



Building and Maintaining a Supplier Approval Program

The success of your organic certification hinges on the quality of your suppliers. A supplier approval program is not a bureaucratic formality. It is the structured, documented process by which you confirm that every ingredient and processing aid entering your facility is what it claims to be, certified to the standard it claims, and verified in your records. This article lays out the practical architecture of a supplier approval program: what it contains, how it works at supplier onboarding and shipment receiving, how to match scrutiny to risk, and how to keep it current over time.



What You'll Learn

- What a supplier approval program consists of
- How to verify the organic certification status of a supplier
- How to match the level of scrutiny to the actual risk of the supplier and ingredient
- What to check at receiving for every shipment, not just when verifying a new supplier onboarding
- How to keep the program current when supplier status, products, or certificates change

A supplier approval program is a documented, systematic, repeatable process applied consistently to every supplier. It is an effective way to produce the auditable records and ongoing monitoring of the organic compliance that are required in the USDA organic regulations.^{1,2} Applying that structure is also one of the most effective fraud prevention actions a handler can take, since it builds transparency and traceability into every sourcing decision rather than leaving them to memory.

“We want to be able to address any problems, any trouble suppliers or any issues, and try to deal with them before we actually have the product in hand. It becomes a tougher issue to deal with. So we do focus a lot on a preventive vetting process of our supply chain.”

Abel Sánchez
Product Innovation Manager
Tradin Organic

It is also a required aspect of your organic certification. Your Organic System Plan (OSP) must describe the monitoring practices and procedures you use to verify suppliers in the supply chain and the organic status of what you receive.² In practice, your OSP needs to answer questions like how you make sure every supplier is currently certified for the products you receive, what verification steps you document, and how you review certification status at regular intervals.³ You will also have to account for how you verify suppliers of approved nonorganic ingredients. Your certifier reviews the OSP to decide whether your program accurately reflects your actual practices,^{4,5} so be sure to provide a complete program description.

CATEGORIES OF SUPPLIERS

A supplier approval program covers every supplier you buy from. In practice that means three supplier categories, each verified a little differently:

- **Certified organic ingredient suppliers:** These suppliers are verified through the [Organic Integrity Database](#), confirming the certificate, the operation profile, and the certificate addendum.
- **Suppliers of approved nonorganic ingredients and processing aids:** These suppliers are often not certified organic, and they do not need to be, because the substance you are purchasing from them is nonorganic. Most of the verification work with these suppliers focuses on whether the ingredient/processing aid itself is allowed. The steps for supplier verification aim to confirm whether the supplier reliably provides the exact source your certifier approved.
- **Uncertified entities handling organic product:** A warehouse, broker, or transporter that handles organic product without being certified is a different case with its own rules, covered in [Managing Uncertified Entities in Your Supply Chain](#).

While aspects of how you approve suppliers in each of these categories vary by type, many of the steps of your supplier approval program apply to all three: risk assessment, receiving checks, ongoing monitoring, OSP documentation, certifier communication, etc.

APPROVING A NEW SUPPLIER BEFORE YOU SOURCE

It is important to vet and approve a prospective supplier before you purchase product from them, not after. Whether your certifier also has to approve a new supplier for an approved organic ingredient depends on the certifier. Some require prior approval of new suppliers, while others allow supplier changes without prior approval, focusing instead on whether your own verification system is fully implemented and effective. Confirm how your certifier handles it, and update your OSP as your suppliers change.

When sourcing approved nonorganic ingredients, use caution when finding new suppliers. These suppliers are often not organic specialists and may be unfamiliar with what you need, so confirm up front that they are willing and able to provide the documentation your certifier requires before you commit to them.

“If you’re simply changing one organic ingredient supplier for a different organic ingredient supplier, that’s a really easy change. If you’re changing your entire formulation, that might be bigger and take more time to review at the certification level.... The most important thing is to realize that this takes time.... Start the communication process with your certifier ... with enough time for some conversation about it, so that it doesn’t bump up against your deadlines.”

Lynne Haynor
Organic Conservation Specialist
Organic Trade Association

It is important to begin any required approval process well in advance of when you need to receive a first shipment. A supply disruption that forces a last-minute pivot to an unapproved supplier is exactly how operations end up with a production shutdown or a noncompliance. Some handlers even subscribe to their key suppliers’ newsletters so they hear about changes that could affect availability, which buys the lead time to fix a problem or switch suppliers before a shortage forces their hand.

