

Module H5A: Monitoring Practices and Procedures, Supplier Verification, and Fraud Prevention Plan—No Physical Facility

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

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. 	
<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.	
7. Does this operation have any other	<input type="checkbox"/> This operation has a contract with the copacker and has addressed organic integrity with the copacker.

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<p>practices to ensure organic integrity of products packed by copacker? [SELECT ALL THAT APPLY]</p>	<p><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.</p> <p><input type="checkbox"/> All products remain in control of copacker until transferred to this operation.</p> <p><input type="checkbox"/> Products are packaged in sealed, tamper-evident packaging then transferred to this operation or shipped to buyer/fulfillment center.</p> <p><input type="checkbox"/> Each individual unit contains a lot number for tracking and traceability purposes.</p> <p><input type="checkbox"/> This operation takes ownership of product from copacker in its finished form, which is a sealed, tamper-evident package.</p> <p><input type="checkbox"/> Other:</p>
<p>8. Does this operation purchase, procure, broker, or take title to ingredients used in this operation's products that are packed by the copacker?</p>	<p><input type="checkbox"/> No, copacker sources and procures ingredients. Skip to Part C.</p> <p><input type="checkbox"/> Yes, this operation sources, procures, selects, or purchases 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.]</p>
<p>9. Does this operation maintain organic certificates for all ingredients it purchases or procures?</p>	<p><input type="checkbox"/> Yes.</p>
<p>10. Does this operation provide organic supplier information to this operation's chosen copacker?</p>	<p><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.</p> <p><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.</p>
<p>C. Verification of Uncertified Operations in Supply Chain</p>	
<p>1. In the purchasing or sourcing of organic items, does this operation purchase, broker, trade, or distribute from an uncertified handler in the supply chain between this operation and the last certified organic operation in the supply chain?</p> <p>Examples: brokers, sellers, marketers, sales departments, distributors, order processors, sales agents/companies, warehouses, or uncertified 'sister' or 'parent' companies of certified entities.</p>	<p><input type="checkbox"/> No. Skip to Section II.</p> <p><input type="checkbox"/> Yes.</p>
<p>2. What type(s) of uncertified operation(s) are in this operation's supply chain (§ 205.101)? [SELECT ALL THAT APPLY]</p>	<p><input type="checkbox"/> Organic Sales < \$5,000</p> <p><input type="checkbox"/> Retail Establishment (That Does or Does Not Process Agricultural Products)</p> <p><input type="checkbox"/> Only Makes Products With < 70% Organic Content or That Only Identify Organic Ingredients on the Information Panel</p> <p><input type="checkbox"/> Store, Receive, or Prepare for Shipment Organic Products That Are Packaged in Sealed, Tamper-Evident Packaging or Containers.</p> <p><input type="checkbox"/> Buy, Sell, Receive, Store, or Prepare for Shipment Organic Products Packaged in Sealed, Tamper-Evident Retail Packaging or Retail Containers.</p> <p><input type="checkbox"/> Customs Broker</p> <p><input type="checkbox"/> Transporters and Operations That Only Arrange for the Shipping, Storing, Transport, or Movement of Organic Products</p>
<p>3. Please confirm that this operation engages in all the MANDATORY practices to the right:</p>	<p><input type="checkbox"/> Maintains the following:</p> <ul style="list-style-type: none"> ➤ 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. <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.

<input type="checkbox"/> Other (describe):	
4. Does this operation purchase, broker, or distribute organic items from operations that choose exemption from organic certification?	<input type="checkbox"/> No. <input type="checkbox"/> Yes.
5. If Yes to #4, does this operation understand that items so purchased, brokered, or distributed from those exempt entities may not be used as ingredients in organic products, or claimed as organic by another operation (205.310(b))?	<input type="checkbox"/> N/A, answer to #4 was no. <input type="checkbox"/> Yes.

SECTION II: Monitoring—Due Diligence in Offsite Storage

Offsite Storage	
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? 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> .	<input type="checkbox"/> No. Skip to Section III. <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.
2. Are the offsite storage locations certified organic?	<input type="checkbox"/> Yes, and this operation maintains a copy of the organic certificate for the offsite storage location, updating it at least annually. <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.
3. Has this operation enclosed with this application the organic certificate or Uncertified Operation Affidavit for each offsite storage location? 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).	<input type="checkbox"/> Yes.

