



ORGANIC FRAUD PREVENTION PLAN (OFPP) RESOURCE GUIDANCE

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OFPP REGULATION INFORMATION

OFPP REGULATION INFORMATION

The SOE (Strengthening Organic Enforcement) rulemaking amends the United States Department of Agriculture (USDA) organic regulations to strengthen oversight and enforcement of the production, handling, and sale of organic agricultural products.

The rise of organic fraud prompted the new rule and it's meant to strengthen the oversight and the enforcement of the production, handling and sale of organic products. ALL organic operators must have an Organic Fraud Prevention Plan (OFPP) in place.

The USDA NOP define Organic Fraud as: Deceptive representation, sale, or labeling of non organic agricultural products or ingredients as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."

REGULATION §205.201(A)(3):

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 operations activities, scope, and complexity.

STEP 1

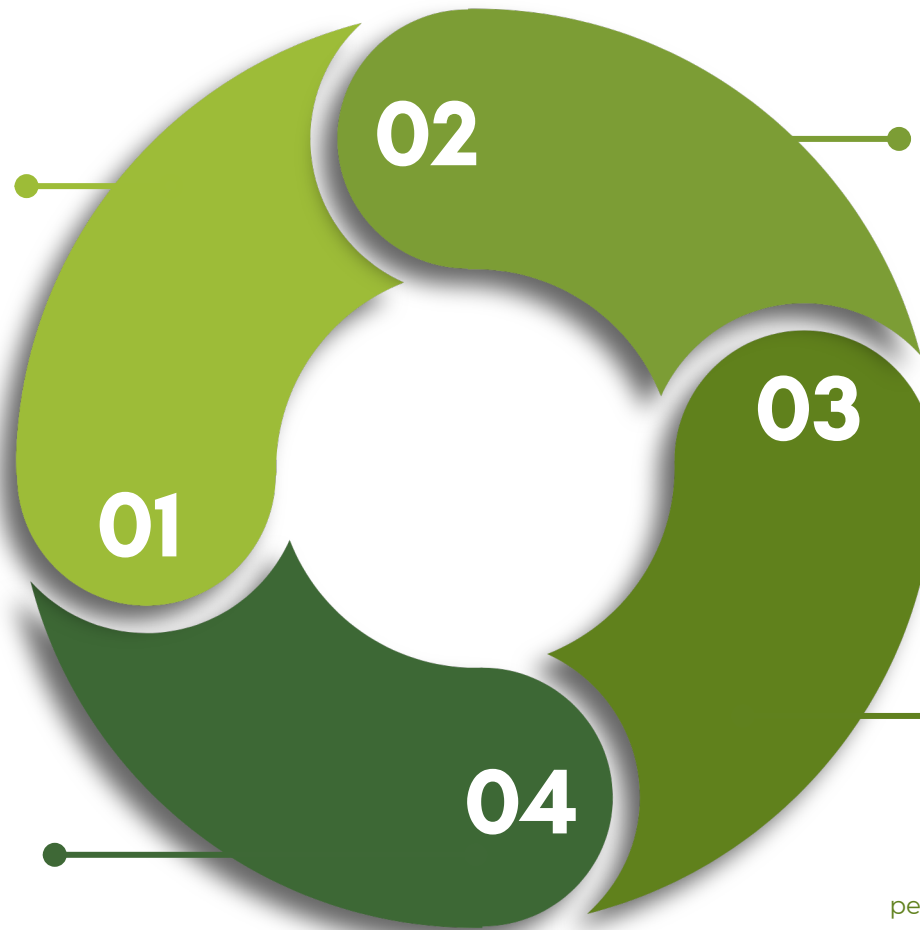
IDENTIFYING ESSENTIAL COMPONENTS

VULNERABILITY ASSESSMENT (SELF AUDIT)

Identifying gaps, risky areas in process, and identification of likelihood. Key factors of a vulnerability assessment are detailed in the next page.

MONITORING/CONTINUOUS IMPROVEMENT

Routine checks should be conducted to see how effective the mitigation strategies are & the changes made accordingly to minimize vulnerabilities.



INCIDENT RESPONSE/REPORTING

Established procedures for dealing with fraud incidents and reporting suspected or detected fraud to PAO and NOP.

MITIGATION MEASURES

Actions/ practices that are implemented to minimize or prevent vulnerabilities.

There should be a group of responsible personnel. Group should be diverse and trained on reporting protocols and incident response.

STEP 2

CONDUCTING VULNERABILITY ASSESSMENT- IMPORTANT ASPECTS

PRODUCT ASSESSMENT

- Imported/ crosses borders?
- Geographical incidents of fraud in a region?
- High corruption level?
- High statistics on total production of volume?

ECONOMIC FACTORS

- Scarce suppliers or high demand?
- Sudden changes in volumes?
- Are trends in line with market value?

