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Organic Fraud Prevention Plan

Operation Name: _____ **Date:** _____

Use this worksheet to describe the monitoring practices and procedures you use to verify suppliers in the supply chain and the organic status of agricultural products received to detect and prevent organic fraud. Also describe the monitoring practices and procedures performed to verify that your plan is effectively implemented.

- ▶ You are responsible for using appropriate and effective means to prevent organic fraud in your supply chain. Your fraud prevention plan should reflect the activities, scope, and complexity of your supply chain.
- ▶ This form, including any addendums, may serve as your Organic Fraud Prevention Plan if you do not have organic fraud prevention integrated into your food safety program and are not enrolled in the OTA Fraud Prevention Solution program.
- ▶ An Organic Fraud Prevention Plan is a living document that should be updated as needed to reflect changing circumstances, ingredients, business practices, supply chains etc.

Not all Organic Fraud Prevention Plans will be alike. According to the best practices described by the NOP, an Organic Fraud Prevention Plan may include the elements identified below.

A. Supply chain map

- 1) Attach a map of your supply chain, beginning with the certified operations before you in the supply chain and ending with certified operations that you sell or ship organic products to. You do not need to submit a separate map for each ingredient unless supply chains are significantly different.
 - Include steps that happen off-site, such as transportation and storage.
 - If product moves through different facilities, describe the flow across different facilities.
 - Indicate when the product changes ownership, including any importing or exporting. Supply chain map attached

B. Practices for verifying the organic status of any product you acquire and/or use

- ▶ You must maintain organic certificates for all suppliers, importers, contracted co-packers, certified private label brand owners, storage facilities, and any other certified organic operation you work with.
 - ▶ You must ensure that all certificates are current (issued within the last 15 months) and complete; listing specific products/crops/parcels/brands. If you export product, certificate must list export market compliance.
 - ▶ For USDA NOP certified operations, refer to [Organic Integrity Database \(Integrity\)](#) for overall certification status. Product listings may need to be requested separately from the operation.
- 1) Your monitoring system must verify that all suppliers and other organic operations you work with are currently certified for the ingredients/products you source, and/or products they produce for you, and/or products you produce for them.
 - a) How frequently do you review organic certificates? *Annual verification is required at a minimum.*
 - With each shipment Monthly Quarterly Annually
 - Other (describe): _____
 - b) Attach or describe your monitoring system. *Be prepared to demonstrate your system at inspection.* Attached

- 2) At receiving, how do you monitor and verify that incoming organic products are from approved suppliers and are organic? Check all that apply or attach a description. Not applicable, I do not take physical possession.
Receiving records must be available for review at inspection and must link back to the last certified handler.
 - Approved organic supplier list verified against bill of lading (BOL) or packaging/container labels
 - Current organic certificate required with each shipment, supplier verified as approved, certificate verified to list product received
 - Other (describe): _____



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C. A process to verify suppliers and minimize supplier risk to organic integrity

- ▶ Before sourcing from new suppliers or working with any other organic operation, you must review their organic certificate to ensure it is current (dated within the last 15 months) and complete; listing specific products/crops/parcels/brands. If you export product, the organic certificate must list export market compliance.
 - ▶ New suppliers and other organic operations you work with must be added to your OSP.
- 1) Do you have a supplier approval program in place to identify, evaluate, and approve new organic suppliers and any other certified organic operation you may work with? *Be prepared to demonstrate your system at inspection.*
- Yes No. If no, explain why not:

2) What is included in your organic supplier approval program? Select all that apply:

- Verification that the supplier's current organic certificate was issued within the last 15 months, includes the list of certified products, and identifies the products I source from them.
- Verification that supplier agrees to meet product specifications for each shipment of product.
- Verification that the supplier participates in 3rd party food safety audits (GFSI or other) and has a passing score that will be provided to my operation annually.
- Verification that the supplier can meet my quality and quantity demands.
- Verification that the supplier agrees to provide timely organic certificate updates at least annually, or upon demand as needed.
- Verification that supplier can provide product residue sampling results on agreed upon schedule (every shipment, one shipment per week, quarterly samples, etc.).
- Verification that the supplier will immediately provide written notification of any positive residue results linked to product purchased by or received by my operation.
- Verification that supplier agrees to annual on-site inspections by representative of my operation.
- Verification that CCOF approves the supplier as part of my OSP supplier list (or other OSP section, as applicable).
- Other, please describe:

3) How often do you switch suppliers, add new suppliers, make one-off purchases or do "spot purchasing"?

Frequent changes may result in increased risk of receiving fraudulent products. CCOF may conduct additional audit trail verification at inspections.

- Daily or Weekly Monthly or Quarterly Annually Rarely or Never

D. Vulnerability assessment to identify weaknesses in your practices and supply chain

▶ Assess the following areas for vulnerabilities where fraud has a greater chance to occur. Each area includes examples of criteria you may consider when conducting your vulnerability assessment.

- 1) **Product assessment** – Consider qualities that are intrinsic to the product (packaging, geopolitical, socio-economic, agronomic):
- *High risk examples:* Product has history of fraud, product is bulk/unpackaged, product comes from an area of political unrest/uncertainty, drastic increases or fluctuations in price, high demand, recent production challenges (e.g. flooding, pests), large fluctuations in production volume, or large disparity between organic and nonorganic pricing.
 - *Low risk examples:* Product packaged in sealed and tamper evident retail packaging, product is readily available in the organic market, product is produced domestically.
- 2) **Supply chain assessment** – Consider the qualities that are inherent to the suppliers you work with:
- *High risk examples:* Low visibility of the entire supply chain, long supply chain (product changes ownership many times before it is in your possession), backup supplier not established (could lead to urgent spot purchases), uncertified operations involved in the supply chain, supplier is selling commodity below cost of production.
 - *Low risk examples:* Established long term supplier relationships, written sales contract addressing organic considerations, supplier readily provides information upon request (organic certificates, specification sheets etc.), supplier is the producer of the organic product, vertically integrated supply chain where the end handler has complete traceability and visibility back to the farm level.



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3) Internal company assessment

- *High risk examples:* Past food fraud incidents, inadequate or minimal supplier approval program, inadequate or minimal receiving procedures, lack of Food Defense Plan, no standard procedures requiring sign-off from more than one employee for each transaction, no formal training for employees involved in organic handling or production, only one knowledgeable employee about the Organic System Plan, repeated failure of mass balance or audit trail exercises during inspections or internal audits.
 - *Low risk examples:* Third party food safety certification (GFSI or similar), established employee training program that addresses organic fraud, written employee code of conduct, employee screening procedures in place, whistleblower guidelines and protection for employees that find internal fraud, history of successful mass balance or traceback exercises during inspections or internal audits.
- My vulnerability assessment is documented and I can describe my vulnerability assessment at inspection (not required to submit a copy of vulnerability assessment unless requested by CCOF).
- My vulnerability assessment is not documented but I can describe my vulnerability assessment at inspection.
- Not applicable to my operation

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

- ▶ **Critical Control Point:** A step at which control can be applied and is essential to prevent or eliminate a hazard or reduce it to an acceptable level.
 - ▶ The following are examples of risks that may require an Organic Critical Control Point (OCCP), **the step when control can be applied**, and *examples of mitigation measures*. Refer to vulnerability assessment section D for additional examples of risk that may require Critical Control Points.
 - Product vulnerability example: Product is imported and has a known condition of entry, has a potential for fumigation with prohibited material.
 - ✓ OCCP and mitigation example: **At receiving**, *review the import documentation accompanying the shipment for verification that the product was not treated. Product remains on hold until verification is complete.*
 - Supply chain vulnerability example: Product is in high demand; I only have one supplier identified and they have a history of shorting orders.
 - ✓ OCCP and mitigation example: **Before making another purchase**, *require existing supplier to sign a contract guaranteeing delivery quantities. Identify new potential back-up suppliers.*
 - Internal vulnerability example: My company does not have an established procedure for verifying new suppliers. We frequently change suppliers and select suppliers based solely on the lowest price.
 - ✓ OCCP and mitigation example: **Before making another purchase**, *establish a supplier verification program and screen existing suppliers against our verification program requirements. We will not purchase from suppliers that do not pass our supplier verification program requirements.*
- 1) Based on your vulnerability assessment, have you identified Organic Critical Control Points (OCCPs) in your supply chain? OCCPs must be established for the vulnerabilities where there is the highest risk of fraud or loss of organic status.
- My critical control points are documented and I can describe my critical control points at inspection (not required to submit a copy of critical control points unless requested by CCOF).
- My critical control points are not documented but I can describe my critical control points at inspection.
- Not applicable to my operation
- 2) For each Organic Critical Control Point, have you developed and implemented mitigation measures to eliminate or reduce the risk for fraud or loss of organic status?
- My mitigation measures are documented and I can demonstrate my mitigation measures at inspection (not required to submit a copy of mitigation measures unless requested by CCOF).
- My mitigation measures are not documented but I can demonstrate my mitigation measures at inspection.
- Not applicable to my operation



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F. Monitoring practices, corrective actions, and verification tools to assess the effectiveness of mitigation measures

- 1) Do you have monitoring procedures to ensure that the mitigation measure for each Organic Critical Control Point is met and corrective actions should your mitigation measures fail?
 - My monitoring and corrective action procedures are documented, and I can demonstrate them at inspection (not required to submit a copy of monitoring practices unless requested by CCOF).
 - My monitoring and corrective action procedures are not documented, but I can demonstrate them at inspection.
 - Not applicable to my operation
 - 2) How do you verify that your Organic Fraud Prevention Plan is effective? Select all that apply.
 - Internal audits Periodic review of records for quality control Annual review of Organic Fraud Prevention Plan
 - Other, describe:
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G. A process for reporting suspected organic fraud to certifying agents and the NOP

► *Organic fraud: Deceptive representation, sale, or labeling of nonorganic agricultural products or ingredients as organic.*

- 1) Describe your criteria for reporting suspected fraud.
Select all that apply:
 - I report all positive sample results linked to organic products I handle.
 - I report instances where I have observed fraudulent activity.
 - I report instances where the quantity of organic product received from a supplier exceeds their known production capacity and can provide credible evidence.
 - I report instances where an organic product is being offered for sale below market price without reasonable explanation and can provide credible evidence.
 - I report all other instances where I can provide credible evidence of fraud. Credible evidence may include but is not limited to: photos, screen shots of websites, audit trail records, copies of correspondence, residue sample results, GMO sample results, etc.
 - Other (describe):

 - 2) What is your process for reporting credible evidence of organic fraud? Select all that apply:
 - Report to [CCOF](#)
 - Report to supplier's [certifying agent](#)
 - Report to USDA [NOP](#)
 - Report to California Department of Food and Agriculture (CDFA) [State Organic Program](#) for operations in CA
 - Other (describe):
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