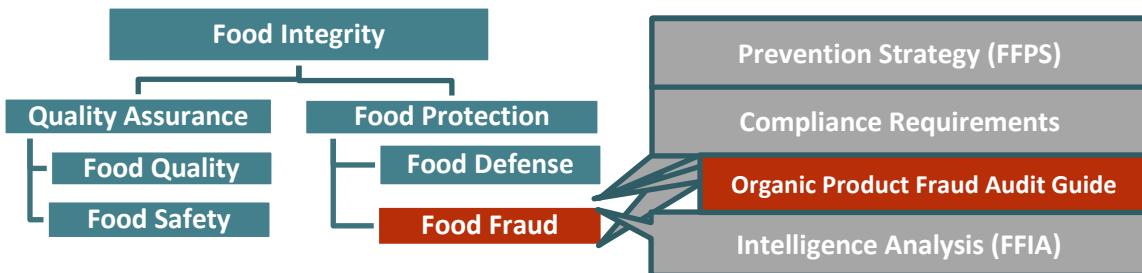




Food Fraud Prevention THINK TANK

Primer on Organic Product Fraud Audit Guide

JANUARY 2021



Organic Product Fraud Audit Guide –

A basic starting point for a USDA inspection or compliance audit.

Organic product fraud has become a more important focus for USDA inspectors, USDA certifiers, auditors, and those companies complying with the requirements. This application to organic product fraud prevention builds upon previous food fraud prevention research. This is aligned with the Global Food Safety Initiative (GFSI) scope and a wide range of other compliance requirements such as the Sarbanes-Oxley Act and the Food Safety Modernization Act (FSMA). The first step for implementing a new management system such as fraud prevention is to “just get started” and create opportunities for continuous improvement. As with the GFSI requirements, a “yes or no” survey is an efficient and optimal way to start broad compliance and adoption efforts. This primer document includes the Organic Product Fraud Inspection Survey Questions.

Link to the USDA Organic Integrity Learning Center and the course registration:

<https://www.ams.usda.gov/services/organic-certification/training>

The US Department of Agriculture (USDA), under the National Organic Program (NOP), has led the creation of the Strengthening Organic Enforcement rule. In support of this rule, and their general focus on supporting the protection of the organic seal, the USDA NOP created the Organic Integrity Learning Center (OILC). Two courses were developed with funding to the Organic Trade Association to co-develop the Food Fraud Prevention Academy programs. The first course is “*Organic Fraud and the Criminal Mind,*” The second course is “*Preventing the Organic Fraud Opportunity.*”

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Organic Product Fraud Inspection Survey Questions

This survey is from the “Preventing the Organic Fraud Opportunity” course created for the USDA NOP by the Organic Trade Association and the Food Fraud Prevention Academy.

For Considering “Organic Fraud and the Criminal Mind”

- The role of the USDA inspector:
 - Be clear and firm in asking for vulnerability assessments and product fraud prevention strategies.
 - The depth of documents and inspections will refine over time.
- Specific SOPs that will help an inspection:
 - Define and share the questions and requirements.
 - Use related product fraud and criminal investigation methods.
- Awareness of best practices that are being implemented by industry.
 - Many programs cover various aspects of a fraud prevention plan -- consider how these other programs are defined to help reduce the fraud opportunity.

Optimal Inspection Plan: Part I – Simple Questions about the Scope

GFSI Food Fraud Compliance Requirements adapted for Organic Product Fraud (asking “yes or no” questions to start):

1. Have they conducted an organic fraud vulnerability assessment (Y/N)
2. Is this documented (written) (Y/N)
3. Have they developed an organic fraud prevention plan (Y/N)
4. Is this documented (written) and incorporated into the Organic System Plan (Y/N)
5. Can they demonstrate effective implementation (Y/N)
6. Do they have executive-level sign-off (Y/N)
7. Have they minimally conducted an annual organic product fraud incident review (Y/N)
8. Do they have a method to review their incidents and general market incidents (Y/N)
9. Do they address all types of organic product fraud (Y/N)
10. Do they address all products from both incoming goods (e.g., ingredients) and outgoing goods (e.g., finished goods) through to the consumer (Y/N)

Optimal Inspection Plan: Part II – A. Documentation and Methods

Building upon the broader product fraud and food fraud concepts, there are more specific organic questions:

- **Part II – A: Documentation**
 1. Do they have a map or inventory of their organic supply chain (Y/N)
 2. Do they have a supplier and product verification process to confirm, on an ongoing basis, the approved organic status of any product they use (Y/N)
 3. Can they demonstrate an audit trace-back of a product selected by the inspector (Y/N)
 4. Can they demonstrate sufficient organic inventory via mass balance audits (Y/N)
 5. Have they utilized an organic industry private initiative, method, or tool (e.g., GFSI Requirements, OTA Organic Fraud Prevention Solutions) (Y/N)

Optimal Inspection Plan: Part II – B. Implementation

Building upon the broader product fraud and food fraud concepts, there are more specific organic questions:

- **Part II – B: Implementation**
 1. Have they identified organic critical control points in their organic supply chain where organic fraud or loss of organic status is most likely to occur? (Y/N)
 2. Have they developed organic mitigation measures to mitigate organic vulnerabilities (Y/N)
 3. Have they integrated and documented their organic fraud prevention activities in their Organic System Plan (Y/N)
 4. Do they have a training program for their employees that includes organic fraud prevention (Y/N)
 5. Do they have a process for reporting suspected organic fraud to certifying agents and the National Organic Program (Y/N)