

USDA PEER REVIEW OF THE SWISS ORGANIC PROGRAM

- 1. REPORT DATE:** November 24, 2025
- 2. DATES OF ONSITE AUDIT:** July 24-31, 2025
- 3. AUDIT TEAM:** Colleen O'Brien, International Specialist, Trade Activities Division, U.S. Department of Agriculture (USDA) Agricultural Marketing Service (AMS) National Organic Program (NOP); Jessica Walden, International Specialist, Trade Activities Division, USDA AMS NOP.

4. INTRODUCTION

In July 2015, the U.S. Department of Agriculture (USDA), Agricultural Marketing Service (AMS) established an equivalence arrangement with Switzerland whereby each government recognizes the other's organic program for the purpose of international trade. The arrangement allows organic products produced under Switzerland's organic ordinances, as defined by the terms of the arrangement, to be sold, labeled, or represented as organic in the United States. As part of ongoing maintenance of this organic equivalence arrangement, USDA's National Organic Program (NOP) representatives conducted an onsite review of the Swiss organic accreditation, certification, and production/handling systems. This report is an account of those activities and the findings of the onsite review.

5. OBJECTIVES OF REVIEW

The objectives of the review were the following:

1. To verify that the Federal Office for Agriculture (FOAG), the Swiss Accreditation Agency (SAS), Swiss Cantonal Food Authorities, and Swiss accredited certification bodies (CBs) are carrying out the requirements of the Swiss Organic Farming Ordinances (OFO).
2. To evaluate FOAG and Swiss-accredited CBs' continued adherence with the provisions of the U.S-Switzerland Organic Equivalence Arrangement.

6. SCOPE OF REVIEW

The scope of the peer review included activities related to the following:

- The FOAG's oversight and SAS' accreditation of domestic certification bodies active in the Swiss Organic Program.
- Certification and oversight of operations certified under the Swiss organic program by CBs approved by FOAG and accredited by SAS.
- FOAG and CB oversight of organic imports and exports, including exports under the U.S.-Switzerland Organic Equivalence Arrangement.
- The FOAG, Cantonal Food Authorities, and CB investigations and related enforcement actions when violations of Swiss OFO or the U.S.-Switzerland Organic Equivalence Arrangement are identified.

7. BASIS FOR THE REVIEW

The July 2015 U.S.-Switzerland Organic Equivalence Arrangement (USSOEA) provides for representatives of USDA, following advance notice, to conduct onsite evaluations to verify that the relevant Swiss regulatory authorities and certification bodies of the Swiss organic program are carrying out the requirements of the program. The onsite evaluations include visits to offices of regulatory authorities, certification body offices, and certified farms and production facilities within Switzerland. On April 8, 2025, AMS NOP informed Switzerland's Federal Office for Agriculture (FOAG) of the Federal Department of Economic Affairs, Education, and Research (EAER) of its intent to conduct an onsite review of Switzerland's organic program as part of the ongoing requirements of the USSOEA. Equivalence arrangements are provided pursuant to USDA organic regulations at 7 CFR § 205.511.

The following statutes, regulations, and standards were considered in the review:

- Provisions of the U.S.-Switzerland Organic Equivalence Arrangement.
- Swiss Ordinance on Organic Farming and the Labelling of Organically Produced Products and Foodstuffs (Organic Farming Ordinance); Document #910.18, defining

principles to which agricultural products and foodstuffs labeled as organic must be produced and manufactured.

- EAER Ordinance on Organic Farming; Document #910.181, regulating products and substances permitted in organic farming and for the processing of organic food and feed.
- FOAG Ordinance on Organic Farming; Document #910.184, relevant for the import of organic products.
- U.S. Organic Foods Production Act of 1990.
- U.S. Code of Federal Regulations (CFR) Part 205, National Organic Program
- ISO/IEC 17011:2017 Conformity assessment — General requirements for accreditation bodies accrediting conformity assessment bodies.
- ISO/IEC 17065:2012 Conformity assessment — Requirements for bodies certifying products, processes and services.