Documents to Collect From Every Supplier

For a certified organic supplier, the basic documentation needed to verify organic status is a current organic certificate pulled directly from the [Organic Integrity Database](#) (OID),⁶ the certificate addendum that lists the specific products the supplier is certified to sell (also called the Product Listing),⁷ and any other verification documents the particular ingredient calls for.

Approved nonorganic ingredients have different documentation requirements. The depth of ingredient documentation (spec sheets, non-GMO statements, natural flavor declarations, and the like) is covered in [Verifying Compliant Ingredients and Processing Aids](#), so lean on that article for specifics.

ORGANIC CERTIFICATE VERIFICATION PROCESS

Possessing a copy of an organic certificate is not the same as verifying one. A certificate is a document, and documents can be altered or fabricated, so verification means confirming it independently. To do this, visit the [Organic Integrity Database](#) to cross-check that all of the information you have received from your supplier is present, correct, and current.

There are three sources of official information about the organic status and products that a supplier is certified to sell:

- **Organic Certificate:**⁶ Generated from the OID, this one-page document contains information about the company, their certifier, and the scope that they are certified under (Handling, Crops, Livestock, and/or Wild Crops). It does not contain a list of the specific products that the operation is certified to sell.
- **Operation Profile:**⁸ Generated from the OID, this multi-page document contains a detailed list of every product that the operation is certified to sell. It does not always contain all of the information that you may need to verify a supplier and product, such as the product composition category, nonorganic ingredient content, or export eligibility of each product. But if you are sourcing a raw commodity, like organic potatoes, the operation profile may contain the information that you need.
- **Certificate Addendum:**⁷ Obtained from the supplier's certifier, this document can fill in the gaps, containing information about things like product composition category, brand names, product ingredients, etc. It is especially important for multi-ingredient processed products and private-label arrangements in order to verify the supplier.

LEARN MORE

For a deeper explanation of the contents of the organic certificate and addenda, see [Anatomy of a USDA Organic Certificate](#).

These three sources together contain all of the information that you need to verify the eligibility of a supplier for the organic product that you are trying to source.

Supplier Organic Certificate Verification Checklist

- ☐ **Step 1.** Receive the certificate from the supplier.
- ☐ **Step 2.** Find the supplier yourself in the [USDA Organic Integrity Database](#) and confirm the status reads Certified. Do not rely only on the document the supplier sent.
- ☐ **Step 3.** Confirm the certifying agent on the certificate matches the certifying agent listed in the database for that supplier.
- ☐ **Step 4.** Confirm the specific product you are buying is listed on the OID operation profile or the certificate addendum. Do not rely on the certificate's general scope designation.
- ☐ **Step 5.** Confirm the certificate issue date is current.

If any step cannot be confirmed, stop. Do not receive the product as organic until verification is complete.

Let’s run an example using the checklist steps. You are verifying the eligibility of a certified supplier of organic apricot puree. Their organic certificate lists them as currently certified in the handling scope. That’s great news, but it doesn’t tell you whether they are an eligible supplier of the apricot puree that you are trying to source. So you look at the operation profile from the OID. It lists “Handling, processed fruit” in their product list. Again, not enough information to know whether they are certified to sell apricot puree specifically. So you turn to the certificate addendum which lists “100% organic apricot puree.” You now have gathered the information necessary to determine that this supplier is certified to sell the specific product that you are trying to source.

 WATCH OUT

A small sauce maker sources certified organic crushed tomatoes from a new distributor. The distributor provides a current, database-verified certificate whose scope reads Handling, Processed Vegetables. At inspection, the inspector asks for the addendum confirming crushed tomatoes are listed. The addendum lists only whole peeled tomatoes. The crushed tomatoes were never specifically certified by that supplier, and the audit trail is broken. The prevention is simple: always verify the specific product on documentation before the first order.

COMMON SUPPLIER CHALLENGES

Even a well-run supplier approval program experiences some friction, and a few challenges come up again and again. The table below pairs each with a practical way to handle it.

