
Organic Fraud Prevention Plan

Operation Name:

Date:

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- ▶ In addition to information in the Organic System Plan, the National Organic Standards now require all operations to create a Fraud Prevention Plan. This plan is vital in shielding supply chains from fraud and minimizing risks. A strong fraud prevention plan detects and prevents fraud early on, enhancing the overall integrity of supply chains.
 - ▶ Fraud Prevention Plans should be tailored to your operation's practices. The plan should outline how you ensure only compliant suppliers and products are used. Examples:
 - A producer dealing with organic and nonorganic crops and livestock needs a plan to prevent nonorganic items from being misrepresented as organic.
 - A processor getting various organic ingredients must have a plan to tackle fraud in complex supply chains.
 - ▶ Your plan should confirm the organic status of suppliers and products and trace it back through the supply chain.
 - ▶ As you draft your plan, consider how you source and distribute organic products. Reference other parts of your Organic System Plan as appropriate.

Instructions: The Fraud Prevention Plan should describe practices which eliminate vulnerabilities and minimize risk. By completing this module and thinking through the risk, vulnerabilities and actions taken by your operation will ensure reliability of supply chains and safeguarding the integrity of organic products. Examples of vulnerability points to be considered include:

▶ **For Producers/Farms:**

- Check organic seed, feed, and bedding sources. Ensure your raw agricultural feed supplier is certified for that feed.
- Verify livestock sources, maintain ownership records, and trace animal transportation.
- Make sure sales and slaughter facilities are organic, maintaining traceability.

▶ **For Handlers, including brokers and traders:**

- Verify 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.

▶ **Producer/Handlers should outline strategies for preventing fraud in both production and handling.**

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 nonorganic agricultural products or ingredients as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."

Please feel free to supply attachments, if your responses require more space.

Georgia Crop Improvement Association Organic Certification Program

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ORGANIC FRAUD PREVENTION TEAM

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?

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) Provide a separate graphic (flow chart or map) which illustrates all received/incoming ingredients, products and inputs in your supply chain. This may include but is not limited to: ingredient groups, certification status of each entity involved, location of suppliers, transportation events, storage, events and all other handling activities. This flow chart or map should highlight Critical Control Points.

Attached

2) How and where do you identify suppliers of organic products in your operations recordkeeping system? (e.g., suppliers are tracked through an input list or supplier list.)

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3) Identify the critical control points in your supply chain where organic fraud or loss of organic status are most likely to occur. *You may attach a separate graphic or flow chart/map or include these points in the supply chain map that illustrates the supply chain and potential risk areas.* For any points of risk ensure they are added to the vulnerability assessment below and mitigation strategies are defined.

Note, a Critical Control Point (CCP) is a specific stage in a process where control measures are applied to prevent, eliminate, or reduce risk to an acceptable level, ensuring the integrity and quality of a product.

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VULNERABILITY ASSESSMENT

A vulnerability assessment is a systematic evaluation that identifies and analyzes weaknesses or susceptibilities in a system, process, or organization, helping 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 took and the factors you considered. These factors could involve 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)
- 2) Complete the table below, or attach a separate table, describing the outcome of the vulnerability assessment. This should include the following:
 - a) All identified critical control points where there is a potential risk of fraud.
 - b) Fraud mitigation or prevention strategies that will be employed.
 - c) Monitoring practices that will be conducted to ensure the fraud prevention strategies are effective.

| 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 and any updates that are made.

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- 2) Describe process that will be taken for reporting suspected organic fraud to both GCIAOCP 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:
 - a) How often this plan is reviewed and updated.
 - b) How do you determine this plan is adequate and effective in mitigating and preventing organic fraud.

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