| **OHP 11: 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 an Organic Fraud Prevention Plan (OFPP) 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 Organic 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 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. Your Organic Fraud Prevention Plan should be updated regularly as applicable to reflect changes to your operation, supply chain, and operating procedures.* | |
| ***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. How are employees trained on your Organic Fraud Prevention Plan, including when updates are made? | |
| 1. **REPORTING FRAUD** 2. Do you agree to report all cases of suspected organic fraud and provide credible evidence such as photos, audit trail records, correspondence, residue sample results, etc., when you:  * receive internal or external test results that identify prohibited substances on organic products you produce or handle? * observe any instance of fraudulent activity within your operation or supply chain? * observe that the quantity of organic products received from a supplier exceeds their known production capacity? * Other. Please describe:   Yes  No. Please explain:   1. Describe your procedures for reporting suspected organic fraud, including who you report to: | |

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| 1. **SUPPLY CHAIN MAP**   *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 start with the certified operations from which you source agricultural products or ingredients and end with the sale and transport of your organic products. It should include intermediary transport and storage, detail all contracted activities, indicate when products change ownership, and describe importing and exporting as applicable.  **Attached** |
| 1. **VERIFYING ORGANIC STATUS OF ORGANIC SUPPLIERS, PRODUCTS, AND INGREDIENTS**   *Your system must ensure that all suppliers, importers, co-packers, certified private label brand owners, storage facilities and other organic partners are currently certified for the ingredients/products they provide to you and those you produce for them.*   1. Describe your procedures for verifying the current organic status of vendors/suppliers and other certified operations you work with. 2. Describe your procedures for verifying the current organic status of all organic products and ingredients your operation buys, brokers, or physically handles.      1. If your operation packs organic products into brands/labels owned by other operations, describe your process for verifying the current organic status of those certified brand owners.   *N/A, I do not pack organic products into brands for other operations*     1. How often do you review the organic status of your suppliers, organic products, ingredients, or services?   With each shipment  Monthly  Quarterly  Annually  Other. Please describe: |
| 1. **VULNERABILITY AND CRITICAL CONTROL POINTS** 2. Do you conduct internal traceability and/or mass balance audits?  Yes  No  If yes, describe, including how often: 3. 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. ***Critical control points*** are points in your supply chain where organic fraud or loss of organic status are most likely to occur. Revisit your supply chain map/flow-chart to identify critical control points in your supply chain and list them below. Describe your strategies to mitigate or prevent fraud at the critical control point, and the monitoring practices that ensure the fraud prevention strategies are effective.  |  |  |  | | --- | --- | --- | | **Critical Control Point** | **Fraud Prevention and Mitigation Strategies** Describe for **each unique type** of organic agricultural product received. | **Monitoring Practices (including how often)** | |  |  |  | |  |  |  | |  |  |  | |  |  |  | |  |  |  | |  |  |  | |  |  |  | |  |  |  | |  |  |  | |
| 1. **MONITORING** 2. How do you verify that your Organic Fraud Prevention Plan is effective? Check all that apply.   Internal audits  Periodic review of records for quality control  Annual review of the Fraud Prevention Plan  Other. Please describe:   1. How often do you monitor the effectiveness of your Fraud Prevention Plan?   Weekly  Monthly  Annually  As needed  Other (specify): |