

ade association

An Organic Trade Association Resource

# PARTICIPANT HANDBOOK

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#### **1. ABOUT THE ORGANIC TRADE ASSOCIATION**

The Organic Trade Association is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States, representing over 9,500 organic businesses across 50 states. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. The Organic Trade Association's mission is to promote and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

For the past two years, the Organic Trade Association has prioritized significant time and resources into organic fraud prevention solutions that will help mitigate and prevent the occurrence of organic fraud inside and outside of the United States. Our work to address organic fraud is taking place on several fronts ranging from our farm bill priorities to a major private-sector initiative that has evolved into an industry-wide program called Organic Fraud Prevention Solutions. It is critical that organic businesses have systems and measures in place that adequately support the promise of providing organic food that people can trust. The Organic Trade Association is calling on its members and the organic sector at-large to learn more about this groundbreaking program, enroll and adopt what will become the industry standard reference for excellence and achieving integrity across complex organic global supply chains.

### 2. ABOUT THE PARTICIPANT HANDBOOK

This booklet provides an overview of Organic Fraud Prevention Solutions, and the steps required to enroll in the program and succeed. It provides potential and existing Organic Fraud Prevention Solutions participants with the information needed to:

- 1. Understand the goals and objectives of the program
- 2. Determine if the program is right for you
- 3. Understand the steps required to complete the enrollment process
- 4. Begin the enrollment process

This Handbook is intended as an overview and introduction to the program. Please find more information at <u>OTA.com/OrganicFraudPrevention</u> and in the **Organic Fraud Prevention Guide**.

You can also contact info@ota.com if you need further details.

For definitions and clarifications of key terms used in the Organic Fraud Preventions Solutions program, refer to the glossary at the end of this booklet.

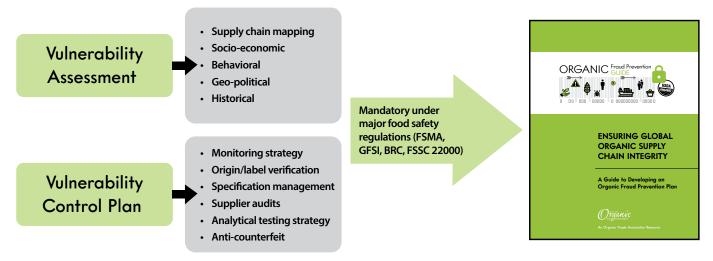
## WHAT IS ORGANIC FRAUD?

Organic product fraud can be defined as an intentional misleading or deceptive action carried out for illicit financial gain. Fraudulent acts may include adulteration, substitution, falsified records and the deliberate mislabeling of goods, as well as false statements made on applications, organic system plans, and during inspections. Of primary concern are intentional and economically motivated substitutions and the fraudulent mislabeling of organic products, including fabrication of fraudulent organic certificates. Such misrepresentation may occur at any point along the value chain from the product source to selling point.



#### 3. ABOUT THE ORGANIC FRAUD PREVENTION GUIDE

The Organic Trade Association has been leading the development of organic fraud prevention best practices since it formed the Global Organic Supply Chain Integrity task force in May 2017. The task force was formed in response to a major organic fraud scheme involving imports of fraudulently labeled corn and soy shipped to the United States from the Black Sea region. Several other incidents of organic fraud have occurred prior to and since then. The work of the task force led to the development of the Organic Fraud Prevention Guide that is based on a leading food fraud prevention model recommended by the Michigan State University Food Fraud Initiative in 2012, adopted by the Global Food Safety Initiative (GFSI) Food Fraud Think Tank in 2014, and now required for GFSI compliance and under the Food Safety Modernization Act (FSMA) Preventive Controls Rule.



Recommended by Food Fraud Think Tank in 2012 Adopted by Global Food Safety Initiative, 2014

The Guide provides organic businesses engaged in organic trade with a globally recognized process for identifying and minimizing organic fraud vulnerability. The *Guide* also forms the basis of a new program launched in March 2019 titled **Organic Fraud Prevention Solutions**.

