



OSP Maple

Important: In order for this form to properly import into the PCO certification system, please save a copy of this form to your desktop and fill out via Acrobat Reader.

- Please DO NOT fill out this form using Preview (Mac) or in your internet browser (e.g. Internet Explorer, Firefox, Safari) as this will cause your data to be lost.
- When sending to PCO, please DO NOT "Print to PDF" as this renders an unreadable form. Please simply "save" the PDF document and send this document to PCO.

Instructions: Use this form if you are requesting organic certification for maple sap collection and maple syrup production. If you only process maple syrup and related products, but do not harvest sap, please complete the Processor/Handler Organic System Plan. Use additional sheets if necessary. Attach current map(s) detailing all sugar bushes with numbers. On the map(s), identify land use of adjoining fields (i.e., conventional crops, residential area, etc.).

SECTION 1 - General Information

§205.201

Primary Contact First Name:

M.I

Last Name:

Business Name:

1.1 Check the statement that applies to your operation:

- Collect maple sap, but do not further process the sap (complete this form, including Section 6).
- Collect maple sap and process the sap to produce maple syrup (complete this form, including Section 6).
Collect maple sap and process into other processed maple products such as creams and candies
(complete OSP Processor/Handler)

1.2 Is this farm:

Organic only

Organic and nonorganic (i.e. split or parallel production)

a) If organic and non-organic, describe crops that are grown conventionally:

2.1 Submit a Food Formulation Sheet and label(s) for each product requested for certification.

- N/A, only harvest sap and do not further process
- Food Formulation Sheet(s) attached
- Label(s) attached (including all retail and nonretail labels)

2.2 Have you managed all tapping areas for three years or more?

- Yes (Field and Crop Form must accurately reflect sugar bush and tapping area management, including inputs for the last 3 years)
- No

a) If no, check the type of documentation attached that shows the eligibility of this land for organic certification:

- Prior Land Use (PLU) Statement (signed by the previous owner/manager or other knowledgeable person* stating the trees planted/managed and all inputs applied during the previous 3 years)
- Field and Crop Form completed by previous land manager (with previous 3 year history)
- Copy of the organic certificate from a previous owner/manager (unless you also submit a PLU statement for requested land, PCO will verify that this land has been continuously certified with no lapse in organic management up to the date of transfer of management)

**Note: PCO may require additional verification from government agencies to verify the accuracy of your land history statement. Making a false statement to an accredited certifying agent shall be subject to provisions of section 1001 of title 18, United States Code. (NOP §205.100(c)(2)).*

2.3 Are all areas requested for certification located at the physical address listed on the OSP General Information Form or the Annual Update Report?

- Yes
- No

a) If no, provide address of additional location(s):

2.4 Did you plant all of the maple trees to be tapped, or were some trees naturally established?

Planted all trees to be tapped

Tapping naturally established trees (may include some trees that were planted)

2.5 When was the last time a prohibited material was applied to the tapped areas?

ADJOINING LAND USE:

Organic production areas must have distinct boundaries and buffer zones to prevent the unintended application of a prohibited substance or contact with a prohibited substance that is applied to adjoining land not under organic management. Adjoining land includes cropland, pastures, residential property, fallow land, etc. Buffer areas may change annually, depending on contamination potential from adjoining land uses. Buffers must be sufficient in size or other features (windbreaks, diversion ditches) to prevent the unintended contact by prohibited substances applied to adjacent land areas. Crops within the buffer must be left unharvested, or managed organically but harvested, stored, and disposed of as nonorganic crop, with records kept of crop disposition. If buffers are not under your direct control, a written agreement is required with the responsible party.

3.1 Are there any potential sources of contamination from prohibited substances or commingling of non-organic sugarbush in or near the tapping area?

- No
- Yes

a) If yes, how is contamination and commingling prevented:

3.2 Adjoining Land Use:

List specific buffer areas you maintain for each side of each organic tapping area.

Location or Tapping Area Name/Numbers	Type of Adjoining Land (non-organic farm, forest, resident)	Type of Buffer (tree line, hedgerow, grass strip, cropland) <i>- If Adjoining Land is under organic management, put N/A in this column</i>	Width of Buffer
	N:	N:	
	S:	S:	
	E:	E:	
	W:	W:	
	N:	N:	
	S:	S:	
	E:	E:	
	W:	W:	
	N:	N:	
	S:	S:	
	E:	E:	
	W:	W:	
	N:	N:	
	S:	S:	
	E:	E:	
	W:	W:	
	N:	N:	
	S:	S:	
	E:	E:	
	W:	W:	
	N:	N:	
	S:	S:	
	E:	E:	
	W:	W:	

3.3 If sap is harvested from the buffer zones, describe its harvest, storage, and sales:

N/A, sap not harvested from trees in buffer zones

3.4 What additional safeguards do you use to prevent accidental contamination?

- Written notification to:
 - Highway departments
 - Electric companies
 - Aerial spray companies/airports
 - Drainage commissions
 - Farm service office

- None
- Adjoining Land Use Agreements with neighbors
- Other (specify):

3.5 Have you posted "Do not spray" signs along roadsides that adjoin organic tapping areas?

- Yes
- No

EQUIPMENT FOR COLLECTION

To prevent commingling and contamination, all equipment used in organic maple production must be free of non-organic sap and prohibited materials. Equipment used for both organic and non-organic farming must be cleaned and flushed prior to use on organic sugarbush or sap. Keep records of equipment clean and flush activities.

3.6 Equipment for Collection (tubing, vacuum system, sap storage): List all equipment used for sap collection.

Equipment	Own/Rent/Custom	How is equipment cleaned before use on organic sugarbush?	Equipment Cleanout documented?
	<input type="checkbox"/> Own <input type="checkbox"/> Rent <input type="checkbox"/> Custom		<input type="checkbox"/>
	<input type="checkbox"/> Own <input type="checkbox"/> Rent <input type="checkbox"/> Custom		<input type="checkbox"/>
	<input type="checkbox"/> Own <input type="checkbox"/> Rent <input type="checkbox"/> Custom		<input type="checkbox"/>
	<input type="checkbox"/> Own <input type="checkbox"/> Rent <input type="checkbox"/> Custom		<input type="checkbox"/>
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	<input type="checkbox"/> Own <input type="checkbox"/> Rent <input type="checkbox"/> Custom		<input type="checkbox"/>
	<input type="checkbox"/> Own <input type="checkbox"/> Rent <input type="checkbox"/> Custom		<input type="checkbox"/>
	<input type="checkbox"/> Own <input type="checkbox"/> Rent <input type="checkbox"/> Custom		<input type="checkbox"/>

3.7 Could any other equipment you use, including contracted operators/equipment, have been contaminated by previous uses?

- No
- Yes

a) If yes, describe:

3.8 How do you store sap? Include size, location, and what storage vessel is made out of:

4.1 What methods do you use to preserve the natural resources of your sugarbush?

- Minimize disruption of priority species and/or sensitive areas
- Avoid erosion
- Allow natural re-establishment of maple trees
- Plant maple trees from external stock
- Maintain natural forest biodiversity
- Maintain wildlife habitat
- Use a forestry management plan
- Transplant maple seedlings within the collection area
- Removal of non-native plants
- Thinning existing plants
- Harvest from stable population
- Monitor water quality
- Other (specify):

4.2 Are there any rare, threatened, or endangered terrestrial or aquatic plants or animals that occur in the sugarbush area?

- No (Skip to question 4.3)
- Yes (Answer questions a & b below)

a) If yes, list:

b) If yes, describe methods used to prevent any negative impacts to these plants and/or animals, including how you monitor to verify lack of impact?

4.3 How do you manage and monitor the health of tapped trees?

- Removal of competing trees/plants
- Monitor leaf canopy during growing and non- growing season
- Visually monitor for presence of pests and/or disease
- Use pest and/or disease management material

- Only tap healthy trees
- Prune trees
- Use fertilizers or soil amendments
- Irrigate
- Other (specify):

4.4 Do you experience any pest problems in the collection area?

- No
- Yes

a) If yes, how are pests managed?

4.5 Are there any disease problems in the collection area?

- No
- Yes

a) If yes, how are diseases managed?

Refer to PCO's Maple Guidance Document for specifics regarding tapping and sap collection restrictions.

5.1 Total number of taps on all sugarbushes?

a) On buckets:

b) On tubing:

5.2 What size taps do you use?

7/16"

5/16"

5.3 Tubing is:

N/A, tubing not used

Taken in after season

Left in sugarbush: date tubing removed?

a) How is tubing disposed of once removed?

Recycled

Waste disposal service

5.4 If sap is collected in buckets:

N/A, buckets not used

a) What are buckets made out of?

b) Are they new or used?

New

Used. Provide age:

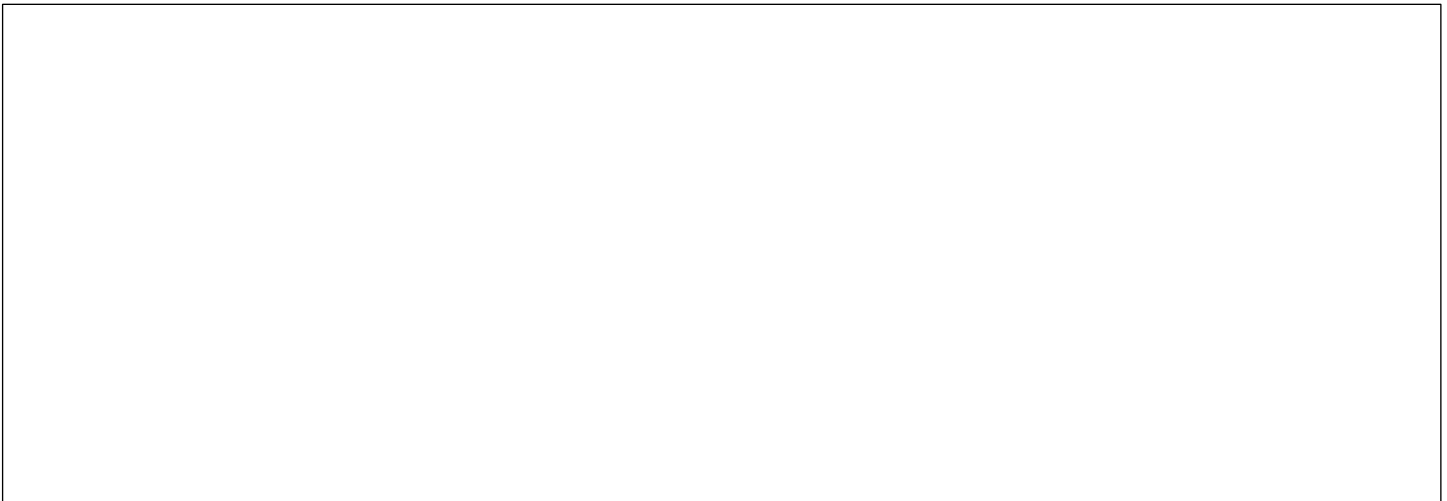
c) If previously used, how were they cleaned prior to use in organic production?

5.5 How do you determine the number of taps to establish per tree - i.e. what criteria do you use?
(PCO policy: minimum 1 tap per 10 inch diameter with 1 additional tap for every four inch increase)



5.6 What is the maximum number of taps per tree you could use? (PCO policy: maximum of 3)

5.7 If multiple taps are used per tree, how are the taps spaced? (PCO policy: minimum 6 inches horizontal and 12 inches vertical)



5.8 Depth of tap (PCO policy: maximum 2.5 inches unless approved by PCO):

5.9 When are taps removed? (PCO policy: must be within 60 days after the end of sap flow)

- a) If any materials are applied to tap holes after tap removal they must be listed on your Materials Used Form.
 Materials Used Form attached.

5.10 Do you do any of the following:

- N/A, do not double tap, ream or freshen (no further changes to tapping after initial tapping of the season)
- Double tap (i.e. previously tapped tree during the same year)
- Ream or freshen taps (i.e. establishing a previously drilled tap during the same year)

- a) If yes, explain:

5.11 Do you use a vacuum pump to gather sap?

- No
- Yes

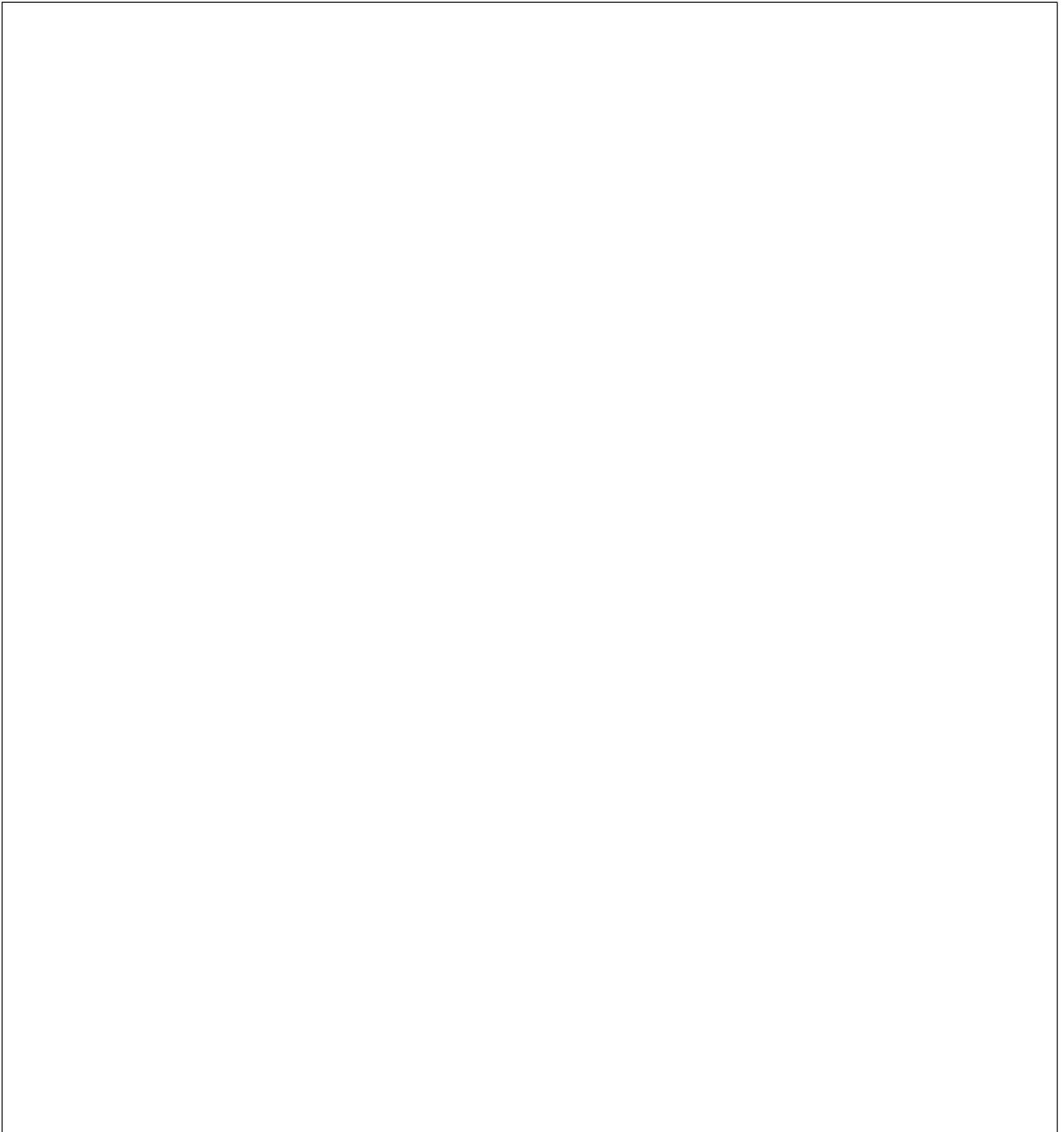
a) If yes, what is the pressure at the pump and at the taps?

5.12 Describe how sap is moved in the sugar house (pump, gravity and/or manually fed):

5.13 Do you have pump stations?

- No
- Yes

a) If yes, describe the equipment used in each station. Identify all stations on your map.



5.14 Describe the cleaning process of all collection equipment including lines, taps, pumps, and storage tanks.
Include any materials used in your description: *(Note: All materials used must be listed on your Materials Used Form)*

Materials Used Form attached

Procedures, processes, storage, and equipment must not present contamination risk to organic products from commingling with other non-organic products, sanitation products, or pest management products. Procedures used to maintain organic integrity must be documented.

N/A, we do not process sap into syrup

PRODUCT FLOW

6.1 Submit a Product Flow Chart or description of your process that shows where and how product is received, stored, processed, packaged, and warehoused, identifying all pieces of equipment, storage areas, and where ingredients are added or processing aids used.

Product Flow Chart schematic and / or description attached

EQUIPMENT FOR PROCESSING

6.2 Equipment Used for Processing: List all equipment used for processing (e.g. reverse osmosis, evaporator, finishing pan, filter press, bottler, syrup storage, etc.).

Name of equipment	How is it cleaned?	When is it cleaned?	Cleaning Material Used

6.3 Is the processing area and equipment used for organic products only?

Yes

No

a) If no, describe how you prevent commingling with non-organic products and contamination with prohibited substance during processing, storage, and packaging:

6.4 When is sap filtered?

6.5 What type of filter is used to filter sap or syrup: (Check all that apply)

Note: All filters should be listed on your Materials Used Form

- N/A, no filter used
- Screen
- Paper Felt
- Pressure filter

- Diatomaceous earth
- Other (specify):

6.6 How are these filters cleaned?

6.7 Is a reverse-osmosis machine used?

- No (Skip to question 6.8)
- Yes (Answer questions a & b below)

a) If a material is used in the storage of the machine they must be listed on your Materials Used Form.

- Materials Used Form attached

b) Describe your procedure for flushing reverse osmosis machine prior to use:

6.8 Do you use ultra-violet light treatment?

- Yes
- No

6.9 Provide details regarding the evaporator(s) used, including size, what it is made out of, and age of evaporator?

- N/A, no evaporator used

6.10 Defoamers must be listed on your Materials Used Form.

(Note: If using an agricultural product as a defoamer (e.g. canola oil) it must be certified organic)

- Materials Used Form attached

6.11 Is a finishing pan used?

- No
- Yes

a) If yes, list make and size:

6.12 Describe the type of equipment used to package syrup:

6.13 Check types of packaging material used:

- Stainless steel barrels
- Glass bottles/jars
- Plastic bottles
- Boxes or other packaging

- Tin
- Plastic barrels
- Epoxy painted galvanized barrels
- Other (specify):

6.14 Do you buy sap?

- No
- Yes

a) If yes, list operation names below and include organic certificates.

- Organic Certificates attached

6.15 Do you buy-in finished maple syrup from other producers?

- No
- Yes

b) If yes, list operation names below and include organic certificates.

- Organic certificates attached

§205.271 requires that operations use management practices to prevent pests (question 7.4). If pest pressure persists, mechanical and physical controls or lures/repellents using nonsynthetics or synthetics on the National List of Allowed and Prohibited Substances (question 7.5) must be used. If there is continued pest pressure an operation may elevate to using a non-synthetic or synthetic on the National List of Allowed and Prohibited Substances such as carbon dioxide, nitrogen gas, vitamin D3 bait, boric acid, diatomaceous earth, or soap products. As a last resort, and with prior approval from PCO, an operation may use a synthetic that is not on the National List. A Synthetic Facility Pest Management Agreement form must be completed if using a synthetic substance that is not on the National List.

Complete this section to describe pest control practices and materials used in any facility where organic maple or maple products are produced and/or stored, including but not limited to storage and packing areas.

7.1 Check which facilities you use for your organic crops or seeds:

- N/A. I have no buildings/facilities that are used for any portion of my organic operation (Skip to section 8)
- Storage areas
- Packing areas
- Production areas

7.2 Attach facility map showing location of pest traps and monitoring devices.

- Map Attached

7.3 Who is responsible for pest control in your facility?

- In-house
- Contracted pest control service (name):

7.4 Which of the following management practices do you use to prevent pests? (Must use at least one)

- Remove pest habitat, food sources, and breeding areas
- Prevent access to handling facilities
- Manage environmental factors to prevent pest reproduction (temperature, light, humidity, atmosphere, air circulation)
- Other (specify)

7.5 Which of the following practices do you use to control pests in organic production and storage areas?

(Must check at least one)

- N/A, the preventative practices used in 7.4 above are sufficient to control pests
- Mechanical or physical controls, including traps, light or sound
- Lures and repellents using nonsynthetic or synthetic substances consistent with the National List.
List lures and repellents that you apply in organic production and storage areas on your Materials Used Form.
 - Materials Used Form attached

7.6 If the measures listed in 7.4 and 7.5 above are not sufficient to prevent or control pests, do you use any of the following:

(Note: List all pest control input materials that you apply in organic production and storage areas on your Materials Used Form.)

- | | |
|--|--|
| <input type="checkbox"/> N/A, measures listed in 7.4 and 7.5 are sufficient to prevent and control pests | <input type="checkbox"/> Diatomaceous earth |
| <input type="checkbox"/> Carbon dioxide | <input type="checkbox"/> Soap products |
| <input type="checkbox"/> Nitrogen gas | <input type="checkbox"/> Other non-synthetic input materials |
| <input type="checkbox"/> Vitamin D3 bait | <input type="checkbox"/> Other synthetic input materials* |
| <input type="checkbox"/> Boric acid | |

**Note: A Synthetic Facility Pest Management Agreement form may need to be completed in order to use certain synthetic input materials. This form must be submitted to PCO PRIOR to the use of those input materials. Check with PCO to determine if this form is required.*

7.7 How do you prevent pest control materials from contacting organic products, ingredients, and packaging materials?

- | | |
|--|--|
| <input type="checkbox"/> N/A, no pest control input materials used | <input type="checkbox"/> Cover equipment used for food handling |
| <input type="checkbox"/> Remove product and packaging from areas to be treated | <input type="checkbox"/> Purge equipment with nonorganic product |
| <input type="checkbox"/> Wash and rinse food contact surfaces after treatment | <input type="checkbox"/> Other (specify): |

7.8 Where do you record pest control material use and measures taken to protect organic products or packaging?

- N/A, no pest control input materials used
- Pesticide Use Log
- Log describing removal/reentry of products and packaging

- Purge log
- Other (specify):

7.9 Describe monitoring (including frequency) used to determine the effectiveness of management practices above:

Certified operations must maintain records concerning the production, management, and handling of agricultural products intended to be sold, labeled, or represented as organic. These records must fully disclose activities and transactions of your operation through all organic production and handling steps. Records will be verified at your inspection. As applicable, inspectors may examine non-organic recordkeeping to verify organic production.

Additionally, §205.403 requires that two types of audits are conducted at each inspection:

- *Mass-balance: to verify that the quantities of organic product and ingredients produced or purchased account for organic product and ingredients used, stored, sold, and transported (i.e. inputs account for outputs)*
- *Traceback: A successful recordkeeping audit trail will use dates, lot numbers, field names, etc. to link incoming products/inputs from initial purchasing by your operation, through all production steps (sap collection), and to final sale or distribution. Records used in an audit trail include and are not limited to purchase invoices, storage records, labels, sales invoices, organic certificates, bills of lading, and hauling records.*

An operation's recordkeeping system, as required by §205.103, must be sufficient to support the required audits conducted during the on-site inspection.

Operations should review §205.103 of the organic regulations for specific recordkeeping requirements. If you have questions about what is required, contact PCO.

8.1 How do you ensure that you maintain audit trail documentation that is sufficient to determine the source, transfer of ownership, and transportation of organic products?

8.2 Does your audit trail documentation identify agricultural products on these records as “100% Organic” or “Organic”?

- Yes
- No

8.3. Does your audit trail documentation contain information that links to your nonretail labels?

- Yes
- No
- N/A, nonretail labels not used

8.4 Do you maintain recordkeeping to document quantities of organic products purchased or produced by your operation?

- Yes
- No

8.5 Do you maintain recordkeeping to document quantities of organic products used, stored, sold, transported or distributed by your operation?

- Yes
- No

8.6 Which of the following records do you currently maintain or plan to maintain for organic production? *Note: Records must be kept to track all activities and transactions, as well as demonstrate the organic integrity of land and crops.*

- Sugarbush maps
- Tapping records
- Sugarbush history sheets (previous three years)
- Documentation of previous land use for rented and/or newly purchased land
- Adjoining Land Use forms
- Lease Agreements for rented land
- Input records for soil amendments, seeds, manure, foliar sprays, and pest control products (keep all labels)
- Documentation of attempts to source organic seeds and/or planting stock
- Documentation of organic seedlings
- Monitoring records (soil tests, tissue tests, water tests, quality tests, observations)
- Equipment cleaning records
- Sap quantities collected that show sugarbush collected from, amount and date of collection
- Storage records that show storage location, storage identification, sugarbush collected from, amounts stored, and cleaning activities
- Boiling records/syrup production records
- Clean transport records
- Invoices/purchase records for bought in sap or syrup
- Sales records (purchase order, contract, invoice, cash receipts, cash receipt journal, sales journal, etc.)
- Shipping records (scale ticket, dump station ticket, bill of lading)
- Transaction Certificates
- Import Certificates
- Organic Certificates
- Exempt Handler Affidavits
- Other (specify):

8.7 If you blend different grades of syrup, do you maintain records of the blend amounts and resulting grade amounts?

- Yes
- No
- N/A, all the same grade

8.8 Describe how do you ensure that the above kept records are readily available upon request by PCO and/or available at inspection:

8.9 How long do you keep your records? (Must be at least 5 years):

9.1 How do you market your organic products? Check all that apply:

- Farmers market
 Direct to retail
 On-farm retail
 CSA/subscription service

- Wholesale
 Wholesale to processor
 Contract to buyer
 Other (specify):

9.2 Do you use or plan to use any retail labels?

- No
 Yes

a) If yes, attach a color copy of the label(s)

Labels attached. Retail label must:

- Identify the ingredients as organic in the ingredient statement
- Identify PCO as the certifier directly below the contact info of the operation using the phrase "Certified Organic by PCO" or a similar phrase

9.3 Do you use or plan to use any nonretail labels?

- No
 Yes

a) If yes, attach a color copy of the label(s)

Labels attached. Nonretail label must include:

- Identification of the product as organic
 - Nonretail containers used to ship organic products that are labeled for retail sale with organic identification visible on the retail label do not require additional identification of the product as organic on the nonretail label
- Production lot number, shipping identification, or other unique information that links the nonretail container to the audit trail documentation

9.4 Do you use or plan to use any marketing materials for your organic products?

- No
 Yes

a) If yes, describe the types of marketing materials (e.g. website, social media, farm market signs, brochures, etc) you use:

9.5 Do your labels identify PCO as the certifying agent?

- Yes
- No
- N/A, no labels used

a) If no, explain:

9.6 Do you use or plan to use the USDA organic seal on product labels or marketing materials?

- Yes
- No
- N/A, no labels or marketing materials used

9.7 Do you use or plan to use the PCO organic logo on product labels or marketing materials?

- Yes
- No
- N/A, no labels or marketing materials used

Pennsylvania Certified Organic (PCO)

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§205.201(a)(3) requires that the Organic System Plan (OSP) of a certified operation 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 the certified operation's activities, scope, and complexity.**

Fraud prevention plans must describe practices that verify the organic status of suppliers and organic products, including how an operation verifies organic status back to the last certified operation in the supply chain. This supports the record keeping and audit trail requirements at §205.103(b)(2) and allows certifiers to verify compliance during on-site inspections and supply chain traceability audits.

Consider your operation's sourcing and selling of organic products and develop a plan that pertains to your operations' activities, including scope and complexity.

Producers may consider the following:

- Purchases, transportation, and sales of organic seed/seedlings.
 - Are your seed/seedling suppliers certified organic for handling of those products (if applicable)?

Processors/Handlers may consider the following:

- Full supply chain verification for each organic ingredient back to the last certified handler, including transporters and exempt handlers within the supply chain.

10.1 Do you work with any exempt handlers (i.e. uncertified handlers - cold storage facilities, syrup brokers/handlers)?

- No (Skip to 10.2)
 Yes (Answer questions a & b below)

a) Check the types of activities they provide for your operation (check all that apply):

- | | |
|---|--|
| <input type="checkbox"/> Storage/Warehousing* | <input type="checkbox"/> Licensed customs brokering |
| <input type="checkbox"/> Brokering* | <input type="checkbox"/> Logistics brokering (e.g. freight forwarding) |
| <input type="checkbox"/> Wholesaling* | <input type="checkbox"/> Transporting |
| <input type="checkbox"/> Distributing* | <input type="checkbox"/> Other (specify)*: |
| <input type="checkbox"/> Trading* | |

b) *The asterisk (*) indicates activities that require a completed Exempt Handler Affidavit (EHA). If the operation you work with conducts any of these activities identified with an asterisk (*), they must complete the EHA.

- Exempt Handler Affidavit(s) attached (Skip to 10.2)
 N/A, activities above do not contain an asterisk. (Answer question c below.)

c) Does the exempt handler provide you with documentation showing full traceability** back to the last certified operation for each shipment?

- Yes
- No, explain:

****Note:** Full traceability includes the following as applicable:

- Identification of product as organic on nonretail containers
- Current organic certificate of the last certified organic operation
- Documents generated by the last certified operation to the exempt handler proving purchase, delivery and/or transfer
- Purchase invoices, receipts, bills of lading, or other audit trail documentation
 - Other audit trail documentation must designate the product as organic, include a description of the product, date of transaction and amount transferred, and list the last certified operation and/or lot numbers applied by the last certified operation (must match lot numbers on exempt handler audit trail documentation).

10.2 Describe the areas in your supply chain where:

- Fraud is most likely to occur; and
- Where you are most likely to notice if purchased products (crops, inputs) or animals do not have organic certification
(Note: These are often referred to as "critical organic control points")

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10.3 How do you prevent fraud and ensure your supply chain is compliant? Check all that apply:

- I participate in an existing Fraud Prevention Plan or Program (e.g. GFSI Food Fraud Vulnerability Assessment, OTA Organic Fraud Prevention Solutions)
- I create a map or inventory of my supply chain that identifies suppliers
- I identify critical organic control points in my supply chain where organic fraud or loss of organic status are most likely to occur
- I conduct an assessment to identify weaknesses in my procedures to ensure my suppliers and products I purchase are organic
- I include practices for verifying the organic status of any product I acquire and/or use prior to use
- I include a process to verify suppliers and minimize supplier risk to organic integrity prior to using a supplier
- I initiate mitigation measures to correct vulnerabilities and minimize risks (as identified in my assessment)
- I regularly monitoring my practices and verification tools to assess the effectiveness of my mitigation measures
- Other (specify):

10.4 Describe the practices you use to verify the organic status of suppliers:

10.5 Describe the practices you use to verify the organic status of products acquired/used:

A large, empty rectangular box intended for the user to describe their practices for verifying the organic status of products.

10.6 How do you monitor the effectiveness of your fraud prevention plan?

- Residue test results
- GMO test results
- Mock recall

- Internal audits
- Other (specify):

10.7 How often do you monitor the effectiveness of your fraud prevention plan?

- Weekly
- Monthly
- Annually

- As needed
- Other (specify):

10.8 Describe your process for reporting suspected organic fraud to PCO and/or the NOP:

