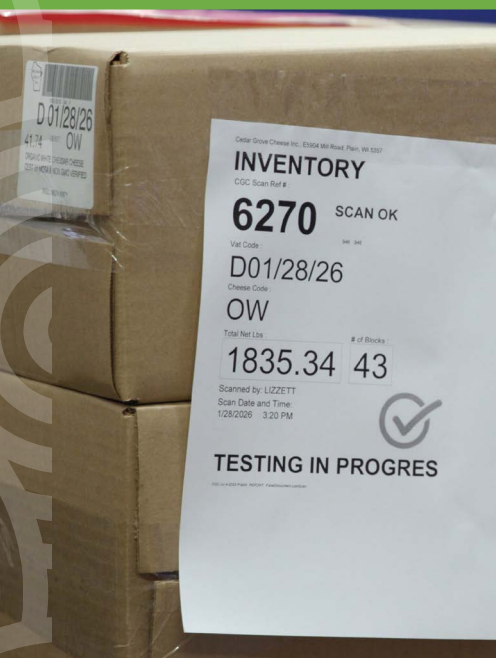




The Traceback Audit

Each certified organic handling operation undergoes a traceback audit at every annual inspection. The traceback starts with one finished product lot and works backward through records to confirm every ingredient came from a certified organic source. This article explains how inspectors select a product and conduct the traceback, walks through the document stages and the identifiers that connect them, illustrates how tracebacks differ by operation type, addresses the most common failure point, and shows you how to run your own pre-inspection self-rollback.



What You'll Learn

- What a traceback audit is, how the regulations define it, and how it relates to the audit trail you maintain every day
- How inspectors select the product they will trace and why the selection often happens at the inspection itself
- The three document stages of a traceback, the records at each stage, and the identifiers that link them
- How tracebacks differ across single-ingredient handlers, multi-ingredient processors, and distributors
- What a lot number gap is, how it breaks the traceback chain, and how a bridging record fixes it
- A 7-step self-rollback process you can run before your organic inspection

When an organic inspector arrives at your facility, one of the necessary exercises they will perform is a **rollback audit**. They will select a lot of a finished organic product and follow its records backward to confirm every organic ingredient came from a verified organic source and compliance with the regulations was maintained at all times. For operations with organized, connected records, a traceback can often be done quickly. For operations with gaps, this exercise surfaces them. This article covers how the process works, what documents come into play at each stage, and how to confirm your records will pass the inspection test.

WHAT A TRACEBACK IS AND WHY IT MATTERS

Traceability is a foundational principle underpinning the USDA organic regulations. All organic products must be traceable from origin to end use. At your annual inspection, certifiers are required to audit your organic products back to the last organic handler in your supply chain.¹ Certifiers can also work together on a broader review of a particular ingredient or product across the wider supply chain, called a supply chain traceability audit.²

? LEARN MORE

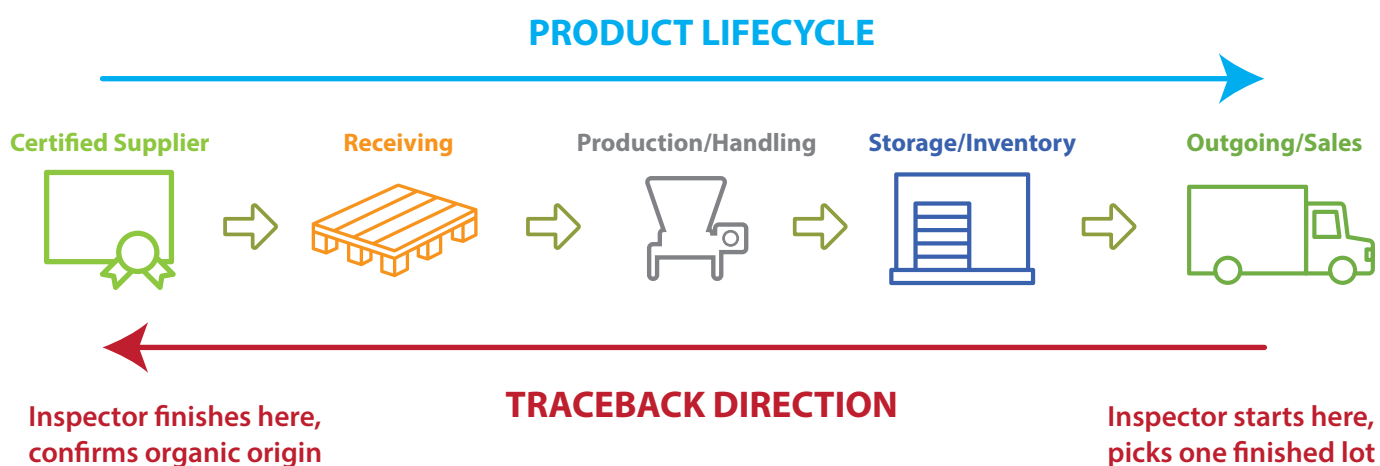
Review [Chapter 7](#) on Supplier Management as you procure organic products to ensure your traceback will be set up to pass the inspection test!

The USDA organic regulations define a supply chain traceability audit as “the process of identifying and tracking the movement, sale, custody, handling, and organic status of an agricultural product along a supply chain to verify the agricultural product’s compliance...”³ The two types of traceability audit differ in scope, purpose, and who conducts them. A traceback audit is a targeted, product-specific test of whether the audit trail is complete for one particular lot, conducted by the operation or an inspector. A supply chain traceability audit is a broader review of the full supply chain of a product or sector, conducted by a certifier or the USDA NOP.

The traceback differs from the audit trail. The audit trail is the system of records you maintain every day. The traceback is a test of that system. An audit trail that passes a traceback is one where every document connects to the next through shared, verifiable identifiers. That distinction matters: an operation can have generally good recordkeeping and still fail a traceback if the chain breaks anywhere between the finished product lot and its certified source.

Every certified organic handling operation must undergo a traceback audit at every annual inspection.^{1,4} A successful traceback confirms that every ingredient in the selected finished product lot traces to a certified organic source, and that the operation’s own records demonstrate organic integrity was maintained throughout its custody of the product.⁵

The Direction of a Traceback



A traceback works backward through time, following records from the sold product to its ingredient source.

How the Inspector Selects the Product

The inspector selects the finished product and lot to trace at the inspection itself. The specific product and lot number are not shared in advance. This protects the integrity of the exercise. If a handler knew which lot would be selected, they could assemble records for just that lot rather than demonstrating a functioning system.

The inspector may select from a recent sales invoice, bill of lading, or shipping documentation. It is less common for an inspector to select a lot number from product on your shelf or in inventory, or from a lot code visible on packaging in your facility, because this would not provide an opportunity to test your full chain of custody through sale. For multi-ingredient products, the inspector may also select one specific ingredient and trace it from the finished product lot containing that ingredient back to the certified supplier, rather than tracing all ingredients simultaneously.

STEPS TO CONDUCTING A TRACEBACK

A full traceback moves backward through three document stages: outgoing documents, then internal production records, then incoming documents and verification that the product is certified organic, as applicable to your operation. At each transition, a shared identifier connects one stage to the next: usually a lot number, though a purchase order, invoice, or shipping ID can serve as a connector between documents. What each of these records holds, and how to build them so the identifiers carry cleanly across stages, is covered in [Building and Maintaining an Organic Audit Trail](#). Here the focus is the act of following those identifiers backward. A traceback succeeds when every document connects to at least one other through a shared identifier, with no gaps in the chain.

Step 1: Outgoing Documents

The inspector starts from the outgoing records for the selected lot and confirms the finished product lot number is on them and designated organic. That lot number is the thread carried inward to the production records. If it appears on no outgoing document, the traceback fails here: there is nothing to confirm the product shipped as organic, and no identifier to follow into production.

Step 2: Internal Production Records

The finished product lot number leads to the batch or work order that produced the lot. This is the pivot of the trace. It carries the finished lot number back toward the outgoing records and the ingredient lot numbers forward toward the incoming ones. If those ingredient lot numbers are recorded, the bridge successfully makes the link; if ingredients appear by name only, it breaks here.

Step 3: Incoming Documents and Certification

The ingredient lot numbers lead back to the receiving log and incoming records, such as bills of lading, purchase invoices, and packing slips, and finally to the supplier's organic certificate confirming each source was certified when the ingredient was purchased. A single-ingredient product resolves in one chain; a multi-ingredient product fans out into one chain per ingredient, and every chain must reach a certified source for the traceback to pass.



Traceback Example - Rocky Ridge Tea Blends

Rocky Ridge Tea Blends produces certified organic tea. They blend organic chamomile, peppermint, and lemon balm into packaged "Organic Calm Blend" tea bags sold to natural grocery retailers.

During their annual inspection, the inspector selects a pallet from an outgoing truck at the loading bay and records lot number CB-20250318-006.

Step 1: Outgoing Documents

The inspector asks for any outgoing sale records for lot CB-20250318-006.

The shipping manager pulls Invoice #INV-2025-0422 (dated March 22, 2025) showing 72 cartons of Organic Calm Blend, lot CB-20250318-006, shipping to Mountain Foods Co-op. The lot number on the pallet matches the lot number on the invoice.

The linking identifier carried to Step 2 is **CB-20250318-006**.

Step 2: Internal Production Records

With lot CB-20250318-006, the inspector finds Batch Record #BR-0318-006 (March 18, 2025) showing 30 lbs of Organic Calm Blend, 120 units.

The batch record lists the ingredient lots used:

- **Chamomile:** receiving lot RCV-0228-CH
- **Peppermint:** receiving lot RCV-0305-PM
- **Lemon balm:** receiving lot RCV-0310-LB

The receiving log shows both the supplier lot number and Rocky Ridge's internal receiving lot number in the same entry for each ingredient:

- **Chamomile:** receiving lot RCV-0228-CH | supplier lot WS-2025-014
- **Peppermint:** receiving lot RCV-0305-PM | supplier lot CG-2025-009
- **Lemon balm:** receiving lot RCV-0310-LB | supplier lot BM-2025-003

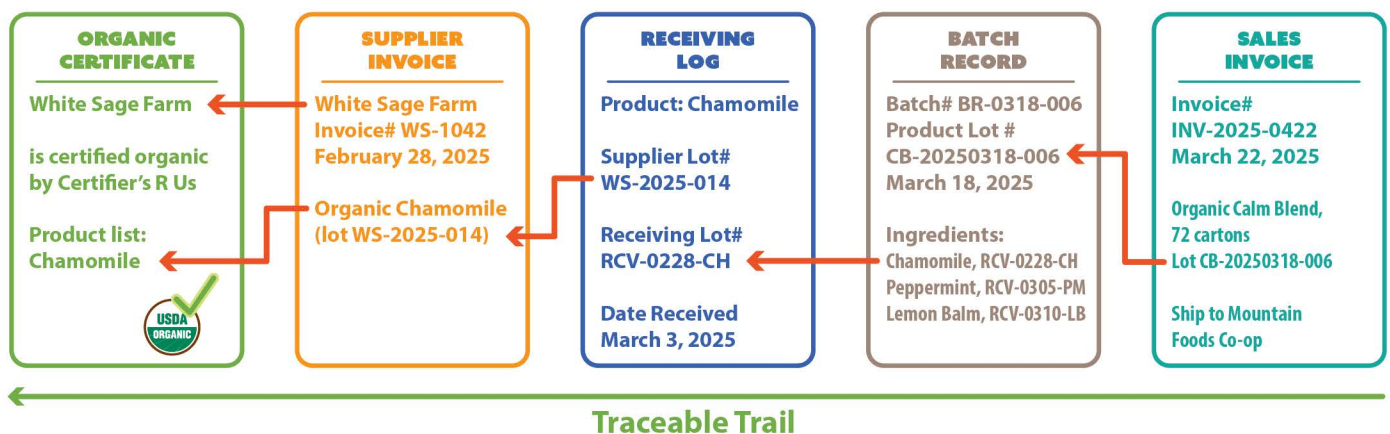
Linking identifiers carried to Step 3 are **WS-2025-014, CG-2025-009, BM-2025-003**.

