| **OSP 06: Organic Fraud Prevention Plan** | USDA Organic Regulations §205.201(a)(3) |
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| *The USDA-NOP National Organic Standards require all operations to maintain a fraud prevention plan as a part of their Organic System Plan. A strong fraud prevention plan can detect and prevent fraud, which strengthens the overall integrity of organic supply chains. The fraud prevention plan is specific to your operation, and it must describe the practices your operation implements to effectively monitor and verify the organic status of crops and/or products you produce or source. The scale and scope of your fraud prevention plan should reflect the complexity of your activities.*  *The Fraud Prevention Plan should:*   * *identify critical control points in your supply chain where fraud is most likely to occur* * *identify measures used to address critical control points and minimize risk* * *describe practices for verifying the organic status of suppliers and organic products* * *describe how employees are trained to on the fraud prevention plan and how to report suspected fraud* * *describe how the effectiveness of the fraud prevention plan is monitored*   *As you draft your plan, consider how you source and distribute organic products. Reference other parts of your Organic System Plan as appropriate.* | |
| ***Organic Fraud*** *(****§205.2)****: 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)).”* | |
| 1. **ORGANIC FRAUD PREVENTION TEAM** 2. Identify the person(s) responsible for approving, implementing, training, and monitoring the Organic Fraud Prevention Plan. ***These authorized representatives will be added as approved contacts for the operation.***  |  |  |  | | --- | --- | --- | | **Name** | **Job Title/Role** | **Contact Info** (Phone, Email, etc.) | |  |  |  | |  |  |  | |  |  |  | |  |  |  |  1. Describe how employees are trained on your Organic Fraud Prevention Plan, including when any updates are made. 2. Describe your process for reporting suspected organic fraud to QCS and/or the National Organic Program: | |
| 1. **SUPPLY CHAIN AND CRITICAL CONTROL POINTS**   *A supply chain is the network of suppliers, growers, storage facilities, processors and/or transporters that provide the ingredients or products your operation uses to create your marketed organic goods. Every organic operation’s supply is different; some supply chains may be short (small farm purchasing organic seed to grow crops for the farmers market) and others may be long (a processor sourcing various ingredients, some imported from other countries). All incoming products in your supply chain (e.g., seeds, raw agricultural ingredients, livestock feed, brokered products) must be traced back to the last certified operation (including storage) that handled the product.*   1. Describe your supply chain or attach a separate flow chart or map. The supply chain should include the certified operations from which you source, include transportation and storage, indicate when products change ownership (including importing and exporting), and end with the certified organic operations to which you sell or ship organic products, if applicable.  **Attached**      1. Do you conduct internal traceability and/or mass balance audits?  Yes  No  If yes, describe, including how often: 2. Has your operation conducted a vulnerability assessment based on the type of products or ingredients received and the complexity of your supply chain(s) AND have you established a written Fraud Prevention Plan?   *A vulnerability assessment is an evaluation of your operation and supply chain to understand stages in the system where organic fraud may occur.*  Yes. Attach Fraud Prevention Plan.  **Attached**  No. Complete table below**.**   1. Describe your critical control points (points in the supply chain where organic fraud or loss of organic status are most likely to occur), the strategies you implement to mitigate or prevent fraud, and the monitoring practices that ensure the fraud prevention strategies are effective. Add critical control points as applicable to your operation.  |  |  |  | | --- | --- | --- | | **Critical Control Point** | **Fraud Prevention and Mitigation Strategies** Describe for **each unique type** of organic agricultural product received. | **Monitoring Practices (including how often)** | | ***Example****: Sourcing of organic agricultural products (e.g., ingredients, seeds/planting stock, livestock feed/bedding, and/or livestock)* | *Our operation collects the organic certificates from our suppliers and verifies the authenticity of the certificate using the USDA's Organic Integrity Database. We verify that each supplier is certified to the appropriate scope and that they are certified to produce the product we are purchasing. We keep these certificates in our records for our certifier to verify at inspection.* | *We collect new certificates from our suppliers annually and use the USDA Organic Integrity Database to verify the certification status of both our suppliers and the products they are selling us before every transaction (or season).* | |  |  |  | |  |  |  | |  |  |  | |  |  |  | |  |  |  | |  |  |  | |  |  |  | |  |  |  | | |
| 1. **MONITORING** 2. Describe how you monitor the implementation and effectiveness of your Fraud Prevention Plan:    1. How often do you monitor the effectiveness of your Fraud Prevention Plan?   Weekly  Monthly  Annually  As needed  Other (specify): | |