Challenge	What you may run into	How to handle it
Timing and planning	Certifier review of a new ingredient or supplier can take time, especially if the supplier is slow to respond.	Plan ahead, and be ready to pivot to a backup if you cannot get what you need from a supplier in time.
Uncooperative or unfamiliar suppliers	A supplier may not know organic requirements, may be unresponsive, or may not be able to get documentation from its own manufacturer, sometimes because it has no direct relationship with them.	For key suppliers, invest in the relationship. Educate them on why the documentation matters, and how organic can be good for their sales.
Documentation and confidentiality	For a nonagricultural ingredient you often need documentation from the manufacturer, who may guard it as a trade secret. Spec sheets may lack an ingredient statement, and names may not match across documents.	Reassure suppliers that certifiers keep material information strictly confidential. Most certifiers have a non-disclosure policy you can share, and many require their own form signed by the manufacturer.
Grocery, online, and imported sourcing	Grocery store and online purchases are among the hardest to verify, and imported ingredients add another layer.	Ask your certifier what they want to see. At a minimum, keep the receipt and a copy of the label. Buy only packaged, sealed retail products from uncertified retailers, ⁹ and source imports only from a certified importer. ¹⁰

The confidentiality point is worth elaborating on, because it stalls more sourcing than almost anything else. A manufacturer that refuses to share a formulation with you may be perfectly willing to share it with a certifier under a non-disclosure policy.¹¹ For uncertified suppliers, [Managing Uncertified Entities in Your Supply Chain](#) goes deeper into the exemptions and your responsibilities when working with them. [Importing Organic Products Overview](#) is a good place to start to become familiar with the import rules that may apply to your ingredients.

RISK LEVELS VARY BY SUPPLIER

The goal is not to treat every supplier with maximum suspicion. It is to match your scrutiny to the actual risk.

There are three categories of vulnerability for organic ingredients:¹²

- **Factors inherent to the ingredient** such as a price premium, a known fraud history, or its physical state
- **Business pressure** factors such as demand volume, price swings, and scarcity
- **Supply chain factors** under your control such as supply chain length, the number of uncertified entities in the supply chain, and how far back toward the farm you can see

Signals That Warrant Closer Scrutiny

At the supplier level, watch for a supplier that:

- Has a short certification history or few clients
- Handles both conventional and organic products
- Operates under multiple names
- Will not disclose upstream sources or provide certificates
- Lists prices well below market

At the ingredient level, watch for:

- A long or complex supply chain
- Imports from regions with a known fraud history
- Product that crosses multiple international borders
- Sudden changes in volume or market price
- Known fraud history for the category
- Recent production challenges like flooding or pests
- Large price gap between organic and nonorganic

Scaling Scrutiny to Risk

For an established, low-risk supplier with a long certification history and a simple supply chain, standard verification of organic ingredients (the certificate and a database check at each renewal) may be enough. For a new or higher-risk supplier, consider enhanced steps such as a supplier questionnaire, a letter of guarantee, more frequent check-ins, testing of initial shipments, or asking the supplier for its own fraud prevention documentation.

“While you’re evaluating the risk in your supply chain and trying to establish supply chain integrity, start with the area that you have the highest level of concern, and manage that concern first.”

Johanna Phillips

*Director of Business Development and
Regulatory Affairs*

Strengthening Organic Systems



HANDLER TIP

Subscribe to the NOP's [Organic Insider](#) e-newsletter for oversight and enforcement updates that contain information about fraud risk identified by the NOP.



LEARN MORE

Visit [Understanding Organic Fraud](#) and [Using Residue Testing as a Fraud Prevention Tool](#) to explore risk factors and mitigation measures more deeply.

VERIFICATION AT RECEIVING FOR EVERY SHIPMENT

Organic certificate verification is not a one-time event. A supplier who was certified when you onboarded them may not be certified at your next purchase, and certifications can be surrendered, suspended, or revoked. Certifiers must update the OID within three business days of a status change,¹³ so verify the supplier's status at the time of each shipment, not just once a year.

It's worth being deliberate about when that verification happens. For a large or complex operation, build the database status check into the purchase-order process rather than leaving it for the receiving dock. But receiving still has a job, because only the dock has the physical product in hand. Even when purchasing has already verified the certificate, the receiver confirms that what actually arrived matches those records: the container label, the lot numbers, the product itself. The two roles work together. The article [Protecting Organic Products During Transport, Receiving, and Shipping](#) covers this topic in depth.

