

Domestic Origin Verification (DOV) SPECIFIC REQUIREMENTS

Purpose

This document provides the requirements of a Domestic Origin Verification (DOV) Audit Program. The DOV program is an audit-based program to verify contractors', subcontractors', suppliers', or processors' procedures for ensuring that fruits, nuts, and vegetables sold to the U.S. Department of Agriculture (USDA), Agricultural Marketing Service (AMS) are of 100 percent U.S. origin. The DOV program is a fee-for-service program open to all suppliers and their subcontractors. Contractors may choose the DOV program in place of the document trace-back otherwise required for each contract to verify compliance with domestic origin requirements. The USDA, AMS, Fruit and Vegetable Programs (FV), Commodity Procurement Division (CPD) announcements and invitations define the domestic origin requirements.

Scope

DOV Specific Requirements apply to applicants who voluntarily request participation in the DOV program. Applicants must meet all the applicable requirements outlined in this document to participate in the DOV program.

Due to the nature of an applicant's operation or its products, specific requirements may be considered for exclusion. The applicant shall explain why specific requirements should be excluded with respect to their operation and DOV program. Exclusions are limited to requirements in this document within Sections 3.2.a, 3.2.b, and 4.2. Exclusions could also apply to either Sections 2.0.a or 2.0.b, not both. Exclusions shall not affect the applicant's ability to provide conforming components or products that meet the domestic origin requirements in the USDA, AMS, FV, CPD announcements and invitations.

References

USDA, AMS FV, CPD announcement and invitations
DOV Program General Policies and Procedures
DOV Quick Guide

Definitions

See DOV Glossary of Terms

1.0 General Program Requirements

Applicants shall submit a documented program that addresses the following *DOV Specific Requirements*:

- a. General Requirements - Establishing, documenting, implementing, and maintaining its DOV procedures and processes;
- b. Requirements for Receiving or Purchasing Components or Products - Selecting growers and suppliers based on their ability to provide components or products that are of domestic origin;
- c. Identification and Verification Method - Identifying each end item component or product and describing the method for documenting that it came from domestic growers;
- d. Monitoring the DOV Process - Verifying the method for (1) documenting that each end item component or product is of domestic origin, (2) preventing the use of components or products not intended for the DOV program, and (3) controlling non-conforming components or products; and
- e. Corrective Action - Taking corrective action to eliminate the cause of non-conformances encountered.

The domestic origin verification procedures shall be established, documented, implemented, and maintained to ensure that products delivered to the USDA conform to the USDA domestic origin requirements.

These procedures and processes shall be organized in a manner that provides easy access for reference and auditing (i.e., a manual).

Top management shall designate a management representative who, regardless of other responsibilities, shall have responsibility and authority that includes:

- a. Ensuring the DOV procedures needed for the applicant's DOV process are established, implemented, and maintained, and
- b. Reporting to the applicant's top management on performance of its DOV program and process.

2.0 Requirements for Receiving or Purchasing Components or Products

The applicant shall have a verifiable written procedure addressing receiving or purchasing domestic origin components or products from growers and suppliers. This relates to components and products that are similar to that delivered to the USDA.

Note: A grower is an individual or entity that develops a fruit, nut, or vegetable through a process of natural growth to maturity (e.g., plants, cultivates, grows, and harvests).

Note: A supplier is someone whose business is to supply a particular service or commodity including, but not limited to, raw materials, components, or finished products (i.e., individual, processor, subcontractor, broker, or contractor). For the purposes of this document, "supplier" does not include growers.

- a. If components are received from growers, the written verifiable procedure shall:
 1. Describe the process used to (1) communicate the domestic origin requirement to growers, and (2) select growers based on their ability to provide components or products of domestic origin (e.g., making it a requirement of purchase, including in its contracts, field checks, etc.).
 2. Include a current list of growers, along with evidence that they are domestic growers (domestic addresses and/or field locations, etc.). If there are non-domestic growers, they must be identified as such and included in the procedure described in section 4.2.
- b. If components or products are received from suppliers, the written verifiable procedure shall:
 1. Describe the process used to (1) communicate the domestic origin requirement to suppliers, and (2) select suppliers based on their ability to provide components or products of domestic origin.
 2. Include a current list of all suppliers who supply components or products similar to those used in USDA contracts, regardless of whether or not the components or products are intended for use in USDA contracts. The list of suppliers shall show the respective

components or products for each supplier. If components or products from a supplier are used for domestic components in the applicant's DOV process, the list shall include whether that supplier also handles non-domestic components or products.

