

Inspector Guidance on Supplier Verification Handling/Processing

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 (Handling/Processing):

- **Supplier Approval Process** – Confirm the operator evaluates each supplier before purchase, including review of certification, OSP approval, and disclosures (e.g. non-GMO).
- **Documentation Requirements** – Inspect for current organic certificates, transaction certificates (when applicable), and documentation for non-organic agricultural ingredients under §205.606.
- **High-Risk Products & Imports** – Pay extra attention to vulnerable supply chains (e.g., imports, bulk commodities, country of origin, history of fraud). Operators should maintain traceability, transaction certificates, and phytosanitary records when required.
- **Receiving & Cross-Verification** – Check that invoices, shipping manifests, and labels match the certificate details (per approved supplier) and that products are clearly identified as organic.
- **Monitoring Practices** – Operators should demonstrate annual certificate reviews, six-month checks for new suppliers, and a process to update/remove suppliers from the approved list.

Red Flags for Inspectors:

- Supplier not found in OID
- Missing transaction certificates for imports or bulk ingredients
- Paperwork that does not match labels or lot codes
- Long/complex supply chains with weak documentation controls

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, staff training).
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

Handler/Processor 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 suppliers are qualified, evaluated and approved prior to their use in our company’s organic operation; and 2) ensure that the organic products received and are consistent with organic certificate verification procedures and the approved Master Products/Ingredient List.

2. Scope

This SOP applies to all vendors or customers used for organic products and sales.

3. Responsibility

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

4. Supplier Verification Procedure

4.1 Organic Status Identification

- Decision makers and buyers are responsible for identifying all organic suppliers through various sources like supplier directories, databases (e.g. OID), 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 ingredients/products/inputs and compliance documentation that meet our company’s specifications. The approval process must include approval by our <CERTIFIER> and corresponding updates to 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 listed in the OID
 - Must be valid and complete certificates (issued within the last 15 months and listing specific ingredients/products/brands).
 - Organic compliant verification shall be obtained for review by our company and approved by <CERTIFIER>
 - Commercial Search Documentation (non-organic ingredients on § 205.606)
 - OMRI, WSDA, CDFA, etc. approval for non-organic ingredients/processing aids/inputs
 - 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)
 - 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 products/ingredients/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>
 - Cross-reference (link) incoming product/input with organic certificates/registration/approved material/product 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 OID to ensure the organic status of organic seed suppliers
- Maintaining an approved OSP Approved Master Product/Ingredient List

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
- Organic Compliant – Compliant for use in organic production (non-organic inputs such as non-organic ingredients/processing aids per the National List, Sanitizers, Cleaners, etc.)

Signatory Authority:

Print Name:	
Sign Name:	
Date:	

Implementation/Revision History:

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