2.22] For non-agricultural ingredients used in “organic” or “made with” products, is documentation on file with the operator disclosing all ingredients?			✓	
[6.2.23] Are processing aids used as described in the OSP?			✓	
[6.2.25] Are processing aids used by the operator listed in 205.605 or 205.606?			✓	
[6.2.26] For all negative status inputs listed on the Inspection Work Order (e.g., “dropped,” “more info needed,” “prohibited”), is there current documentation on file for each material?			✓	
[6.2.27] If any products are making a 100% organic claim, are processing aid(s) used in the production of the product?			✓	
<b>6.4 Copackers</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[6.4.1] Does this operation provide copacking service or utilize copackers?			✓	
[6.4.2] Are co-packers listed and identifiable in the OSP?			✓	
[6.4.3] Is there valid documentation on file with the operator to verify the appropriate organic status of the facility(ies) where product(s) is(are) co-packed?			✓	
[6.4.4] If this certification is for a co-packer, are the companies and brands for which it co-packs identified in the OSP?			✓	
[6.4.6] Do the co-packers listed own the product formulations for the products they co-pack?			✓	
[6.4.7] Are product formulations owned by the company for which the co-packers are co-packing?			✓	
[6.4.8] Is the co-packer responsible for sourcing and purchasing ingredients?			✓	
[6.4.9] Does the co-packer maintain copies of organic certificates and non-organic ingredient documentation as required?			✓	
[6.4.10] Does the operator have a monitoring system in place to ensure that its ingredient sourcing, product composition, production process, and documentation management continuously remains in compliance with the regulations?			✓	
<b>6.5 International Labeling and Compliance</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[6.5.1] Does the operator export any finished products or import any ingredients?		✓		
[6.5.2] If the operation is labeling product for export with labels that do not meet labeling requirements in the U.S., does the operation have a system in place to ensure that its product packaging is labeled “Export Only?”			✓	

[6.5.3] Is there a monitoring system in place to ensure NOP Import Certificates are obtained and maintained on file for all organic ingredients and inputs purchased under the terms of a US Equivalency Arrangement (e.g., EU, Switzerland, Korea, and Japan)?			✓	
[6.5.4] Are NOP Import Certificates for all organic ingredients and inputs purchased under the terms of a US Equivalency Arrangement on file for each shipment?			✓	
[6.5.5] If the operation is labeling product with the JAS seal, does it have a contract with the JAS-certified importer on file?			✓	
[6.5.6] Is there documentation included with each shipment of organic product imported from COR-certified operators which states: "Certified in compliance with the terms of the US-Canada Organic Equivalency Arrangement"?			✓	
[6.5.7] If importing NOP product from India, are organic certificates from suppliers and Certificates of Inspection/Transaction Certificates maintained on file?			✓	
[6.5.8] For all organic ingredients originating from India shipped after July 12, 2021 and until July 12, 2022, does the operator have an internal monitoring system to ensure that the supplier appears in the NOP Organic Integrity Database with a status of "Applied; APEDA Certified" or "certified" and has a current APEDA NOP Organic Certificate or USDA NOP Organic Certificate?			✓	
[6.5.9] For all organic ingredients originating from India shipped after July 12, 2022, does the operator have an internal monitoring system to ensure that the supplier appears in the NOP Organic Integrity Database with a status of "certified" and has a current USDA NOP Organic Certificate?			✓	
<b>6.8 Facility Sanitation</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[6.8.0] Does the operation have a facility where they are handling or processing organic products and sanitation procedures are relevant for certification?	✓			
[6.8.1] Are sanitation procedures and materials described in the OSP and listed in the Inspection Work Order (IWO) accurate and consistent with inspector findings?	✓			
[6.8.2] Do sanitation procedures cover all lines, equipment, containers and utensils used in organic production?			✓	
[6.8.3] Are sanitation logs maintained?	✓			
[6.8.4] Do sanitation logs clearly demonstrate that sanitation procedures are conducted prior to organic production?	✓			

[6.8.5] Is the sanitation procedure listed sufficient to ensure that all non-listed sanitizers/cleaners are effectively removed from all contact surfaces prior to organic processing?			✓	
[6.8.6] Is there a monitoring system in place to ensure and document that the sanitation program is conducted regularly?	✓			H5 supplement included in this report. Daily check off logs maintained and reviewed identify "yes " or "no" for completion and no sanitizers are listed on H5. Supporting document included in this review identify what cleaning practices look like on site.
[6.8.7] Are purging procedures and materials accurately described in the OSP?			✓	
[6.8.8] Do purging procedures cover all necessary lines, equipment, containers and utensils used in organic production?			✓	
[6.8.9] Does the operation have documentation to demonstrate the efficacy of their purge procedures?			✓	
[6.8.10] Are purges appropriately documented for traceability?			✓	
[6.8.11] Are any direct food/product contact sanitizers as listed in the OSP utilized in processing?			✓	
[6.8.12] Are direct food/product contact sanitizer requirements and restrictions found at 205.605 and annotations being met?			✓	
[6.8.13] For each direct food/product contact sanitizer listed in the OSP, is there sufficient documentation on file to demonstrate compliance with all applicable regulations?	✓			
<b>6.9 Water and Water Additives</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[6.9.0] Does the operation use water in handling or or organic products?			✓	Water is used for sanitation and does not come into contact with product.
[6.9.1] Is the water used in production verified to not pose a contamination risk to organic products (e.g, municipal source, monitored well, in-house testing and treatment, etc.)			✓	
[6.9.2] Are the water treatments performed at the facility accurately described in the OSP?			✓	
[6.9.3] Is the facility's use of water accurately represented in the OSP?			✓	
[6.9.4] Is there evidence that water, when used as an ingredient, complies with the Safe Drinking Water Act or other applicable federal or state regulations?			✓	
[6.9.5] If steam additives are used, are they consistent with the OSP?			✓	

[6.9.6] If volatile steam additives (amines, ammonia) are used, in steam that contacts organic products or packaging, are there measures in place to prevent limit or eliminate, as possible, contact with organic products?			✓	
[6.9.7] If the OSP indicates that steam or boiler additives are injected directly into the steam line, are the additives being used on the National List?			✓	
[6.9.8] If cooling systems are used, are the cooling system additives consistent with the OSP?			✓	
<b>6.10 Receiving, Storage, Packaging and Distribution</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[6.10.0] Does the operation receive, store, package or distribute organic products?	✓			Physical segregation for organic produce verified during facility tour.
[6.10.1] Are receiving and shipping practices consistent with the OSP?	✓			Items are stored in specific organic storage pallet area with organic signage. Photos are included in the accompanying sample report.
[6.10.2] Are organic ingredients clearly marked and segregated during receiving?	✓			
[6.10.3] Are finished organic product(s) clearly marked upon shipment?	✓			
[6.10.4] Are storage and distribution practices consistent with the OSP?	✓			
[6.10.5] Are organic ingredients clearly marked and segregated in storage?	✓			
[6.10.6] Is the operator's finished product clearly marked as finished product while in storage and upon shipment?	✓			
[6.10.7] During the manufacture of organic product(s), is the product clearly identified as organic and protected from contamination/commingling?	✓			
[6.10.8] Is documentation (OTCO Independent Storage sheets, equivalent documentation, or certificate) on file for each off-site storage and/or distribution facility?			✓	
[6.10.9] Is there a system in place to ensure that storage and distribution practices as outlined in the operator's OSP are being effectively implemented?	✓			
[6.10.10] Are all packaging materials used consistent with the OSP?			✓	Products arrive in finished good packaging.
[6.10.11] Is there evidence that packaging materials and storage containers do not contain synthetic fungicides, preservatives, or fumigants and are free from prohibited materials prior to use?			✓	



[6.10.19] Is there evidence that primary packaging materials are not “active” or “intelligent” packaging?			✓	
[6.10.20] If reusing any bag or container that has been in contact with prohibited substances or non-organic products, has such bag or container been thoroughly cleaned?			✓	
[6.10.21] Are packaging aids and oxygen displacers used consistent with the OSP?			✓	
<b>6.11 Facility Pest Management</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[6.11.0] Does the operation operate a facility where organic goods are handled?	✓			Reports are maintained in physical binder reviewed on site. Pest control operator visits once per month. Ten months of service reports were reviewed with no concerning observations by this auditor.
[6.11.1] Is pest management handled as reported in the OSP?	✓			
[6.11.6] As required, are preventative measures in place to control/prevent pests, including removal of pest habitat/food, prevention of access, and management of environmental factors?	✓			
[6.11.7] If mechanical and physical tactics are not effective to prevent or control pests, were/are the substances consistent with the National List used as additional control measures?	✓			
[6.11.8] If substances not consistent with the National List are used, is there appropriate justification and need for such materials?			✓	
[6.11.9] If substances not consistent with the National List are used, are the substances listed in the OSP having been approved by OTCO?			✓	
[6.11.10] Are monitoring and pest control logs maintained?	✓			
[6.11.11] Is there an adequate system in place to ensure that no organic ingredient, product or packaging is present when substances not consistent with the National List are applied?			✓	
[6.11.12] Is there a monitoring system in place to ensure the pest management program and substances used in execution of the program remain in compliance with the NOP?	✓			
<b>6.12 Livestock Auction and Transport</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[6.12.1] Does the operation engage in live animal auctions or live animal transport?			✓	
[6.12.2] Do records adequately identify animals?			✓	

[6.12.3] For ruminant livestock, do the records clearly document eligibility for slaughter or dairy production as applicable?			✓	
[6.12.4] If feed is provided to livestock, is there documentation of its source and organic status?			✓	
[6.12.5] Is bedding either organic (if a roughage) or listed on the IWO in the materials section?			✓	
[6.12.6] Are records of all healthcare treatments and alterations available?			✓	
[6.12.7] Do records document the transport and sale of animals?			✓	
[6.12.8] Are loading and hauling practices in place to minimize stress to livestock? (e.g., organic feed if long haul, clean water, appropriate handling during loading, etc.)			✓	
[6.12.9] If a contractor transports live animals, is the contract company listed in the OSP?			✓	
[6.12.10] Is there evidence that the practices described in the OSP are being met?			✓	
[6.12.11] If animals transported while under the operation’s ownership require a resting period, are documents maintained to verify the continual organic management and compliance during transport and rest?			✓	
[6.12.12] Are all purchases of organic livestock directly from organic certified entities and are the organic certificates on file?			✓	
[6.12.13] Are organic poultry slaughter facilities in compliance with the Poultry Products Inspection Act, unless exempted?			✓	
[6.12.14] Does the organic slaughter facility have record of any non-compliant actions?			✓	
[6.12.15] Are organic mammalian slaughter facilities in compliance with the Federal Meat Inspection Act (inspected by either a federal or state inspector)?			✓	
<b>10, End</b>				
<b>10.1 Additional Considerations/Checks</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[10.1.1] Did you provide a summary of your findings to the operator at the end of the inspection?	✓			
[10.1.2] Are all OSP changes noted on the Exit Interview, or otherwise signed by the operator and attached?	✓			
[10.1.3] Have you attached the completed Exit Interview Form?	✓			

[10.1.4] Have you attached the Inspection Work Order (IWO) completed with necessary updates and notes.	✓			
[10.1.5] If this was a virtual audit, have you attached the Remote Audit Agreement?			✓	
[10.1.6] Have you attached all necessary Audit Trail Exercise documentation and/or summarized within the checklist?	✓			
[10.1.7] Have you uploaded all referenced attachments within the checklist?	✓			
[10.1.14] Identify Attachments and supporting documents submitted with this report	✓			Gross Organic Sales Contact Change Form Mass Balance Exercise Traceback Exercise – with documents H5 supplement Exit Interview

Business Information	
Client ID and Service Team	OT-021109   Orange
Legal Business Name	Great West Produce Inc
DBA (if any)	
Legally Responsible Contact	Sean Villa
Primary Contact	Joe Segura
Mailing Address	2600 S. Eastern Ave Los Angeles, CA 90040 United States
Business Contact Info	P: (323) 622-2500   M: (562) 302-9799   E: foodsafetyteam@greatwestproduce.com
Parent Production Partner	

Inspection Information	
Inspector Name	Megan Allen
Audit Details	2022 - Mandatory Audit (33673)
Audit Services and results	Risk Assessment (Concerns), NOP-Handling (Concerns)
Priority and Type	Normal - Remote
Inspection Date	08/19/2022
Location Details	2 Facilities : San Francisco, CA
Assigned sites	
General Info	Great West Product operates as a distributor for finished goods from three warehouses observed by Oregon Tilth. One location (Las Angeles) and two smaller storage distribution sites (located in San Francisco). These two inspections were performed as a complete onsite presence for the Las Angeles location and remote inspection (with in person review of documents) for the San Francisco location.
Auditee Participants	Kenneth E. Ewalt Jr. – Executive Vice President Joe Segura – Operations and Food Safety Micaela Luna – Food Safety Coordinator
Audit finished on	08/23/2022

Inspection Checklist (v 1.4)				
1, General				
1.1 Misc.	Y	N	N/A	Deviation/Comments
[1.1.1] Are the total organic sales identified during the inspection consistent with sales reported in the OSP, Fee Worksheet and Inspection Work Order?		✓		Gross Organic Sales reported from the dates 01/01/2021 as \$5,986,657.82 which is inconsistent with the amount submitted to OTCO on 12/31/2022 (different periods of time dates submitted for 01/01/2020 To: 12/31/2020 as \$7,546,051.45) this was noted on the Exit Interview.
[1.1.2] Is this operation certified in production partnership with another, in agreement with the OTCO Fee Schedule?		✓		The organic system plan update application submitted 12/31/2022 identifies no selection regarding production partnership under number 3: Renewal Type. It was verbally verified by operator Kenneth E. Ewalt Jr. this operation is not in a production partnership as defined by OTCO.
[1.1.3] Is the section of the OSP requesting information about the partnership complete?			✓	
[1.1.4] If the operation is in a production partnership, does the percentage of total organic sales sold to the production partner meet the minimum requirement, as required by the OTCO Fee Schedule?			✓	
[1.1.5] Were all facilities/growing sites (e.g., field, circle, etc.) listed on the Inspection Work Order (IWO) inspected?	✓			Remotely Inspected from the Los Angeles Facility
1.2 Background Information	Y	N	N/A	Deviation/Comments
[1.2.1] Are the services requested for certification listed on the IWO accurate?	✓			
[1.2.2] Does the operator demonstrate knowledge of how to access all applicable organic certification standards and procedures?		✓		Purchasing department (corporate representatives) were not present as well as the third party company (Ceres) who is responsible for holding certificates. this is further described in this report below.

[1.2.3] Does the operator appear to understand all applicable organic certification standards?		✓		Use of uncertified brokers/handlers does not present as clear for the teams responsible for supplier verification.
[1.2.4] Does this operation produce or handle organic products exclusively?		✓		
[1.2.5] If the operation has been inspected by other regulatory agencies, have all noted concerns been adequately addressed according to the regulatory agency that noted the concerns?	✓			Operator Information form (O1) letter C.5 identifies regulatory agencies Primus as additional regulatory agencies responsible for auditing this operation. The O1 on file is to represent all three locations.  Harmonized audit for the San Francisco location completed 07/07/2021 with a score of 100%.
[1.2.6] If the operation is in California, does it have verification of California's State Organic Program (SOP) Registration?	✓			CDPH registration # 19-008391 presented with coordinating OTCO primary address (2600 S. Eastern Ave Los Angeles, CA 90040 listing both other sites at the bottom for 1961 and 2001 Jerrold Ave San Francisco, California 94127) and active registration with expiration date until 05/01/2023. This is not the same registration number reflected in the Operator Information Form (O1) letter E approved by OTCO 12/01/2016.
<b>1.3 Certification of New Clients</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[1.3.1] Is this an application for a new organic certification or an applicant applying for reinstatement?			✓	
[1.3.2] Is this operator requesting reinstatement?			✓	
[1.3.3] If yes, a) Have all prior outstanding non-compliances been adequately addressed, and all corrective actions been appropriately implemented and are effective?			✓	
[1.3.4] If yes, b) Was it verified that no product was sold as organic during the period of suspension?			✓	
[1.3.5] If yes, c) Was it verified that there has been a system in place to prevent commingling of noncompliant product(s) produced or inventoried during the suspension?			✓	
[1.3.6] Is documentation associated with a previous certification and/or denial and any subsequent corrective actions on file for review?			✓	

[1.3.7] Has the operation received a copy of the OSP Initial Review letter?			✓	
[1.3.8] Have all points listed in the OSP Initial Review letter been adequately addressed?			✓	
[1.3.9] On the IWO, is the information provided in both the General Operation Information and the services listed in the Inspection Details accurate?			✓	
[1.3.10] Did the operation provide complete, unfettered access to its facilities, including non-certified areas, structures, and offices?			✓	
<b>1.4 Certification History Renewal</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[1.4.1] Is this an application for renewal of an organic certification?	✓			
[1.4.2] Is the current certificate accurate?	✓			The certificate and MPL are designed to address all potential vegetables or fruits that may be sources, which may not reflect as purchased in the previous 12 months (or ever).
[1.4.4] On the IWO, is the information provided in both the General Operation Information and the services listed in the Inspection Details accurate?		✓		Updated contact change form collected and addressed on the Exit Interview.
[1.4.5] Are corrective actions associated with previous noncompliance points still in effect?	✓			#0103965 – Noncompliance - Finished NOP §205.201(a)(1) states that a producer of a production operation must develop an organic production system plan that is agreed to by the producer and an accredited certifying agent, and NOP §205.406 (a)(1) requires that any deviations from, changes to, modifications to, or other amendments made to the previous year's Organic System Plan (OSP) during the previous year must be fully documented prior to implementing the changes. It was reported mid-year that a new facility was in use which had not been previously submitted or reviewed by OTCO. - Additional facility in construction – not yet ready for OTCO inspection but will be declared before production according to Joe Segura. - This is intended to be built into the 2000 Jerrold Ave San Francisco, California 94127 and will replace the 1961 Jerrold Ave San Francisco, California 94127.

[1.4.6] Have previous reminders been acknowledged?

✓

#0101881 – Reminder – In Progress  
 Please be advised that your Organic System Plan (OSP) and supporting documentation must accurately represent practices and materials in use at your facility. In addition, 7CFR205.406 requires that any deviations from, changes to, modifications to, or other amendments made to the organic system plan must be fully documented in your Organic System Plan (OSP) Annual Update. It was noted during inspection that your Master Ingredient List (MIL) was no longer accurate and needed to be updated to remove a supplier. Please ensure that all OSP documents are kept current, and that updates are submitted to OTCO for review and approval.  
 - Addressed in this report and on the Exit Interview.

#0113692 – Reminder – In Progress  
 NOP §205.103 (b)(4) requires that records be sufficient to demonstrate compliance with the Act and the regulations in this part (7CFR205). This includes ensuring that all organic ingredient supplier or manufacturer certificates are on file and current within 18 months of their issue date at the time that you receive ingredients, and that all traceability documentation from uncertified brokers is available during inspection. Effective September 28, 2017, operations that source organic products through uncertified operations are required to clearly identify the uncertified entities they are sourcing from, maintain organic certificates for the last certified source of the products received, collect and maintain all records associated with purchase and transport of the organic product through the supply chain from the last certified source, and have the documents mentioned available for OTCO staff and inspectors upon request. This information must be collected and maintained for each



				<p>shipment received through an uncertified broker. At inspection it was noted that your Master Ingredient List (MIL) does not list uncertified brokers or distributors but at inspection there were certificates provided to the auditor for review which did not appear on the MIL / MPL/Sales report reviewed (Fresh Organic King, Nagnar SPR De. Ri) identified operations in Mexico.                  - MIL inconsistent again this year.</p> <p>#0114971– Reminder – In Progress                  During the inspection it was observed that the sales of organic goods reported to OTCO in the annual Organic System Plan (OSP) update application were not consistent with the sales report generated while the inspector was on-site. Please ensure that future update applications contain accurate sales information for the organic products sold during the reported time frame.                  - Addressed above in this report and reflected on the Exit Interview.</p>
[1.4.7] As applicable, have any changes to the OSP during the previous year been documented in the OSP?		✓		
[1.4.8] As applicable, have any intended changes to the OSP for the coming year been documented in the OSP?	✓			
[1.4.9] Did the operation provide complete, unfettered access to its facilities, including non-certified areas, structures, and offices?	✓			
[1.4.10] As applicable, has any application (including drift) of a prohibited substance to any production unit, site, facility or product that is part of this operation been reported to OTCO as required?			✓	
<b>3, Multi-scope</b>				
<b>3.2 Labeling</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[3.2.2] Have all labels been submitted to and approved by OTCO, including any labels for products the operation packages for others?			✓	

