Building an Effective Organic Fraud Prevention Plan

The USDA organic regulations require that every certified operation maintain a written Organic Fraud Prevention Plan (OFPP) as part of its Organic System Plan. This article walks through each component of an effective OFPP, including assembling a fraud prevention team, conducting a vulnerability assessment, designing mitigation measures, and verifying that mitigation measures are working. This article also explains what certifiers look for during annual inspections.

What You'll Learn

- Elements required in an Organic Fraud Prevention Plan under the NOP organic regulations
- How to structure a fraud prevention team, and why the compliance lead's authority over purchasing decisions matters
- How to conduct a vulnerability assessment and identify Organic Control Points in your supply chain
- Mitigation measures scaled to risk level, from supplier verification and receiving protocols to import certificate review
- Practices for monitoring, internal audit, and testing that verify your plan is working

An Organic Fraud Prevention Plan (OFPP) is a regulatory requirement, not a recommended practice. Every certified handler must maintain a written OFPP as part of its Organic System Plan. The plan describes how you will verify suppliers, confirm that what you receive matches what you ordered, and keep fraudulent product out of your supply chain.[1]

The regulation allows the plan to be appropriate to the activities, scope, and complexity of your operation.[1,2,3] A small handler sourcing from a handful of long-term domestic suppliers will write a simpler plan than a large importer working through multiple brokers across several countries. What matters is that the plan reflects your actual supply chain and addresses the specific vulnerabilities in it.

An OFPP is not a static, one-time document; it is a living plan, reviewed and updated as your operation evolves. Your certifying agent may examine it at each inspection. It must reflect how your operation actually functions, not merely what was proposed at initial certification.

DESIGNING AN EFFECTIVE ORGANIC FRAUD PREVENTION PLAN

While the exact criteria and questions for a fraud prevention plan are not explicitly prescribed in the standards, certifying agents generally evaluate an effective OFPP — whether submitted as part of your OSP or attached as a formal addendum — against a consistent set of elements. The plan need not follow this exact structure and may incorporate additional measures, but it must address supplier verification, product verification, and fraud prevention in sufficient detail for an inspector to verify it.

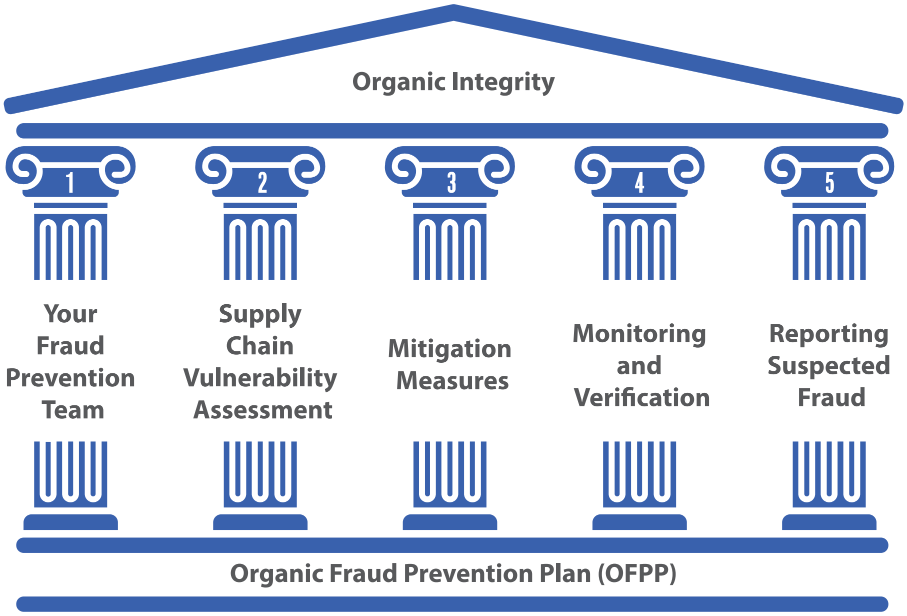
Aspects of an Effective Organic Fraud Prevention Plan

The USDA organic regulations require that the plan address supplier verification, product receipt verification, and fraud prevention. The components below represent best-practice implementation of those requirements and can vary according to your individual operation's needs and your unique supply chain.

