



AMERICERT INTERNATIONAL

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Guidance on Completing Handler Organic System Plan Modules:

Module 5 Monitoring Practices and Procedures, Supplier Verification, and Fraud Prevention Plan

03/10/24

Module 5 covers monitoring, supplier verification, and fraud prevention. Depending on whether the operation has a physical facility or not, the operation will complete either Module H5A or Module H5B. Both cover monitoring, supplier verification, and fraud prevention, but one is designed for operations without a physical facility while the other covers additional aspects for operations with a physical facility.

Module H5A is to be completed by operations without a physical facility.

Module H5B 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)).

§ 205.201 Organic Production and Handling System Plan

(a) The producer or handler of a production or handling operation, except as exempt under [§ 205.101](#), intending to sell, label, or represent agricultural products as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))" must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include:

- (1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;
 - (2) A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable;
 - (3) 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;
 - (4) A description of the recordkeeping system implemented to comply with the requirements established in [§ 205.103](#);
 - (5) 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; and
 - (6) Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations.
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Section 1: Verification of Suppliers

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. At a minimum, operations must engage in certain mandatory practices to verify the last certified organic sources. These mandatory minimum practices are as follows:

- Maintain the following:
 - 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 and updates 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.
- Verify the following:
 - 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.

B. Verification of Copackers by Brand Owners. Operations that are private label brand owners/marketers that contract an independently certified copacker to produce, pack, manufacture, process, or handle organic items into the brand owner's packaging must engage in certain mandatory minimum verification practices as follows:

- This operation has listed all copackers used in Module H2 or H3 Product List.
- This operation obtains approval from Americert for each copacker **prior to use**.
- This operation maintains the following:
 - 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.



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- 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.

In addition, copies of the copacker's organic certificates (and product detail listings) and the Private Label Agreements must be provided with the application. 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. 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.

If the Brand Owner also purchases, procures, brokers, takes title to, or takes physical possession of ingredients used in their products that are packed by the copacker, the Brand Owner must also maintain organic certificates for all ingredients it purchases or procures, must disclose these ingredients in their Product List (Module H2 or Module H3), and must obtain documentation that traces back to the last certified organic source.

Please note that Brand Owners must also submit to Americert with their application copies of all organic brand labels (nonretail and retail) that they have the copacker pack into on their behalf.

C. Verification of Brand Owners by Copackers. If the brand owner is certified organic, the copacker should maintain a current copy of the brand owner's organic certificate, update it at least annually, and verify that it lists the product this operation packs for the brand owner (if the product packed is not packed into retail packaging that is sealed and tamper-evident). Brand owners that are distributing nonretail (bulk wholesale) packaged product (not containing individual retail units) must be certified organic for distribution of those wholesale bulk organic items. If the brand owner is procuring or sourcing ingredients for the copacker, the brand owner must also be certified organic for that ingredient sourcing activity.

D. Verification of Uncertified Operations in Supply Chain. In the purchasing, receiving, or sourcing of organic items, if an operation purchases, brokers, trades, receives, or distributes from an uncertified handler in the supply chain between this operation and the last certified organic operation in the supply chain, such operations must be disclosed in the OSP and verified by an operation. Examples of such entities include: brokers, sellers, marketers, sales departments, distributors, order processors, sales agents/companies, warehouses, or uncertified 'sister' or 'parent' companies of certified entities.

With the USDA NOP's publication of the Strengthening Organic Enforcement rule in January 2023, many previously exempt handlers must now be certified organic. Organic certification is now required for the following types of operations:

- Storage facilities or warehouses receiving organic product that is unpackaged or is packaged but not in sealed, tamper-evident packaging.
- Brokers, traders, wholesalers, and distributors who sell (or facilitate sale of) organic products that are not in sealed and tamper-evident final retail packaging.
- Importers or exporters of organic products into the United States.
- Private label or brand owners who purchase organic ingredients for their co-packers, sell organic products in nonretail packaging, or sell finished organic products in packaging that is not sealed or tamper-evident.
- Operations that provide transport or transloading services that unload unpackaged organic products into uncertified facilities or storage areas before loading into the next transport vehicle. Certification of location where unpackaged organic products are loaded/unloaded is required.



