

Module H5B: Monitoring Practices and Procedures, Supplier Verification, and Fraud Prevention Plan—Physical Facility

This Module is to be completed by operations with a physical facility where they receive organic items.

Operations must provide 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 this operation’s activities, scope, and complexity. (§205.201(a)(3)).Operations must also provide a description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances. (§205.201(a)(5)).

Operation Name:	
Date:	

Instructions

1. The collection of Modules, documents, and forms submitted by this operation will be this operation’s Organic System Plan (OSP). (§ 205.201(a)(1)). In addition, collectively, the Modules are used to determine compliance with organic handling requirements. (§205.270, 205.400, and 205.401).
2. Some words pertaining to organic handling have certain meanings. To aid in understanding, Americert has clarified how certain words used in these Modules are defined. Please see the “Guidance on Completing Handler Organic System Plan Modules: Overview” for these definitions.
3. The majority of the questions are “Yes/No” or “Select All That Apply.” To complete a checkbox for your chosen answer, move your mouse cursor over the desired box and click it to select the desired box.
4. Other questions are fill in the blank or ask you to provide a brief response. Please type in your response in the spaces provided. If additional room is needed, please reference to “See Attachment” and attach your response.
5. If a question in a Module tells you to “Skip” to another part of the Module, please do so. For example, here is one question from a Module.

1. Is this operation a private label brand owner/marketer that contracts an independently certified copacker to produce, pack, manufacture, process, or handle organic items into this operation’s brand packaging?	<input type="checkbox"/> No. Skip to Part C. <input type="checkbox"/> Yes.
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If you answer “No” to this question, follow the instructions within the question and “Skip to Part C.”

6. For “Select All That Apply” questions, please do not merely submit SOPs instead of answering the questions in the Modules. Each question and answering options are there for a reason. You may, however, submit SOPs in addition to answering the questions.

SECTION I: Monitoring—Verification of Suppliers (Supplier Due Diligence)

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Operations must verify their suppliers, including exempt operations. This requirement applies to all certified organic handlers, regardless of their scope of handling activities. Operations must implement ongoing practices for Verification of Suppliers (Supplier Due Diligence) to verify suppliers in the supply chain and organic status of agricultural products received. (§205.201(a)(3)).

Operations must have a process for verifying that organic items are actually organic. If an Americert-certified operation purchases, buys, brokers, trades, or distributes **FROM** an operation other than the last certified organic source, the Uncertified Operation Affidavit is required to be completed by each such seller, broker, trader, or distributor. Americert does not require the following types of operations to complete the Uncertified Operation Affidavit:

- Retail establishments with physical locations from which customers can purchase product;
- Operations with organic sales less than \$5,000; and
- Operations that only make products with less than 70% organic content or that only state organic in the ingredient list.

A. Verification of Last Certified Organic Sources. Please confirm that this operation engages in all the MANDATORY practices below:	
<input type="checkbox"/> Maintains the following: <ul style="list-style-type: none"> ➤ A list of suppliers (such as Module H2 or H4 Supplier List). Such a list includes the name of the supplier and what organic items are sourced from that supplier. Unless other arrangements are made, this operation discloses this list to Americert at least annually and obtains approval for any new supplier prior to using them. ➤ Current organic certificates for each of this operation’s suppliers for the last certified organic source of organic items, updating them at least annually. ➤ An audit trail that traces back to the last certified operation in the supply chain. ➤ Purchase and receiving documentation, confirming it notes the item’s organic status, for any organic items received, purchased, or brokered. ➤ Documentation needed to comply with the NOP Final Rule for use of any nonorganic ingredients or processing aids. 	
<input type="checkbox"/> Verifies the following: <ul style="list-style-type: none"> ➤ That each supplier or copacker used to produce, pack, manufacture, process, or handle organic crops or products purchased, received, distributed, or brokered by this operation is certified organic to the USDA National Organic Program standards (or an acceptable equivalency). ➤ That all specific organic items purchased, received, distributed, or brokered by this operation are listed as certified organic on the organic certificate for the last certified organic source. 	
<input type="checkbox"/> Other (describe): 	
B. Verification of Copackers by Brand Owners	
1. Does this operation operate as a Brand Owner that contracts an independently certified copacker to produce, pack, manufacture, process, or handle organic items, packaging them into this operation’s branded packaging or labels (either retail or nonretail) on its behalf? <input type="checkbox"/> No. Skip to Part C. <input type="checkbox"/> Yes. Attach copies of all organic brand labels. 	
2. Please confirm that this operation engages in all the MANDATORY practices to the right:	<input type="checkbox"/> This operation has listed all copackers used in Module H2 or H3 Product List. <input type="checkbox"/> This operation obtains approval from Americert for each copacker prior to use . <input type="checkbox"/> This operation maintains the following: <ul style="list-style-type: none"> ➤ The organic certificate (and product detail page listing) for the copacker listing this operation’s brand name products. ➤ Inventories of finished product held by copacker on this operation’s behalf. ➤ A Private Label Agreement form that is updated at least annually. <input type="checkbox"/> This operation verifies that, for products packed by a copacker into this operation’s brand, each certified organic copacker used has specifically had this operation’s products and brand name added to their organic certificate to show they are certified to handle this operation’s brand name products.
3. Has this operation enclosed the copackers’ organic certificates (and product detail listings) with this application? <input type="checkbox"/> Yes.	
4. Has this operation enclosed the Private Label Agreements with this application? <input type="checkbox"/> Yes.	
5. Does this operation understand that no label or packaging in this operation’s brand name can be used on organic products unless that specific label or packaging has been submitted to Americert for review and approval AND to the certifying agent for the copacker and both certifying agents have approved the use of that specific label? <input type="checkbox"/> Yes.	
6. Does this operation understand that no copacker can be used to apply organic labels under this operation’s brand name or using the phrase “Certified Organic by Americert International” unless this operation has executed an Americert Private Label Agreement form with the copacker and submitted that signed agreement to Americert for review and approval? <input type="checkbox"/> Yes.	

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7. Does this operation have any other practices to ensure organic integrity of products packed by copacker? [SELECT ALL THAT APPLY]	<input type="checkbox"/> This operation has a contract with the copacker and has addressed organic integrity with the copacker. <input type="checkbox"/> After packing at copacker into primary unit packaging (bottle, jar, pouch, case, pallet), the unit packaging is not opened, repackaged, or relabeled by this operation or this operation's subcontracted warehouses. <input type="checkbox"/> All products remain in control of copacker until transferred to this operation. <input type="checkbox"/> Products are packaged in sealed, tamper-evident packaging then transferred to this operation or shipped to buyer/fulfillment center. <input type="checkbox"/> Each individual unit contains a lot number for tracking and traceability purposes. <input type="checkbox"/> This operation takes ownership of product from copacker in its finished form, which is a sealed, tamper-evident package. <input type="checkbox"/> Other:	
8. Does this operation purchase, procure, broker, take title to, or take physical possession of ingredients used in this operation's products that are packed by the copacker?	<input type="checkbox"/> No, copacker sources and procures ingredients. Skip to Part C. <input type="checkbox"/> Yes, this operation sources, procures, selects, purchases, or takes physical possession of ingredients. [List the ingredients this operation sources on Module H2 or H3 Product List. Americert will list this activity on this operation's organic certificate.]	
9. Does this operation maintain organic certificates for all ingredients it purchases or procures?		<input type="checkbox"/> Yes.
10. Does this operation provide organic supplier information to this operation's chosen copacker?	<input type="checkbox"/> Yes, this operation provides all organic supplier information to this operation's chosen co-packer and each shipment to the co-packer directly connects back to the certified supplier. <input type="checkbox"/> No, this operation does not provide organic supplier information to this operation's chosen co-packer; instead, this operation maintains such documentation itself.	
C. Verification of Brand Owners by Copackers		
1. Does this operation pack into brand name labels (retail or wholesale) owned/controlled by a third party?		<input type="checkbox"/> No. Skip to Part D. <input type="checkbox"/> Yes.
2. Is the Brand Owner certified organic?	<input type="checkbox"/> No. <input type="checkbox"/> Yes, and this operation maintains the Brand Owner's organic certificate on hand, updates it at least annually, and verifies that it lists the products this operation packs for the Brand Owner.	
3. Are the products packed by this operation for the Brand Owner labeled for retail sale or wholesale?	<input type="checkbox"/> Retail and are sealed, tamper-evident. <input type="checkbox"/> Wholesale, and the Brand Owner is certified organic for the wholesale product(s).	
4. Is the Brand Owner (or entity for which this operation packs) sourcing, brokering, procuring, purchasing, or having ingredients shipped to this operation?	<input type="checkbox"/> No. <input type="checkbox"/> Yes, and the Brand Owner is certified organic for that ingredient sourcing handling activity.	
D. Verification of Uncertified Operations in Supply Chain		
1. In the purchasing, receiving, or sourcing of organic items, does this operation purchase, broker, trade, receive, or distribute from an uncertified handler in the supply chain between this operation and the last certified organic operation in the supply chain? Examples: brokers, sellers, marketers, sales departments, distributors, order processors, sales agents/companies, warehouses, or uncertified 'sister' or 'parent' companies of certified entities.		<input type="checkbox"/> No. Skip to Section II. <input type="checkbox"/> Yes.
2. What type(s) of uncertified operation(s) are in this operation's supply chain (\$ 205.101)? [SELECT ALL THAT APPLY]	<input type="checkbox"/> Organic Sales < \$5,000 <input type="checkbox"/> Retail Establishment (That Does or Does Not Process Agricultural Products) <input type="checkbox"/> Only Makes Products With < 70% Organic Content or That Only Identify Organic Ingredients on the Information Panel <input type="checkbox"/> Store, Receive, or Prepare for Shipment Organic Products That Are Packaged in Sealed, Tamper-Evident Packaging or Containers. <input type="checkbox"/> Buy, Sell, Receive, Store, or Prepare for Shipment Organic Products Packaged in Sealed, Tamper-Evident Retail Packaging or Retail Containers. <input type="checkbox"/> Customs Broker <input type="checkbox"/> Transporters and Operations That Only Arrange for the Shipping, Storing, Transport, or Movement of Organic Products	
3. Please confirm that	<input type="checkbox"/> Maintains the following: ➤ A list (such as H2 or H4 Supplier List) of all uncertified operations used in its supply chain, stating the name of the uncertified operation, what is purchased/received	

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<p>this operation engages in all the MANDATORY practices to the right:</p>	<p>from that operation, and the last certified organic source for those items.</p> <ul style="list-style-type: none"> ➤ An Uncertified Operation Affidavit for each such entity in the supply chain, obtaining it PRIOR TO using that entity and updating it at least annually. <p><input type="checkbox"/> Having a practice that an uncertified operation must complete the Uncertified Operation Affidavit, demonstrating it qualifies for an exemption. Otherwise, this operation will not purchase, distribute, receive, or broker organic items from such operation.</p> <p><input type="checkbox"/> For any delivery that cannot be traced back to the last certified organic source, refusing or holding shipment in quarantine until the last certified organic source is verified.</p> <p><input type="checkbox"/> Only purchasing, brokering, trading, or distributing wholesale bulk organic items FROM a certified organic entity/business. Wholesale bulk items purchased from vendors that are not certified organic cannot be used as ingredients in organic products or represented, sold, or marketed as organic, because they have lost their organic integrity.</p> <p><input type="checkbox"/> Verifying or ensuring the following:</p> <ul style="list-style-type: none"> ➤ That organic items purchased, brokered, or distributed from an uncertified handler are packaged in sealed, tamper-evident packaging or containers that are labeled for retail sale, and that these products remain in that sealed, tamper-evident packaging until received by this operation, a buyer, or this operation’s designated storage location. ➤ That organic items received from an uncertified handler are packaged in sealed, tamper-evident packaging or containers that are labeled for wholesale or retail sale, and that these products remain in that sealed, tamper-evident packaging until received by this operation. <p><input type="checkbox"/> Other (describe):</p>	
<p>4. Does this operation purchase, broker, distribute, or receive organic items from operations that choose exemption from organic certification?</p>		<p><input type="checkbox"/> No.</p> <p><input type="checkbox"/> Yes.</p>
<p>5. If Yes to #5, does this operation understand that items so purchased, brokered, distributed, or received from those exempt entities may not be used as ingredients in organic products, or claimed as organic by another operation (§205.310(b))?</p>		<p><input type="checkbox"/> N/A, answer to #4 was no.</p> <p><input type="checkbox"/> Yes.</p>

SECTION II: Monitoring—Due Diligence in Offsite Storage

<p>Offsite Storage</p> <p>1. Does this operation use or contract with another operation anywhere in this operation’s audit trail for warehousing, holding, or offsite storage of organic ingredients, organic crop, organic product, or packaging for organic items?</p> <p>Note: For purposes of this Section II, Americert does not consider fulfillment centers (such as KeHE, UNFI, or Amazon warehouse) to be offsite storage, <u>as long as</u> the items sent to those fulfillment centers are packaged in retail packaging that is <u>sealed, tamper-evident</u>.</p>		<p><input type="checkbox"/> No. Skip to Section III.</p> <p><input type="checkbox"/> Yes. Please provide a list of each storage or warehouse facility (including location and phone number) used to store this operation’s products after leaving the possession of the supplier or copacker or after leaving this operation.</p>
<p>2. Are the offsite storage locations certified organic?</p>	<p><input type="checkbox"/> Yes, and this operation maintains a copy of the organic certificate for the offsite storage location, updating it at least annually.</p> <p><input type="checkbox"/> No, the offsite storage location is not certified organic and this operation maintains an Uncertified Operation Affidavit completed and signed by that uncertified operation, updating it at least annually.</p>	
<p>3. Has this operation enclosed with this application the organic certificate or Uncertified Operation Affidavit for each offsite storage location?</p> <p>Note: Americert requires an Uncertified Operation Affidavit to be completed by each storage or warehouse, with which this operation contracts for storage of organic items (if the storage location is not certified organic).</p>		<p><input type="checkbox"/> Yes.</p>

SECTION III: Monitoring—Due Diligence in Transport

A certified operation’s organic plan must include monitoring practices and procedures to verify the organic status of products they receive/broker/distribute. Certified operations are responsible for verifying that products handled by uncertified entities in their supply chain comply with organic regulations. This verification includes verifying organic

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products transported by an uncertified transporter. These requirements apply to all certified organic operations. Transport could be inbound to this operation or outbound from this operation. It could also be from supplier to customer, supplier to storage, or storage to customer.

A. General	
1. Does this operation understand that, for unpackaged organic items, uncertified transporters can only be used when they are transporting the unpackaged organic items from one certified organic location to another certified organic location, with no middle loading or unloading by the transporter for storage?	<input type="checkbox"/> Yes.
2. Does this operation maintain organic certificates for transporters/entities where certification is required such as: <ul style="list-style-type: none"> ➤ Operations that provide transport or transloading services that unload <u>unpackaged</u> organic products into <u>uncertified</u> facilities or storage areas before loading into the next transport vehicle. Certification of location where unpackaged organic products are loaded/unloaded is required. [Note: Different forms of transport are not considered a 'location.'] ➤ Transporters and transloaders who combine, split, containerize, pack, repack, treat, sort, open, enclose, or label organic products. ➤ Moving unpackaged organic agricultural products from storage to transport, or from transport to storage. The movement of organic items from storage to transport or transport to storage are loading and receiving and are considered handling activities under SOE. ➤ Transload facilities where unpackaged product is transferred into another container. 	<input type="checkbox"/> Yes.
3. Does this operation ensure or confirm that: <ul style="list-style-type: none"> ➤ The organic status is indicated on the item and in transport records for the organic items transported? ➤ That a traceability identifier is on or with the organic items transported? 	<input type="checkbox"/> Yes.
B. Transport—Generally	
1. Who arranges inbound or initial transport of organic items?	<input type="checkbox"/> Supplier <input type="checkbox"/> This operation. <input type="checkbox"/> Customer or Buyer.
2. Who arranges outbound transport (or delivery to this operation's buyer)?	<input type="checkbox"/> Supplier <input type="checkbox"/> This operation. <input type="checkbox"/> Customer or Buyer.
3. If this operation arranges inbound or outbound transport, does it also conduct that transport?	<input type="checkbox"/> N/A, this operation does not arrange inbound or outbound transport. <input type="checkbox"/> Yes. <input type="checkbox"/> No.
C. Transport of Organic Items	
1. For organic items transported, how are they packaged?[SELECT ALL THAT APPLY] Note: The vehicle or vessel in which the organic item is transported does not count as a package or container for purposes of this section.	<input type="checkbox"/> Packaged in sealed, tamper-evident packaging. Skip to Section IV. <input type="checkbox"/> Packaged but not in sealed, tamper-evident packaging or containers (e.g., reusable containers like RPCs or lugs). Skip to Section IV. <input type="checkbox"/> Unpackaged.
2. Are the organic items transported from a certified organic location?	<input type="checkbox"/> Yes. <input type="checkbox"/> No.
3. Are the organic items transported to a certified organic location?	<input type="checkbox"/> Yes. <input type="checkbox"/> No.
4. Do the certified organic locations conduct all loading and receiving?	<input type="checkbox"/> Yes, and this operation maintains an Uncertified Operation Affidavit for transporters transporting unpackaged organic items. <input type="checkbox"/> No.
5. If this operation answered No to any of #2 – 4, does this operation have documentation showing the unpackaged organic items are transported via a certified organic transporter?	<input type="checkbox"/> Yes. <input type="checkbox"/> No.

SECTION IV: Monitoring—Fraud Prevention Plan

An operation's description of monitoring practices and procedures must include those designed to prevent organic fraud, as appropriate to the certified operation's activities, scope, and complexity. (§205.201(a)(3)). All operations must have a Fraud Prevention Plan, which must be included in an operation's organic plan. This Fraud Prevention Plan

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must describe an operation’s monitoring practices and procedures to prevent organic fraud. Measures must be implemented to prevent contamination and commingling and to mitigate against fraud.

The questions below are all mandatory. Operations will be able to answer YES to any Yes/No questions and have at least one option selected for each SELECT ALL THAT APPLY question.

A. Overview	
1. <u>Supplier Map or Inventory</u> . Does this operation maintain an audit trail map or inventory of its supply chain that identifies suppliers?	<input type="checkbox"/> Yes, such documentation is maintained in the form of Module H2, Module H4, or in the form of a Supplier Inventory, Supplier List, Approved Vendor List, Audit Trail Map, etc.
2. <u>Verification of Suppliers/Supplier Due Diligence</u> . Has this operation implemented a process to verify suppliers and minimize supplier risk to organic integrity?	<input type="checkbox"/> Yes, see Section I above for description of this operation’s ongoing Verification of Suppliers or Supplier Due Diligence practices.
3. <u>Monitoring and Corrective Actions</u> . What tools does this operation use to monitor its practices, to assess and verify the effectiveness of mitigation measures, and to take corrective actions if deficiencies are noted?	<input type="checkbox"/> Formal monitoring and recordkeeping. <input type="checkbox"/> Informal visual monitoring. <input type="checkbox"/> Procedures for identification of issues and the implementation of Corrective Actions where deficiencies are identified. <input type="checkbox"/> Responding to Noncompliances and Corrective Actions identified by Americert and ensuring that Corrective Actions are effectively implemented. <input type="checkbox"/> If this operation is subject to mandatory health or safety inspections, then maintaining documentation, including any inspections conducted by those authorities, corrective actions requested, and how those corrective actions were remedied. <input type="checkbox"/> Other (describe):
4. <u>Reporting to NOP and Americert</u> . Does this operation have a process for reporting suspected organic fraud to Americert and the NOP?	<input type="checkbox"/> Yes, if suspected organic fraud is found, this operation will immediately notify Americert. This operation will also notify the NOP.
B. Critical Control Points: This operation must identify critical control points in this operation's supply chain where organic fraud <u>or loss of organic status</u> is most likely to occur. Please choose from the options below any critical control points identified by this operation (whether or not they have actually occurred in the past): [SELECT ALL THAT APPLY]	
<input type="checkbox"/> Use of uncertified, exempt entity in purchasing or supply chain. <input type="checkbox"/> Importing organic items. <input type="checkbox"/> Purchased or inbound load arrives damaged or with the apparent intrusion of pests. <input type="checkbox"/> Purchased or inbound load has apparent issues with organic integrity. <input type="checkbox"/> Use of uncertified, exempt entity for offsite storage of organic raw materials. <input type="checkbox"/> Failure to prevent contamination or commingling in organic production, storage, or transport (e.g., employees incorrectly store organic with nonorganic or vice versa). <input type="checkbox"/> Mistakenly identifying or labeling a nonorganic product as organic. <input type="checkbox"/> Receiving/Brokering/Distributing nonorganic rather than the organic item. <input type="checkbox"/> Use of pest control substances in organic production or storage areas. <input type="checkbox"/> Use of cleaners or sanitizers requiring water rinse or subsequent event prior to organic production. <input type="checkbox"/> Use of sanitizers requiring residue testing (e.g., use of chlorine on organic raw materials or quaternary ammonium sanitizers on organic contact surfaces). <input type="checkbox"/> Failure to clean or purge shared-use equipment before use in organic production. <input type="checkbox"/> Failure to ensure only compliant, approved labels are printed and used. <input type="checkbox"/> Organic item has a fraud history generally in the United States market. <input type="checkbox"/> Organic item is stored or transported in raw or unpackageged condition. <input type="checkbox"/> Other (describe):	
C. Vulnerability Assessments: This operation has conducted a vulnerability assessment to identify weaknesses in this operation's internal practices, procedures, and supply chain by: [SELECT ALL	

THAT APPLY]	
<input type="checkbox"/> Undergoing formal external (third party) audits or inspections such as GMP, GAP, SQF, Primus, FDA, USDA, Kosher, Non-GMO, Food Safety, or other governmental or private agency auditing. <input type="checkbox"/> Conducting internal audits such as mock product recalls, traceability or mass balance exercises, food safety audits, or internal audits of labels, policies, procedures, or SOPs. <input type="checkbox"/> Conducting sample analysis of raw material and/or product to monitor for potential contamination. <input type="checkbox"/> Conducting water tests to monitor water quality. <input type="checkbox"/> Monitoring employee training and updating/revising it as needed. <input type="checkbox"/> Conducting initial or additional Organic Fraud Screening to determine this operation's highest risk organic items. <input type="checkbox"/> Identifying vulnerabilities inherent to organic items (such as fraud history in the region item is from, crossing multiple borders, high corruption levels in country of origin, organic item composition, and its raw or unpackaged status) handled by this operation. <input type="checkbox"/> Identifying business pressures (such as market price, market fluctuation, scarce supplies, production challenges, or high demand) that may contribute to organic fraud for organic items handled by this operation. <input type="checkbox"/> Implementing processes or guidelines for internal whistleblowers to report concerns and be protected. <input type="checkbox"/> Other:	

D. Verification of Product Received, Acquired, Purchased, Brokered, or Used: This operation must implement practices to verify the organic status of any product received, acquired, purchased, brokered, or used by this operation. Verification records must be available for review at inspection.

<p>1. Please select from the options to the right the following MANDATORY verification measures this operation has implemented:</p>	<input type="checkbox"/> Verifying that organic items received/purchased/brokered are from approved suppliers. <input type="checkbox"/> Obtaining updated supplier documentation of organic status at least annually and confirming the item purchased or received is listed on that documentation. <input type="checkbox"/> Having a practice/policy that the approved organic supplier list is verified against bill of lading (BOL) or packaging/container labels to verify that incoming organic items are sent by approved suppliers. <input type="checkbox"/> Requiring that suppliers of organic items identify such products as organic in all invoices, bills of lading, trip tickets, and shipping documents and promptly having the supplier correct any documentation that does not indicate the organic status of ingredients and products. <input type="checkbox"/> Having policies, practices, or procedures in place to quarantine non-compliant, non-conforming, or questionable product (product for which sufficient documentation of organic status has not been received) to prevent it from being released as organic until the issue of its organic status is resolved. <input type="checkbox"/> For products purchased or received from uncertified entities, maintaining receipts, invoices, shipping or receiving manifests, shipping logs, bills of lading, or transaction certificates that document the uncertified entity, last certified organic source, and supplier's lot number. <input type="checkbox"/> Confirming this operation's audit trail documentation identifies organic products as "100% Organic," "Organic," or "Made with Organic (Specified Ingredients or Food Groups)," whichever is applicable. <input type="checkbox"/> For items only brokered, having a policy or practice of having the buyer/receiver notify this operation immediately if the organic integrity of the load appears impaired. <input type="checkbox"/> Having the organic items clearly identified as organic during the transaction and clearly identified with a traceability identifier. <input type="checkbox"/> Maintaining bills of lading and/or shipping records of products shipped by or released from supplier/copacker which show the name of the product, its organic status (i.e., 100% Organic, Organic, or Made with Organic), the amount of product or crop, a unique numerical traceability identifier, from whom and where shipped, the date of shipping, and to whom it was shipped or released. <input type="checkbox"/> Maintaining invoices or bills issued by the supplier/copacker for fees or sales of product to this operation which show the organic status (i.e., 100% Organic, Organic, or Made with Organic) of products or crops handled, produced, or packed; the amount of such products handled; the associated unique numerical traceability identifier, and the date. <input type="checkbox"/> Implementing recordkeeping measures to support full traceability by confirming the inbound/purchase and outbound/sales audit trail documentation identify the last certified operation that handled the product, transfer of ownership, and transportation of the organic product. <input type="checkbox"/> Documenting supplier's lot number with information on product received, date received, amount received, and supplier. <input type="checkbox"/> For organic items physically received from uncertified operations but not purchased by this operation, maintaining Inbound Acquisition notifications from the company having organic items shipped to this operation. The Inbound Acquisition notification must note the anticipated date/period to be received, item to be received, its organic status, amount to be received, from where it will be received, and a traceability identifier that links to the inbound shipping documentation. <input type="checkbox"/> For unpackaged organic items or organic items that are not sealed, tamper-evident that are received from locations (such as third-party warehouses) NOT listed on the certified supplier's organic certificate, quarantining the organic items until documentation is obtained proving the location from which received is certified organic. And, if such documentation cannot be obtained, allocating this load to nonorganic production.
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	<input type="checkbox"/> Training receiving staff not to commingle organic and nonorganic. <input type="checkbox"/> Maintaining a practice, policy, or procedure for Vendor/Supplier Approval and/or Verification which includes verifying the vendor/supplier's organic status on the Organic Integrity Database. <input type="checkbox"/> Having policies, practices, or procedures in place to address organic items (inbound or outbound) whose packaging has been compromised or damaged (such that the organic integrity of the product is in question), contaminated, damaged in shipping or storage, commingled, or subject to phytosanitary treatment. Reports or documentation must be maintained of such incidents noting the product compromised, the amount of product compromised, and the disposition of the compromised product (e.g., destroyed, removed from organic inventory, sold as nonorganic, etc.).Organic products whose packaging is damaged to the point of risking organic integrity are not represented as organic. <input type="checkbox"/> Other (describe):
<p>2. Please choose from the options to the right any additional mitigation practices and procedures performed or maintained by this operation: [SELECT ALL THAT APPLY]</p>	<input type="checkbox"/> Not transporting ingredients or products in unpackaged bulk condition. <input type="checkbox"/> Verifying received product against COA provided by supplier. <input type="checkbox"/> For products purchased or received from uncertified entities, inspecting inbound load to confirm organic status. <input type="checkbox"/> Training receiving employees on proper receiving procedures. <input type="checkbox"/> Upon receipt of organic items, comparing the labeling and packaging to the bill of lading and invoices, as well as to the organic certificate for the supplier (for last certified organic source), to ensure that the product received is the product this operation ordered or anticipated receiving. <input type="checkbox"/> Conducting truck inspections of inbound loads (and having policies that any offsite storage locations do the same) to verify the following: (a) organic integrity of inbound load appears intact; (b) no signs of contamination or commingling; (c) the product received is the product and amount ordered; and (d) nonretail packaging or containers are labeled organic and contain a traceability identifier linking the container to audit trail documentation. <input type="checkbox"/> If this operation treats, cleans, or sanitizes the organic items purchased or received by this operation, disclosing this information (identification of input, when used, and how used) in this operation's Modules as a material to be used and having it approved by Americert prior to use. <input type="checkbox"/> Confirming that all nonretail containers received are identified as organic when containing organic. <input type="checkbox"/> Confirming that all nonretail containers received contain information linking the container to audit trail documentation. <input type="checkbox"/> Auditing this operation's suppliers. <input type="checkbox"/> All inbound organic items are received/transported in sealed, tamper-evident packaging or containers. <input type="checkbox"/> Other (describe):
<p>E. Mitigation Measures: In addition to the "Verification of Suppliers" measures noted in Section I above and the "Verification of Product Received" measures noted in Part D above, this operation must implement additional mitigation measures to correct vulnerabilities and minimize risks.Operations must implement measures necessary to prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances. (§205.272).</p>	
<p>1. Please select from the options to the right the following MANDATORY mitigation measures this operation has implemented:</p>	<input type="checkbox"/> Monitoring for risks of contamination or commingling. <input type="checkbox"/> Verifying that the only products marketed, sold, stored, distributed, or represented as organic by this operation are those listed on the most recent organic certificate for this operation. <input type="checkbox"/> Ensuring that all nonretail containers used in storage or transport of raw materials or final product contain labeling identifying the contents as organic: by using the word "organic" or USDA seal, by using abbreviations or acronyms (such as "OG"), by using temporary labels or signage, by having the nonretail container contain retail product that has organic status clearly indicated on it, or by some other method approved by Americert. <input type="checkbox"/> Ensuring that all nonretail containers used in storage or transport of raw materials or final product contain a traceability identifier. <input type="checkbox"/> Ensuring that organic status is noted for the organic items for all sales and outbound shipping records and for all purchase, acquisition, and inbound receiving records. <input type="checkbox"/> Other (describe):
<p>2. Please choose from the options to the right any additional overall mitigation practices and procedures performed or</p>	<input type="checkbox"/> Not handling nonorganic products or ingredients. <input type="checkbox"/> No nonorganic ingredients or processing aids used in organic production. <input type="checkbox"/> No product is ever removed from its primary unit packaging. <input type="checkbox"/> Retail unit organic packages are not opened at the facility, and there is no modification of the retail unit packaging labels performed at this facility. <input type="checkbox"/> Product is not opened, repackaged, or relabeled. <input type="checkbox"/> This operation has established an Organic Fraud Prevention or Mitigation Team and has identified the names and roles of team members. <input type="checkbox"/> Obtaining management commitment to Fraud Prevention Plan.

<p>maintained by this operation: [SELECT ALL THAT APPLY]</p>	<p><input type="checkbox"/> Conducting employee training on Fraud Prevention Plan. <input type="checkbox"/> Implementing Incident Management Procedures for if fraud is detected or identified. <input type="checkbox"/> Utilizing an industry fraud prevention private initiative, method, or tool (such as GFSI Requirements, FSMA/FDA Traceability Requirements, OTA Organic Fraud Prevention Solutions). <input type="checkbox"/> Not conducting spot purchases. <input type="checkbox"/> Other (describe):</p>
<p>3. For operations utilizing offsite storage that is not certified organic, please select from the options to the right the following MANDATORY mitigation measures this operation has implemented:</p>	<p><input type="checkbox"/> N/A, no offsite storage. <input type="checkbox"/> N/A, this operation does not utilize offsite storage locations that are not certified organic.</p> <p>Mitigation in Offsite Storage:</p> <p><input type="checkbox"/> Having a practice and policy that any organic items, when received and stored by that uncertified storage location, are packaged in sealed, tamper-evident packaging or containers labeled for either retail sale or wholesale prior to arrival at the offsite storage location and remain in that sealed, tamper-evident packaging (wholesale or retail) while at the uncertified storage. <input type="checkbox"/> Having a practice or policy that, while at the storage location, the storage location does not process, combine, aggregate, cull, label, or repackage this operation's products. This operation also does not open, break, or otherwise disturb the primary unit packaging, even to conduct sampling, culling, or other purposes. <input type="checkbox"/> Having a practice or policy that ensures organic items stored are labeled with organic status and labeled with a traceability identifier. <input type="checkbox"/> Having practices or policies that warehouses and storage facilities must notify this operation of potential product contamination in storage or transit or damage to product in transit or storage. <input type="checkbox"/> Having a practice and policy that product that has been identified as contaminated or damaged is discarded, destroyed, or allocated to nonorganic sales, and such activities are documented as deductions from inventory. <input type="checkbox"/> Maintaining bills of lading and/or receiving records of products received by the storage facility which show the name of the product, its organic status, the amount of product or crop, a traceability identifier, the date of receiving, and from whom it was received. <input type="checkbox"/> Maintaining current inventories of finished product held by the storage facility on this operation's behalf. <input type="checkbox"/> Maintaining bills of lading and/or shipping records of products shipped by or released from storage facility which show the name of the product, its organic status, the amount of product or crop, a traceability identifier, the date of shipping, and to whom it was shipped or released. <input type="checkbox"/> Other (describe):</p>
<p>4. Please select the mitigation measures this operation has implemented in Transport: [SELECT ALL THAT APPLY]</p>	<p>Mitigation in Transport:</p> <p><input type="checkbox"/> Organic items are transported to or from a certified organic operation. <input type="checkbox"/> If transported to or from an operation not certified organic, the organic item is packaged in sealed, tamper-evident packaging/containers that are labeled for either retail sale or wholesale. <input type="checkbox"/> Marine Surveyor reports are maintained for vessel cargo holds. <input type="checkbox"/> Organic items are not transported in unpackaged bulk condition. <input type="checkbox"/> Reusable packaging or containers (if used) are cleaned/sanitized prior to use for organic packing/transport or the containers are dedicated for organic use only or for specific organic items only. <input type="checkbox"/> Organic items are transported in dedicated organic loads or transport vehicles. <input type="checkbox"/> Other:</p>
<p>5. For operations that arrange transport, please select from the options to the right the</p>	<p><input type="checkbox"/> N/A, this operation does not arrange transport. <input type="checkbox"/> N/A, transporter is certified organic.</p> <p>Mitigation in Arranged Transport:</p> <p><input type="checkbox"/> This operation confirms by written agreement, notice, or contract that the transporter (and any transload or cross-dock locations used) does not do other handling such as process, combine, split, containerize, pack/repack, treat, sort, open, enclose, label/relabel, or repackage this operation organic products. <input type="checkbox"/> This operation maintains written agreements, notices, or contracts with transporters regarding measures to protect organic products from contamination and commingling. <input type="checkbox"/> This operation has practices or policies that transporters notify this operation of potential product contamination in transit or damage to the in-transit product.</p>

<p>following MANDATORY mitigation measures this operation has implemented:</p>	<p><input type="checkbox"/> If this operation has unpackaged organic items transported, it maintains the Uncertified Operation Affidavit on hand for transporters involved in transport of that item, updating these at least annually.</p> <p><input type="checkbox"/> Organic items are transported in dedicated organic loads.</p> <p><input type="checkbox"/> Organic items are transported in dedicated organic transport vehicles.</p> <p><input type="checkbox"/> This operation has loading policies or practices to prevent commingling of organic with organic.</p> <p><input type="checkbox"/> Organic items are only transported packaged in sealed, tamper-evident packaging or containers that are clearly marked as organic with a traceability identifier.</p> <p><input type="checkbox"/> Organic and nonorganic products have designated areas in the cargo area of vehicles.</p> <p><input type="checkbox"/> Other:</p>
<p>6. If this operation is responsible for physically loading or receiving organic items, please select from the options to the right any mitigation measures this operation has implemented: [SELECT ALL THAT APPLY]</p>	<p><input type="checkbox"/> N/A, this operation is not responsible for physically loading or receiving organic items.</p> <p><input type="checkbox"/> This operation packages or containerizes the organic items prior to transport.</p> <p><input type="checkbox"/> This operation only loads or receives organic items that are packaged or containerized.</p> <p><input type="checkbox"/> Inspections of inbound and outbound transport vehicles are conducted before loading or unloading to ensure that there are no potential sources of contamination and no risks to organic integrity.</p> <p><input type="checkbox"/> Affidavits, Clean Truck Affidavits, or other documentation is maintained showing truck is cleaned prior to loading.</p> <p><input type="checkbox"/> This operation maintains truck cleaning procedures documented in a policy or SOP.</p> <p><input type="checkbox"/> This operation checks for wash tags prior to loading.</p> <p><input type="checkbox"/> Tanker/Container seals are inspected prior to unloading to confirm they match those affixed at last certified organic source.</p> <p><input type="checkbox"/> This operation maintains bills of lading and/or shipping records of products transported by the transporter which show the name of the product, its organic status, the amount of product or crop, a traceability identifier, the date of shipping, and to whom it was shipped or released.</p> <p><input type="checkbox"/> Other:</p>
<p>7. Please select the following MANDATORY mitigation measures this operation has implemented for General Physical Facility management:</p>	<p>General Physical Facility Mitigation:</p> <p><input type="checkbox"/> Conducting facility walk throughs to visually confirm organic and nonorganic raw materials, in-process products, and final products are not mixed or commingled.</p> <p><input type="checkbox"/> Maintaining (and updating as needed to reflect changes) a facility map identifying organic production and storage areas.</p> <p><input type="checkbox"/> Maintaining (and updating as needed to reflect changes) a process flow identifying the flow of organic production, purchasing, receiving, and outbound shipments.</p> <p><input type="checkbox"/> If packaging must be opened to conduct sampling, having policies, procedures, or practices in place to conduct such sampling in a manner that protects the organic integrity of the product sampled or it must cease to be designated and represented as organic. Records are maintained of any such sampling events.</p> <p><input type="checkbox"/> For inputs used in organic production, verifying purchased/used cleaners, sanitizers, pest control substances, and any nonorganic ingredients or processing aids are compliant, are listed in the approved Modules, and have any supporting documentation needed for compliance maintained on site.</p> <p><input type="checkbox"/> Other (describe):</p>
<p>8. Please select the following mitigation measures this operation has implemented in Production and Labeling: [SELECT ALL THAT APPLY]</p>	<p><input type="checkbox"/> N/A, no production, relabeling, or labeling occurs at physical facility.</p> <p>Mitigation in Production or Processing:</p> <p><input type="checkbox"/> Ingredients are palletized or grouped and marked as organic for production.</p> <p><input type="checkbox"/> Organic ingredients, crops, and products remain in original packaging during staging for production.</p> <p><input type="checkbox"/> In-process containers are dedicated organic.</p> <p><input type="checkbox"/> In-process containers are marked/labeled as organic.</p> <p><input type="checkbox"/> In-process containers are fully sealed or enclosed.</p> <p><input type="checkbox"/> Production areas or lines are segregated or marked for “organic use only” when organic handling is being conducted.</p> <p><input type="checkbox"/> Organic materials are not commingled with nonorganic materials.</p> <p><input type="checkbox"/> Organic production occurs prior to nonorganic production or on dedicated “organic only” days.</p> <p><input type="checkbox"/> Only organic is present in production area when organic is being run.</p> <p><input type="checkbox"/> Other (describe):</p>

	<p>Mitigation in Labeling:</p> <ul style="list-style-type: none"> <input type="checkbox"/> During organic production, verifying that only approved labels and printed packaging are used. <input type="checkbox"/> Confirming nonorganic product is not mistakenly labeled or identified as organic. <input type="checkbox"/> Confirming organic raw material or product is labeled organic. <input type="checkbox"/> Exercising label control by conducting internal audits to verify that any labels or packaging used, purchasing, or ordered are as approved with the last certification renewal. <input type="checkbox"/> Removing any labels which are not compliant or not currently approved by Americert from the facility. <input type="checkbox"/> For any electronic copies of labels which are not compliant or not approved by Americert, ensuring that they are deleted or clearly marked as not compliant and not to be used or printed. <input type="checkbox"/> Reviewing and auditing website, online storefronts (such as Amazon, Walmart, etc.), and online marketing materials to ensure that the organic products, labels, and packaging depicted are limited to those that are compliant and currently approved by Americert. <input type="checkbox"/> Maintaining a formal notebook, guide, or binder for staff which depicts the labels and printed packaging currently approved by Americert. <input type="checkbox"/> Other (describe):
<p>9. Please select the following additional mitigation measures this operation has implemented with regard to Storage:</p>	<p>Mitigation in Storage:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Training the employees on proper storage procedures. <input type="checkbox"/> Storing raw materials, packaging, and product elevated off the flooring. <input type="checkbox"/> Storing raw materials, packaging, and product in closed/sealed non-permeable storage containers before and after processing, in its original packaging from supplier, or in closed/sealed non-permeable final retail packaging. <input type="checkbox"/> Ensuring organic products and ingredients are stored segregated from nonorganic products and ingredients in a manner which makes them clearly identifiable as organic and prevents contact between organic and nonorganic products and ingredients. <input type="checkbox"/> Visually monitoring to verify that pest control substances, cleaners, and sanitizers are stored away from organic production and storage areas. <input type="checkbox"/> Dedicating storage areas for organic raw materials, in-process items, and/or products. <input type="checkbox"/> Clearly marking the organic storage areas as for organic only. <input type="checkbox"/> Ensuring organic crops, products, or ingredients are clearly marked as organic. <input type="checkbox"/> Organic only facility. <input type="checkbox"/> Storing organic above nonorganic. <input type="checkbox"/> Not storing organic items in unpackaged bulk condition. <input type="checkbox"/> Not removing organic items from their primary unit packaging or repacking or packing. <input type="checkbox"/> Not storing or commingling organic with nonorganic. <input type="checkbox"/> Not commingling individual organic and nonorganic retail packages in storage. <input type="checkbox"/> Storing organic ingredients separately in an area marked, segregated, and designated for organic only. <input type="checkbox"/> No nonorganic ingredients or processing aids used. <input type="checkbox"/> Organic packaging or labels are stored in dedicated organic area or shelf. <input type="checkbox"/> Clearly marking and identifying as organic the final products packed in sealed, tamper-evident packaging, even if units of final organic product are not segregated from nonorganic product. <input type="checkbox"/> Other (describe):
<p>10. Please select the following mitigation measures this operation has implemented with regard to Cleaning and Sanitation:</p>	<ul style="list-style-type: none"> <input type="checkbox"/> N/A, unpackaged organic items do not have direct contact with any equipment or contact surfaces or with cleaners or sanitizers. <p>Mitigation in Cleaning and Sanitation:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Dedicating as solely for organic use all equipment, containers, utensils, and organic contact surfaces used. <input type="checkbox"/> Prior to use in organic production, thoroughly cleaning all shared use equipment, containers, utensils, and organic contact surfaces. <input type="checkbox"/> Utilizing a materials or heat purge on shared use equipment. <input type="checkbox"/> Maintaining cleaning logs (or SOPs, Wash Tags, or other records) to confirm shared use equipment is cleaned prior to use in organic production. <input type="checkbox"/> Maintaining purge logs (or SOPs, Purge Tags, or other records) documenting amounts, dates, and times of purges of shared use equipment. <input type="checkbox"/> Conducting and documenting any residue testing conducted (if using quaternary ammonium sanitizers on organic contact surfaces or chlorine on organic

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	ingredients or unpackaged product). <input type="checkbox"/> Not using cleaners/sanitizers in contact with organic raw materials or unpackaged organic product. <input type="checkbox"/> Marking equipment for "organic use only" when organic handling is being conducted or otherwise segregating it. <input type="checkbox"/> Utilizing appropriate water rinses in cleaning and sanitation. <input type="checkbox"/> Other (describe):
11. Please select the following mitigation measures this operation has implemented with regard to Pest Control:	Mitigation in Pest Control: <input type="checkbox"/> Monitoring of facility for pest problems and documenting same. <input type="checkbox"/> Monitoring and reviewing pest control service provider records to confirm compliance with the pest control portion of organic plan. <input type="checkbox"/> Not using pest control substances in organic production or storage areas. <input type="checkbox"/> Other (describe):

SECTION V: Attestation

I attest this information is accurate and complete.	<input type="checkbox"/> Yes
Date Completed:	
Name of Person Completing Form:	