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# Global Organic Alliance



## QUALITY MANUAL

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## 1. DEFINITIONS

**Accreditation:** A procedure by which an authoritative body (i.e. USDA, ISO) gives formal recognition that a body or person is competent to carry out specific activities.

**Accreditation Certificate:** A document issued by an accreditation body to confirm a certification body's accreditation.

**Administrator:** The Administrator for the Agricultural Marketing Service, United States, Department of Agriculture, or the representative to whom authority has been delegated to act on behalf of the Administrator.

**Appeal:** Procedure where an applicant or certified operation or member of the public contests a certification decision and requests a review.

**Applicant:** A producer or handler of agricultural products who is not currently certified by GOA and applies for certification through GOA.

**Audit Trail:** Documentation sufficient to track the source, transfer of ownership, transportation, and organic integrity of products/ingredients from production through harvest, storage, transport, processing, handling, and sale.

**Certificate:** The document issued by GOA that identifies the organic status and organic products of an applicant or certified operation.

**Certification:** Procedure by which a third party gives written assurance that a clearly identified process has been methodically assessed, such that adequate confidence is provided that specified products conform to specified requirements.

**Certification Agent:** A body accredited by the USDA's NOP to verify through the certification process that a product sold, labeled, or represented as "100 percent organic", "organic" or "made with organic ingredients" is produced and handled according to organic standards.

**Certification Decision:** Systematic assessment based on all relevant information obtained, including the inspection, in order to make a decision.

**Certification Program:** System operated by a certifying agent with its own policies, procedures, and administration to carry out certification activities.

**Certification Scope:** The areas in which the certifying body has been accredited to provide certification services.

**Complaint:** A grievance against a certifying agent, an applicant, or a certified operation involving adherence to standards, policies, procedures, and/or activities.

**Conflict of Interest:** The situation where an individual's capacity for objectivity is put at risk by financial or personal interests that are in conflict with their interest in conducting fair and impartial inspection or certification.

**Declaration of Interest:** A statement of direct, indirect, or perceived personal and/or commercial interests in the organic industry made by those individuals involved in inspections or the certification decision process.

**Denial:** Refusal to grant certification due to willful violation(s), major noncompliance(s) or multiple minor noncompliances.

**Handling Operation:** Any operation or portion of an operation (except final retailers of agricultural products that do not process agricultural products) that receives or otherwise acquires agricultural products and processes, packages, or stores such products.

**Inspection:** The act of examining and evaluating the production and handling operation of an applicant for certification or certified operation to determine compliance.

**Inspector:** Any person retained or used by GOA to conduct inspections of certification applicants or certified production or handling operations.

**Internal Audit:** A periodic self review and self assessment of the objectives and performance of the GOA certification program.

**ISO:** International Organization for Standardization.

**Licensing Agreement:** Agreement between a certified operation and GOA that permits the certified operation to use the GOA seal/logo in compliance with the NOP and GOA Program.

**Minor Noncompliance:** A violation of the NOP or GOA Standard that does not affect the organic integrity of the crop/product, does not jeopardize the effectiveness of the operation's organic system plan, and does not require notification of the noncompliance to the Administrator of the NOP.

**Major Noncompliance:** A violation of the NOP or GOA Standard that does affect the organic integrity of the crop/product, results in serious failure in the operation's organic system plan, and requires notification of the noncompliance to the Administrator of the NOP.

**Mutual Recognition:** Accepting certification decisions made by other certification agents accredited by the USDA.

**Quality System:** Documented procedures that are established, implemented, and audited to assure that production, handling, management, certification, and other systems meet specific requirements and results.

**Responsibly Connected:** Any person who is a partner, officer, director, holder, manager, or owner of ten (10) percent or more of voting stock of an applicant or a recipient of certification.

**Revocation –** Certified operation or a person responsibly connected with an operation whose certification has been revoked will be ineligible to receive certification for a period of 5 years following the date of such revocation. The Secretary may, when in the best interest of the certification program, reduce or eliminate the period of ineligibility.

