



Operation Name: _____ Date: _____

An "Audit Trail" or "trace-back" system documents the source (certified supplier), purchase or acquisition, transfer of ownership, physical and financial possession, receipt, handling, production, processing, contractual oversight responsibilities, sale, and transportation of organic products. Records must disclose all activities and transactions in enough detail to be readily understood and audited. Records must show compliance with organic requirements and be kept for at least five (5) years. Records must identify (link back to) the last certified operation in the supply chain and must identify products as organic.

- Complete a separate [H5.0 Record Keeping](#) form for each process or product when different record keeping systems are used.

Facility, product, or process covered by this plan:

A. Location of Records

CCOF will inspect your records location. A knowledgeable authorized contact must be physically present at your records location at your first inspection.

- 1) What formats are your records in? Select all that apply.

- ☐ Physical paper records
☐ Digital records available only at the records location listed below
☐ Digital records available online from any computer
☐ Other (describe): _____

- 2) List the location where all organic records are available every day and can be reviewed during on-site (in person) inspections.

☐ Records address is the same as the physical location address on my [CCOF Certification Contract](#). Skip to section B.

Address (if different from main physical address): _____

City: _____ State/Province: _____ Zip/Postal Code: _____ Country: _____

Contact(name/title): _____

Phone: _____ Fax: _____ Email(s): _____

- 3) Which authorized contact(s) can be physically present at the records location?

Name(s): _____

- 4) Is there anything else we should know about your records or the location(s) where they are held? Please describe below.



**B. Lot Numbering**

- 1) Describe your lot numbering system for finished products or attach a description. If you do not process products and use your supplier's lot number, describe their system. ☐ Description attached

EXAMPLE: **Lot Number:** 23123A045

Code	23	123	A	O	45
Signifies	Year: 2023	Julian date of production	Shift	Organic	Plant location

Lot Number: _____

Code						
Signifies						

- 2) How do nonretail containers identify the organic status of the product, including temporary signage applied to unpackaged product during shipping and storage? Select all that apply.

Non-retail containers are any container used to ship or store organic products, other than containers used for retail sale. All nonretail containers must identify product as organic. If nonretail container holds retail labeled product and organic status on retail label is visible through the nonretail container, nonretail container is not required to also identify product as organic.

☐ 'Organic', 'Org', 'O', 'OG', 'MWO' ☐ CCOF seal ☐ USDA seal ☐ "Certified organic by CCOF" statement

☐ Nonretail container holds product packaged for retail sale & organic status is visible through nonretail label

☐ Other (describe): _____

- 3) Where does lot number, shipping identification, or other unique information appear? Select all that apply.

All nonretail containers used to ship or store organic products must display lot number, shipping identification, or other unique information that links to audit trail documentation.

☐ Printed on retail label

☐ Printed on nonretail shipping container or package

☐ Other (describe): _____

- 4) How is lot number, shipping identification, or other unique information linked to audit trail documentation associated with outgoing shipments? Select all that apply.

☐ On invoice or Bill of Lading ☐ On a "pick list" or "ship list"

☐ Other (describe): _____





C. Tracking Organic Products

- 1) Describe or attach a diagram of how your audit trail trace-back system tracks finished products from the last certified operation, through transport, storage, inbound receiving, production or packing to final outbound shipping or invoice.

☐ Description or diagram attached

Audit trail systems include the following elements:

- a) **Chain of custody and shipping documents** – Documents include both internal documents you generate as well as external documents generated by the last certified organic operation. Common audit trail documents:
- Bills of Lading (BOL), purchase orders, invoices, contracts, packing slips, certificate of analyses, product specification sheets, receiving logs, inventory logs, batch records, manifests, shipping and delivery records (field ticket, weigh tickets, scale tickets, receipts, tags), chain of custody, truck and trailer numbers, clean truck affidavits.
- b) **Uncertified operations** – Additional audit trail information is required for each shipment that is handled by an uncertified handler, refer to the [Exempt Handler Affidavit](#) (EHA). Sourcing from uncertified handlers requires additional audit trail verification at inspection.
- Documents from exempt, uncertified handlers must identify (link back to) the last certified operation in the supply chain
 - Documents generated by the last certified operation proving purchase, delivery, and/or transfer to the uncertified handler must be included for each shipment.
 - Your receiving procedures must include verification and documentation of the last certified operation.
 - If product passes through multiple uncertified handlers in sequence, documents must trace through all uncertified handlers back to the last certified handler.
- c) **Imports to the US** – Organic imports must be clearly identified and marked as organic on all import documents, including U.S. Customs and Border Protection (CBP) entry data.
- NOP Import Certificate must be associated with each shipment.
 - Additional documentation for each shipment may include, but are not limited to: import permits (should identify the certified importer of record), phytosanitary certificates, fumigation certificates (if fumigated, both pre- and post-arrival), transaction certificates, CBP Forms 3461 and 7501, commercial invoices, export packing list, Certificate of Origin, Bill of Lading, Waybills/Air Waybills, AMS Inspection Certificate, Charter Party, Marine Surveyor report (for bulk vessel shipments, to document cleaning), transaction certificate issued in the APEDA TraceNet system for shipments from India.
- d) **Exports**
- Shipments from the **US** to other countries – CCOF-issued export certificates may be reviewed as part of your in/out mass balance during inspection.
 - Shipments from **Mexico to the US** – Each shipment must be associated with an NOP Import Certificate. You must request an NOP Import Certificate from CCOF prior to shipment. Audit trail documentation showing that exported products were not treated at any point in the product's movement across country borders must be maintained and verified at inspection.

- 2) Attach sample audit trail documents to demonstrate your system. ☐ Documents attached

- All audit trail records and documents must identify products and ingredients as "100% Organic", "Organic", "Made with Organic..." or easily understood abbreviation or acronym, e.g. 100% OG, Org, MWO.
- Documents must identify (link back to) the last certified operation in the supply chain that handled the organic product.
- Product label must link to documentation via lot number, shipping identification, or other unique identification printed on the label.
- Documentation must be sufficient to determine the source, transfer of ownership, and transportation of the organic product.

- 3) **In/out mass balance** – Which operation maintains inventory of your organic products?

CCOF inspectors will review your records to track inventory to verify that you received sufficient organic products to account for final production, sale, or transportation of organic products.

- ☐ Inventory stored and reported by my operation
- ☐ Inventory stored and reported by co-packer(s)
- ☐ Inventory stored and reported by exempt uncertified facilities
- ☐ My operation does not carry or maintain any inventory
- ☐ Other (describe):





- 4) **In/out mass balance** – How often is physical inventory performed to reconcile with records? Select all that apply.

Even if your operation does not physically store products, you must request inventory records from the location where products that you own are stored.

- ☐ Monthly ☐ Quarterly ☐ Annually ☐ My operation does not carry or maintain any inventory
☐ Other (describe):

D. Supply Chain Overview & Fraud Prevention

You must implement monitoring practices and procedures to verify suppliers in the supply chain and organic status of agricultural products received to detect and prevent organic fraud. You must also implement monitoring practices and procedures to verify that your plan is effectively implemented.

A fraud prevention plan must be appropriate to the activities, scope, and complexity of the operation, and should be sufficient to address the verification and anti-fraud needs of the particular operation. This means not all fraud prevention plans will be alike.

For example, a processor that receives many organic ingredients from numerous suppliers should develop a fraud prevention plan that describes practices to detect, prevent, minimize, and mitigate organic fraud risks in lengthy supply chains. Because fraud prevention plans must verify the organic status of suppliers and organic products, they should include a description of how an operation verifies organic status back to the last certified operation in the supply chain.