The Organic fraud Prevention Solutions Guide forms the basis of Organic Fraud Prevention Solutions, and is available at no charge to companies that enroll in the program. The *Executive Summary* may be downloaded at www.ota.com/resources/fraud-prevention.



#### 4. ABOUT THE ORGANIC FRAUD PREVENTION SOLUTIONS PROGRAM

Organic Fraud Prevention Solutions is a program that organic businesses may voluntarily enroll in to help minimize or eliminate organic fraud. The program is based on buyer responsibility and supply chain management, and provides companies with a risk-based process for developing and implementing an organic fraud prevention plan. The program complements and reinforces organic certification and enforcement efforts of USDA's National Organic Program and organic certifiers through promotion of industry-wide, best practices for improving the resilience and overall integrity of global organic supply chains.

#### The goals of the program include:

- Establish an industry standard practice for improving organic supply chain management
- Assure the authenticity of organic products by minimizing or eliminating fraud
- Maintain or grow consumer confidence in the USDA Organic seal
- Recognize businesses that are enrolled in the program

This program is NOT a certification program, verification program, or add-on label. The program is a *quality assurance program* that is helpful in business-to-business marketing and sourcing practices to ensure the integrity of the organic supply chain.

### 4.1 WHO CAN PARTICIPATE IN THE PROGRAM?

To enroll in the program, a company must be either USDA certified organic or listed with a USDA recognized Material Review Organization such as OMRI (Organic Material Review Institute, <u>www.omri/org</u>) or WSDA's Organic Input Registration Program. Eligible operations include any certified operation in the organic supply chain (e.g. farmers, handlers, processors, distributors, traders, retailers and input manufacturers). There are also opportunities for organic certifiers, consultants and advisors that would like to partner in the program as experts in the subject matter (See section 9.0).





### 4.2 WHY IS THE PROGRAM IMPORTANT?

Organic fraud cannot be tolerated in the organic supply chain, inside or outside the United States. Anytime there is fraud anywhere in the organic system, it takes value out of the organic label. Everyone plays a role in preventing organic fraud. It is critical that organic businesses have robust systems and measures in place that adequately support the promise of providing organic products that people can trust. Organic Fraud Prevention Solutions, as adopted by businesses engaged in organic trade, will become the industry standard reference for excellence in achieving integrity across complex organic global supply chains.

## 4.3 WHY SHOULD I ENROLL?

The primary reason to enroll in the program is to strengthen the transparency and traceability of your organic supply chain in order to prevent organic fraud.

### 4.4 WHAT ARE THE BENEFITS?

Organic companies that want to prevent organic fraud in their supply chain and be publicly recognized for having implemented an Organic Fraud Prevention Plan need to successfully complete the enrollment process and maintain organic fraud mitigation measures on an on-going basis. Leadership and commitment from organic businesses will drive adoption of the program. The more companies that join, the stronger the organic supply chain will become.

## ORGANIC FRAUD PREVENTION SOLUTIONS The more companies that join the stronger the organic supply chain will become!

**For Farms:** Farm gate sales mark the first critical transfer point in the supply chain where product aggregation occurs. Organic integrity is born on the farm, and organic fraud prevention measures must start there as well.

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**For Buyers:** Organic Fraud Prevention Solutions is based on buyer responsibility. This program will help buyers implement measures to ensure the authenticity of the organic ingredients and products you are buying and selling.

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**For Handlers and Processors:** Whether your supply chain is simple or complex, this program will help handlers and processors increase supply chain visibility and verification, and improve the transparency and traceability of the products you offer.



**For Input Manufacturers (fertilizers, pest control, processing aids):** Incidents of organic fraud are not limited to food. This program is designed to work for manufacturers of farm and processing inputs to ensure the authenticity of the products you offer.

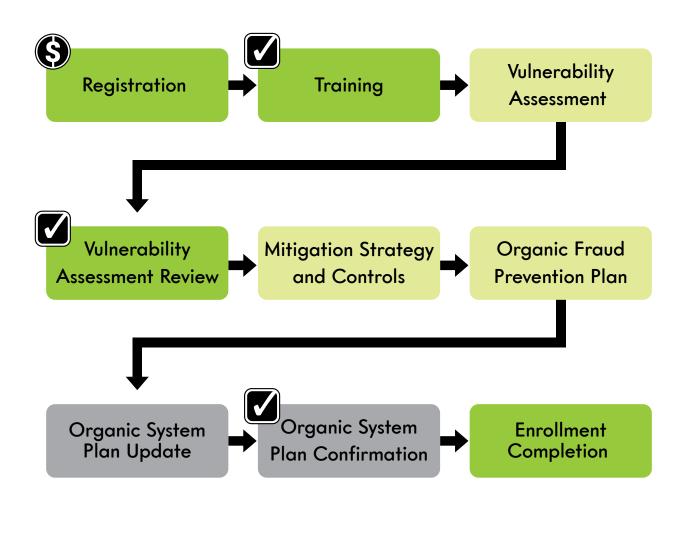


**For Brands and Retailers:** Brands and retailers are uniquely positioned to work with their suppliers to ensure they are enrolled in Organic Fraud Prevention Solutions and exercising all necessary measures to deliver authentic organic products.



#### 5. WHAT DOES THE ENROLLMENT PROCESS INVOLVE?

Eligible companies who want to prevent organic fraud in their supply chain and be recognized for having implemented an organic fraud prevention plan need to successfully complete a nine-step enrollment process:



Internal Steps Taken by Company

Interaction with Organic Certifier



**Payment Step** 



**Critical Enrollment Step** 

	ORGANIC FRAUD PREVENTION SOLUTIONS ENROLLMENT PROCESS CHECKLIST
STEP 1	REGISTRATION:
\$	The first step is to contact the Organic Trade Association and fill out the on-line enrollment eligibility form. Upon submission of the form, the Organic Trade Association will verify your eligibility and provide you with a registration link. When a company registers, they receive a Company Start-Up Kit that includes the Participant Handbook, the Organic Fraud Prevention Guide, required training information and the Satisfactory Vulnerability Assessment Declaration.
STEP 2	TRAINING:
	The lead personnel responsible for leading the vulnerability assessment and implementing the organic fraud prevention program must sign up for a required training. The training is an on-line, on-demand class offered at no additional charge. After appropriate company personnel have successfully completed the training and achieved the certificate of completion, the company continues to step three. <see 5.1="" for="" information="" more="" on="" section="" the="" training=""></see>
STEP 3	VULNERABILITY ASSESSMENT:
	The most critical step in the implementation of an organic fraud prevention plan is forming an organic fraud prevention team and conducting the vulnerability assessment. This assessment maps out weak points in a supply chain that increase exposure to organic fraud. Information is collected at the appropriate points along the supply chain (including raw materials, ingredients, products and packaging) and evaluated to identify significant vulnerabilities for organic fraud. This sets the stage for developing an organic fraud mitigation strategy.
STEP 4	VULNERABILITY ASSESSMENT REVIEW:
	The quality of the vulnerability assessment is key to having a strong organic fraud prevention program. This step ensures that a company has carried out the vulnerability assessment in a thorough fashion. The review must be conducted by a designated and qualified individual referred to as a "Competent Partner." Once the vulnerability assessment is found to be satisfactory, the Competent Partner will sign off on a Satisfactory Vulnerability Assessment Declaration that will be included in the Organic Fraud Prevention Plan.
STEP 5	MITIGATION STRATEGY AND CONTROLS:
	Once the vulnerability assessment and review are complete, the company can then identify and select proportionate mitigation measures and design a mitigation strategy based on the outcomes of the vulnerability assessment. To ensure that organic fraud mitigation measures are adequate and effectively implemented, a monitoring program, including verification activities and incident management procedures, must also be documented and formally built into the Organic Fraud Prevention Plan.

(Continued on next page)



ORGANIC FRAUD PREVENTION SOLUTIONS ENROLLMENT PROCESS CHECKLIST (Continued)		
STEP 6	IMPLEMENT THE ORGANIC FRAUD PREVENTION PLAN:	
	At this stage of the process, a food fraud mitigation team has been established, a vulnerability assessment is complete, appropriate mitigation measures have been identified, and a monitoring program, including verification activities and incident management procedures, are in place and should all be documented in the Organic Fraud Prevention Plan. The Plan is then submitted to upper management for approval and sign-off.	
STEP 7	NOTIFY CERTIFIER OF ORGANIC SYSTEM PLAN UPDATE:	
	Organic fraud mitigation measures that are established as a result of the vulnerability assessment exercise will need to be updated in the certified operation's Organic System Plan. This is best done by attaching the Organic Fraud Prevention Plan as an addendum to the Organic System Plan. This will integrate the organic fraud mitigation practices into the annual certification cycle. The updated Organic System must then be submitted to the operation's organic certifier and updated annually.	
STEP 8	ORGANIC SYSTEM PLAN CONFIRMATION:	
	Once the certifier has received the updated Organic System Plan from the enrolled company, the certifier will send a receipt confirmation to the Organic Trade Association. This step must happen annually.	
STEP 9	ENROLLMENT COMPLETION:	
	Once the Organic Trade Association has received the certifier confirmation, the company has successfully completed the Enrollment Process. The company receives recognition of completion of enrollment, marketing collateral including use of the program's logo, and is added to the www.Find.Organic as an Enrolled company. Note: The program logo must NOT be used on products. The logo or other materials may be used in other marketing materials according to the logo use agreement.	

Internal Steps Taken by Company

Interaction with Organic Certifier



) Payment Step



**Critical Enrollment Step** 

## 5.1 WHAT IS THE REQUIRED ORGANIC FRAUD PREVENTION TRAINING AND WHY IS IT IMPORTANT?

In order to efficiently and effectively complete the enrollment process and be publicly recognized, program participants must complete a critical training titled "Developing an Organic Fraud Prevention Plan." The training is a five-hour on-line, on-demand course designed for self-paced learning. The training provides detailed information and tools on how to carry out a vulnerability assessment and develop and implement an organic fraud prevention plan. It also provides an overview of the entire organic fraud concept, details the motivation behind fraud and insights into the criminal mind and teaches on the basics of risk and supply chain management and the role of vulnerability assessments. The training was developed in partnership with the Michigan State University's (MSU) Food Fraud Initiative and is taught by Dr. John Spink, a globally recognized expert in food fraud prevention. Dr. Spink leads the food fraud research at MSU. The training is offered at no additional charge with an MSU accounting system fee of \$100 for participants to receive a certificate of completion. A refresher course will be offered and required annually.

#### Course Title: Developing an Organic Fraud Prevention Program

- Required in order to be recognized for completing the enrollment process
- Five-hour on-line, self-pace course divided into three lessons
- Required at no additional charge; however, a certificate of completion is \$100
- Available on FoodFraudMOOC.com or OTA.com
- A refresher course is required annually

### 5.2 HOW MUCH TIME AND RESOURCES WILL THE PROGRAM TAKE?

Time and resource commitment depend on the size, scope and complexity of the organic business. The program is designed to foster continuous improvement and provide each company with a reasonable entry point to start the process. Companies should expect to form a multi-disciplinary organic fraud prevention team with a designated and qualified lead to carry out a vulnerability assessment. To begin the process, each company will first perform a pre-filter or initial assessment screening, followed by a more in-depth detailed assessment on based on the outcome of the pre-filter. Quality departments are best positioned to take the lead in conducting the pre-filter and vulnerability assessment, but will be best supported by procurement, legal, and Human Resources. The program requires ongoing annual management.



# 5.3 HOW MUCH DOES THE PROGRAM COST?

Enrolling companies' annual fees are based on a sliding organic sales income scale to reflect the market value the enrollment represents for a company.

- Organic Trade Association members receive a discount
- Program fees for members range from \$320 \$6,000
- 99% of members will pay between \$320 - \$1,280
- Initial pricing is competitive with other food safety quality assurance programs
- Trainings are FREE to all eligible businesses and professionals

PAYMENT LEVELS				
SIZE/TYPE *	NON-MEMBER	OTA MEMBER		
\$0-1 million	\$600	\$320		
\$1-2.5 million	\$700	\$400		
\$2.5-5 million	\$900	\$560		
\$5-10 million	\$1,100	\$720		
\$10-15 million	\$1,100	\$720		
\$15-30 million	\$1,150	\$760		
\$30-50 million	\$1,200	\$800		
\$50-75 million	\$1,200	\$800		
\$75-100 million	\$1,700	\$1,200		
\$100-150 million	\$1,700	\$1,200		
\$150-200 million	\$1,700	\$1,200		
\$200-300 million	\$1,800	\$1,280		
\$300-400 million	\$1,800	\$1,280		
\$400-500 million	\$2,200	\$1,600		
\$500-600 million	\$2,700	\$2,000		
\$600-700 million	\$2,700	\$2,000		
\$700-800 million	\$3,200	\$2,400		
\$800-900 million	\$3,200	\$2,400		
\$900-1.0 billion	\$3,200	\$2,400		
\$1.0-2.0 billion	\$5,200	\$4,000		
\$2.0-3.0 billion	\$7,700	\$6,000		
*Dues level based on total annual organic sales				



#### 6. HOW DOES THE PROGRAM SUPPORT USDA-NOP CERTIFICATION?

USDA's National Organic Program is responsible for oversight and enforcement of the organic regulations. The Organic Fraud Prevention Solutions is designed to complement and reinforce USDA's organic standards and the work of the accredited certifying agencies.

#### 7. DOES THE PROGRAM INVOLVE A CONSUMER-FACING LABEL?

No. The program is not a certification or verification program, and it does not involve a consumer-facing label. The program serves as a business-to-business marketing advantage designed to improve internal quality assurance programs. Companies that successfully complete and maintain annual enrollment will be publicly recognized and be provided with the use of the program's logo for non-label purposes only.

# 8. WHAT ARE OPPORTUNITIES FOR CERTIFIERS, CONSULTANTS AND ADVISORS?

Organic Fraud Prevention Solutions welcomes partnership with certifiers, consultants and advisors. This is possible through two professional program categories: 1) "Competent Partner:" 2) "Trusted Advisor." The Organic Trade Association is also creating opportunities for inspectors and certifiers to deepen their knowledge about organic fraud prevention to improve inspection and detection skills.

### **8.1 COMPETENT PARTNER**

A "Competent Partner" is a category of professional responsible for verifying that a satisfactory vulnerability assessment has been conducted. This person can be internal or external to the enrolled company developing an Organic Fraud Prevention Plan. The individual must have expertise in carrying out a vulnerability assessment and designing a mitigation strategy, and must complete a series of required training. The Competent Partner satisfies a critical enrollment step in the enrollment process.

### 8.2 TRUSTED ADVISOR

A "Trusted Advisor" is a category of professional who will be allowed to use marketing collateral that includes a version of the program's logo. Trusted Advisors can go into depth with an enrolled company and advise in the development of the organic fraud prevention plan from start to finish. A Trusted Advisor must be a well-established advanced organic consultant, have expertise in Vulnerability Assessments, and must complete a series of required training. A Trusted Advisor automatically qualifies as a "Competent Partner."

Contact the Organic Trade Association to learn more about the training requirements and the fee associated with becoming a Trusted Advisor.