3.0 Identification and Verification Method

3.1 Identification

The applicant shall have a verifiable written procedure that uniquely identifies products (components or raw materials and/or finished products). It must include a detailed example along with an explanation of the identification (e.g., code or positive lot identification) used to represent each component or product requested for approval into the DOV program. If multiple components or products are requested for DOV program approval, an explanation of each end item code or positive lot identification is needed for each component or product.

The method for identifying the components or products shall be such that the identification transfers through phases of product realization, from receipt through processing to delivery (including warehousing and storage), as applicable.

The identification shall also transfer back to purchased components or products and their origin, as applicable.

3.2 Verification Method

The applicant shall have a verifiable written procedure for the method used for documenting that the end item component or product is of domestic origin. The method shall provide records that are verifiable back to a domestic grower or list of domestic growers. Through documentation, the applicant shall be able to provide the history, location, or activity (e.g., receiving, packing, processing, warehousing) of the component or product, as applicable, from the end item back to its domestic origin (growers).

Note: *An acceptable method for documenting domestic origin is trace-back. Methods of tracking or verifying domestic origin may vary depending on the facility. It may or may not include working back through every step of receiving, packing, processing, and/or warehousing.*

- a. If raw components are not **directly** received from growers, and have gone through an intermediary facility or stage of receipt but have not changed form (i.e., have not been processed), the applicant shall include in its verifiable written procedure how it ensures the components maintain their

domestic origin integrity through the intermediary facilities or stages of receipt. These facilities or stages of receipt may include, but are not limited to, receiving stations, produce packing facilities, and/or warehouses, as applicable.

If the component has changed form (i.e., has been processed), follow the requirements in (b).

- b. If processed components or products are received or purchased from a supplier(s), the applicant shall include in its verifiable written procedure how the supplier ensures that the components or products maintain domestic origin integrity prior to receipt by the applicant.

Note: Current acceptable methods are: (1) the supplier is an “Approved DOV Program Participant” or (2) the applicant requests a trace-back from each supplier where the supplier’s components or products are used in a USDA contract. The applicant shall have a record of reviewing these trace-backs for adequacy. The trace-backs shall be on file, or the supplier’s “Approved DOV Program Participant” certificate shall be on file.

4.0 Monitoring the Domestic Origin Verification Process

4.1 Verification Activity

At least once a year, for each component or product in the DOV program, the applicant shall verify the method described in Section 3.2 and be able to show evidence of its verification activity through records. If a non-conformance is found during the verification by the applicant, it shall be corrected. Non-conformances and their corrective action shall be documented.

4.2 Segregating (Preventing the Use of) Components or Products Not Intended for Customers Requiring Domestic Origin

The applicant shall have a verifiable written segregation procedure addressing the process for segregating (preventing the use of) components or products that are non-domestic and those “not established” as domestic from those delivered to or destined for USDA, or destined for customers requiring only domestic origin products. Components or products that are similar to those destined for USDA are also required to be segregated.

- a. As applicable, the verifiable written procedure shall include the process for segregating non-domestic components or products from products delivered to or destined for USDA, or destined for customers requiring only domestic product. The written procedure for known “non-domestic” components or products shall include:
 1. Positive identification - from receipt through processing, packaging, storage, and shipment - to show a clear distinction between the domestic components or products intended for USDA, and those non-domestic components or products that are not intended for USDA;
 2. Release authority; and
 3. Physical separation, as applicable.
- b. As applicable, the verifiable written procedure shall also include the process for segregating components or products that are “not established” as domestic from those delivered to or destined for USDA, or destined for customers requiring domestic origin product. Components or products “not established” as domestic are those from suppliers who are either not “Approved DOV Program Participants,” or who do not provide trace-back on supplied components or products. The applicant is required to keep the suppliers’ tracebacks on file. The verifiable written procedure shall include:
 1. Positive identification - from receipt through processing, packaging, storage, and shipment - to show a clear distinction between the domestic components or products intended for USDA, and those “not established” as domestic;
 2. Release authority; and
 3. Physical separation, as applicable.

4.3 Controlling Non-conforming Components or Products

The applicant shall have a verifiable written procedure to control non-conforming components or products in its DOV process.