**Surrender:** Action taken by a certified operation to terminate their organic certification and Licensing Agreement.

**Suspension:** Certified operation may at any time, unless otherwise stated in the notice of suspension, submit a request to the Secretary for reinstatement of its certification. The request must be accompanied by evidence demonstrating correction of each noncompliance and corrective actions to comply with and remain in compliance with the NOP.

**Withdrawal:** Action taken by an applicant to terminate their own certification process prior to a certification decision.

## 2. HISTORY

Global Organic Alliance, Inc. (GOA) was founded by Betty Kananen in 1997 and is a privately owned organization. GOA is an Equal Opportunity Employer (EOE) who employs a staff with over 60 cumulative years of administrative experience in organic certification.

On December 22<sup>nd</sup>, 2000, GOA obtained ISO 65 accreditation and was in the first group of certifying agents to receive accreditation by the USDA to administer the National Organic Program (NOP) on April 29<sup>th</sup>, 2002. In February 2007, GOA was accredited to administer the Japan Agricultural Standard (JAS) by the Ministry of Agriculture, Forestry, and Fisheries (MAFF) in Japan. In achieving this feat, GOA became the first certifying agency in North America to administer the JAS certification program on US soil and also the first certifying agent in the US to be accredited to certify livestock to JAS.

GOA is audited annually to ISO 17065 accreditation which facilitates international trade for operations certified to the GOA certification program and also audited annually by MAFF to continue administering the JAS program.

GOA provides organic certification services to production and handling operations interested in obtaining organic certification to certification and/or compliance programs offered by GOA. Currently, GOA is accredited to administer the National Organic Program (NOP) and Canada Organic Regime (COR). GOA's scope of certification activities encompasses crops, livestock, wild crop, handling, retailing, and fiber. Retail and fiber certification is only available under the scope of the GOA certification program because the scope of the National Organic Program does not include these types of operations.

GOA has established this Quality Manual based on the ISO 65: 1996, General Requirements for Bodies Operating Product Certification Systems. The Quality Manual, procedures, and forms are part of the GOA quality system, and are referred to in the following pages. This manual will provide an overview of the GOA quality and certification systems.

## 3. INSTRUCTIONS

This Quality Manual describes the implementation and monitoring of the ISO 17065 program and is broken down into four sections – Quality Manual, Procedures and Administrative Documents, Forms, and Work Instructions. GOA documents are titled, numbered, and provide the effective date, version number and revision date as described in the Document Management Procedure (P018). The Quality Manual is maintained in the GOA office and available to all staff in their daily operations. The GOA Policy Manual (AD001D) takes precedence over the portrayal provided within should differences occur as a result of periodic amendments from the upgrading and monitoring process.

## 4. QUALITY POLICY

Quality is based on constant revision and improvement of procedures and documentation. Information regarding the certification system is available to establish a relationship based on transparency. GOA strives to offer a certification system that is economically affordable and provides prompt, courteous, impartial service to all persons and organizations.

## 5. MISSION STATEMENT

See AD015.

## 6. LEGAL STATUS

The mailing address of Global Organic Alliance is: PO Box 530, Bellefontaine, OH 43311-0530

The physical address of Global Organic Alliance is: 3185 Township Road 179, Bellefontaine, OH 43311-0530

Telephone: 937 593 1232

Fax: 937 593 9507

Email: [goaorg@centurylink.net](mailto:goaorg@centurylink.net)

GOA is an Ohio Corporation that incorporated in 1997, and is a privately owned organization. Specific Bylaws were established in 2007 to better serve the needs of our organization and are mailed annually to all entities on record.

GOA operates under United States Federal and Ohio State Labor Laws and maintains errors and omission insurance for staff.

## 7. EMPLOYMENT

GOA is an Equal Opportunity Employer (EOE) and the employment policy does not discriminate against any staff member, contractor, or employment applicant based on race, ethnicity, religion, political affiliations/beliefs, skin color, creed, gender, marital or family status, sexual orientation, age, national origin, or physical or mental challenges. This policy affects, but is not limited to, recruitment and employment, promotion, demotion, compensation, or selection for training or continued education.