[3.2.21] Are the "100% organic," "organic", or "made with" claims confirmed by the operator and found to be correct?			✓	
[3.2.22] Is each organic ingredient in the product identified as organic in the ingredient statement that appears on the product's retail labels?			✓	
[3.2.23] For each product's retail label, as reviewed during the inspection, is the statement: "Certified Organic by Oregon Tilth" (or similar phrase) clearly indicated on the information panel beneath the information identifying the handler or distributor of the product?			✓	
[3.2.24] For each product's non-retail label reviewed during the inspection, is the production lot number displayed (if applicable)?			✓	
[3.2.25] If used on, "100% organic" or "organic" products, are the color combinations and size of the USDA seal in compliance with NOP regulations?			✓	
[3.2.26] If both the USDA Organic and OTCO logos are used on the same panel of a product, is the OTCO logo less prominent than the USDA Organic logo?			✓	
[3.2.27] Do the percentage claims made on retail labels conform to the size, style and color requirements?			✓	
[3.2.28] If this operation packages organic product(s) for other certified organic operations, are valid certificates for those companies on file to verify the label claim?			✓	
[3.2.29] If this operation packages its organic product(s) under labels owned by other companies that are not certified organic, is a private label agreement between the two entities on file?			✓	
[3.2.30] Are "made with" statements used on labels for products that list three or fewer of the requisite food groups?			✓	
[3.2.31] Do "made with" statements conform to print size, style, and color requirements?			✓	
[3.2.32] Is there evidence substantiated by the operator that claims being made regarding the composition of the products in the less than 70% organic content category are accurate?			✓	
[3.2.33] Does the operator have a monitoring system in place to ensure that all labels are submitted to OTCO for approval and continuously remain in compliance with applicable regulations?			✓	
[3.2.34] For exported products under an NOP equivalency arrangement, is the operator ensuring that the product is labeled in accordance with the requirements of the destination country (as applicable)?			✓	

<b>3.5 Record Keeping</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[3.5.1] Are all records readily available for review during the inspection?	✓			
[3.5.2] Do records fully disclose all activities and transactions in sufficient detail to be readily understood and audited?	✓			
[3.5.3] Is the audit trail flow chart provided in the OSP accurate and complete?	✓			
[3.5.4] Is the lot coding system the operator uses consistent with that provided in the OSP?		✓		Request to update lot system for H8 (reflective of both locations) included on the Exit Interview.
[3.5.6] Are receipts for purchased inputs available and consistent with materials used/to be used as listed in the OSP?	✓			
[3.5.13] Do sales records show date, product, and quantity sold?	✓			
[3.5.15] Are waste, spoilage and/or damaged product losses documented?	✓			
[3.5.17] Are records maintained for at least five years beyond their creation?	✓			
[3.5.18] For exported products under an NOP equivalency arrangement, is the operator ensuring that the appropriate export documents are requested from OTCO and accompany each shipment?			✓	
[3.5.35] For imported products (directly imported or purchased through uncertified brokers), does the operation maintain phytosanitary documentation that identifies whether any substances were applied to the product?		✓		(exemplified in accompanying report for Los Angeles facility and noted on the Exit Interview.  No concerns with San Francisco location Mass balance and traceback activity.
[3.5.36] For products purchased through excluded operations (brokers, traders, distributors), can the operation trace the products back to the last certified handler using authentic, understandable documents?		✓		
[3.5.37] For products directly imported or purchased through uncertified brokers to whom OTCO has not issued a lot specific approval letter, can the operation trace the products back to the last certified handler using authentic, understandable documents?		✓		
[3.5.39] Does the operator have a monitoring system in place to ensure that all records are continuously maintained as required by the applicable regulations?		✓		

<p>[3.5.41] Conduct one trace-back as appropriate, for the operation. Show your work, including calculations and descriptions of records reviewed for the exercises. Explain the results and indicate whether they are reasonable for the crops that are subject of the audit. If audits are unsuccessful, describe the steps taken to perform the audit, the records that were reviewed, and specify any records or documents that were missing.</p>	✓			
<p>[3.5.42] Conduct one mass balance as appropriate, for the operation. Show your work, including calculations and descriptions of records reviewed for the exercises. Explain the results and indicate whether they are reasonable for the crops that are subject of the audit. If audits are unsuccessful, describe the steps taken to perform the audit, the records that were reviewed, and specify any records or documents that were missing.</p>	✓			
<p><b>4, US/Canada Equivalency</b></p>				
<p><b>4.1 US/Canada Equivalency</b></p>	Y	N	N/A	Deviation/Comments
<p>[4.1.2] Are the products to be assessed correctly listed in the Master Products List as applicable?</p>	✓			<p>It was declared by staff Joe Segura no organic products are currently exported to Canada. There had been communication with a client for potentially shipping in the near future but no solid plans had been made.</p> <p>Currently all products listed on the MPL and organic certificate to allow the opportunity to export, however all products are simultaneously listed on MIL as US/Canada Equivalent which is not reflected to be true for each supplier. This auditor requested the last known date of export to Canada to ensure products are compliant with organic certificates when program resumes.</p>
<p>[4.1.7] Are all labels used on organic products shipped to Canada on file with OTCO?</p>			✓	
<p>[4.1.8] Are all organic products exported to Canada that have been approved for US/Canada Equivalency on the operation's organic certificate?</p>			✓	
<p>[4.1.9] Do all products labeled for export to Canada comply with Canadian labelling requirements?</p>			✓	
<p>[4.1.10] If the Canadian Organic Seal is used, do the labels include the statement "Product of" immediately preceding the name of the country of origin or the statement "Imported" in close proximity to the product information panel?</p>			✓	