- ☐ **Supply Chain Map:** a visual or written map of the operation's supply network, including uncertified entities, brokers, storage, and transporters
- ☐ **Supplier Verification Practices:** documented use of the Organic Integrity Database and certificate review, updated at least annually to verify the organic status of products acquired
- ☐ **Vulnerability Assessment:** documentation that the operation has evaluated its ingredients, supply chain structure, and internal processes for fraud risk, with suppliers and ingredients assigned to risk tiers
- ☐ **Organic Control Points and Mitigation Measures:** identified critical control points, each paired with a documented control
- ☐ **Monitoring and Verification Tools:** procedures for verifying that mitigation measures are working, including internal audits appropriate to the operation's complexity
- ☐ **Incident Management Procedures:** what to do when fraud is suspected
- ☐ **Fraud Reporting Process:** a defined protocol for reporting suspected fraud to the certifying agent and the NOP[4]
- ☐ **Evidence of Annual Review:** documentation that the OFPP has been reviewed and updated to reflect current supply chain conditions[4]

An effective OFPP is integrated into the OSP, either embedded within existing OSP sections or attached as a formal addendum. Once it's part of the OSP, the practices it describes become the documented standard your certifying agent will verify at every annual inspection.[2]

The Pillars of Fraud Prevention



Step 1: Assembling Your Fraud Prevention Team

Organic fraud prevention touches purchasing, receiving, processing, and sales. A plan built within one department will have gaps. Fraud vulnerabilities tend to show up exactly where responsibility changes hands: between purchasing and receiving, between QA and operations, between whoever approves a new supplier and whoever accepts the first shipment.

Your team should include the people who approve suppliers, place purchase orders, receive incoming product, and sign off on production records. The purchasing manager who chooses a new broker based on price, the receiving staff member who doesn't notice a certificate has expired, the QA team that flags a concern but can't stop a shipment, those are the gaps a fraud prevention team is designed to close.

"It is important to understand that it is not the best approach to be like the Paladin of fraud prevention. It is better to create a team and be a partner with others in preventing fraud … We created our fraud prevention plan not only with compliance team members, but also with purchasing and logistics and that resulted in finding different levels of mitigation measures for different suppliers."

Humberto Maldonado
Safety and Compliance Manager
Organically Grown Company (OGC)

The person you designate to lead organic compliance needs real authority over purchasing decisions that affect organic integrity. There is no explicit regulatory requirement to name a specific individual with veto power over organic purchases, but the OFPP requirement only works if the compliance lead can act on what they find, not just file it away.

Put the team structure in writing in your OFPP. This is best practice and it keeps fraud prevention responsibilities from going undefined when people change roles. Your certifier will appreciate it if you put the team structure in writing because it will help them determine your compliance with your OFPP as you implement it.

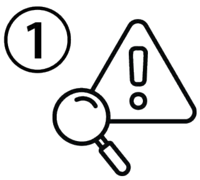
"Having a dedicated person for organic compliance who has the authority to communicate problems internally … it's really a critical success point for operations … I've seen fraud cases, and in organizations of size or organizations with layers, when the person who's in charge of organic compliance does not have authority to make adjustments to the system, there's a lot more opportunity for there to be problems in certification including and up to fraud."

Johanna Phillips
Director of Business Development and Regulatory Affairs
Strengthening Organic Systems

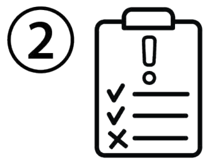
Step 2: Mapping Your Supply Chain and Identifying Vulnerabilities

Learn your supply chain. Start with a supply chain map: a visual or written account of how each ingredient moves from the original farm through every handler, broker, storage facility, and transporter before it reaches your dock, including uncertified entities. A transporter or storage operator who is exempt from certification can still be a point where organic status is lost or falsified.[4]

Based on the map, evaluate where your operation is most exposed to fraud. The assessment covers three areas: the inherent risk of the ingredient, the structure of your supply chain, and your own internal processes.[4]



Identify Vulnerability
Ingredient: Organic cocoa powder.
Origin: Imported through three brokers.



Assess OCP Risk
Risk of uncertified broker substitution between the exporter and the U.S. port of entry.

Mitigation Measure
Require NOP Import Certificate data prior to shipment departure and mandate a direct mass-balance audit traceable to the origin farm.