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- 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.
- Wholesalers that sell unpackaged products or nonretail-packaged products.

Wholesale bulk organic items must be purchased, brokered, traded, or distributed 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. Uncertified handlers may only sell, broker, or distribute organic items packaged in sealed, tamper-evident packaging or containers that are labeled for retail sale, and these products must remain in that sealed, tamper-evident retail packaging until received by a buyer or this operation's designated storage location.

The remaining exemptions can be found in § 205.101 of the NOP regulations:

§ 205.101 Exemptions from Certification

The following operations in [paragraphs \(a\)](#) through [\(h\)](#) of this section are exempt from certification under [subpart E of this part](#) and from submitting an organic system plan for acceptance or approval under [§ 205.201](#) but must comply with the applicable organic production and handling requirements of [subpart C of this part](#), the applicable labeling requirements of [subpart D of this part](#), and any requirements described in [paragraphs \(a\)](#) through [\(i\)](#) of this section.

(a) A production or handling operation that sells agricultural products as "organic" but whose gross agricultural income from organic sales totals \$5,000 or less annually.

(b) A retail establishment that does not process organically produced agricultural products.

(c) A retail establishment that processes, at the point of final sale, agricultural products certified under this part as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."

(d) A handling operation that only handles agricultural products that contain less than 70 percent organic ingredients (as described in [§ 205.301\(d\)](#)) or that only identifies organic ingredients on the information panel.

(e) An operation that only receives, stores, and/or prepares for shipment, but does not otherwise handle, organic agricultural products that:

(1) Are enclosed in sealed, tamper-evident packages or containers prior to being received or acquired by the operation; and

(2) Remain in the same sealed, tamper-evident packages or containers and are not otherwise handled while in the control of the operation.

(f) An operation that only buys, sells, receives, stores, and/or prepares for shipment, but does not otherwise handle, organic agricultural products already labeled for retail sale that:

(1) Are enclosed in sealed, tamper-evident packages or containers that are labeled for retail sale prior to being received or acquired by the operation; and

(2) Remain in the same sealed, tamper-evident packages or containers that are labeled for retail sale and are not otherwise handled while in the control of the operation.

(g) A Customs broker (per [19 CFR 111.1](#)) that only conducts customs business but does not otherwise handle organic agricultural products.

(h) An operation that only arranges for the shipping, storing, transport, or movement of organic agricultural products but does not otherwise handle organic products.

Operations that use uncertified handlers in their supply chain must engage in the following mandatory minimum practices:

- Maintain the following:



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- 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 from that operation, and the last certified organic source for those items.
- 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.
- Have 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.
- 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.
- 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.
- Verifying or ensuring the following:
 - 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.

Ingredients that are purchased, brokered, received, or distributed from operations that choose exemption from organic certification may NOT be used as ingredients in organic products or claimed as organic by another operation.

Section 2: Due Diligence in Offsite Storage

If offsite storage locations are used by an operation for warehousing, holding, or offsite storage, a list must be provided of each storage or warehouse facility used including the name, location, and phone number. Americert does not consider fulfillment centers (such as KeHE, UNFI, or Amazon warehouse) to be offsite storage, as long as the items sent to those fulfillment centers are packaged in retail packaging that is sealed, tamper-evident. In addition, organic certificates or Uncertified Operation Affidavits must be submitted for each such location. Both the organic certificate and Uncertified Operation Affidavit must be updated at least annually. 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).

Section 3: 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 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.



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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.

Certification is required for the following transporters/entities:

- Operations that provide transport or transloading services that unload *unpackaged* organic products into *uncertified* 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.

Operations must ensure or confirm that:

- 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.

Organic certificates must be maintained for transporters that do other handling such as combine, containerize, pack/repack, treat, sort, open, enclosed, or label.

Section 4: 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 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.