- 1) According to the best practices described by the NOP, an Organic Fraud Prevention Plan may include the elements identified in the table below. Use the table as a guide when building your Organic Fraud Prevention Plan. Select the relevant check box below and attach your Organic Fraud Prevention Plan.
- ☐ I completed the [CCOF Organic Fraud Prevention Plan](#) worksheet, attached.
- ☐ I have updated my existing food safety programs (HACCP/HARPC Plan, Food Safety Plan, Food Defense Plan, Supplier Verification Program, Food Fraud Prevention, or other Prerequisite Programs). Attach a description of where and how applicable elements below have been incorporated into your system.
- ☐ I have written my own Organic Fraud Prevention Plan using applicable elements below as a framework. My plan is attached.

	Supply chain oversight and organic fraud prevention may include:
A	Supply chain map. <i>Required.</i>
B	Practices for verifying the organic status of any product you acquire and/or use. <i>Required.</i>
C	A process to verify suppliers and minimize supplier risk to organic integrity. <i>Required.</i>
D	A vulnerability assessment to identify weaknesses in your practices and supply chain.
E	Identification of critical control points in the supply chain where organic fraud or loss of organic status are most likely to occur and mitigation measures.
F	Monitoring practices, corrective actions, and verification tools to assess the effectiveness of mitigation measures.
G	A process for reporting suspected organic fraud to certifying agents and the NOP . <i>Required.</i>





E. Imports

Each shipment of imported organic product must be associated with a valid NOP Import Certificate.

- *The exporter must request a NOP Import Certificate from their certifier prior to shipment.*
- *The importer must declare the shipment as organic and enter the NOP Import Certificate number into the U.S. CBP Automated Commercial Environment (ACE) database.*
- *The importer must also retain a copy of the NOP Import Certificate.*
- *Shipments that arrive without a NOP Import Certificate must not be sold as organic, they must be re-exported, donated, or destroyed.*
- *Importers must notify CCOF of any shipments received without a NOP Import Certificate and provide evidence of re-export (CBP 7512 form and Export Booking Confirmation), donation, or destruction (CBP Certificate of Destruction).*

1) Do you import any organic products into the United States?

Importers of organic products into the United States must be certified. You must maintain organic certificates for all importers you source from.

Select all that apply:

- ☐ Yes, I import organic products, I am the importer of record. Continue to question E2

Importer of record = the entity legally responsible for the product entering the US.

- ☐ No, no imported products. Stop, this form is complete.

- ☐ No, I purchase imported products from a certified organic importer. Stop, this form is complete.

List importers who take title on your supplier list (H2.0A or H2.6).

If your supplier purchases imported products, you are not required to know the identity of the importer or maintain their organic certificate. Your supplier is responsible for that information.

Customs broker must be certified if they act as the importer of record or take ownership of products not in sealed tamper-evident retail packaging.

- ☐ No, I receive imported products from a certified organic importer who does not take title. Stop, this form is complete.

Importers who do not take title do not need to be listed on your supplier list (H2.0A or H2.6) but are still required to be certified and you must maintain their organic certificates. Supplier list (H2.0A or H2.6) must list certified seller (not importer) and you must also maintain seller's organic certificate.

Customs brokers must be certified if they act as the importer of record.

2) Are phytosanitary certificates required for any of your imported commodities?

- ☐ No ☐ Yes. *Have all phytosanitary certificates available at inspection.*

3) Pre- and post-arrival – How do you verify that imported products had no contact with prohibited substances or exposure to ionizing radiation? (Check all that could apply.)

If treatment is required, you must notify CCOF and have all treatment documentation available at inspection. Product treated with prohibited materials or exposed to ionizing radiation must be sold as conventional, destroyed or returned to the exporter.

- ☐ Standard Operating Procedure is attached.

- ☐ For products with Conditions of Entry, only organic compliant methods are used (ex: cold storage, carbon dioxide).

- ☐ I am notified of shipments that require treatment. For products that require treatment, only organic compliant methods are used (ex: cold storage, carbon dioxide).

- ☐ I am notified of shipments that require treatment. If prohibited substances or ionizing radiation is used, I will notify CCOF and have all treatment documentation and evidence that contaminated products were not sold as organic available at inspection.

- ☐ Other (describe): _____