[4.1.12] Is documentation on file confirming that all high-risk ingredients used in products shipped to Canada have been produced in compliance with the terms of the US-Canada Organic Equivalency Arrangement?		✓		
<b>6, Handling</b>				
<b>6.1 Processing</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[6.1.1] Are the process/handling flow charts and associated processing equipment listed in the OSP complete, accurate, and consistent with inspector observations?	✓			
[6.1.3] Is the floor plan diagram provided in the OSP accurate and consistent with inspector observations?	✓			
[6.1.6] Are measures described in the OSP to avoid any contamination or commingling adequately implemented in order to protect organic products at all stages of receiving, processing, storing, and shipping?	✓			Physical designation on facility map in H2 observed and demonstrated during virtual site tour of both facilities.
<b>6.2 Product Summary</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[6.2.1] Are all products and ingredients reviewed for compliance? If not, what percentage is not being reviewed?		✓		
[6.2.2] Are all products subject to this certification completely and accurately listed in the Master Products List of the OSP?	✓			
[6.2.3] Are Product Formulation Spreadsheets (PFS's) in the OSP complete and accurate for each of subject products?			✓	
[6.2.5] Do PFS's match batch records?			✓	
[6.2.6] For each product requesting certification as "100% organic", "organic", or "made with", is the requested designation consistent with the product's formulation?			✓	
[6.2.8] Is the master list of organic and non-organic ingredient suppliers current, complete and consistent with the OSP?		✓		One PDF was provided to this auditor at the beginning of the inspection with the Supplier Certificate but not the product summary. This operator functions as a distributor and so no handling or repacking occurs.

<p>[6.2.9] For all organic ingredients, does the operator have on file valid documentation confirming the ingredients' acceptable organic status?</p>		<p>✓</p>	<p>The way the MIL is maintained is not easy to determine what tracks real movement. The MIL and MPL when compared to the gross organic sales list was not "readily auditable" per this auditor.s observations. Due to the third party management of certificates and purchasing department remotely located it is unclear if products are managed with oversight to import / exports as well as drop shipments as evidenced in the Los Angeles facility traceback exercise (see accompanying report).</p>
<p>[6.2.10] For all organic ingredients, does the operator have an internal monitoring system to ensure that the certificates remain current and valid?</p>		<p>✓</p>	
<p>[6.2.11] For all non-organic ingredients, does the operator have an internal monitoring system to ensure that declarations and questionnaires remain current and valid?</p>		<p>✓</p>	
<p>[6.2.12] Are non-organic agricultural ingredients used in "organic" products listed in 205.606?</p>		<p>✓</p>	
<p>[6.2.14] For non-organic agricultural ingredients listed in 205.606, are the annotations appropriately addressed?</p>		<p>✓</p>	
<p>[6.2.15] For any non-organic ingredients found at 205.605 and which require a commercial availability search and for all non-organic ingredients found at 205.606, is their commercial unavailability documented and current?</p>		<p>✓</p>	
<p>[6.2.16] For all non-organic agricultural ingredients used in "made with" products, is there current documentation on file to establish agricultural status?</p>		<p>✓</p>	
<p>[6.2.17] For all non-organic ingredients or processing aids used in either "organic" or "made with" products, does the operator have documentation to verify compliance with 205.105(e),(f),(g) (i.e., dated, signed OTCO Non-Organic Ingredient Declarations)?</p>		<p>✓</p>	
<p>[6.2.19] For all non-synthetic flavors used in "organic" or "made with" products, are dated and signed OTCO Natural Flavor Questionnaires on file with the operator?</p>		<p>✓</p>	
<p>[6.2.20] Are non-agricultural ingredients used in "organic" or "made with" products listed as allowed pursuant to 205.605?</p>		<p>✓</p>	
<p>[6.2.21] For non-agricultural ingredients used in "organic" or "made with" products, is documentation on file with the operator to verify compliance with any applicable annotation from the National List?</p>		<p>✓</p>	

[6.2.22] For non-agricultural ingredients used in “organic” or “made with” products, is documentation on file with the operator disclosing all ingredients?			✓	
[6.2.23] Are processing aids used as described in the OSP?			✓	
[6.2.25] Are processing aids used by the operator listed in 205.605 or 205.606?			✓	
[6.2.26] For all negative status inputs listed on the Inspection Work Order (e.g., “dropped,” “more info needed,” “prohibited”), is there current documentation on file for each material?			✓	
[6.2.27] If any products are making a 100% organic claim, are processing aid(s) used in the production of the product?			✓	
<b>6.4 Copackers</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[6.4.1] Does this operation provide copacking service or utilize copackers?			✓	
[6.4.2] Are co-packers listed and identifiable in the OSP?			✓	
[6.4.3] Is there valid documentation on file with the operator to verify the appropriate organic status of the facility(ies) where product(s) is(are) co-packed?			✓	
[6.4.4] If this certification is for a co-packer, are the companies and brands for which it co-packs identified in the OSP?			✓	
[6.4.6] Do the co-packers listed own the product formulations for the products they co-pack?			✓	
[6.4.7] Are product formulations owned by the company for which the co-packers are co-packing?			✓	
[6.4.8] Is the co-packer responsible for sourcing and purchasing ingredients?			✓	
[6.4.9] Does the co-packer maintain copies of organic certificates and non-organic ingredient documentation as required?			✓	
[6.4.10] Does the operator have a monitoring system in place to ensure that its ingredient sourcing, product composition, production process, and documentation management continuously remains in compliance with the regulations?			✓	
<b>6.5 International Labeling and Compliance</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[6.5.1] Does the operator export any finished products or import any ingredients?		✓		
[6.5.2] If the operation is labeling product for export with labels that do not meet labeling requirements in the U.S., does the operation have a system in place to ensure that its product packaging is labeled “Export Only?”			✓	