Compliant Fraud Prevention Plans share many of the same core elements:

- A supplier map or inventory
- Verification of Suppliers/Supplier Due Diligence
- Monitoring and Corrective Actions
- Reporting to NOP and Americert
- Critical Control Points
- Vulnerability Assessments
- Verification of Product Received, Acquired, Purchased, or Brokered
- Mitigation Measures

Each of these will be covered below.

A. Supplier Map or Inventory. Operations must maintain an audit trail map or inventory of its supply chain that identifies suppliers. This documentation may be 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.



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B. Verification of Suppliers/Supplier Due Diligence. Operations must implement a process to verify suppliers and minimize supplier risk to organic integrity. This can be done by implementing the mandatory procedures and practices referenced in Section 1 (Verification of Suppliers) above.

C. Monitoring and Corrective Actions. Operations must have implemented one or more measures to monitor their practices, to assess and verify the effectiveness of mitigation measures, and to take corrective actions if deficiencies are noted. Examples of such measures include, but are not limited to, the following:

- Formal monitoring and recordkeeping.
- Informal visual monitoring.
- Procedures for identification of issues and the implementation of Corrective Actions where deficiencies are identified.
- Responding to Noncompliances and Corrective Actions identified by Americert and ensuring that Corrective Actions are effectively implemented.
- 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.

D. Reporting to NOP and Americert. Operations must have a process for reporting suspected organic fraud to Americert and to the NOP. If suspected organic fraud is found, an operation must immediately notify Americert and must also notify the NOP.

E. Critical Control Points. Operations must identify one or more critical control points in this operation's supply chain where organic fraud or loss of organic status is most likely to occur (whether or not they have actually occurred in the past). Examples of such critical control points include, but are not limited to, the following:

- Use of uncertified, exempt entity in purchasing or supply chain.
- Importing organic items.
- Purchased or inbound load arrives damaged or with the apparent intrusion of pests.
- Purchased or inbound load has apparent issues with organic integrity.
- Use of uncertified, exempt entity for offsite storage of organic raw materials.
- Failure to prevent contamination or commingling in organic production, storage, or transport (e.g., employees incorrectly store organic with nonorganic or vice versa).
- Mistakenly identifying or labeling a nonorganic product as organic.
- Receiving/Brokering/Distributing nonorganic rather than the organic item.
- Use of pest control substances in organic production or storage areas.
- Use of cleaners or sanitizers requiring water rinse or subsequent event prior to organic production.
- Use of sanitizers requiring residue testing (e.g., use of chlorine on organic raw materials or quaternary ammonium sanitizers on organic contact surfaces).
- Failure to clean or purge shared-use equipment before use in organic production.
- Failure to ensure only compliant, approved labels are printed and used.
- Organic item has a fraud history generally in the United States market.
- Organic item is stored or transported in raw or unpackaged condition.

F. Vulnerability Assessments. Operations must conduct one or more vulnerability assessments to identify weaknesses in their internal practices, procedures, and supply chain. Examples of such assessments include, but are not limited to, the following:

- 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.



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- 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.
- Conducting sample analysis of raw material and/or product to monitor for potential contamination.
- Monitoring employee training and updating/revising it as needed.
- Conducting initial or additional Organic Fraud Screening to determine this operation's highest risk organic items.
- 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.
- 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.
- Implementing processes or guidelines for internal whistleblowers to report concerns and be protected.

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

At a minimum, operations must implement some mandatory verification measures as follows:

- Verifying that organic items received/purchased/brokered are from approved suppliers.
- Obtaining updated supplier documentation of organic status at least annually and confirming the item purchased or received is listed on that documentation.
- Having a practice or 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.
- 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.
- 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.
- 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.
- 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.
- 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.
- Having the organic items clearly identified as organic during the transaction and clearly identified with a traceability identifier.
- Maintaining bills of lading and/or shipping records of products shipped by or released from supplier (or 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.
- Maintaining invoices or bills issued by the supplier (or 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



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or crops handled, produced, or packed; the amount of such products handled; the associated unique numerical traceability identifier, and the date.

- 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.
- Documenting supplier's lot number with information on product received, date received, amount received, and supplier.
- 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.
- 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.
- Training receiving staff not to commingle organic and nonorganic.
- 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.
- Having a policy or practice of having the buyer/receiver notify this operation immediately if the organic integrity of the load appears impaired.
- 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.

Operations may also implement additional verification measures as follows:

- Not transporting ingredients or products in unpackaged bulk condition.
- Verifying received product against COA provided by supplier.
- For products purchased or received from uncertified entities, inspecting inbound load (or having inbound loads inspected) to confirm organic status.
- Training receiving employees on proper receiving procedures.
- 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.
- 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.



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- 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.
- Confirming that all nonretail containers received are identified as organic when containing organic.
- Confirming that all nonretail containers received contain information linking the container to audit trail documentation.
- Auditing this operation's suppliers.
- All inbound organic items are received/transported in sealed, tamper-evident packaging or containers.

H. Mitigation Measures. In addition to the "Verification of Suppliers" measures noted above and the "Verification of Product Received" measures noted 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).

1. *General Overall Measures*. At a minimum, operations must implement some mandatory general overall mitigation measures as follows:

- Monitoring for risks of contamination or commingling.
- 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.
- 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.
- Ensuring that all nonretail containers used in storage or transport of raw materials or final product contain a traceability identifier.
- 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.

Operations may also implement additional general mitigation measures as follows:

- Not handling nonorganic products or ingredients.
- No nonorganic ingredients or processing aids used in organic production.
- No product is ever removed from its primary unit packaging.
- 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.
- Product is not opened, repackaged, or relabeled.
- This operation has established an Organic Fraud Prevention or Mitigation Team and has identified the names and roles of team members.
- Obtaining management commitment to Fraud Prevention Plan.
- Conducting employee training on Fraud Prevention Plan.
- Implementing Incident Management Procedures for if fraud is detected or identified.
- Utilizing an industry fraud prevention private initiative, method, or tool (such as GFSI Requirements, FSMA/FDA Traceability Requirements, OTA Organic Fraud Prevention Solutions).
- Not conducting spot purchases.



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2. Offsite Storage. Operations that utilize offsite storage locations that are not certified organic must implement some minimum mandatory mitigation measures as follows:

- 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.
- 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.
- Having a practice or policy that ensures organic items stored are labeled with organic status and labeled with a traceability identifier.
- 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.
- 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.
- 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.
- Maintaining current inventories of finished product held by the storage facility on this operation's behalf.
- 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.

3. Transport. Operations may implement general transport mitigation measures as follows:

- Organic items are transported to or from a certified organic operation.
- 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.
- Marine Surveyor reports are maintained for vessel cargo holds.
- Organic items are not transported in unpackaged bulk condition.
- 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.
- Organic items are transported in dedicated organic loads or transport vehicles.

Operations that arrange transport by transporters that are not certified organic must implement some minimum mandatory mitigation measures as follows:

- 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/rebel, or repackage this operation organic products.
- This operation maintains written agreements, notices, or contracts with transporters regarding measures to protect organic products from contamination and commingling.
- This operation has practices or policies that transporters notify this operation of potential product contamination in transit or damage to the in-transit product.



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- 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.
- Organic items are transported in dedicated organic loads.
- Organic items are transported in dedicated organic transport vehicles.
- This operation has loading policies or practices to prevent commingling of organic with organic.
- Organic items are only transported packaged in sealed, tamper-evident packaging or containers that are clearly marked as organic with a traceability identifier.
- Organic and nonorganic products have designated areas in the cargo area of vehicles.

Operations that are responsible for physically loading or receiving organic items may also choose to implement additional mitigation measures as follows:

- This operation packages or containerizes the organic items prior to transport.
- This operation only loads or receives organic items that are packaged or containerized.
- 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.
- Affidavits, Clean Truck Affidavits, or other documentation is maintained showing truck is cleaned prior to loading.
- This operation maintains truck cleaning procedures documented in a policy or SOP.
- This operation checks for wash tags prior to loading.
- Tanker/Container seals are inspected prior to unloading to confirm they match those affixed at last certified organic source.
- 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.

