

Inspector Guidance on Supplier Verification CROPS

Why Supplier Verification Matters

Supplier verification is a cornerstone of organic fraud prevention. Under USDA’s **Strengthening Organic Enforcement (SOE)** rule, certified operations must verify the organic status of suppliers and inputs. Inspectors play a critical role in ensuring that operators not only collect certificates but also implement systematic processes to prevent fraud.

A robust supplier verification program increases supply chain transparency, reduces vulnerabilities, and ensures that all inputs, ingredients, and products align with the National Organic Program (NOP) standards. Supplier verification should be viewed as a **continuous monitoring process**—not a one-time exercise.

Inspector Focus Areas:

- **Approved Supplier List** – Confirm the operation sources only from suppliers that have been pre-approved, documented in the Organic System Plan (OSP), and added/removed as practices change.
- **Certificates & Registrations** – Verify that organic suppliers appear in the **NOP Organic Integrity Database (OID)** and hold current, valid certificates.
- **Seed & Input Documentation** – For non-organic seed use, check that **commercial availability searches** are documented. For soil amendments or pest controls, look for OMRI/WSDA/CDFA/ODA approvals and product labels.
- **Receiving Practices** – Ensure that invoices, bills of lading, and lot numbers link directly to the supplier and certificate. Cross-check incoming materials against the approved OSP list.
- **Ongoing Monitoring** – Review how operators monitor supplier status through the OID and keep annual updates of supplier information.

Red Flags for Inspectors:

- Missing or expired certificates
- Inputs not listed in the OSP
- Lack of documentation for seed commercial availability searches
- Gaps between incoming product volumes and production/sales (mass balance)

Key Takeaways:

Supplier verification is not just paperwork—it is the **front line of organic fraud prevention**. Inspectors should confirm that operators:

1. Maintain an **up-to-date, approved supplier list** in their OSP.
2. Collect, verify, and regularly review **organic certificates and supporting records**.
3. Implement **ongoing monitoring** (OID checks, audits, cross-verification).
4. Identify and mitigate risks in **complex or high-risk supply chains**.



Supplier Verification Template:

The attached template provides detailed, step-by-step procedures for operators. As inspectors, your role is to ensure these systems are not only written into the OSP but also **implemented and documented in practice**.

Purpose of the Standard Operating Procedure (SOP) Template

- The **Supplier Verification SOP** included with this guidance is an **illustrative template**. It shows what a thorough supplier verification practice could look like in a certified organic operation.
- For inspectors, the template is **not a compliance checklist**, but rather an **example to understand what to look for** during an inspection. It outlines the expected structure: purpose, scope, responsibilities, procedures, monitoring, recordkeeping, and review.
- For operators, inspectors may **leave the template behind as a resource**. It can help the operator strengthen their OSP by showing what a complete, well-documented supplier verification program looks like.

How Inspectors Should Use It

- **Before the inspection:** Review the SOP template so you understand the types of documentation, approvals, and recordkeeping practices to look for in an operation's OSP.
- **During the inspection:** Compare the operator's supplier verification process to the template. Ask: Do they have a written SOP? Does it include certificate verification, traceability, monitoring, and corrective actions?
- **After the inspection:** If the operator's system is weak or incomplete, provide the SOP template as a resource to help them build or strengthen their program.

*See next page for attached Supplier Verification Template

CROPS

Organic Supplier Verification Procedure Standard Operating Procedure (SOP) Template

Prepared By	Organic Fraud Prevention Team	Original Issue	Doc #
Department	Organic Fraud Prevention Team	Review Date	Version

1. Purpose

The purpose of this standard operating procedure (SOP) is to 1) ensure that all organic farm input suppliers are qualified, evaluated and approved prior to their use in our company’s organic farm operation; and 2) ensure that the inputs received and applied are consistent with the approved supplier/input list.

2. Scope

This SOP applies to all farm inputs used in our company’s certified organic operations, including but not limited to seed, fertilizers, pest control products, cleaners, sanitizers, and any other farm or post-harvest materials/inputs that may impact organic certification.

3. Responsibility

The lead of the Organic Fraud Prevention Team (OFPT) is responsible for ensuring compliance with this SOP and tracking the qualification of input suppliers.

4. Input Supplier Verification Procedure

4.1 Organic or “Organic Compliant” Identification

- Decision makers and buyers are responsible for identifying all input suppliers through various sources like supplier directories, databases, catalogues, websites, existing supplier recommendation, etc.

4.2 Initial Supplier Approval

- The OFPT lead and buyers are responsible for evaluating each supplier’s suitability and capability to supply certified organic and/or organic compliant inputs and documentation that meet our company’s specifications. The approval process must include approval by <certifier> and updating the OSP
 - A USDA organic operation must be listed in the NOP Organic Integrity Database (OID)
 - Organic certificates shall be obtained from the supplier for review and maintained on-file
 - Must be valid and complete certificates (issued within the last 15 months and listing specific products/crops/parcels/brands).
 - Organic compliant verification shall be obtained for review by our company and approved by certifier or Material Review Organization (MRO)
 - Commercial Seed Search Documentation for Non-Organic Seeds
 - OMRI, WSDA, CDFA, etc. approval for inputs (Certifier or recognized MRO)
 - Product Labels
 - Non-GMO/Irradiation/Sewage Sludge Disclosure
 - Suppliers must be able to provide documentation demonstrating that the product meets product specification for each product (e.g. commercial availability (quality, quantity form), approved seed treatment, non-GMO disclosure, etc.)
 - Suppliers must agree to provide timely updates to certification or registration status, at least annually or on demand.
 - Suppliers who meet all the criteria shall be approved as qualified suppliers. All inputs must be approved and added to our OSP or deleted if they are no longer being used.

4.3 Purchasing and Receiving

- Buyers/purchasers must order inputs from suppliers approved as per 4.2

- Buyers and receiving operations must verify that inputs are received from an approved supplier / approved input per certifier and OSP
 - Cross-reference (link) incoming product/input with organic certificates/registration/MRO approved material list and all receiving documents and associated records (BOL, shipping manifest, lot numbers, etc.)

4.4 Supplier Organic Status Monitoring – The organic status of each qualified supplier shall be monitored on an on-going basis. This includes:

- Monitoring the Organic Integrity Database (OID) to ensure the organic status of organic seed suppliers
- Maintaining an approved OSP Materials List per certifier
- Looking for and referencing OMRI/WSDA/MRO approved materials

5. Records

All relevant organic certification records shall be maintained in a secure and systematic manner for no less than 5 years beyond their creation, be sufficient to demonstrate compliance with the applicable parts of the organic regulations and be made available for inspection and copying during normal business hours.

6. Distribution

This SOP and its related attachments shall be distributed to those personnel who require access to it for the performance of their tasks.

7. Training Requirement

This SOP shall be provided during orientation of a new employee, and refresher training shall be given annually to employees involved in purchasing, receiving or QA functions.

8. Review and Revision:

This SOP will be reviewed annually or when required and updated as per the requirements of the annual organic certification cycle.

9. Abbreviations and Definitions:

- SOP – Standard Operating Procedure
- QA – Quality Assurance
- OFPP – Organic Fraud Prevention Plan
- OID – Organic Integrity Database
- Organic – NOP certified organic (e.g. certified organic seed)
- Organic Compliant – Compliant for use in organic production

Signatory Authority:

Print Name:	
Sign Name:	
Date:	

Implementation/Revision History:

Date	Action/Reason	Revised/Reviewed By
	Implementation	Approvers: Owner: