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| **Operation name:** |  | **Date:** |  |

*►*The Organic Fraud Prevention Plan is specific to your operation and must describe how you ensure only compliant organic suppliers and certified organic products (i.e., ingredients, retail and non-retail products, livestock, seeds, and/or planting stock) are used.

*►* Your plan should confirm the organic status of suppliers and products and trace it back through the supply chain.

**INSTRUCTIONS:**

Fill out the sections below to describe how your Organic Fraud Prevention plan will reduce risk and prevent fraud. Your plan should explain what your operation does to address weaknesses (vulnerabilities) and protect the organic supply chain.

Think about the risks your operation may face and what actions you take to manage them.

Below are examples of areas to review in your plan:

*►* For Farms:

* Verify that any organic seed, feed, or bedding come from certified sources.
* Confirm that replacement livestock are from certified farms and that you fully trace organic status through purchase and transport records.
* Make sure animals are transported to certified organic slaughter facilities, maintaining traceability.

*►* For Handlers, including brokers and traders:

* Verify the supply chain for each ingredient to the last certified handler.
* Include transporters and any exempt operations

*►* Producer/Handlers:

* Describe how you prevent fraud in both production and handling parts of your operation.

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| **NOP §205.201** An organic production or handling system plan must include a description of the monitoring practices and procedures to verify suppliers in the supply chain and organic status of agricultural products received, and to prevent organic fraud, as appropriate to the certified operation’s activities, scope, and complexity. **NOP §205.2** Organic Fraud- Deceptive representation, sale, or labeling of non-organic agricultural products or ingredients as “100% Organic”, “Organic”, or “Made with Organic (specified ingredients or food group(s)).”  |

**Section 1. ORGANIC FRAUD PREVENTION TEAM**

1. Identify the person or people responsible for approving, implementing, training staff, and monitoring the Organic Fraud Prevention Plan.

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| **Name**  | **Job Title/Role**  | **Contact Info** (Phone/Email) |
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1. How will you report possible organic fraud? (check all that apply)

[ ]  Report to your Oregon Tilth’s Client Services Team

[ ]  Report to the supplier’s [certifying agent](https://organic.ams.usda.gov/integrity/Certifiers/CertifiersLocationsSearchPage)

[ ]  Report to the [USDA National Organic Program](https://www.ams.usda.gov/services/enforcement/organic/file-complaint)

[ ]  Report to the [California Department of Food and Agriculture](https://organic.cdfa.ca.gov/Complaints/) (CDFA)- *State Organic Program for CA operations*

[ ]  Other, describe:

1. If you grow perennial crops or harvest wild crops, do you buy certified organic products like seeds or planting stock?

[ ]  Yes

[ ]  No – *The Organic Fraud Prevention plan is not applicable (stop here you do not need to fill out the rest of the form)*

[ ]  N/A – *I don’t grow perennial crops or harvest wild crops*

1. Does your operation already have an Organic Fraud Prevention Plan?

[ ]  No –*Complete this module*

[ ]  Yes –Plan is attached. *You can skip the rest of this module if your plan includes all the required sections. If anything is missing, complete those sections.*

**Section 2. SUPPLY CHAIN MAP**

1. Attach a map or flow chart of your supply chain. Start with the certified operations that supply to you, and end with your operation. [ ]  Attached
2. Submit multiple maps only if the supply chains are very different.
3. Highlight the Critical Control Points in your plan; these are important steps in a process where you can stop or prevent fraud (refer to section 3).
4. Include the location of suppliers, when product changes ownership, and activities like importing or exporting.
5. Include all handling steps that happen off-site, such as transportation and storage.

If your supply chain is simple, you may describe it here:

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1. How do you approve and keep track of organic suppliers in your records?

[ ]  We use a supplier list to track organic suppliers.

[ ]  We ensure that our suppliers are listed in our OSP on our Master Ingredient List or Master Product List.

[ ]  We have a supplier approval program to review and approve new organic suppliers.

[ ]  We check that the supplier’s organic certificate is current, lists the certified products, and shows the products we buy from them.

[ ]  We confirm the supplier agrees to meet product specifications for every shipment.

[ ]  We check that the supplier passes a 3rd-party food safety audit (like GFSI) every year.

[ ]  We confirm the supplier can meet our quality and quantity needs.

[ ]  We make sure the supplier gives us updated organic certificates at least once a year, or when requested.

[ ]  We get product residue testing results from the supplier on a regular schedule (such as every shipment, weekly, or quarterly).

[ ]  The supplier will immediately notify us in writing if any residue is found on products we receive.

[ ]  We require suppliers to allow an annual on-site visit from someone at our operation.

[ ]  Other, describe:

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**Section 3. VULNERABILITY ASSESSMENT & CRITICAL CONTROL POINTS***A vulnerability assessment is an evaluation of your operation and supply chain to understand weaknesses where fraud may occur. It helps identify possible risks for fraud and develop plans to prevent or reduce those risks. A Critical Control Point (CCP) is a step in your process where you can take action to prevent, stop, or reduce the chance of organic fraud.*

1. Complete the table below, or attach a separate sheet, to describe the results of the vulnerability assessment. [ ]  Attached
	1. Identify critical control points where there is a potential risk for fraud. You can consider things like:
		* The supplier’s certification status (certified vs. exempt)
		* Where the supplier is located (domestic or foreign)
		* Economic factors, like high value, hard to find, or high demand ingredients or products
		* Agronomic factors (like pests or plant diseases)
		* How products are handled (organic and conventional products)
		* Your relationship with the supplier (if you have a supplier approval program)
	2. Fraud prevention and mitigation strategies that will be implemented. You can consider things like:
		* Records that are maintained
		* Practices to prevent commingling or contamination
	3. Monitoring practices that ensure the fraud prevention strategies are effective. You can consider things like:
		* Documents that are verified
		* The frequency (how often) practices are monitored.

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| **Critical Control Point** | **Fraud Prevention and Mitigation Strategies** | **Monitoring Practices (including how often)** |
| ***Example:*** *Use of uncertified transportation*  | *Our operation verifies clean truck procedures with the shipper and ensures the documents are included in the receiving records. Product is listed as “organic” in all records.*  | *Clean truck affidavits and records showing the product is listed as organic are kept for each purchase. These are verified when the product is received and before the organic product is offloaded.* |
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**Section 4. TRAINING**

1. How will employees be trained on the Organic Fraud Prevention Plan (OFPP) and any updates?. (check all that apply)

[ ]  All new employees receive OFPP training during onboarding

[ ]  All employees complete annual refresher training on the OFPP

[ ]  Employees are trained on updates to the OFPP within one month of any changes

[ ]  Other, describe:

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**Section 5. MONITORING**

1. How do you verify that your Organic Fraud Prevention Plan is effective?

[ ]  Internal audits [ ]  Regularly check of records for quality control

[ ]  Other, describe:

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1. How often this plan is reviewed and updated?

[ ]  Monthly [ ]  Quarterly [ ]  Annually

[ ]  Other, describe: