

# Inspector Guidance on Supplier Verification

## Livestock

### 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, feedstuff, 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 (Livestock):

- **Receiving & Cross-Verification** - Ensure feed and inputs match certificates, invoices, BOLs, and lot numbers per approved suppliers. Livestock purchases must comply with origin of livestock requirements and be traceable to birth/ eligibility level of the animal (slaughter, breeding stock, milk/ egg).
- **Feed suppliers** - Listed in the OID with valid organic certificates covering all feed ingredients. Products distributed from international locations, brokers/ traders, or multiple source suppliers, may merit testing or additional risk management.
- **Pasture compliance** - OSP and records must demonstrate  $\geq 30\%$  dry matter intake from pasture during the grazing season.
- **Supplements and minerals** - Limited to those allowed under the National List (e.g., kelp meal, yeast, salt, nutritional supplements).
- **Veterinary inputs** - Consistent with organic standards – no antibiotics, growth hormones, or prohibited substances, or clear documentation process for removal from the organic herd.
- **Residue testing protocols** - In place for vulnerable supply chains, high-risk feeds (e.g., imported corn/soy).
- **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.

### Potential Red Flags for Inspectors:

- Missing or expired organic certificates for feed or replacement suppliers.
- Imported feedstuffs - look for import certificates, sample results, and supplier verification, as applicable
- Supplements or veterinary inputs not listed in the OSP or inconsistent with the National List – except for those necessary for medical intervention required by regulation.
- Little or no indication of medical treatment in records.
- Insufficient plan for treatment of sick animals and/ or euthanasia, including lack of medical intervention plan with antibiotics/ animal removal.
- Discrepancies in grazing records (failure to meet  $\geq 30\%$  DMI requirement).
- Incomplete audit trail for feed shipments, especially imports.
- Residue test results indicating prohibited substances.
- Vertical Integration Model- look for evidence of compliant inputs being shipped to the farmer, where they are not sourcing themselves (feed or supplements are certified organic).



## 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 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

## LIVESTOCK

### 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

To ensure that all inputs used in organic livestock production—new or replacement animals, feed, forage, supplements, and veterinary supplies—are sourced from qualified, approved suppliers, verified against USDA organic standards, and documented in the Organic System Plan (OSP).

#### 2. Scope

This SOP applies to all suppliers of feed, forage, pasture seed, supplements, and veterinary inputs used in the operation’s organic livestock production system.

#### 3. Responsibility

The Livestock Manager (or designated Organic Fraud Prevention Team member) is responsible for supplier verification and recordkeeping.

#### 4. Supplier Identification & Initial Approval

- Certification verification: Confirm every supplier is listed in the NOP Organic Integrity Database (OID) with a valid certificate (issued within the past 12 months).
- Product-specific certificates: Certificates must list all ingredients or products (e.g., corn, soy, hay, silage, supplements, dairy replacement heifer, slaughter eligibility, etc.).
- Compliance history: Review supplier history for recalls, warning letters, or NOP noncompliances.
- Approved materials: Verify supplements/minerals against the National List and any OMRI/WSDA (or other Material Review Organization) approvals.
- Veterinary inputs: Confirm that inputs (e.g., vaccines, pain medications, dewormers) are allowed under the organic livestock standards.
- Where medical or euthanasia materials are sourced to comply with intervention or humane euthanasia, procedures exist to ensure documentation of use and diversion from organic production.

#### 5. Purchasing & Receiving

- Only purchase animals, feed and inputs from approved suppliers.
- Receiving staff must cross-check deliveries with approved supplier list, certificates, and product documentation.
- Verify that all product labels clearly designate “organic” status and lot numbers.
- Animals must be traceable to birth. Confirm adherence to certifier documentation expectations for verifying bough-in animal eligibility.
- For imports, require transaction certificates, phytosanitary certificates (checking for fumigation), and shipping documents.

## 6. Ongoing Supplier Monitoring

- Annual review: Update all supplier certificates and compliance records.
- Six-month check: For new suppliers, conduct an interim review of certification status.
- Residue testing: Conduct risk-based residue testing on high-risk feeds using accredited labs with validated methods.
- Pasture compliance: Verify that certified organic pasture meets grazing requirements ( $\geq 30\%$  dry matter intake during grazing season) for all classes of animals.
- Ensure adequate plan for alternative sourcing in the event of emergency or identified supplier concerns.

## 7. Recordkeeping

- Maintain records for a minimum of 5 years, including:
  - Supplier approval forms and certificates
  - Transaction certificates (for imports)
  - Shipping and receiving records (invoices, BOLs, manifests)
  - Test results (residue, GMO, prohibited substances)
  - OSP-approved input lists

## 8. Training & Review

- Provide annual training for staff on supplier verification, receiving checks, and fraud prevention.
- Re-evaluate the supplier verification program annually as part of the OSP update.
- Report any suspected fraud immediately to the certifier and USDA NOP.

## 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: \_\_\_\_\_