



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

Location where all organic records can be reviewed during inspection. If identical to the physical location address provided on your CCOF Certification Contract, skip to section B. Identical to physical location address on contract.

Address: \_\_\_\_\_

City: \_\_\_\_\_ State/Province: \_\_\_\_\_ Zip/Postal Code: \_\_\_\_\_ Country: \_\_\_\_\_

Contact(name/title): \_\_\_\_\_

Phone: \_\_\_\_\_ Fax: \_\_\_\_\_ Email(s): \_\_\_\_\_

B. Lot Numbering

- 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

Table with 6 columns: Code, 23, 123, A, O, 45. Signifies: Year: 2023, Julian date of production, Shift, Organic, Plant location

Lot Number: \_\_\_\_\_

Table with 6 columns: Code, Signifies

- 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.

Nonretail 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 is visible through the nonretail container, nonretail container is not required to 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): \_\_\_\_\_

- 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** – Importers are required to have additional documentation showing that imported organic products have not been treated upon entry to the USA. Organic imports must be clearly identified and marked as organic on all import documents, including U.S. Customs and Border Protection entry data.
- NOP Import Certificate must be associated with each shipment. The exporter must request an 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 CBP ACE database.
  - Additional documentation for each shipment may include, but are not limited to: import permits, phytosanitary certificates, transaction certificates, NOP Import 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), APEDA Certificate of Inspection 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** – Describe the records and system you use to track inventory of ingredients and products. You may attach sample documents to illustrate, e.g. monthly log of beginning and ending inventory. Describe any abbreviations or acronyms used in your records to indicate that products are organic.

*CCOF inspectors will verify that you received sufficient organic products to account for final production, sale, or transportation of organic products.*

### 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.
- I am enrolled in OTA's [Fraud Prevention Solutions](#) program (optional third-party program), my Fraud Prevention Plan is attached.

	Supply chain oversight and organic fraud prevention may include:
A	Supply chain map.
B	Practices for verifying the organic status of any product you acquire and/or use.
C	A process to verify suppliers and minimize supplier risk to organic integrity.
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 <a href="#">certifying agents</a> and the <a href="#">NOP</a> .



E. Imports

- 1) Do you work with any licensed Customs Brokers?
  - Yes  No, continue to question E2.
  - a) If yes, does any Customs Broker also do any of the following:
 

*If any of the following are checked, provide an [Exempt Handler Affidavit](#) (EHA) for the Customs Broker so CCOF can determine if certification is required.*

    - Act as importer of record  Sell imported products  Trade imported products
    - Take physical possession of imported products  Take ownership of imported products
- 2) Do you import any organic products into the United States or purchase or receive organic products directly from any importers?
 

*All importers of organic products into the United States must be certified and you must maintain organic certificates for any importer you source from.*

Select all that apply:

  - No, no imported products. Stop, this form is complete.
  - Yes, I import organic products, I am the importer of record. *Importer of record = the owner, purchaser, consignee, or authorized Customs broker of imported products coming into the United States.*
  - Yes, I purchase imported products from a certified organic importer. Stop, this form is complete. *Importers who take title should be listed on your supplier list (H2.0A or H2.6).*
  - Yes, I directly 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.*
  - Yes, I receive imported products from my supplier. Stop, this form is complete. *If your supplier purchases imported products, you are not required to know the identity of the importer or maintain their organic certificate. Supplier is responsible for that information.*
- 3) If you are the importer of record – Are phytosanitary certificates required for any of your imported commodities?
  - No  Yes. *Have all phytosanitary certificates available at inspection.*
- 4) Do your imported commodities currently have any Conditions of Entry?
  - No  Yes
  - a) For products with Conditions of Entry, how do you ensure that only organic compliant treatments are used (ex: cold treatment, carbon dioxide)?

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- 5) How do you verify that imported products were not treated or exposed to a prohibited substance, fumigated with prohibited substances, or exposed to ionizing radiation?
  - Standard Operating Procedure is attached.
  - I am notified of shipments that require treatment. Describe notification: \_\_\_\_\_
  - Other (describe): \_\_\_\_\_
- 6) If treatment is required, I will notify CCOF, maintain treatment documentation (PPQ Form 203, Fumigation Form 429, and Emergency Action Notification Form 523), and do the following (check all that could apply):
  - Treat with organic allowed treatment (ex: cold treatment, carbon dioxide).
  - Treat with prohibited treatment and sell as conventional (nonorganic).
  - Return shipment to exporter.
  - Destroy shipment.
  - Other (describe): \_\_\_\_\_