8. ONSITE REVIEW PROCESS

AMS NOP auditors conducted the peer review in multiple parts: a review of oversight and accreditation activities with the FOAG, SAS, and other regulatory authorities at the Bern headquarters; meetings and a review of certification activities with one of the four Swiss accredited CBs; and witness audits of FOAG staff assessing three different inspectors from two CBs. These activities covered various phases of organic production, certification, and accreditation systems to assess whether the responsible authorities had the necessary controls in place to ensure traceability and compliance with the referenced organic standards. In selecting the CB and the operations to review, AMS NOP auditors worked with FOAG staff to select operations representative of organic products produced in Switzerland that are commonly exported to the United States.

On July 24, the first day of the onsite review, AMS NOP auditors conducted an opening meeting with representatives from the FOAG, SAS, the Office for Consumer Protection (a Cantonal Food Authority), and the Swiss Feed Control at the FOAG headquarters in Bern.

AMS NOP auditors reviewed the CB's policies and procedures for the organic certification process, import and export requirements, and how complaints are handled. AMS NOP auditors observed FOAG conduct two witness audits of inspections by two different inspectors for this CB, and one witness audit of a different CB at a third inspection. The three inspections included one operation certified for agriculture and two operations certified for processing and trade. FOAG representatives accompanied AMS NOP auditors throughout the review.

9. OVERVIEW OF THE SWISS ORGANIC SYSTEM

Switzerland is a federal republic composed of 26 cantons, which are essentially member states that have their own governments, constitution, and degree of autonomy managing local affairs. Switzerland's Federal Office for Agriculture is the competent authority for the Swiss Organic Program, responsible for developing and enforcing standards for agricultural products labeled as organic. Accreditation of Certification Bodies (CBs) is performed by the Swiss Accreditation Service (SAS), which is part of the State Secretariat of Economic Affairs. According to Article 28 of OFO 910.18, CBs must be accredited to the ISO/IEC 17065:2012 standard. Certification bodies must apply to be licensed by FOAG for their activities under the OFO, and all activities must occur within Switzerland.

The FOAG oversees four accredited CBs through supervising inspections at farms, processing facilities, and trading operations, as well as ensuring correct enforcement of the OFO in general. FOAG's surveillance activities overlap somewhat with those that SAS carries out, and at times they conduct joint audits. FOAG conducts a yearly office audit and at least one witness audit for each CB, and CBs are required to submit annual reports to FOAG. SAS carries out surveillance activities every 12-18 months within the 5-year accreditation cycle. An organic expert accompanies the SAS auditor during these assessments, which are specific to the ISO 17065 guidelines. SAS and FOAG exchange assessment reports, discuss issues identified at the CBs and/or operations, carry out joint witness audits, and participate in an organic enforcement working group. While SAS makes the final accreditation determination for ISO 17065, FOAG's role is to license the CBs to perform organic certification activities within Switzerland. Both SAS and FOAG have the authority to suspend CBs due to noncompliant activities.

The Cantonal Food Authorities are the local enforcement authorities for food safety and food fraud protection, and they will inform FOAG in cases where positive residues are detected or violations of the OFO are observed. Both FOAG and SAS have the authority to suspend the license or accreditation of a CB, while the Cantonal Food Authorities are authorized to stop the sale of organic products due to detected pesticide residues.

The Swiss organic regulations allow organic certification for the following categories: (a) unprocessed agricultural crop and livestock products and production animals (including wild plants, algae, and aquaculture); (b) processed agricultural crop and livestock products intended for human consumption (including essential oils and yeasts used for food and animal feed); and (c) animal feed materials and feedstuff used for feeding of pets and production animals.