Assessing Inherent Product Risk

Some ingredients may carry a higher fraud risk based on their physical characteristics or market position. Bulk, unpackaged commodities are easier to adulterate without changing their appearance. Highly processed or blended ingredients can obscure the origin of their inputs. Ingredients with large price gaps between organic and conventional may create a stronger financial incentive for fraud. Products experiencing sudden supply shortages from weather, pests, or geopolitical disruptions also become higher risk, as demand outpaces documented certified supply.

Lower-risk ingredients look the opposite: domestically produced, packaged in sealed, tamper-evident retail containers, with limited price difference between organic and conventional.

Assessing Supply Chain Risk

The longer and more complex the supply chain, the more opportunity there is for substitution or falsified records to go undetected. High-risk supply chains have multiple ownership changes, multiple border crossings, sourcing from open markets with limited documentation, or the use of uncertified brokers in regions with a documented fraud history.[4]

Lower-risk supply chains tend to be vertically integrated, involve direct relationships with the origin farm, or source entirely domestically from established certified operations.

Assessing Internal Company Risk

Your own processes can be a vulnerability. Operations without a formal supplier approval program, those that choose suppliers based primarily on price, and facilities with untrained receiving staff have fewer controls in place to catch problems before product enters the production stream.

A common internal vulnerability is inadequate receiving procedures: receiving staff who accept a product without checking whether the certificate covers that specific item, or without confirming that the word "organic" (or similar) appears on the shipping paperwork. Another example is sourcing from a supplier who handles both organic and conventional products in the same facility, without confirmed segregation procedures in place. When documentation gaps exist on your end, they compound any gaps in your supplier's records.

Lower-risk operations have a formal supplier approval program, documented receiving procedures, trained staff, and routine internal review of organic records. Internal audits are successful when you rigorously vet new suppliers.

Level of Vulnarability

High Risk
Unpackaged imported commodity purchased through an uncertified broker with no NOP Import Certificate on file.

Medium Risk
Bulk domestic produce from a new, unaudited supplier with no prior purchase history.

Low Risk
Tamper-evident retail-packaged ingredients purchased directly from a long-term certified farm partner with a stable OID record.

Based on the vulnerability assessment, identify Organic Control Points (OCPs): the specific steps in your supply chain where organic fraud or loss of organic status is most likely to occur. Each OCP needs a documented control, a specific action that reduces the risk at that point, and a monitoring procedure that verifies the control is working.

Recognizing Red Flags

Your vulnerability assessment should also train your purchasing and receiving teams to spot warning signs during daily operations. None of these are proof of fraud, but each one warrants a stop and a documented follow-up before the shipment moves forward:[4]

- A supplier offering certified organic product at a price significantly below the market rate or below the cost of production for that commodity;
- A sudden, unexplained increase in a supplier's available volume that exceeds what their certified acreage or capacity would realistically support;
- Suppliers operating under multiple names or unwilling to disclose the origin of their ingredients;
- Shipping paperwork missing the word "organic," illegible handwritten receipts for large shipments, or certificates with portions altered or blacked out;
- Ingredients where conventional product is physically indistinguishable from organic, particularly bulk unpackaged goods and highly processed or blended products sourced through intermediaries without direct farm visibility.

HANDLER TIP

When mapping your supply chain, ask where the most money can be made with the least documentation. A product with a large organic price premium, moving through multiple uncertified intermediaries with minimal paperwork, is your highest-risk scenario. A directly sourced, well-documented domestic purchase is your lowest.

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The NOP maintains a current list of known fraudulent certificates at ams.usda.gov/services/enforcement/organic/fraudulent-certificates. Reviewing this page when you add new suppliers or handle new commodities is a straightforward way to catch known bad actors early.

Step 3: Designing Mitigation Measures

Mitigation measures are the controls you put in place to address the risks your vulnerability assessment identified. The level of scrutiny should match the level of risk. A low-risk supplier with a long track record and a simple domestic supply chain doesn't require the same measures as a new broker handling imported bulk commodities.

Supplier Approval Program

The foundation of mitigation is a formal supplier approval program: a documented process for evaluating and approving every supplier before you purchase from them. For every certified supplier, verify their status and specific product scope in the Organic Integrity Database before placing your first order and again at each annual renewal.[5] The OID is the authoritative source. A certificate a supplier hands you, whether by email or in print, is a starting point for verification, not a substitute for confirming it directly in the database.