### **8.3 ADDITIONAL TRAINING FOR CERTIFIERS AND INSPECTORS**

The Organic Trade Association is also partnering with USDA's National Organic Program to develop courses that will be available on the USDA Organic Integrity Learning Center. The courses will be tailored for organic certifiers, inspectors, reviewers, and other professionals working to protect organic integrity and will be offered at no charge as an on-line, on-demand courses for self-paced learning. The trainings will be available in late 2020.

#### Courses to be offered on the USDA Organic Integrity Learning Center:

- Course Part One: Organic Fraud and the Criminal Mind
- Course Part Two: Reviewing and Inspecting the Organic Fraud Prevention Plan
  - Available for no charge on USDA's Organic Integrity Learning Center in late 2020

#### 9.RESOURCES

On the next page is a list of helpful resources that support organic fraud prevention efforts and our program. Please consult the Organic Trade Association's Organic Fraud Prevention Guide for a much more comprehensive list of resources and further reading.

#### 10. HOW DO I ENROLL IN THE PROGRAM AND GET STARTED?

To get started, confirm your eligibility by signing up on the Organic Trade Association's <u>Organic Fraud</u> <u>Prevention Webpage</u>. Once confirmed, you will be able register for the program, receive the Company Start Up Kit and sign up for the required training.



OTA.COM/ORGANICFRAUDPREVENTION



RESOURCE	DESCRIPTION
OTA GLOBAL ORGANIC TRADE REPORTS	Includes international trade reports, data analysis, global organic product prices and trade model analysis.
OTA ORGANIC FRAUD PREVENTION SOLUTIONS	Homepage to OTA's organic fraud prevention program. Includes enrollment info, a list of early adopters, frequently asked questions, access to a webinar and other critical resources.
OTA ORGANIC FRAUD PREVENTION GUIDE EXECUTIVE SUMMARY	The executive summary to the Organic Fraud Prevention Guide. Includes table of content, overview, flowcharts & definitions.
OTA FIND.ORGANIC	The organic industry's most comprehensive directory of organic businesses, organic products and other organic resources.
OTA ORGANIC FRAUD COMPLAINT TEMPLATE	A template providing detailed instructions on the information needed to submit an actionable complaint.
MSU FOOD FRAUD INITIATIVE	Home page for the Food Fraud Initiative. Includes extensive information about the initiative including primers, resources, training opportunities and much more.
USDA ORGANIC REGULATIONS	NOP landing page to the USDA organic regulation, the NOP Program Handbook, OFPA 1990, the preamble, fact sheets, etc.
USDA ORGANIC INTEGRITY LEARNING CENTER	
USDA NOP INDUSTRY ALERTS	Sign up for the National Organic Program's Organic Insider and receive critical organic program updates.
USDA NOP ENFORCEMENT WEBPAGE	NOP's Learning Center of on-line training that supports professional development & continuing education of professionals to protect organic integrity.
USDA NOP 4013 INTERIM INSTRUCTION: MAINTAINING THE INTEGRITY OF ORGANIC IMPORTS	Details the certification requirements and documentation needed to import organic products into the United States with a focus on certifiers' responsibilities. It also includes best practices.

#### GLOSSARY

**Accredited Certifying Agents:** An organic certification agency (anywhere in the world) that has been authorized by the USDA to issue an organic certificate to operations that comply with the USDA organic regulations.

Certifiers: see "Accredited Certifying Agents."

**Competent Partner:** A category of professional responsible for verifying that a satisfactory vulnerability assessment has been conducted.

**Enroll:** The step that initiates the enrollment process through eligibility confirmation and registration.

**Enrolled:** The status a company achieves after successfully completing the Enrollment process.

**Enrollment:** The annual process a company must carry out to be "Enrolled" in the program.

*Mitigation Measure:* A measure taken to decrease vulnerability to organic fraud in a given supply chain.

*Mitigation Strategy:* Selected set of mitigation measures aimed at preventing food fraud in a given supply chain that are incorporated into the Organic Fraud Prevention Plan.