Step 3: Incoming Documents and Certification

For each ingredient, the inspector checks the supplier invoice and organic certificate. All three suppliers are on Rocky Ridge's approved supplier list, with a valid organic certificate on file for each:

- **White Sage Farm:** Invoice #WS-1042, chamomile lot WS-2025-014 received Feb 28, certificate issued by Organic Certifiers 'R Us, issued Dec 2025, chamomile listed as a certified product
- **Cascade Green Gardens:** Invoice #CG-0892, peppermint lot CG-2025-009 received Mar 5, certificate issued by COAC, issued Aug 2025, peppermint listed
- **Purple Mountain Herbs:** Invoice #BM-0334, lemon balm lot BM-2025-003 received Mar 10, certificate issued by IDFA, issued Jun 2025, lemon balm listed

Every ingredient in lot CB-20250318-006 traces to a certified organic source through a chain of documents connected by shared lot numbers. The inspector completes the traceback in less than thirty minutes, without needing to ask any questions that the documents don't already answer.



Single-Ingredient Operations

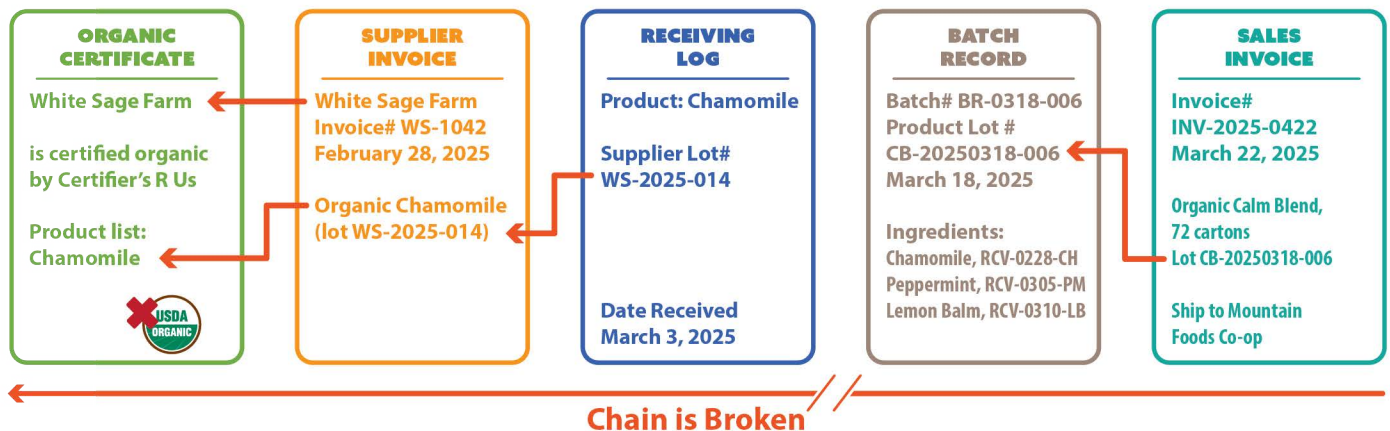
At Clarkson Grain in Illinois, a certified organic grain distributor, the team completes a full traceback from the outgoing BOL back to the specific farmer who delivered the grain in about five to ten minutes, linking the BOL to their internal lot, to the daily receiving log, to the farm grain delivery.

At Scratch & Peck Feeds, a multi-ingredient organic feed producer in Washington State, the traceback follows the production process in reverse: receiving documents come in with ingredient deliveries, batch records are generated during milling, production work orders carry lot tracking, and that information transfers to outgoing shipping documents. The inspector follows the same path the product already traveled, in the opposite direction.

For distributors and traders who receive and ship organic product without processing or manufacturing, the traceback path skips the internal production stage. The chain runs: outgoing BOL and invoice, receiving log, incoming supplier BOL and invoice, organic certificate. The receiving log is the key document, because it captures both the supplier's lot number from the incoming delivery and the internal lot number that appears on the outgoing shipment.

Designing lot numbers that carry across stages, and building the bridging records that document each change, are covered in [Building and Maintaining an Organic Audit Trail](#). In a traceback, the receiving log is one of the most likely places where the chain breaks. It is the one record that should carry both the supplier's lot number and your internal lot number for every incoming ingredient.

In the example below, Rocky Ridge Tea Blends' receiving log no longer links the supplier lot number and the lot number assigned at receiving. The chain is complete only while one record carries both the supplier lot and the internal lot together. Drop either side of that pairing and the traceback breaks, even though the same products are involved.



CONDUCTING YOUR OWN TRACEBACK

Running a traceback yourself, before your inspection, surfaces gaps while you still have time to fix them. It also confirms that the people who will present records at inspection know how to walk through the chain. Proving compliance starts with understanding compliance.

Pre-Inspection Traceback Checklist

- ☐ Pick a recently sold finished product lot at random.
- ☐ Find the outgoing sale record (invoice or BOL) and note the lot number.
- ☐ Find the batch or production record that generated this lot; confirm the lot number appears in that record.
- ☐ From the batch record, identify every ingredient lot number used in that batch.
- ☐ For each ingredient lot, find the receiving log entry; confirm both the supplier lot number and your internal lot number appear in the same entry.
- ☐ From the receiving log, find the supplier BOL and invoice for that delivery; confirm the lot number and organic designation match.
- ☐ Verify that a current organic certificate is on file for each supplier and that the specific ingredient is listed as a certified product.

If you can hand these documents to someone who has never seen your system and they can follow the chain without asking any questions, your traceback is ready.

Making the internal traceback a team exercise before inspection day pays off at the inspection itself. At TCHO Chocolate, Quality Assurance Senior Manager Aileen Mannion runs a traceability exercise with the warehouse supervisor, purchasing, and production manager before inspections, so when the inspector arrives, each person knows exactly which records they are responsible for producing.



"Since we're already an organic certified facility ... it's not like 'oh, we have an audit next month and it's a fire you have to put out.' When everyone is trained on what they need to do, and you're doing it on a daily basis, there's really nothing to prepare."

Aileen Mannion
Quality Assurance Senior Manager
TCHO Chocolate

WHAT HAPPENS IF THE TRACEBACK IS UNSUCCESSFUL

When an inspector cannot complete a traceback because a gap exists in the audit trail, they document the gap in the inspection report and discuss it with the handler in the exit interview.⁶ The certifying agent, not the inspector, then determines the appropriate response: a condition for continued certification, a notice of noncompliance, or further investigation if the gap suggests a potential organic integrity issue.

“The inspector in no way will be able to tell you how to fix them. It is your system and is completely on you to fix it ... but identifying gaps in your traceability ... are going to be really helpful to improving your system.”

Nate Powell-Palm

Founder

Powell Palm Ag Services LLC

Most first inspection traceback failures come from recordkeeping gaps that accumulated over time: lot numbers that were never recorded at receiving, batch records that reference ingredients by name only, or outgoing documents that use internal order numbers rather than the lot numbers on the product. These are fixable. Operations that address certifier compliance issues and close those gaps typically pass subsequent inspections without incident.

CONCLUSION

The traceback is the most direct test of whether your recordkeeping system does what it is supposed to do. It succeeds through consistent habits applied at every stage. Run your own traceback before your inspector does. Pick any finished product lot, follow the chain, and see where it holds and where it breaks. That is how you know what needs to be fixed.



ACTION ITEMS

- Conduct an internal traceback on a product lot shipped in the last 90 days.
- Flag document connection gaps where relationships are not self-evident.
- Audit receiving logs to ensure they record both supplier and internal lot numbers.
- Review three months of batch records for ingredient lot numbers.
- Verify organic certificates are current and list the ingredients you use.
- Practice the traceback with your team before inspection day.

SOURCES CITED

1. USDA National Organic Program, [7 CFR §205.403\(d\)\(5\)](#).
2. USDA National Organic Program, [7 CFR §205.501\(a\)\(21\)](#).
3. USDA National Organic Program, [7 CFR §205.2 \(Supply Chain Traceability Audit\)](#).
4. USDA National Organic Program, [7 CFR §205.403\(a\)\(1\)](#).
5. USDA National Organic Program, [7 CFR §205.103\(b\)\(2\)](#).
6. USDA National Organic Program, [7 CFR §205.403\(e\)](#).

DIG DEEPER

1. Organic Integrity Learning Center (OILC) Course. *NOP-080: Traceability Techniques*. Guidance on how traceback audits are conducted and documented during NOP inspections.
2. Organic Integrity Learning Center (OILC) Course. *NOP-140: Recordkeeping*. Covers basics of recordkeeping and certifier cooperation for supply chain traceability audits.
3. Organic Integrity Learning Center (OILC) Course. *NOP-280: Advanced Traceability and Mass Balancing Techniques*. Covers lot number systems, mock tracebacks, and audit trail maintenance.



United States Department of Agriculture
Agricultural Marketing Service
National Organic Program