AGRONOMIC FACTORS

- Production challenges in a specific region?
- Natural disaster in specific region?
- Fumigation treatment?
- Yield averages/ trends.

SUPPLIER ASSESSMENT

- Timeframe of relationship with supplier.
- Prior fraud involvement.
- Timeframe certified organic.
- Identify how your supplier's organic certification is verified.
- Describe or illustrate the potential risk areas within your supply chain.

SUPPLY CHAIN VISIBILITY

- Full visibility of supply chain.
- Are there uncertified suppliers?
- Brokers who do not disclose suppliers.

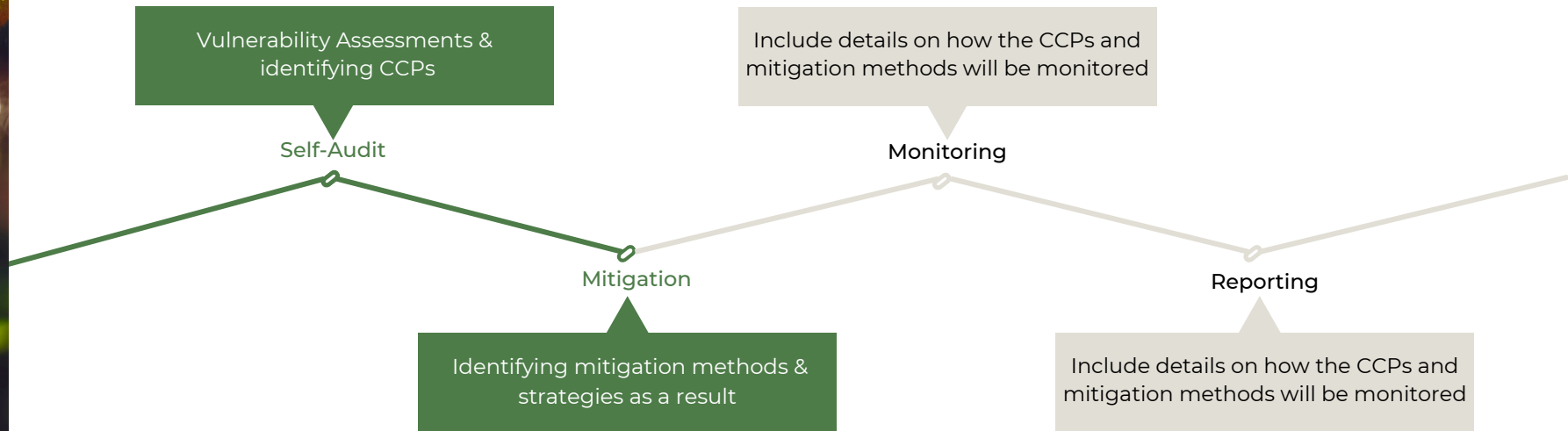
STEP 2 CONTINUED: CONDUCTING VULNERABILITY ASSESSMENT OUTCOMES & MONITORING

1 CRITICAL CONTROL POINTS	<ul style="list-style-type: none">• Identify each critical control point in your operation• May have to conduct a hazard analysis with justifications• Establish critical limits
2 MITIGATION MEASURES/STRATEGIES	<ul style="list-style-type: none">• Be detailed and focus on the areas with higher risk• Ensure that each mitigation strategy can be verified at your onsite inspections and self audits.• Each mitigation method should be followed by a monitoring practice
3 MONITORING & CONTINUOUS IMPROVEMENT	<ul style="list-style-type: none">• Indicate the who, what, when, where, and how of the monitoring process• Include the steps in reporting incidents of fraud

STEP 3 BUILDING YOUR OFPP

It is imperative that your OFPP is adapted to your operation's activities. The details within your OFPP should directly reflect, the complexity of your operation.

For example, a simple Storage and Distribution facility may have far less CCPs and risks identified within the vulnerability assessment, as opposed to a Packinghouse operation.



ADDITIONAL RESOURCES

Primus Auditing Ops website:

<https://primusauditingops.com/nop-national-organic-program-usa/>

USDA Strengthening Organic Enforcement:

<https://www.ams.usda.gov/rules-regulations/strengthening-organic-enforcement>

USDA Code of Federal Regulations:

<https://www.ecfr.gov/current/title-7/subtitle-B/chapter-I/subchapter-M/part-205?toc=1>

NOP Integrity Database:

<https://organic.ams.usda.gov/integrity/>

USDA - How to file a complaint site:

<https://www.ams.usda.gov/services/enforcement/organic/file-complaint>

OTA Fraud Prevention Guidance:

<https://ota.com/OrganicFraudPrevention>

PrimusLabs Toolkit:

<https://intranet.primuslabs.com/Toolkit/User/Default.aspx>

CONTACT OUR ORGANIC TEAM AT:

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