*National Organic Standard (NOP):* The National Organic Program develops the rules & regulations for the production, handling, labeling, and enforcement of all USDA organic products.

**On-Demand Class:** For the purposes of this manual, it is an online class that is available at any time to the student who wishes to access its content.

**Organic Fraud:** Organic product fraud is defined as an intentional misleading or deceptive action carried out for illicit financial gain. Fraudulent acts may include adulteration, substitution, falsified records and the deliberate mislabeling of goods, as well as false statements made on applications, organic system plans, and during inspections. Of primary concern are intentional and economically motivated substitutions and the fraudulent mislabeling of organic products, including fabrication of fraudulent organic certificates. Such misrepresentation may occur at any point along the value chain from the product source to selling point.

**Organic Fraud Prevention Plan (OFPP):** A company plan that documents the vulnerability assessment, mitigation measures and verification procedures that will be performed and maintained to verify that the plan is effectively implemented.

**Organic Integrity Learning Center (OILC):** USDA-NOP online training platform that supports professional development and continuing education of organic certifiers, inspectors, reviewers, and professionals who protect organic integrity.

**Organic System Plan (OSP):** A plan of management of an organic production or handling operation that has been agreed to by the producer or handler and the certifying agent, and that includes written plans concerning all aspects of agricultural production or handling described in Title 7 CFR 205 (National Organic Program Regulations).

(Continued on next page)



#### (Glossary continued)

**Primary Training:** The annual training that a Company, Competent Partner, or Trusted Advisor must take to (respectively) be eligible for Enrollment, receive "Competent Partner" status, or "Trusted Advisor" status. This is the "Developing an Organic Fraud Prevention Plan" class in the first year, or "Refreshing on Organic Fraud" in following years.

**Enrollment:** Process of informing the Organic Trade Association of intent to complete enrollment in the program and signing up for the required training.

**Renewal:** To remain Enrolled in the program, a company must go through the entire Enrollment process annually. After the initial Enrollment year, this process is called Renewal.

*Trusted Advisor:* A category of professional who advises or consults with an enrolled company in the development of the Organic Fraud Prevention Plan. A Trusted Advisor automatically qualifies as a "Competent Partner."

*Verification Tools:* Procedures, forms, or other mechanisms to verify the Organic Fraud Prevention Plan is effectively implemented.

**Vulnerability Assessment:** Within a food fraud management system, the step aimed at reviewing and assessing various factors that create vulnerabilities in a supply chain (i.e. weak points where fraud has greater chances to occur).

#### CONTACT

If you have any questions, do not hesitate to reach out to us.

Web: <u>www.ota.com</u>

Email: info@ota.com

## **ENROLL NOW!**

OTA.COM/ORGANICFRAUDPREVENTION







**Organic Fraud Prevention Solutions** improves your internal quality assurance programs.

- It helps prevent organic fraud in your supply chain
- It provides a business-to-business marketing advantage

The program provides step-by-step training and resources.

- Identify weaknesses and gaps
- Design internal **mitigation** measures
- Implement **monitoring** and verification tools
- Update your Organic System Plan

The program complements and reinforces the U.S. Department of Agriculture's Organic standards and the work of the accredited certifying agencies.

 It is a quality assurance program, not a certification or verification program

**Organic Fraud Prevention Solutions** is designed and tested by the organic sector. It minimizes vulnerabilities for organic farmers, handlers, traders, processors, distributors and retailers.

#### **Organic Fraud Prevention Solutions** is open for enrollment

- Be **publicly recognized** as an Organic Fraud Prevention Solutions enrollee
- Receive the comprehensive Organic Fraud Prevention Best Practices Guide
- Secure your training slot (free to Organic Trade Association members)
- Receive business-critical updates on program developments and fraud news

#### An Organic Trade Association Resource

#### Headquarters

The Hall of the States, 444 N. Capitol St. NW, Suite 445-A Washington, D.C., 20001 (202) 403-8513

Published in March 2020 for use by Organic Trade Association members.



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