## 8. STRUCTURE

The organizational structure of GOA is designed to build confidence and provide for impartiality and transparency in the efficient execution of the certification process. See Organizational Chart – AD008. Personnel are required to know their responsibilities and duties associated with their position and defined in the position's job description. GOA is proactive in sourcing ways to improve the level of personnel proficiency.

GOA is open to all production and handling operations that fall within its scope of accreditation and certifies compliant operations to the extent of our administrative capacity without regard to size or membership in any association or group or number of certificates already issued. GOA does not require membership of any entity seeking organic certification.

GOA may conduct certification business in:

- North America (USA, Canada)
- US Territories (Guam, North Marianna Islands, Puerto Rico, US Virgin Islands, Samoa Islands)
- Mexico
- Central America (Panama, Belize, Costa Rica, El Salvador, Guatemala, Nicaragua, Panama)
- South America (Argentina, Bolivia, Brazil, Chile, Columbia, Guyana, French Guyana, Peru, Paraguay, Uruguay, Venezuela)
- Russia
- Asia (Japan, Philippines, South Korea, Indonesia, Taiwan)

**Staff Responsibilities and Reporting Structure** – See AD008 and Work Instructions W010 A through L

**Board of Advisors Responsibilities and Reporting Structure** – See Organizational Chart, AD008 and Work Instruction W010A

**Executive** – See Organizational Chart, AD008 and Work Instructions (W010B, W10BB, W10CC, W10DD)

## 9. BOARD OF ADVISORS

An appointed Board of Advisors consists of unpaid volunteers who are knowledgeable in organic production and handling practices and general business practices. Board members do not have to be actively involved in organic production and handling operations.

The Board of Advisors is a resource for advice or information on financial and legal affairs, internal and external relations, and internal audit and conformance review or other related areas of expertise.

Members of the Board of Advisors report to the duly appointed Chair who reports to the President/Chief Executive Officer.

## **10. EXECUTIVE**

The Executive currently consists of a President and Vice President and functions in an advisory role to the Chief Executive Officer as needed. Appointments to the Executive are based on the need and growth of Global Organic Alliance.

The Executive advises on the administration, finances, legal proceedings, GOA activities, and create and supervise committees, when applicable. The Executive agrees to abide by and accept guidance as stipulated by the duly appointed Board of Advisors.

Personnel files contain information on the relevant qualifications, training, and experience of each executive personnel.

## **11. CHIEF EXECUTIVE OFFICER**

The Chief Executive Officer (CEO) is responsible for the operations of Global Organic Alliance and for implementation of Quality Policy of the organization in conjunction with the Quality Manager. He/she is independent of possible influences and is impartial in the administrative processes. The responsibilities and accountability of the CEO are set forth in Job Description (W010B).

The CEO collaborates with the Quality Manager in the evaluation and implementation of the Quality Manual, Procedures, and Forms in which the CEO has final approval of, in planning and execution of the internal audit and implementing corrective actions as a result of the internal audit. The CEO may also contribute to the development and improvement of documents comprising the Quality Manual.

The CEO must keep current on the accreditation requirements and continued compliance to the programs Global Organic Alliance is accredited to administer.

The CEO makes decisions regarding the creation of committees for specific tasks and/or issues and ensures the activities of appointed committees are clearly documented.

Personnel files contain information on the relevant qualifications, training, and experience of the CEO.

## **12. QUALITY MANAGER**

The Quality Manager in collaboration with the Chief Executive Officer is responsible for assessing the efficiency and compliance of the quality system. The responsibilities and accountability of the Quality Manager are set forth in the Job Description (W010E).

The Quality Manager has direct access to the Chief Executive Officer and to the relevant documentation which allows him/her to constantly inform the Chief Executive Officer of the efficiency of the whole quality system, as well as occurring problems or the necessity to review or modify applicable procedures or documents. The Quality Manager reports on the functioning of the quality system to the Chief Executive Officer of Global Organic Alliance with the purpose of substantiating needed improvements to the quality system.

## **13. QUALITY CONTROL TEAM**

The Quality Manager, Chief Executive Officer, Certification Director, Administrative Assistant, Certification Coordinator and Certification Review Specialist compose the GOA Quality Control Team. The Quality Control Team is responsible for monitoring the quality system within their departments and reporting noncompliance issues and/or inefficiencies in the execution of the quality system to the Quality Manager.

## **14. CERTIFICATION STAFF**

The responsibilities and accountability of the certification staff which consists of the Certification Coordinator, Assistant Certification Director, Certification Review Staff, and Certification Director are set forth in the applicable Job Descriptions (W010H, W010I, W010IA W010J).

The Certification Staff must have sufficient expertise in organic production and handling techniques to successfully perform the duties assigned and are required to attend workshops, seminars, etc. to enhance their knowledge in production and handling. Global Organic Alliance provides training to certification staff and documents the training and/or continuing education of certification staff.

Certification Staff must disclose all conflicts of interest (i.e. direct, indirect, or perceived) and sign a Confidentiality Statement. GOA certification personnel shall have no commercial or advisory relationship with the operations requesting certification and must be independent of possible influences and impartial in the decision-making process. These documents must be updated annually and are maintained in the personnel files.

An annual performance evaluation is performed of all persons who review applications for certification, review certification documents, evaluate compliance for certification, make recommendations concerning certification, or make certification decisions. Corrective actions are implemented correct any deficiencies in the certification process.

Personnel files contain information on the qualifications, training, and experience of each certification personnel.

## **15. ADMINISTRATIVE STAFF**

Administrative staff positions are not involved in the certification decision-making process. These functions include accounting, reception, office supplies, and facilities, quality system management, including internal program evaluation. In special cases qualified temporary services are hired.

A job description applicable to the position being filled is provided to the new employee. Personnel are trained on the Quality Manual and procedures. Staff is evaluated annually and the results of the evaluation is documented and maintained in the employees personnel file.

Personnel files contain information on the relevant qualifications, training, and experience of each administrative personnel.

## **16. SUBCONTRACTORS**

GOA takes full responsibility for subcontracted work (i.e. inspection, testing, and quality management system evaluation) and uses suitably qualified individuals or entities to perform specific tasks and maintains full responsibility for the evaluation of the report and all decision-making, including but not limited to granting, extending, suspending, or revoking certification. GOA maintains a register of subcontractors.

Subcontracting is limited to defined, discrete supporting activities and must be accomplished in compliance with the applicable provisions and criteria in ISO 17065 and the applicable certification program standards, requirements, and policies/procedures.

GOA monitors the performance and assesses the work of subcontractors. Responsibilities, including adhering to confidentiality and conflict of interest requirements, are specified in the applicable contract and in GOA policies and procedures for conflict of interest (AD001D, P004) and confidentiality (AD001D, P003).

Applicants and certified operations are notified when subcontractors will be used and have the right to object to a specific subcontractor for just cause; however, the final decision rests with GOA. Subcontractors may not be continuously rejected by an applicant or certified operation.

## **17. INSPECTORS**

Inspectors are independent contractors engaged by GOA to conduct an impartial, transparent, and comprehensible on-site inspection to observe and assess the activities employed by operations seeking certification through GOA, as well as preparing a comprehensive and objective inspection report based on their discussions and observations.



Hiring criteria is based on education, (both past and continued) expertise, experience, geographic location and evaluations. Inspectors must be qualified to perform the assigned inspection, successfully complete some form of inspector training, be knowledgeable of applicable Standards, and be able to effectively and accurately communicate their observations without personal opinion or bias in writing and represent GOA in a professional manner.

Mutual responsibilities within the inspection process (between the inspector and GOA) are specified in the GOA Inspector Contract (F026A).

Inspectors may not influence or recommend for or against certification or make certification decisions; they are only to document their observations relevant to the operation's compliance with the applicable organic standards.

Responsibilities, including confidentiality and conflict of interest, are specified in the applicable contract and in GOA policies and procedures for conflict of interest and confidentiality and inspections. Inspectors must disclose all conflicts of interest (i.e. direct, indirect, or perceived) and sign a Confidentiality Statement annually. The inspector is required to notify GOA in the event of a conflict of interest or report any changes that may create a conflict of interest without delay.

Inspectors are required to update their file annually by supplying updated Conflict of Interest Disclosure, Confidentiality Statement, Resume/CV, signed GOA contract, and records of continued education and/or training.

Inspectors are evaluated annually and must implement measures to correct any identified deficiencies in their inspection work.

## 18. CONFIDENTIALITY AND CONFLICT OF INTEREST

Administrative and Certification Staff, Board of Advisors, members of the Executive, inspectors and subcontractors, and committee members are required to sign a confidentiality statement and declare any conflicts of interest (i.e. direct, indirect, perceived) before beginning their respective duties and annually thereafter. The aforementioned individuals must comply with GOA's Confidentiality Procedure (P003) and the Policy Manual (AD001D).

All certification and/or compliance files are confidential. Access is only permitted to staff, inspectors, file clerks, outside evaluators or accreditation agents, or law officers who have signed a Confidentiality Statement. In cases where information is required to be disclosed by law, GOA will notify the operation that the information was shared in accordance with the law.

GOA will maintain strict confidentiality with respect to its members and clients under the applicable organic certification program and will not disclose to third parties (with the exception of the Secretary or the applicable State organic program's governing State official or their authorized representatives) any business-related information concerning any member or client obtained while administering the applicable certification program.

Personnel	Conflict of Interest	Confidentiality	Execution and Updating	Location
Board of Advisors	X	X	Upon Appointment	Personnel File
Executive	X	X	Upon Appointment and Annually	Personnel File
Certification Staff	X	X	Upon Hiring and Annually	Personnel File
Administrative Staff	X	X	Upon Hiring and Annually	Personnel File
Inspectors	X	X	Upon Engaging Annually	Inspector File
Subcontracts	X	X	Upon Engaging	Personnel File
Committee Member	X	X	Upon Engaging	Personnel File

Failure to disclose a conflict of interest by inspectors or certification staff is just cause to be removed from the inspector list or dismissed from certification review and decision-making activities.

## 19. DOCUMENTS AND RECORDS

The oversight of documents and records is in accord with the Document Management Procedure (P018) and Policies (AD001D).

The documents and record systems cover the quality and certification system. Documents and records may be hard copy or electronic media. Documentation and records are periodically updated based on the demands of accreditation requirements and to the internal operations of GOA. Old document versions are removed from use and operators are informed of all changes via mail, periodical publication, the GOA newsletter, or directly from the GOA office. New, revised, or deleted documents are recorded in the GOA Document Index.

Certification records are kept confidentially and securely. Operations are entitled to see inspection documents and correspondence relating to their certification. Copies of certification documents are not disclosed or released to outside parties without written permission from the operation or when required by law and of which the operator is notified.

## **20. DISTRIBUTION OF DOCUMENTS**

The Quality Manual is available to applicants, certified operations, chapters, committees, accreditation agencies, and other individuals and outside organizations who request a copy from the GOA office. A listing of all documents is maintained in the Master Document Listing (F002) which provides the effective and revision date, and revision number.

Quality Manuals are supplied to personnel and subject to periodic revisions to improve operations and maintain compliance with accreditation requirements. Updated versions of documents are provided upon approval with instructions to replace the earlier version with the later version and to destroy the earlier version. GOA does not provide updated versions to recipients of the Quality Manuals provided for informational purposes only.

Bylaws are mailed annually in January to all entities on record.

The Master Directory of certified operations is available to the public via the GOA website and upon request and distributed to applicants and certified operations annually with the documents for the annual update. The electronic version is updated annually in January and the hard copy is updated at least annually and if necessary, as needed during the year.