The Swiss organic regulations include an authorized substance list that specifies the materials, inputs, and ingredients allowed in organic production and processing. See [Annexes 1-3](#) of EAER Ordinance on Organic Farming, SR 910.181. Although the OFO provides for EAER to develop an organic logo, one has not been created for Swiss organic products. Certified operations may apply the logo of their certifier on qualifying organic products. But while the use of any CB organic logo is voluntary on certified products, they all must also include the CB code number and an indication it refers to organic production. The codes align with the EU organic CB codes. The Swiss organic program requires that all CBs conduct at least 10% unannounced inspections annually and collect samples from at least 5% of the number of operations subject to inspections.

Finally, the FOAG manages bilateral organic equivalences with the United States, Canada, Chile, EU Member States, and Japan, and unilateral organic recognitions with Argentina, Australia, Costa Rica, India, Israel, New Zealand, and Tunisia. Not all product categories are covered under each agreement (for example, the India recognition only covers unprocessed crop products and seeds/planting stock). The FOAG recognizes 7 CBs based in the United Kingdom, for certification within Great Britain and in third countries to the UK organic product regulations. Switzerland now refers to the EU list of recognized CBs, and products certified to the EU organic regulations by these EU-recognized third country inspection bodies may be imported into Switzerland.

As of 2023, approximately 18% of Swiss farmland was in organic production, up from 14% in 2017, with total farmland remaining steady at 1.04 million hectares during this time period. There has been an overall decrease in the total number of farms in Switzerland, but the number of organic farms has steadily increased alongside the growth in organic acreage. The top Swiss organic exports to the United States are coffee, chocolate, confectionaries (including cough drops), fruit juice, seeds for sowing, and extracts of vegetables, fruits and herbs or spices.

10. OBSERVATIONS OF CB AND CERTIFIED OPERATIONS

Certification body #1

This CB certifies over 8,000 operations and is accredited for Swiss organic certification of agricultural produce and processed foodstuffs. This CB employs approximately 50 staff for various inspection, certification, and managerial roles. The CB also certifies operations to several standards, including EU 2018/848, Demeter, and Bio Suisse. SAS assesses this CB every 12-18 months and provided AMS NOP auditors with its reports from its three previous assessments that included nonconformities issued and corrective actions the CB implemented; the CB is accredited by SAS to ISO/IEC 17065:2012. The FOAG conducted an audit of this CB in October 2024, including witness audits. The CB successfully responded to audit findings and observations and continues its license for organic certification. This CB has about 80 clients currently approved under the U.S.-Switzerland Organic Equivalence Arrangement, but about half of those are suppliers to the exporters and do not themselves export to the United States under the equivalence.

Witness Inspection – Certified Operation #1

AMS NOP auditors witnessed an annual surveillance inspection at a seed processing and trading operation that markets solely certified organic and biodynamic seeds. The seed production occurs on their own farm (certified for the agriculture scope as a separate entity) and on many contracted organic farms throughout Switzerland. The operation also imports from certified organic seed suppliers around the world and receives imported seeds from a sister company located nearby in Germany (certified as a separate entity by a different CB). The operation has

been certified organic for more than 20 years. The inspector verified information in documents supporting the movement of products starting at receipt from suppliers to outgoing finished product, including purchase orders, production records, and export records of sales to operations in the U.S. AMS NOP noted several issues of concern from this inspection: the inspector did not verify all organic control points, and it did not appear the inspector had a full understanding of all the activities that are under the control of this operation. For example, the inspector did not visit any locations where seeds delivered by local farmers would be received and dried, nor did they observe where the wet processing of seeds occur. The operation is very large and complex, with multiple sites and multiple entities operating close together but certified as separate businesses. The FOAG assessors also reported the inspector's oversight as a concern and therefore it is not a finding for this peer review. However, the AMS NOP auditors also observed the inspector conduct a mass balance on only one lot received from one operation, and not for one product over a select period of time as would be expected for an adequate mass balance. The FOAG assessors did not report this as an issue of concern following the inspection.

Witness Inspection – Certified Operation #2

AMS NOP auditors witnessed an annual surveillance inspection at an agricultural operation that grows herbs, vegetables, fruits, and flowers for seed by contract exclusively for operation #1. The operation has been certified organic for over 30 years and currently manages six distinct fields around his home, approximately half of which are in meadows, fallow fields, or other natural state. The farm is also certified to BioSuisse and Demeter standards, and the operator stated he receives all inputs (fertility inputs, seeds, etc.) from operation #1. All harvested products are delivered directly to operation #1 and farm activities are recorded in a color-coded farm log. Similar to observations during the inspection of operation #1, the AMS NOP auditors observed that the inspector was uncertain about which organic control points to verify at the inspection due to a lack of clarity about the activities operation #1 carries out. For example, while operation #2 stated the inputs are provided by operation #1 and stored at a different farm, the inspector did not visit this input storage site and assumed (but did not know with certainty) this control point was verified at another contracted entity's inspection. The FOAG assessors

reported this as a concern to the inspector following the inspection and therefore the AMS NOP auditors have no additional concerns.

Witness Inspection – Certified Operation #3

This certified operation is a chocolate manufacturer producing both organic and non-organic chocolate bars and other confectionaries that are packed into the operation's own labels as well as private labels. The AMS NOP auditors observed an additional inspection carried out approximately four months following the annual surveillance inspection. The purpose of the additional inspection was to verify implementation of corrective actions and verify compliance of products exported to the U.S. The inspection was very limited in scope and included a brief facility tour, though the main production line (that makes the chocolate bars) was closed for maintenance at the time. The AMS NOP auditors observed the inspector conduct a trace-back audit that started with an NOP Import Certificate. The inspector found that the corrective actions had been adequately implemented but had one additional finding regarding the ability to properly link documents within the supply chain. Neither the FOAG nor the AMS NOP auditors had any additional concerns.

11. CLOSING MEETING

AMS NOP auditors held the closing meeting with FOAG officials at their headquarters in Bern on July 31, 2025. At the meeting, the auditors presented a summary of the findings and discussed other observations from the peer review, which are included in this report.

12. SUMMARY OF PREVIOUS PEER REVIEW

AMS NOP conducted its last onsite review of the Swiss organic program in March 2015. That review was part of AMS NOP's equivalence determination process with Switzerland and resulted in no findings to which the FOAG needed to respond.

13. SUMMARY OF REVIEW FINDINGS

The 2025 onsite review resulted in two findings:

Finding 1. ISO/IEC 17011 (2017): 7.4.4 The accreditation body shall establish documented procedures to assess the competence of a conformity assessment body to perform all activities in its scope of accreditation irrespective of where these activities are performed. These procedures shall describe the manner in which the scope of an applicant or an accredited conformity assessment body is covered through the use of a combination of on-site assessments and other assessment techniques sufficient to provide confidence in the conformity with the relevant accreditation criteria.

Comments: *AMS NOP auditors observed that FOAG does not evaluate CB activity with regards to verification of compliance with the terms of the U.S.-Switzerland Organic Equivalence Arrangement during their annual surveillance controls. FOAG stated this verification is not part of their control activities during either desk audits or witness evaluations.*

FOAG's Response: FOAG will review its current audit procedures to ensure that verification of compliance with the U.S.-Switzerland Organic Equivalence Arrangement (and other bilateral equivalence arrangements) is appropriately integrated into future surveillance activities. FOAG will add a checkpoint that aligns with the relevant requirements to its checklist for annual office audits.

Finding 2. ISO 17011, 7.6.4 states, “The assessment team shall analyze all relevant information and objective evidence gathered prior to and during the assessment to determine the competence of the conformity assessment body as determined through its conformity with the requirements for accreditation.”

Comments: *During the peer review, AMS NOP auditors observed an inadequate mass balance exercise at an inspection. The inspector conducted a mass balance for one lot of seed delivered from one operation instead of selecting one product over a defined period of time. This lot balance did not ensure inputs account for outputs, nor was it appropriate to the operation's activities, scope, and complexity. FOAG did not note this inadequacy as a concern following their witness audit.*

FOAG's Response: FOAG informed the CBs of this finding during the annual meeting of the enforcement group. At the next annual office- and witness audits of CBs FOAG will place greater emphasis on assessing the adequacy of mass balances. If necessary, FOAG will instruct

the CBs to provide guidance and training for inspectors to ensure that mass balance exercises are conducted appropriately, reflecting the operation's activities, scope, and complexity.

14. CONCLUSIONS

The staff at FOAG are knowledgeable, dedicated, and professional. They prepared a comprehensive peer review schedule based on USDA's requested criteria. FOAG was unfailingly responsive to requests for more information when questions arose during the review. FOAG representatives demonstrated transparency, consistency, and competence in the Swiss organic technical requirements. The CB staff that AMS NOP auditors interviewed were consistently knowledgeable and demonstrated competence. The CB demonstrated a system that allows for comprehensive client management, tracking, and oversight. The inspectors observed during the peer review were proficient, courteous, and professional. The peer review team also found that the organic operators were dedicated and transparent about their processes, records, and overall organic plans.

AMS NOP accepts FOAG's response to the findings AMS NOP will assess implementation of the actions taken during the next onsite review of the Swiss organic certification program. AMS NOP will post the final report on its website.

END OF REPORT

FINAL REPORT – May 12, 2015

USDA REVIEW OF THE SWISS ORGANIC PROGRAM

USDA Agricultural Marketing Service (AMS) National Organic Program's (NOP) follow-up Peer Review of the Switzerland's Federal Office for Agriculture Organic Program.

DATES OF PEER REVIEW – March 23-24, 2015

1. INTRODUCTION

- 1.1. The U.S. Department of Agriculture (USDA) is engaged in ongoing discussions with representatives of the Federal Office for Agriculture (FOAG) of Switzerland to explore a possible equivalency agreement to recognize each other's organic production and handling standards for the purpose of international trade. To further inform these discussions, in September 2013, USDA conducted and observed onsite reviews of Switzerland's organic accreditation, certification, and organic production and handling systems. The 2013 review noted four observations to which FOAG provided responses. This review was conducted to follow-up on the responses to the observations reported in the USDA's September 3, 2014 Final Report.
- 1.2. On March 23-24, representatives of the USDA Agricultural Marketing Service (AMS) reviewed the organic accreditation and certification activities in Switzerland. A representative from the State Department attended as an observer and a translator. This report is an account of those activities and findings of the review.
- 1.3. The Review team was comprised of:
 - 1.3.1. Cheri Courtney, Lead Auditor, Director, Accreditation and International Activities Division, AMS, NOP
 - 1.3.2. Robert Yang, Second Auditor, Accreditation Manager, Accreditation and International Activities Division, AMS, NOP
 - 1.3.3. Raphael Vogel, Observer/Translator, Political & Economic Affairs, State Department

2. OBJECTIVES OF REVIEW

2.1. The objective of the review was to evaluate and verify the status of FOAG's responses to the four observations chronicled in USDA's September 3, 2014, Final Peer Review Report.

3. LEGAL BASIS FOR THE REVIEW

3.1. The review was conducted as part of the ongoing equivalency process and was not part of a legal or regulatory enforcement function of the USDA.

3.2. The following statutes, regulations, and standards were considered in the review:

3.2.1. U.S. Organic Foods Production Act of 1990

3.2.2. 7 U.S. Code of Federal Regulations (CFR) Part 205, National Organic Program

3.2.3. ISO/IEC 17011:2004(E) Conformity assessment — General requirements for accreditation bodies accrediting conformity assessment bodies.

3.2.4. ISO/IEC 17065 Conformity assessment – Requirements for bodies certifying products, processes and services.

3.2.5. Swiss regulations – Switzerland Ordinance on Organic Farming and the Labeling of Organically Produced Products and Foodstuffs (Organic Farming Ordinance); Document #910.18.

3.2.6. EAER Ordinance on Organic Farming; Document #910.181.

4. PROTOCOL

4.1. The review was accomplished by reviews of the Swiss accreditation system, a Certification Body (CB), and two (2) certified organic operations. There are four (4) CBs operating in Switzerland. The review team selected one (1) CB that is certifying a broad base of operations. The review team identified production and handling systems for review including a crop and livestock operation, and processing operation.

4.2. At the CB office the team reviewed files and interviewed staff. The review team observed procedures relating to the certification of organic operations and reviewed staff qualifications to determine compliance as it relates to the revised Organic Farming Ordinance and EAER Ordinance on Organic Farming.

4.3. The team visited two (2) organic production and handling operations. A witness audit and a review audit were conducted to determine the level of competency of the

inspectors and the CB oversight of organic operations. The team reviewed files and interviewed farmers and other responsible parties.

- 4.4. The review team was accompanied by representatives of FOAG throughout the review. At each of the certified organic operations the team was also accompanied by a representative of the CB.

5. OVERVIEW OF ONSITE REVIEW

5.1. Witness Inspection

- 5.1.1. Organic processing operation: The operation produced both organic and nonorganic chocolate products. The operation was certified organic under the Swiss Organic Legislation and Bio Suisse. The inspection was an announced annual inspection. No organic production was taking place at the time of the audit. Prior to a walk-around of the facility, the inspector conducted a review of documentation and record-keeping with a representative of the operation. The review included a verification of cleaning procedures between organic and non-organic runs, pest control practices, and product composition. Current organic certificates for ingredients used in organic production, along with supplier information, were additionally verified. The inspector also conducted a traceback and in/out balance as part of the review of purchasing, inventory, production, sales, and shipping records. The inspector inspected all aspects of the production process – from incoming ingredients and ingredient storage, to production, packaging, and finished product storage. The inspector concluded the inspection with a closing meeting during which the representative was informed of noncompliances resulting from the inspection.

5.2. Review Audit

- 5.2.1. Organic crop and livestock operator: The dedicated organic livestock operation was certified organic under the Swiss Organic Legislation and Bio Suisse for various milk and meat products, eggs, fruits, and vegetables. The operation operated a small, on-site store from which it marketed its certified products. A majority of the milk was being sold to a local certified organic milk processor. Certified land

included 40 hectares, of which 17 hectares were being used as pasture. Certified organic livestock included dairy cows, bull calves, and layers. The operation's grazing season was from mid-April to mid-November, on average 210 days. The only off-farm feed purchased was hay; the cows were fed silage and dry hay during the winter. The operation used homeopathic remedies for animal health management. The last reported use of antibiotics was in 2005. Production areas, including pasture and the orchard, as well as all the milk parlor, animal housing and feed storage areas, were inspected and found to be compliant. Products marketed in the on-site store were inspected and also found to be compliant. A review of record-keeping – herd health records, outdoor access, feed purchases, field activity, seed and seedling purchases – maintained by the operator was conducted, and found to be sufficient. An interview with the operator regarding the last annual inspection confirmed that the inspector visited all production sites, conducted an audit of record-keeping, and concluded the inspection with an exit interview. The operation had received a noncompliance from the last certification cycle for improper labeling. The revised product label was reviewed and verified to be compliant.

5.3. Certification Body: The CB certifies to a variety of private and public Standards including the Swiss Organic Legislation. It employs fulltime and contract inspectors, and its training program, which includes both classroom and on the job training, is robust. The staff was well informed and knowledgeable in regard to Switzerland's Ordinance on Organic Farming and EAER Ordinance on Organic Farming and the recent revisions.

6. SUMMARY OF PREVIOUS REVIEW

USDA conducted and observed an onsite review of Switzerland's organic accreditation, certification, and organic production and handling systems in September 2013. There were four (4) onsite review observations to which FOAG provided responses as reported in USDA's September 3, 2014, Final Peer Review Report.

6.1.1. Observation 1. The revised Swiss organic program requires the type or range of product to be included on the certificates for agricultural producers. On November 11, 2013, the FOAG instructed its CBs to adapt certificates for agricultural producers to include a type or range of product on the certificate. On July 1, 2014 the CBs began revising certificates. The certificates reviewed at the CB and certified operations listed the types of products.

6.1.2. Observation 2. The Swiss organic program was revised to include a surveillance audit that includes a review of the CB's staff qualifications. Article 28(2) of the revised Organic Farming Ordinance (effective January 1, 2015) describes the requirements for CB's to have a sufficient number of employees who have expertise and knowledge of the elements affecting the organic status of products.

Additionally, it states that CBs must ensure that employees have the necessary qualifications, education, and experience in the area of organic production and the provisions of the Organic Farming Ordinance.

The Organic Farming Ordinance (Article 32) was revised to clearly define the surveillance responsibilities of FOAG. The FOAG verifies during the surveillance audit that the CB has a sufficient number of suitable qualified and experienced staff and that a systematic training scheme with regard to risks that might affect the organic status of products has been implemented. As a result of this revision, FOAG began conducting surveillance audits and developed a comprehensive checklist that is used during surveillance audits which includes a review of personnel qualifications.

Interviews with the CB and inspectors, as well as file reviews show that personnel are adequately trained. The CB has an extensive training program which includes a regular training schedule, field training, mentoring, and onsite reviews to ensure that staff is qualified and adequately trained.

The inspector observed during the witness inspection conducted a thorough inspection including the performing of a traceback audit and in/out balance as part of the review of purchasing, inventory, production, sales, and shipping records.

6.2. Observation 3. The Swiss organic program was revised to more clearly define FOAG's role and supervisory oversight of the CBs. The revised Swiss Organic Farming Ordinance defines the surveillance tasks of the FOAG: 1) Article 28(2) describes the requirements the CBs have to fulfill, and the mandatory standard procedures for inspection and certification by CBs, the requirements for the number and training level of the personnel, a concept for measures in the case of irregularities etc.; 2) Article 32 defines the surveillance tasks of the FOAG, which include the verification of compliance with Article 28(2). 3) Article 32(4) of the revised ordinance provides a new provision that allows FOAG to request suspension or revocation of a CB's accreditation by the SAS.

The FOAG conducted its first independent surveillance assessment of a CB on March 3, 2015. Additionally, the FOAG and SAS are in regular contact as they work together to ensure that thorough surveillance audit is performed on all the CBs.

6.2.1. Observation 4: The Federal Food Law's, new provision in Article 60 explicitly requires the Cantonal Food Inspection Services to exchange all relevant data for the implementation of the Organic Farming Ordinance and the EAER Organic Farming Ordinance (SR 918.181) with the competent federal authority and the CBs. The amendment of the Federal Food Law will be effective in 2016.

7. CLOSING MEETING

7.1. The review team conducted a closing meeting with FOAG officials in Bern, Switzerland on March 24, 2015. At the meeting, the review team provided a complete summary and discussion of the findings in this report.

8. GENERAL OBSERVATIONS AND NEXT STEPS

General Observations:

- 8.1. The staff of FOAG is knowledgeable, dedicated and professional;
- 8.2. All personnel involved in the review were cooperative, responsive, and accommodating to the team's requests, both prior to and during the peer review.

Next Steps

8.3. U.S. Department of Agriculture and the Federal Office for Agriculture (FOAG) of

Switzerland will continue with final discussions regarding an equivalency arrangement.

9. END OF REPORT.