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 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: ➤ 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:	<input type="checkbox"/> Yes.

➤ 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?		
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 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	<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.

deficiencies are noted?	<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 storage or transport. <input type="checkbox"/> Mistakenly identifying a nonorganic product as organic. <input type="checkbox"/> Receiving/Brokering/Distributing nonorganic rather than the organic item. <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 unpackaged 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"/> 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, or Brokered: This operation must implement practices to verify the organic status of any product received, acquired, purchased, or brokered by this operation. Verification records must be available for review at inspection.	
1. Please select from the options to the right the following MANDATORY verification measures this operation has	<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 brokered 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

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<p>implemented:</p>	<p>certificates that document the uncertified entity, last certified organic source, and supplier's lot number.</p> <p><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.</p> <p><input type="checkbox"/> Having a policy or practice of having the buyer/receiver notify this operation immediately if the organic integrity of the load appears impaired.</p> <p><input type="checkbox"/> Having the organic items clearly identified as organic during the transaction and clearly identified with a traceability identifier.</p> <p><input type="checkbox"/> Maintaining bills of lading and/or shipping records of products shipped by or released from supplier/copacker which show the product name, 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.</p> <p><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.</p> <p><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.</p> <p><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.</p> <p><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.</p> <p><input type="checkbox"/> Other (describe):</p>
<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>	<p><input type="checkbox"/> Not transporting ingredients or products in unpackaged bulk condition.</p> <p><input type="checkbox"/> For products purchased or received from uncertified entities, having inbound loads inspected to confirm organic status.</p> <p><input type="checkbox"/> Having policies that any offsite storage locations conduct inspections of inbound loads 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.</p> <p><input type="checkbox"/> Auditing this operation's suppliers.</p> <p><input type="checkbox"/> All inbound organic items are received/transported in sealed, tamper-evident packaging or containers.</p> <p><input type="checkbox"/> Other (describe):</p>
<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>	<p><input type="checkbox"/> Monitoring for risks of contamination or commingling.</p> <p><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.</p> <p><input type="checkbox"/> Ensuring that all nonretail containers used in storage or transport of organic items 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.</p> <p><input type="checkbox"/> Ensuring that all nonretail containers used in storage or transport of organic items contain a traceability identifier.</p> <p><input type="checkbox"/> Ensuring that organic status is noted for the organic items for all sales and outbound shipping records and for all purchase and inbound receiving records.</p> <p><input type="checkbox"/> Other (describe):</p>
<p>2. Please choose from the options to the right any additional</p>	<p><input type="checkbox"/> Not handling nonorganic products or ingredients.</p> <p><input type="checkbox"/> No product is ever removed from its primary unit packaging.</p> <p><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.</p> <p><input type="checkbox"/> Product is not opened, repackaged, or relabeled.</p>

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<p>mitigation practices and procedures performed or maintained by this operation: [SELECT ALL THAT APPLY]</p>	<ul style="list-style-type: none"> <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. <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>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>	<ul style="list-style-type: none"> <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>Mitigation in Offsite Storage:</p> <ul style="list-style-type: none"> <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>4. Please select the mitigation measures this operation has implemented in Transport: [SELECT ALL THAT APPLY]</p>	<p>Mitigation in Transport:</p> <ul style="list-style-type: none"> <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>5. For operations that arrange transport, please select from the options</p>	<ul style="list-style-type: none"> <input type="checkbox"/> N/A, this operation does not arrange transport. <input type="checkbox"/> N/A, transporter is certified organic. <p>Mitigation in Arranged Transport:</p> <ul style="list-style-type: none"> <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/rebel, or repackage this operation organic products.

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to the right the following MANDATORY mitigation measures this operation has implemented:	<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. <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. <input type="checkbox"/> Organic items are transported in dedicated organic loads. <input type="checkbox"/> Organic items are transported in dedicated organic transport vehicles. <input type="checkbox"/> This operation has loading policies or practices to prevent commingling of organic with organic. <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. <input type="checkbox"/> Organic and nonorganic products have designated areas in the cargo area of vehicles. <input type="checkbox"/> Other:
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SECTION V: Attestation

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