4. General Physical Facility. Operations with a physical facility must implement some minimum mandatory mitigation measures as follows:

- Conducting facility walk throughs to visually confirm organic and nonorganic raw materials, in-process products, and final products are not mixed or commingled.
- Maintaining (and updating as needed to reflect changes) a facility map identifying organic production and storage areas.
- Maintaining (and updating as needed to reflect changes) a process flow identifying the flow of organic production, purchasing, receiving, and outbound shipments.
- 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.
- 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.

5. Production and Labeling. Operations that engage in production, processing, or labeling may implement additional mitigation measures as follows:

- Ingredients are palletized or grouped and marked as organic for production.
- Organic ingredients, crops, and products remain in original packaging during staging for production.
- In-process containers are dedicated organic.
- In-process containers are marked/labeled as organic.



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- In-process containers are fully sealed or enclosed.
- Production areas or lines are segregated or marked for “organic use only” when organic handling is being conducted.
- Organic materials are not commingled with nonorganic materials.
- Organic production occurs prior to nonorganic production or on dedicated “organic only” days.
- Only organic is present in production area when organic is being run.
- During organic production, verifying that only approved labels and printed packaging are used.
- Confirming nonorganic product is not mistakenly labeled or identified as organic.
- Confirming organic raw material or product is labeled organic.
- 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.
- Removing any labels which are not compliant or not currently approved by Americert from the facility.
- 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.
- 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.
- Maintaining a formal notebook, guide, or binder for staff which depicts the labels and printed packaging currently approved by Americert.

6. Storage. Operations that engage in storage of organic items may implement additional mitigation measures as follows:

- Training the employees on proper storage procedures.
- Storing raw materials, packaging, and product elevated off the flooring.
- 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.
- 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.
- Visually monitoring to verify that pest control substances, cleaners, and sanitizers are stored away from organic production and storage areas.
- Dedicating storage areas for organic raw materials, in-process items, and/or products.
- Clearly marking the organic storage areas as for organic only.
- Ensuring organic crops, products, or ingredients are clearly marked as organic.
- Organic only facility.
- Storing organic above nonorganic.
- Not storing organic items in unpackaged bulk condition.
- Not removing organic items from their primary unit packaging or repacking or packing.
- Not storing or commingling organic with nonorganic.
- Not commingling individual organic and nonorganic retail packages in storage.
- Storing organic ingredients separately in an area marked, segregated, and designated for organic only.
- No nonorganic ingredients or processing aids used.
- Organic packaging or labels are stored in dedicated organic area or shelf.



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- 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.

7. Cleaning and Sanitation. Operations that engage in cleaning or sanitation of organic contact surfaces or unpackaged organic items may implement additional mitigation measures as follows:

- Dedicating as solely for organic use all equipment, containers, utensils, and organic contact surfaces used.
- Prior to use in organic production, thoroughly cleaning all shared use equipment, containers, utensils, and organic contact surfaces.
- Utilizing a materials or heat purge on shared use equipment.
- Maintaining cleaning logs (or SOPs, Wash Tags, or other records) to confirm shared use equipment is cleaned prior to use in organic production.
- Maintaining purge logs (or SOPs, Purge Tags, or other records) documenting amounts, dates, and times of purges of shared use equipment.
- Conducting and documenting any residue testing conducted (if using quaternary ammonium sanitizers on organic contact surfaces or chlorine on organic ingredients or unpackaged product).
- Not using cleaners/sanitizers in contact with organic raw materials or unpackaged organic product.
- Marking equipment for “organic use only” when organic handling is being conducted or otherwise segregating it.
- Utilizing appropriate water rinses in cleaning and sanitation.

8. Pest Control. Operations that engage in pest control practices where organic production or storage occurs may implement additional mitigation measures as follows:

- Monitoring of facility for pest problems and documenting same.
- Monitoring and reviewing pest control service provider records to confirm compliance with the pest control portion of organic plan.
- Not using pest control substances in organic production or storage areas.