With the enactment of the Strengthening Organic Enforcement update to the NOP regulations, all certified organic operations must have an Organic Fraud Prevention Plan (FPP). Refer to the Fraud Prevention Plan—Instructions for additional information. This form may be used as an FPP, or you may submit your own Fraud Prevention Plan in place of this form. Some of this information may already be in your Organic System Plan (OSP).

Applicant name:      \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Client ID:      \_\_\_\_\_\_\_\_\_\_\_

1. What are the most likely sources of fraud for your operation?
2. Who at your operation is responsible for ensuring you are preventing fraud?
3. Describe how you assess your vulnerabilities for fraud. For example, do you do an internal risk assessment?
4. What organic products (such as ingredients, bulk products for further processing, etc.) do you bring into your operation?

4.a. Do you maintain an approved product list?

4. b. If yes, who is responsible for maintaining and updating this list and sourcing new products (such as the QA department, procurement, etc.?

1. How do you verify that what you ordered is what you received?

5a. Describe the documents that you require.

1. How often do you require updated verification of certification of incoming organic products?

6a. Describe the documentation you maintain:

1. What transportation documents do you keep?

7a. What do you do if a shipment arrives without documentation (such as a missing organic certificate, invoice, Import Certificate, bill of lading or clean truck verification)?

1. How do you verify that the items came directly from the last certified organic handler or producer?

8a. If an item does not come directly from the last certified organic handler or producer, how do you ensure that organic integrity is maintained (such as specifying transport cleanout records)?

1. What is your procedure if you suspect fraud?
2. Do you have any additional methods of preventing fraud? Check if applicable:

[ ]  purchasing directly from only certified organic entities producing the item (rather than a broker/trader/
wholesaler/distributor that may not require certification).

[ ]  requiring Transaction Certificates for purchases

[ ]  check the NOP OID to verify certification [ ]  before each purchase [ ]  monthly [ ]  other:

[ ]  using only warehouses that are certified organic.

[ ]  having procedures or qualifications for suppliers/transporters/importers, etc., including criteria to end a relationship if qualifications are not met. Submit an example.

[ ]  requiring specific import documents, list:

[ ]  conduct in-house pesticide residue testing. Describe protocols:

[ ]  reviewing fraud vulnerabilities periodically. Describe:

[ ]  Other. Describe:

1. Do you import any organic products?

11.a. If yes, are you working with exporters who are set up to issue Organic Import Certificates?

1. Additional comments:

Additional questions may need to be addressed for operations with complex supply chains or those that do importing. The SOE guidance document that accompanied the publishing of the SOE regulation specifically says

certified operations must:

* Maintain records of their activities that span the time of purchase or acquisition, through production, to sale or transport;
* Maintain records that trace back to the last certified operation in their supply chain;
* Maintain audit trail documentation to facilitate supply chain traceability, including identification of agricultural products as organic on audit trail documents; and
* Describe in the OSP the monitoring practices and procedures used to prevent organic fraud and verify suppliers and organic product status.

A robust plan for supply chain oversight and organic fraud prevention, may include, as appropriate to your operation:

* A map or inventory of the operation’s supply chain that identifies suppliers;
* Identification of CCP’s in the supply chain where organic fraud or loss of organic status are most likely to occur;
* A process to verify suppliers and minimize supplier risk to organic integrity;
* Practices for verifying the organic status of any product they acquire and/or use;
* A vulnerability assessment to identify weaknesses in the operation’s practices and supply chain;
* Mitigation measures to correct vulnerabilities and minimize risks;
* Monitoring practices and verification tools to assess the effectiveness of mitigation measures; and
* A process for reporting suspected fraud to certifying agents and the NOP.

Resources include:

* The NOP website: <https://www.ams.usda.gov/rules-regulations/strengthening-organic-enforcement> including their trainings: <https://www.ams.usda.gov/services/organic-certification/training>
* The Organic Integrity Learning Center (OILC) on the NOP website has video courses that may be relevant that are open to the public.
* OTA: <https://ota.com/advocacy/critical-issues/strengthening-organic-enforcement>
* OTA: <https://ota.com/OrganicFraudPrevention>
* Free online course: Developing an Organic Fraud Prevention Plan MOOC online course: <https://foodfraudpreventionthinktank.com/courses/developing-an-organic-fraud-prevention-plan-mooc-ota0/>.