For nonorganic ingredients, confirm at every shipment that your supplier continues to supply the specific source (product name and manufacturer) of the ingredient that you have had verified by your certifier.

Name Mismatches Must Be Resolved

All paperwork describing the ingredient you are sourcing must match, for both organic and approved nonorganic ingredients. For example, a bill of lading that says Green Valley Produce while the organic certificate says Green Valley Agricultural LLC is a broken audit trail, even if it is genuinely the same entity. Operating under multiple business names is also a recognized fraud-risk signal, so this is not something to resolve on the supplier's word alone. The organic certificate is required to reflect all the legal names an operation uses so that traceability is maintained,^{1,14} so the real fix is that the certificate is updated to include or match the name in use, or the supplier aligns its recordkeeping with its certification. For anything that reads as higher risk, do not accept the supplier's own statement that the two names are the same; involve their certifier and confirm it through the certification, not a self-declaration.

ONGOING MONITORING OF SUPPLIERS

Your approved supplier list is a living document, not a snapshot. Whenever a supplier, an ingredient, or a supplier's certification status changes, update the list and inform your certifier.^{15,16}

Build a Scheduled Cadence

Set a formal annual process for reviewing all supplier verification documents, and for a new supplier or a newly issued certificate, consider a six-month compliance check before moving to annual review. Re-certification does not automatically carry every product forward. After a supplier's annual certification renewal, verify that the specific products you buy are still listed on the updated addendum, rather than assuming they were carried forward through the renewal.

Organizing Supplier Certificate Records

- ☐ Track each certificate's issue date so your system flags when an update is due.
- ☐ Write simple procedures for confirming received product is listed on a current certificate.
- ☐ Keep current paper or digital certificates easy to reach during an audit.
- ☐ Cross-check the database certificate against the copy the supplier gave you to confirm they match.

Ongoing verification has a quieter benefit too. A request for an updated certificate is also a chance to hear a supplier's supply outlook, learn about new products, and trade feedback, so the monitoring that protects your certification doubles as a way to keep your key relationships warm.

Have a Defined Response When Something Changes

Every supplier approval program needs a documented procedure for when something goes wrong, when a certificate lapses, when a supplier's database status changes, when a shipment fails a receiving check, or when testing returns an anomalous result. At a minimum, the procedure should say who is notified internally, whether the ingredient goes on hold, when the certifier is contacted, and what documentation is created. Dropping a supplier for repeated compliance failures is part of the program, not an exception to it. A well-structured program even makes that exit cleaner, because the relationship and its records were clear from the start.

DOCUMENT THE PROGRAM IN YOUR OSP

Your certifier evaluates your supplier approval program through your OSP,² so the description should be specific. An effective program description says who is responsible, what documents are collected, how certificates are verified, when monitoring happens, and what happens when a discrepancy is found. The [Common OSP Handling form](#) gives a structured example, covering database checks, certificate maintenance, letter-of-guarantee collection, receiving procedures, and review frequency.³

Your described process and your actual records have to match.⁴ If your OSP says you verify database status before every shipment but your receiving logs show no sign of it, that is a potential noncompliance, not because the check did not happen, but because it was not documented. In a supplier approval program, the documentation demonstrates the compliance.

CONCLUSION

A supplier approval program is only as strong as the records behind it. Collecting documents once at onboarding and never checking again is not a program: it's a starting point. The operations that stay out of trouble are the ones that verify status at every shipment, flag name mismatches before they become audit problems, and have a documented procedure ready for when something changes. Build the program into your OSP, assign clear ownership, and treat it as an ongoing part of operations rather than an annual scramble. Your organic integrity begins with your suppliers, and it shows up in your records.



ACTION ITEMS

- Write a supplier approval program into your OSP that names who does what, and when. Develop and maintain relationships with your suppliers.
- Run the five-step certificate check on every supplier of organic ingredients.
- Request the certificate addendum and confirm your specific products are listed.
- Match extra scrutiny to supplier and ingredient risk, and document the reasoning.
- Verify each shipment against its documentation, and keep the approved supplier list current. Be sure to plan ahead.

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United States Department of Agriculture
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National Organic Program

