**OCIA Organic Fraud Prevention Plan**

 **Instructions:** In addition to information in the Organic System Plan (OSP), the USDA Organic Regulations now require all OSPs to include an Organic Fraud Prevention Plan (OFPP). The OSP includes questions about ingredient and supplier verification and traceability at the operation. This OFPP template is designed to help outline the procedures and practices that support early detection, prevention, and mitigation of fraud, strengthening integrity across organic supply chains.

The Organic Fraud Prevention Plan should be tailored to your operation and describe practices which eliminate vulnerabilities and minimize risk. As you draft your plan, consider how you source and distribute organic products, and reference other parts of your Organic System Plan as appropriate. Examples of vulnerability points may include:

* Verifying the supply chain for each ingredient to the last certified handler. This may include transporters and exempt operations. Some previously exempt operations may now need certification. Encourage your suppliers to get certified for full-chain traceability and reduced risk.

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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 be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented. This 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)).” |

**Organic Fraud Prevention Team**

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| Identify the person(s) responsible for approving, implementing, training, and monitoring the Organic Fraud Prevention Plan (name/role). *Responsible person(s) will be added as approved contacts for the operation and should assess and update the Organic Fraud Prevention Plan on an annual basis for any changes in risks or activities.* |
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1) Does your operation have an existing Organic Fraud Prevention Plan?

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| [ ]  No; *Complete this module* |
| [ ]  Yes; Attached. *Skip the remainder of this module as long as your existing Organic Fraud Prevention Plan includes all aspects outlined. If any aspects are missing, complete those sections* |

**Supply Chain Map & Critical Control Points**

1) Please provide a separate graphic (flow chart or map) which reflects all received/incoming ingredients, products, and inputs in your supply chain. This graphic should be focused on Critical Control Points (CCP). These are points in the supply chain where organic fraud or loss of organic status are most likely to occur. Critical Control Points are where control measures are applied to prevent, eliminate, or reduce risk to an acceptable level, ensuring the integrity and quality of a product. This may include but is not limited to importing, ingredient groups, suppliers, certification status of each entity involved, location of suppliers, transportation events, storage events, exporting, and all other handling activities

[ ]  Attached

**Verification of Organic Status**

1) H3.0 of the Organic System Plan asks operations to “…describe the monitoring practices and procedures to verify suppliers in the supply chain and organic status of agricultural products received.” Please note how your process minimizes supplier risk to organic integrity. Also, if you have any additional comments about verification of suppliers and products/ingredients, please include them here.

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2) How frequently do you review organic certificates to verify suppliers' organic status of the agricultural products received?

**Vulnerability Assessment**

*A vulnerability assessment is a systematic evaluation that identifies and analyzes weaknesses or susceptibilities in a system, process, or organization. This assessment helps to anticipate potential risks and develop effective strategies for prevention and mitigation.*

1. Explain your process of performing a vulnerability assessment, including the actions you take and the factors you consider. These factors could involve how you keep current of fraud incidents and general market incidents, the supplier's certification status, where they are located (imported or domestic), economic aspects (like ingredient scarcity or high demand), agronomic factors (such as vulnerability to pests or diseases), supply chain details (including handling of organic and conventional products), and the nature of your relationship with the supplier (existence of a supplier approval program).

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1. Complete the table below, or attach a separate table, describing the outcome of the vulnerability assessment. This should include the following:
2. All identified critical control points where there is a potential risk of fraud.
3. Fraud mitigation or prevention strategies that will be employed.
4. Monitoring practices that will be conducted to ensure the fraud prevention strategies are effective.

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| **Critical Control Point** | **Mitigation or Prevention Strategies** | **Monitoring Practices** |
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**Training and Reporting**

1. Describe how employees will be trained on the Organic Fraud Prevention Plan:

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2. Describe the process that will be taken for reporting suspected organic fraud to both OCIA and the National Organic Program (NOP).

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**Monitoring**
1. Describe the monitoring practices and verifications tools to assess the effectiveness of the Organic Fraud Prevention Plan. This should include:

1. How often this plan is reviewed and updated.
2. How you determine this plan is adequate and effective in mitigating and preventing organic fraud.

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The Organic Fraud Prevention Plan has been reviewed and approved by the management of       (Company Name):

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| Name | Name |
| Signature | Signature |
| Date | Date |