An information packet is sent to any person requesting information about certification through GOA; a file card is kept, containing all pertinent data on the requestor. Requestor name is added to the newsletter mailing list. A copy of the current NOP Standards, Policy Manual, Schedule of Fees (W004), description of the certification and compliance programs offered by GOA (W014), and list of certified operations are available to the general public upon request.

A New Member Booklet is sent to all entities who submit the GOA Registration Form and applicable fees. New Client Booklets are sent to operations that have applied to become clients and paid the applicable fees. Both booklets contain the Certification Procedure (P008).

The Certification Booklet is sent to certified operations after they have successfully completed the certification process. Certified operations will only receive this booklet once per year; therefore, updated documents are not sent out as they occur.

The Inspector handbook containing the Program Standards, Policy Manual, and the current inspector and inspection procedures is sent to the inspector the first time they are engaged by GOA each fiscal year.

## **21. STANDARDS**

GOA will furnish the Standards and regulations for any organic certification and compliance program offered by GOA upon request.

New applicants receive the applicable standards/regulations as requested on the Registration Form (F004).

Certified operations receive the applicable standards/regulations, certification procedure, and updates or amendments annually with the certification renewal packet mailed out in January.

## 22. CERTIFICATION

Certification activities are carried out as described in the Certification Procedure (P008) and applicable policies for certification and inspection in the Policy Manual (AD001D). The certification process is a transparent, impartial, and traceable process. The information and documentation gathered during the certification process must be sufficient to make an informed decision on certification, traceable documentation (i.e. an appeal), and for monitoring continued compliance with standards/regulations of the applicable certification and/or compliance verification program.

Certification is open to all production and handling operations involved in the production and/or handling of organic product that falls within GOA's areas of accreditation and/or standards and will certify all qualified applicants, to the extent of its administrative capacity regardless of size, income, creed, color, religion, gender, or membership in any association or group, nor is certification conditional upon the number of certificates all ready issued. Policy and procedures shall not impede or inhibit access to certification.

All certified operations must sign a Licensing Agreement (F025) which stipulates the rights and responsibilities of the undersigned certified operation and GOA.

Applicants and certified operations are required to sign and date the completed applicable organic plan(s), Licensing Agreement, and any other form, which indicates the need for a signature prior to submitting the document(s). The signature serves as verification that they have completed the forms truthfully and accurately and they understand and will comply with the applicable standards and certification requirements.

Operations must be in compliance with the standards/regulations of the applicable certification program to which application has been made. Certification decisions are based upon the information supplied in the Organic Plan and supporting documentation supplied by the applicant/certified operation, and results of the on-site inspection to determine compliance with the applicable certification program Standards and requirements, policies, and Licensing Agreements.

### **Withdraw from or Surrendering Certification**

Applicants who want to withdraw their application from the certification process must notify the GOA office in writing of their decision to withdraw. Certified operations must notify the GOA office in writing of their decision to surrender their organic certification.

An applicant may withdraw its application at any time. An applicant who withdraws its application shall be liable for the costs of services provided up to the time the written withdrawal notification is received in the GOA office. An applicant that voluntarily withdraws its application prior to the issuance of a notice of noncompliance will not be issued the notice of noncompliance. Similarly, an applicant that voluntarily withdraws its application prior to the issuance of certification denial will not be issued a notice of certification denial.

Certified operations may surrender their GOA certificate at any time; however, the certified operation is liable for the costs of services provided up to the time the surrender notification is received in the GOA office. Certified operations who surrender their certificate during the certification process and a certification decision has been made, the certified operation will be notified of the committee decision and issued a notice of noncompliance when applicable.

The GOA License Agreement is terminated upon receipt of the withdrawal or surrender notification from the operation. Certified operations must immediately cease using the name and seal/logo of the applicable certification program and reference to GOA as the certification agent.

## 23. GRANTING, HOLDING, MAINTAINING, SUSPENDING AND EXPANDING/REDUCING CERTIFICATION

Refer to Granting, Holding, Maintaining and Expanding/Reducing Certification Procedure (P008A) and Noncompliance and Denial, Suspension, Revocation or Cancellation Procedure (P008C) and applicable policies in AD001D.

## 24. APPEALS

All appeals shall be reviewed, heard, and decided by persons not involved with the decision being appealed.

Appeals must be filed and heard in accordance with the Appeals Procedure (P020) and policies for appeals or as required by the applicable certification program. Any applicant or certified operation may appeal a noncompliance or denial or suspension/revocation of certification when it is believed the decision was not made in accordance with the applicable certification program standards and requirements, policies or procedures. The appeal must be received by the GOA office within 30 days of the date of the certification decision.

All written communication involved in the appeal is sent to the appellant's address of record on file with GOA by a delivery service that provides dated return receipts.

GOA does not have the authority to accept appeals applicable to the NOP. Appeals regarding the NOP may only be heard by the United States Department of Agriculture, except when an appellant is subject to an approved State organic program.

## 25. INSPECTIONS

GOA requires an initial on-site inspection of each production unit, facility, and site that produces or handles organic products that is included in an operation for which certification is requested. Additional inspections may be announced or unannounced at the discretion of GOA or as required by the accreditation body of the applicable certification program.

The inspector must conduct an exit interview with an authorized representative of the operation who is knowledgeable about the inspected operation to confirm the accuracy and completeness of inspection observations and information gathered during the on-site inspection. The inspector must also address the need for any additional information as well as any potential noncompliance issues of concern.

At the time of the inspection, the inspector shall provide the operation's authorized representative with a receipt for any samples taken by the inspector. There shall be no charge to the inspector for any samples taken.

GOA will send a copy of the on-site inspection report and any test results to the inspected operation.

## 26. LICENSING AGREEMENT

The Licensing Agreement stipulates the rights and responsibilities of the operation and those of GOA. The Licensing Agreement (F025) must be signed before the certification process will begin and signed annually thereafter.

The Licensing Agreement is immediately terminated when applicants withdraw from certification and certified operations surrender their certification or certification is suspended, cancelled, or revoked. Use of the applicable certification program seal, GOA seal and reference to GOA as the certifying agent must be discontinued and removed from advertising/promotional materials, labels, etc..

## 27. COMPLAINTS

Complaints may be lobbied against a staff member, officer, board member, applicant or certified operation of GOA,

GOA will investigate complaints against production and handling operations certified by GOA in accordance with the Complaint Procedure (P021).

Complaints submitted to the GOA office must provide the following information:

- State the submission is a complaint;
- Details and explanation of the complaint or alleged offense, including dates and names of those involved;
- Supporting documentation; and
- Name, contact information, and signature of the complainant.

Investigation of complaints or alleged offenses received by GOA that lack any of the above information is at the discretion of GOA.

## **28. COMPLAINTS RECEIVED BY CERTIFIED OPERATIONS**

Certified operations are required to develop and maintain a register of complaints regarding the organic attribute that are received from buyers or consumers of the crop(s) grown, crops or products sold, product(s) manufactured, offered service(s), or certified production/handling operations owned by them.

Certified operation must report all complaints received annually with the organic plan(s) and have the documentation available for the inspector or when requested by authorized representatives of GOA or applicable accreditation body. The following information must be documented by the certified operation:

- Name, address, and phone number of the complainant;
- Date and nature of the complaint;
- Action taken by the certified operation to investigate or resolve the complaint; and
- Final resolution of the complaint.

## **29. SEAL ABUSE/SURVEILLANCE**

GOA monitors the use of the organic seal/logo of the certification or compliance programs administered by GOA. Surveillance activities are documented. Refer to Surveillance Procedure (P021A)

The use of the applicable certification program seal/logo, or other identifying mark is not required on product sold, labeled, or represented as organic.

A certified operation shall only make claims regarding certification in respect to the scope for which certification has been granted or continued.

