



An "Audit Trail" or "trace-back" system documents the source (certified supplier), purchase or acquisition, transfer of ownership, physical and financial possession, receipt, handling, production, processing, contractual oversight responsibilities, sale, and transportation of organic products. Records must disclose all activities and transactions in enough detail to be readily understood and audited. Records must show compliance with organic requirements and be kept for at least five (5) years. Records must identify (link back to) the last certified operation in the supply chain and must identify products as organic.

- Complete a separate [R5.0 Record Keeping for Retail Establishments](#) form for each department or area when different record keeping systems are used.

Department or area covered by this plan:

A. Location of Supplier Certificates

Location where all organic SUPPLIER certificates can be reviewed during inspection. Separate inspection of this location may be required. If identical to the physical location address provided on your [CCOF Certification Contract](#), skip to section B.

☐ Identical to physical location address on contract.

Location type: ☐ Corporate office ☐ Regional office ☐ Store office ☐ Internal portal ☐ Other: _____

Address: _____

City: _____ State/Province: _____ Zip/Postal Code: _____ Country: _____

Contact(name/title): _____

Phone: _____ Fax: _____ Email(s): _____

B. Tracking Organic Products

- 1) Describe or attach a diagram of how your audit trail trace-back system tracks ingredients and finished products from the last certified operation, through transport, storage, inbound receiving, display, production or packing for eventual sale to customer.

Documentation maintained for other programs such as food safety, allergen prevention, product recall, animal welfare grading, etc. may be used as part of your organic trace-back system.

☐ Description or diagram attached

Audit trail systems include the following elements:

- a) **Chain of custody and shipping documents** – Documents include both internal documents you generate as well as external documents generated by the last certified organic operation. Common audit trail documents:
- Bills of Lading (BOL), purchase orders, invoices, contracts, packing slips, certificate of analyses, product specification sheets, receiving logs, inventory logs, batch records, manifests, shipping and delivery records (field ticket, weigh tickets, scale tickets, receipts, tags), chain of custody, truck and trailer numbers, clean truck affidavits.
- b) **Uncertified operations** – Additional audit trail information is required for each shipment that is handled by an uncertified handler, refer to the [Exempt Handler Affidavit](#) (EHA). Sourcing from uncertified handlers requires additional audit trail verification at inspection.
- Documents from exempt, uncertified handlers must identify (link back to) the last certified operation in the supply chain
 - Documents generated by the last certified operation proving purchase, delivery, and/or transfer to the uncertified handler must be included for each shipment.
 - Your receiving procedures must include verification and documentation of the last certified operation.
 - If product passes through multiple uncertified handlers in sequence, documents must trace through all uncertified handlers back to the last certified handler.
- 2) Attach sample audit trail documents to demonstrate your system. ☐ Documents attached
- All audit trail records and documents must identify products and ingredients as "100% Organic", "Organic", "Made with Organic..." or easily understood abbreviation or acronym, e.g. 100% OG, Org, MWO.
 - Documents must identify (link back to) the last certified operation in the supply chain that handled the organic product.
 - Product label must link to documentation via lot number, shipping identification, or other unique identification printed on the label.
 - Documentation must be sufficient to determine the source, transfer of ownership, and transportation of the organic product.
- 3) **In/out mass balance** – Describe the records and system you use to verify sufficient quantity received to meet display needs and/or to produce a finished product batch. You may attach sample documents to illustrate, e.g. monthly log of beginning and ending





inventory. Describe any abbreviations or acronyms used in your records to indicate that products are organic. Links may be established via "Sell by" dates on relabeled products or packing slips based on "first in first out".

CCOF inspectors will verify that you received sufficient organic products to account for final production, sale, or transportation of organic products.

C. Lot Numbering and In/out Mass Balance for Processed / Repacked Products

- 1) Describe your lot numbering system for finished processed / repacked products or attach a description. If you do not process / repack products, skip to section D. ☐ Description attached ☐ Do no process / repack products.

EXAMPLE: **Lot Number:** 23123A045

Code	23	123	A	O	45
Signifies	Year: 2023	Julian date of production	Shift	Organic	Plant location

Lot Number: _____

Code						
Signifies						

D. Supply Chain Overview & Fraud Prevention

You must implement monitoring practices and procedures to verify suppliers in the supply chain and organic status of agricultural products received to detect and prevent organic fraud. You must also implement monitoring practices and procedures to verify that your plan is effectively implemented.

A fraud prevention plan must be appropriate to the activities, scope, and complexity of the operation, and should be sufficient to address the verification and anti-fraud needs of the particular operation. This means not all fraud prevention plans will be alike.

For example, a processor that receives many organic ingredients from numerous suppliers should develop a fraud prevention plan that describes practices to detect, prevent, minimize, and mitigate organic fraud risks in lengthy supply chains. Because fraud prevention plans must verify the organic status of suppliers and organic products, they should include a description of how an operation verifies organic status back to the last certified operation in the supply chain.

- 1) According to the best practices described by the NOP, an Organic Fraud Prevention Plan may include the elements identified in the table below. Use the table as a guide when building your Organic Fraud Prevention Plan. Select the relevant check box below and attach your Organic Fraud Prevention Plan.

- ☐ I completed the [CCOF Organic Fraud Prevention Plan](#) worksheet, attached.
- ☐ I have updated my existing food safety programs (HACCP/HARPC Plan, Food Safety Plan, Food Defense Plan, Supplier Verification Program, Food Fraud Prevention, or other Prerequisite Programs). Attach a description of where and how applicable elements below have been incorporated into your system.
- ☐ I have written my own Organic Fraud Prevention Plan using applicable elements below as a framework. My plan is attached.
- ☐ I am enrolled in OTA's [Fraud Prevention Solutions](#) program (optional third-party program), my Fraud Prevention Plan is attached.

	Supply chain oversight and organic fraud prevention may include:
A	Supply chain map.
B	Practices for verifying the organic status of any product you acquire and/or use.
C	A process to verify suppliers and minimize supplier risk to organic integrity.
D	A vulnerability assessment to identify weaknesses in your practices and supply chain.
E	Identification of critical control points in the supply chain where organic fraud or loss of organic status are most likely to occur and mitigation measures.
F	Monitoring practices, corrective actions, and verification tools to assess the effectiveness of mitigation measures.
G	A process for reporting suspected organic fraud to certifying agents and the NOP .