The OTA's Organic Fraud Prevention Solutions Guide recommends that certificates used for supplier verification be no older than 12 months. The reasoning is that the annual certification cycle creates a short gap around renewal. This is not a specific requirement in the USDA organic regulations, but it reflects sound practice for a supplier approval process.[4]

Uncertified (Exempt) Handlers in the Supply Chain

When any link in your supply chain involves a handler who is not certified (a transporter, a storage operator, or an intermediary exempt from NOP certification requirements), you should obtain a signed Uncertified Handler Declaration. This is a written affirmation from that entity confirming that the product can be traced to the last certified operation in the supply chain and that it has been handled in a way that maintains its organic integrity.

Receiving Dock Protocols

A documented receiving protocol applies to every incoming organic shipment, regardless of risk level. At the dock, cross-reference the supplier's current certificate with the incoming shipping documents and confirm that the word "organic" (or similar) is explicitly designated on the label, bill of lading, and invoice.[6,7] A shipment arriving without "organic" on the documentation is a red flag. A certificate that doesn't match the product description on the shipping paperwork is another. Receiving staff should know to flag these rather than resolve them informally.

Step 4: Monitoring, Verification, and Internal Audits

The plan is only as good as the monitoring behind it. It needs to describe how you will verify that your mitigation measures are actually working, and that requires ongoing monitoring throughout the year. Adapt your plan as new information or processes are introduced. Update your certifier on all big changes you make.

Internal Audits

Two types of internal audits are the core tools here. A trace-back audit follows a finished product back through all production and receiving records to the organic ingredient at the point of receipt from the last certified operation in your supply chain. A mass-balance audit verifies that the volume of organic product you sold corresponds to the organic ingredients you purchased. Discrepancies in either are a signal that something in the system warrants investigation.[7]

These are also what your inspector conducts at every annual inspection. Inspectors are required to perform these audits and verify your records.[8,9] Running your own internal audits regularly means you're not encountering recordkeeping problems for the first time during an inspection.

The OTA's Fraud Prevention Solutions Guide recommends that organizations conduct internal audits routinely and that the findings are reviewed at the management level, with results used to update the OFPP as needed.[4] The USDA organic regulations require that your records be complete and available for inspection, but they do not prescribe specific internal audit frequencies or formats.[9,10] The structure is yours to define; the requirement is that the trail exists.

Analytical Testing

For high-vulnerability ingredients, pesticide residue or GMO testing gives you something documentation can't: a direct check on what the product actually is. Testing is most useful for bulk commodities where adulteration is hard to detect visually. A result showing prohibited substance residues in a product sold as organic warrants further investigation.

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More information on analytical testing can be found in the article Using Residue Testing as a Fraud Prevention Tool.

Supplier Audits

For high-risk ingredients or new suppliers in complex supply chains, a second-party supplier audit (an on-site visit to the supplier's facility) lets you observe their organic handling practices, review their records, and verify that what they're doing matches what their certificate claims. These may be conducted by your own compliance team or a contracted third-party and should be documented in your OFPP.[4] Supplier audits are a documented best practice in the industry and a good way to protect yourself and the integrity of your organic products.

Step 5: Reporting Suspected Fraud

If your mitigation measures fail and fraudulent product reaches your facility, or if you have a credible concern that it might, your OFPP must specify how to respond. Under the USDA organic regulations, you are required to immediately notify your certifier of changes that may affect compliance, including instances when your mitigation measures fail. Ignoring it is not an option.[1,11]

The first step when fraud is suspected is to place the affected lot on hold and move it into quarantine — physically and systematically blocking it from sale, further processing, or use as organic while the investigation proceeds. Once fraudulent product enters the stream of commerce as organic, everything downstream is compromised and far harder to correct. Quarantining the product immediately limits the damage and creates a documented record that you acted the moment the issue was identified. From there, a test-and-release process — verifying the product's status through supplier documentation, testing, or other evidence before the hold is lifted — ensures nothing re-enters the organic supply chain until its integrity is confirmed. Together, these steps protect organic integrity and support your ongoing compliance.

Your OFPP should include a monitoring practice for NOP enforcement announcements: fraudulent certificate notices, suspension actions, and revocation decisions. These notices provide early warning of active fraud threats and may change the risk level of a current supplier or commodity in your OFPP. A supplier who appears on an NOP suspension notice warrants immediate review.[4] When you have a specific documented discrepancy, not a vague worry, but something you can point to in a record, your plan should define how you will report it.

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More details can be explored in the article Ongoing Monitoring and Reporting Suspected Fraud.

CONCLUSION

Building an OFPP for the first time is the hardest part. Once you have a map of your supply chain, a clear-eyed look at where you're most exposed, and documented controls for your highest-risk inputs, the annual review and update requires far less effort than the initial build. More importantly, you're operating with a framework that lets you identify problems before they affect your certification. The rest of this chapter covers what to do when monitoring finds something, and how to navigate the reporting process when a concern becomes a credible suspicion of fraud.

ACTION ITEMS

- Create a supply chain map for your highest-risk ingredients. Trace each one from your dock back to the origin farm, noting every handler along the way, certified or not.
- Use the risk categories (product, supply chain, internal) in this article to conduct a vulnerability assessment. Assign your major ingredients and suppliers to a risk tier: high, medium, or low. Document what makes each one higher or lower risk.
- Review your Organic System Plan. Confirm it includes a written OFPP that addresses supplier verification, receiving protocols, and a fraud reporting process. If it doesn't, this is your next certification item to resolve.

- Confirm that your compliance lead has the authority to pause or reject high-risk purchasing decisions. If that authority isn't documented or isn't recognized across departments, address it before your next inspection.
- Bookmark the NOP fraudulent certificates page (ams.usda.gov/services/enforcement/organic/fraudulent-certificates) and build a habit of checking it when you add new suppliers or source new commodities.

SOURCES CITED

1. USDA National Organic Program, 7 CFR §205.201(a)(3).
2. Organic Trade Association. *OTA SOE Rule Summary, Section 3: Supply Chain Traceability and Fraud Prevention.*
3. U.S. Department of Agriculture, Agricultural Marketing Service. *National Organic Program: Strengthening Organic Enforcement; Final Rule.* Retrieved from https://www.federalregister.gov/d/2023-00702/p-891
4. Organic Trade Association. *Organic Fraud Prevention Solutions: A Guide to Developing an Organic Fraud Prevention Plan.*
5. USDA National Organic Program, 7 CFR §205.404.
6. USDA National Organic Program, 7 CFR §205.273.
7. U.S. Department of Agriculture, Agricultural Marketing Service. (2024, March 20). NOP 2615: *Organic System Plans, Organic System Plan Updates, and Notification of Changes.* Retrieved from https://www.ams.usda.gov/sites/default/files/media/2615.pdf
8. U.S. Department of Agriculture, Agricultural Marketing Service. (2011, July 22). *NOP 5025 Guidance: Commingling and Contamination Prevention in Organic Production and Handling.* Retrieved from https://www.ams.usda.gov/sites/default/files/media/5025.pdf
9. USDA National Organic Program, 7 CFR §205.103(b)(2)–(3).
10. USDA National Organic Program, 7 CFR §205.103(c).
11. USDA National Organic Program, 7 CFR 205.400(f).

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1. Oregon Tilth. *Organic Fraud Prevention Plan (OFPP) Resource Guide.* Retrieved from https://tilth.org/wp-content/uploads/2024/01/Organic-Fraud-Prevetion-Plan-Resource-Guide_Digital.pdf
2. Organic Integrity Learning Center (OILC). NOP-100: *Organic Fraud and the Criminal Mind.*
3. Organic Integrity Learning Center (OILC). NOP-110: *Preventing the Organic Fraud Opportunity.*
4. Organic Trade Association. (2023). *Organic Fraud Prevention Guide: Ensuring Global Organic Supply Chain Integrity.* Retrieved from https://ota.com/sites/default/files/legacy/indexed_files/OrganicFraudPreventionGuide_OrganicTradeAssociation%20-%202023%20Update.pdf
5. U.S. Department of Agriculture, Agricultural Marketing Service. *Fraudulent Organic Certificates.* Retrieved from https://www.ams.usda.gov/services/enforcement/organic/fraudulent-certificates
6. U.S. Department of Agriculture, Agricultural Marketing Service. NOP 2610, 2611, and 2613: *Sampling Procedures, Laboratory Selection, and Responding to Residue Test Results.* Retrieved from https://www.ams.usda.gov/rules-regulations/organic/handbook

United States Department of Agriculture
Agricultural Marketing Service
National Organic Program