A certified operation must not use product certification in such a manner that brings GOA into disrepute and must not make any statement regarding product certification which GOA considers misleading or unauthorized.

Certified operations must use the certification only to indicate that products are certified as being in compliance with the applicable certification program requirements.

Use of the certification program seal/logo is subject to the following conditions:

- Must be in compliance with the certification program regulations and in good standing.
- Must have a current organic certificate. The certificate is updated annually.

An operation that has surrendered its' certification or whose certification is suspended, cancelled, or revoked must discontinue use of the organic certification program seal/logo and name and reference to GOA as the certifying agent immediately.

A certified operation found to be utilizing the GOA name, seal/logo, or derivative thereof, in an inappropriate, illegal, or fraudulent manner, and/or that is not compliant with the labeling regulations of the certification program may be notified of the labeling noncompliance and/or reported to the accreditation body or certification program authorities.

## **30. TESTING and INSPECTION**

Refer to the Inspection and Testing Procedure (P009) and Assessing, Recording, and Monitoring Subcontracted Laboratories (P009A) and policies in AD001D or as required by the applicable certification program.

### 31. INTERNAL AUDIT

An internal audit in line with GOA's Internal Audit Policy (AD001D) and Internal Audit Procedures (P015, P015A) is conducted annually. The internal audit evaluates the GOA structure, policies, and procedures which may result in implementing corrective actions to areas where improvement is needed.

The President/Chief Executive Officer or appointed representative shall ensure that an internal audit process is in place and internal audits are conducted at least annually. The internal audit will assess whether the duties, requirements, policies, and procedures are adhered to by staff when executing the certification process and in compliance with ISO 17065, accreditation bodies, and certification program requirements.

- Internal Audit will evaluate certification document flow, adherence to inspector procedures and policies, the Quality Manual, staff and inspector evaluations, applicant and certified operation support, product inventory certificate support, document control and record keeping, execution of the complaint, dispute and appeal procedures, and finances.

A member of the Board of Advisors, GOA Staff, an outside auditor, or a consultant with the knowledge and expertise to conduct such audits will conduct the annual internal audit of the GOA office. The Board of Advisors has the authority to require an interim audit at their discretion.

Periodic in-house audits may be conducted by staff and management. The purpose of the in-house audit is to continually improve the efficiency and effectiveness of the certification program. As necessary:

- Management and Staff monitors response time by the Certification Department, update on staff workload, document changes, file status, and miscellaneous items that affect the functioning of the certification program.
- Management and Staff monitor present and future staffing needs, document flow, operation support, the Quality Manual, finances, update on chapter functions, newsletter, and booklets, handbooks, and manuals, and miscellaneous items that affect the function of the certification program.

Personnel in charge of the audited section/department is informed of the audit results and must implement appropriate preventive and/or corrective measures to identified deficiencies or noncompliances promptly. GOA personnel will have 60 to 120 days to address serious noncompliances and submit a plan to come into full compliance. Mitigating circumstances may affect the response time.

A written report will be provided for each internal audit and distributed to the Board of Advisors and Executive. The result of the internal audit is distributed to the Executive and Board of Advisors within 3 weeks of receipt of the audit report.

### 32. MANAGEMENT REVIEWS

The management review of the Quality System is a continuously evolving process involving the Chief Executive Office, Quality Manager and Certification Director. Other members of the Quality Team and Staff may also participate. Reviewing the effectiveness, efficiency and capability of the Quality System is vital, and the outcome of the review is communicated to all employees/departments. Reviewing and monitoring is conducted with the aim of seeking an internal the best internal process. This review is conducted at least once a year and is part of the overall improvement activities and an integral part of managing change within the organization.

A quality management system **review** covers:

- Results of audits
- Customer feedback
- Process and product conformity
- Status of preventative and corrective actions
- Follow up actions from previous management reviews
- Changes that could affect the QMS

- Recommendations for improvements

The procedures for conducting audits and reviews and the results from them are recorded in the In-House Management Review Log. Refer to Policy 2.6, Procedures P015 and P015A, and Form F048.