[6.5.3] Is there a monitoring system in place to ensure NOP Import Certificates are obtained and maintained on file for all organic ingredients and inputs purchased under the terms of a US Equivalency Arrangement (e.g., EU, Switzerland, Korea, and Japan)?			✓	
[6.5.4] Are NOP Import Certificates for all organic ingredients and inputs purchased under the terms of a US Equivalency Arrangement on file for each shipment?			✓	
[6.5.5] If the operation is labeling product with the JAS seal, does it have a contract with the JAS-certified importer on file?			✓	
[6.5.6] Is there documentation included with each shipment of organic product imported from COR-certified operators which states: "Certified in compliance with the terms of the US-Canada Organic Equivalency Arrangement"?			✓	
[6.5.7] If importing NOP product from India, are organic certificates from suppliers and Certificates of Inspection/Transaction Certificates maintained on file?			✓	
[6.5.8] For all organic ingredients originating from India shipped after July 12, 2021 and until July 12, 2022, does the operator have an internal monitoring system to ensure that the supplier appears in the NOP Organic Integrity Database with a status of "Applied; APEDA Certified" or "certified" and has a current APEDA NOP Organic Certificate or USDA NOP Organic Certificate?			✓	
[6.5.9] For all organic ingredients originating from India shipped after July 12, 2022, does the operator have an internal monitoring system to ensure that the supplier appears in the NOP Organic Integrity Database with a status of "certified" and has a current USDA NOP Organic Certificate?			✓	
<b>6.8 Facility Sanitation</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[6.8.0] Does the operation have a facility where they are handling or processing organic products and sanitation procedures are relevant for certification?	✓			
[6.8.1] Are sanitation procedures and materials described in the OSP and listed in the Inspection Work Order (IWO) accurate and consistent with inspector findings?	✓			
[6.8.2] Do sanitation procedures cover all lines, equipment, containers and utensils used in organic production?			✓	
[6.8.3] Are sanitation logs maintained?	✓			
[6.8.4] Do sanitation logs clearly demonstrate that sanitation procedures are conducted prior to organic production?	✓			



[6.8.5] Is the sanitation procedure listed sufficient to ensure that all non-listed sanitizers/cleaners are effectively removed from all contact surfaces prior to organic processing?			✓	
[6.8.6] Is there a monitoring system in place to ensure and document that the sanitation program is conducted regularly?	✓			H5 supplement included in this report. Daily check off logs maintained and reviewed identify "yes " or "no" for completion and no sanitizers are listed on H5. Supporting document included in this review identify what cleaning practices look like on site.
[6.8.7] Are purging procedures and materials accurately described in the OSP?			✓	
[6.8.8] Do purging procedures cover all necessary lines, equipment, containers and utensils used in organic production?			✓	
[6.8.9] Does the operation have documentation to demonstrate the efficacy of their purge procedures?			✓	
[6.8.10] Are purges appropriately documented for traceability?			✓	
[6.8.11] Are any direct food/product contact sanitizers as listed in the OSP utilized in processing?			✓	
[6.8.12] Are direct food/product contact sanitizer requirements and restrictions found at 205.605 and annotations being met?			✓	
[6.8.13] For each direct food/product contact sanitizer listed in the OSP, is there sufficient documentation on file to demonstrate compliance with all applicable regulations?			✓	
<b>6.9 Water and Water Additives</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[6.9.0] Does the operation use water in handling or or organic products?			✓	Water is used for sanitation and does not come into contact with product.
[6.9.1] Is the water used in production verified to not pose a contamination risk to organic products (e.g, municipal source, monitored well, in-house testing and treatment, etc.)			✓	
[6.9.2] Are the water treatments performed at the facility accurately described in the OSP?			✓	
[6.9.3] Is the facility's use of water accurately represented in the OSP?			✓	
[6.9.4] Is there evidence that water, when used as an ingredient, complies with the Safe Drinking Water Act or other applicable federal or state regulations?			✓	
[6.9.5] If steam additives are used, are they consistent with the OSP?			✓	

[6.9.6] If volatile steam additives (amines, ammonia) are used, in steam that contacts organic products or packaging, are there measures in place to prevent limit or eliminate, as possible, contact with organic products?			✓	
[6.9.7] If the OSP indicates that steam or boiler additives are injected directly into the steam line, are the additives being used on the National List?			✓	
[6.9.8] If cooling systems are used, are the cooling system additives consistent with the OSP?			✓	
<b>6.10 Receiving, Storage, Packaging and Distribution</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[6.10.0] Does the operation receive, store, package or distribute organic products?	✓			
[6.10.1] Are receiving and shipping practices consistent with the OSP?	✓			
[6.10.2] Are organic ingredients clearly marked and segregated during receiving?	✓			
[6.10.3] Are finished organic product(s) clearly marked upon shipment?	✓			
[6.10.4] Are storage and distribution practices consistent with the OSP?	✓			
[6.10.5] Are organic ingredients clearly marked and segregated in storage?	✓			
[6.10.6] Is the operator's finished product clearly marked as finished product while in storage and upon shipment?	✓			
[6.10.7] During the manufacture of organic product(s), is the product clearly identified as organic and protected from contamination/commingling?			✓	
[6.10.8] Is documentation (OTCO Independent Storage sheets, equivalent documentation, or certificate) on file for each off-site storage and/or distribution facility?			✓	
[6.10.9] Is there a system in place to ensure that storage and distribution practices as outlined in the operator's OSP are being effectively implemented?	✓			
[6.10.10] Are all packaging materials used consistent with the OSP?			✓	
[6.10.11] Is there evidence that packaging materials and storage containers do not contain synthetic fungicides, preservatives, or fumigants and are free from prohibited materials prior to use?			✓	
[6.10.19] Is there evidence that primary packaging materials are not "active" or "intelligent" packaging?			✓	

[6.10.20] If reusing any bag or container that has been in contact with prohibited substances or non-organic products, has such bag or container been thoroughly cleaned?			✓	
[6.10.21] Are packaging aids and oxygen displacers used consistent with the OSP?			✓	
<b>6.11 Facility Pest Management</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[6.11.0] Does the operation operate a facility where organic goods are handled?	✓			
[6.11.1] Is pest management handled as reported in the OSP?	✓			
[6.11.6] As required, are preventative measures in place to control/prevent pests, including removal of pest habitat/food, prevention of access, and management of environmental factors?	✓			
[6.11.7] If mechanical and physical tactics are not effective to prevent or control pests, were/are the substances consistent with the National List used as additional control measures?		✓		The facility maintains physical documents for pest control reports. These records were copied and made available for this auditor to review in person while on site at the Los Angeles facility location. The facility s visited once per month. Ten months of reports were reviewed with one report identifying an application of a product on the interior without designating if it was in the storage space or office. The report is included in this report ofr final review.
[6.11.8] If substances not consistent with the National List are used, is there appropriate justification and need for such materials?		✓		
[6.11.9] If substances not consistent with the National List are used, are the substances listed in the OSP having been approved by OTCO?		✓		
[6.11.10] Are monitoring and pest control logs maintained?	✓			
[6.11.11] Is there an adequate system in place to ensure that no organic ingredient, product or packaging is present when substances not consistent with the National List are applied?			✓	
[6.11.12] Is there a monitoring system in place to ensure the pest management program and substances used in execution of the program remain in compliance with the NOP?		✓		
<b>6.12 Livestock Auction and Transport</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[6.12.1] Does the operation engage in live animal auctions or live animal transport?			✓	
[6.12.2] Do records adequately identify animals?			✓	

[6.12.3] For ruminant livestock, do the records clearly document eligibility for slaughter or dairy production as applicable?			✓	
[6.12.4] If feed is provided to livestock, is there documentation of its source and organic status?			✓	
[6.12.5] Is bedding either organic (if a roughage) or listed on the IWO in the materials section?			✓	
[6.12.6] Are records of all healthcare treatments and alterations available?			✓	
[6.12.7] Do records document the transport and sale of animals?			✓	
[6.12.8] Are loading and hauling practices in place to minimize stress to livestock? (e.g., organic feed if long haul, clean water, appropriate handling during loading, etc.)			✓	
[6.12.9] If a contractor transports live animals, is the contract company listed in the OSP?			✓	
[6.12.10] Is there evidence that the practices described in the OSP are being met?			✓	
[6.12.11] If animals transported while under the operation's ownership require a resting period, are documents maintained to verify the continual organic management and compliance during transport and rest?			✓	
[6.12.12] Are all purchases of organic livestock directly from organic certified entities and are the organic certificates on file?			✓	
[6.12.13] Are organic poultry slaughter facilities in compliance with the Poultry Products Inspection Act, unless exempted?			✓	
[6.12.14] Does the organic slaughter facility have record of any non-compliant actions?			✓	
[6.12.15] Are organic mammalian slaughter facilities in compliance with the Federal Meat Inspection Act (inspected by either a federal or state inspector)?			✓	
<b>10, End</b>				
<b>10.1 Additional Considerations/Checks</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Deviation/Comments</b>
[10.1.1] Did you provide a summary of your findings to the operator at the end of the inspection?	✓			
[10.1.2] Are all OSP changes noted on the Exit Interview, or otherwise signed by the operator and attached?	✓			

[10.1.3] Have you attached the completed Exit Interview Form?	✓			
[10.1.4] Have you attached the Inspection Work Order (IWO) completed with necessary updates and notes.	✓			
[10.1.5] If this was a virtual audit, have you attached the Remote Audit Agreement?			✓	Physical on site location in Los Angeles with remote tour of facility and physical on site document review.
[10.1.6] Have you attached all necessary Audit Trail Exercise documentation and/or summarized within the checklist?	✓			
[10.1.7] Have you uploaded all referenced attachments within the checklist?	✓			
[10.1.14] Identify Attachments and supporting documents submitted with this report	✓			Gross Organic Sales Contact Change Form Mass Balance Exercise Traceback Exercise – with documents H5 supplement Pest Control Report Exit Interview