USDA Agricultural Marketing Service
U.S. DEPARTMENT OF AGRICULTURE

National Organic Program
Organic Oversight and Enforcement Report



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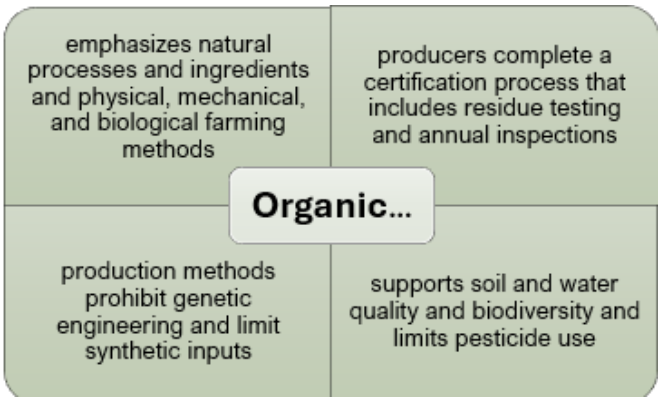
USDA Organic Oversight and Enforcement Update

Summary of Activities – Calendar Years 2024 and 2025

The USDA Agricultural Marketing Service (AMS) National Organic Program (NOP) develops and enforces consistent standards for agricultural products labeled organic for sale in the United States.

Congress established NOP as a regulatory program in cooperation with state organic certification agencies, and private and nonprofit organizations. The program accredits and provides oversight of third-party organizations, called certifiers, who inspect and certify organic farms and businesses to the USDA organic regulations. Together, USDA and accredited certifiers enforce the organic standards, protecting farmer and consumer confidence in the value and integrity of the USDA organic seal.

NOP specialists provide organic certifier accreditation and oversight, standards development, training, trade systems development, import oversight, international cooperation, and complaint investigations and enforcement. These actions strengthen organic farmer, business, and consumer confidence in the USDA organic seal.



At the start of 2024, there were 42,204 USDA certified organic farms, ranches, and businesses worldwide, including 24,183 (57 percent) in the United States. By the close of 2025, this number had grown to 56,281 certified operations worldwide, with 27,179 (48 percent) in the United States. This overall increase in certified operations has paralleled a strong market performance year after year. In 2023, organic sales reached a record $69.7 billion, grew to $71.6 billion in 2024, and grew to $76.6 billion in 2025. The annual growth rate of 6.8 percent in 2025 was double that of the comparable marketplace, which grew at 3.4 percent. Organic food sales rose from $65.4 billion to $70.1 billion during this period, while non-food sales increased from $6.2 billion to $6.5 billion.

This report continues our regular updates on enforcement activities and responds to three reporting requirements in the Agriculture Improvement Act of 2018 (Farm Bill). It also provides an update for the organic community on the full range of oversight and enforcement activities being led by the agency and our partners.

Report sections include:

- Domestic and Overseas Investigations and Compliance Actions
- Organic Trade Enforcement Interagency Coordination Report
- Report on Enforcement Actions Taken on Organic Imports

Previous Organic Oversight and Enforcement Reports are available on the USDA National Organic Program website. Enforcement actions are also reported throughout the year on the USDA Organic Enforcement Activity web page at www.ams.usda.gov/services/enforcement/organic-enforcement-activity.

Domestic and Overseas Investigations and Compliance Actions

Investigations and enforcement support a fair market for honest organic businesses. Organic products command a premium in the marketplace, so demand for organic products depends on consumers trusting that products with the organic label are actually organic. NOP investigates complaints about products that do not comply with the regulations to determine if violations have occurred and conducts proactive surveillance to monitor organic markets and systems. We take enforcement action when needed to stop noncompliant products from deceiving consumers.

Throughout 2024 and 2025, NOP engaged in surveillance and enforcement activities around the world. Additional information on import oversight activities is in the third section of this report. This section of the report provides updates on the following topics:

- Complaints Overview
- Domestic and International Investigations
- Livestock Organic Compliance Initiative
- Certifier Oversight, Training, and Awards
- Appeals

From training to surveillance, directives, and criminal prosecution, NOP and its partners engage in a wide range of activities and strategies to protect the USDA organic seal, support compliance, and hold those who violate the regulations accountable under the law. The chart below shows the range of NOP's enforcement tools, which include educational outreach to more severe outcomes like fines and loss of organic certification. The right side of the chart lists agencies that collaborate with NOP on enforcement activities.



Complaints Overview

NOP responds to complaints regarding potential violations of the organic regulations. Complaints come in from industry members, advocacy groups, and the public. When evaluating and acting on these complaints, NOP applies risk analysis to focus enforcement resources where they have the greatest impact in protecting organic farmers, businesses, and consumers from fraud. NOP continues to identify and implement efficiencies across multiple compliance activities. This has positively impacted complaint response time, database efficiency, screening for recurrent violators, supply chain information, and data integration for investigations.

Complaints received:

769 in 2024
755 in 2025

Complaints resolved at intake:

36% in 2024
33% in 2025

Investigated or referred complaints:

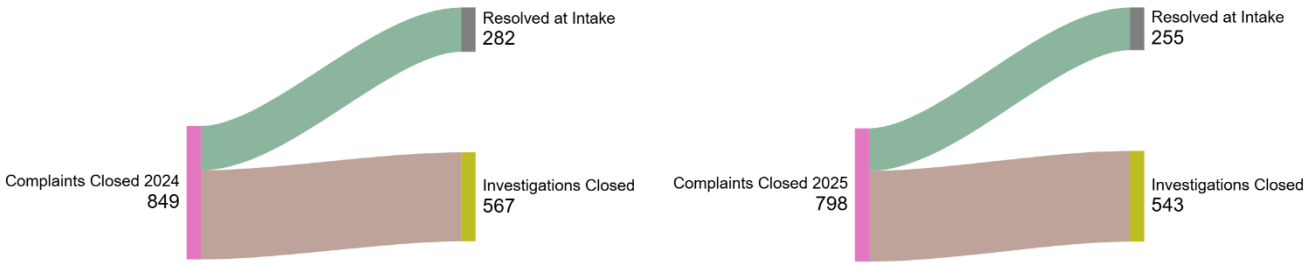
64% in 2024
67% in 2025

Most common outcome: Voluntary compliance or referred for investigative support

Approximately 10 percent of consumer questions were related to products outside the scope of the organic program, such as supplements. NOP quickly closes these complaints after educating the complainant on NOP regulations.

The NOP online complaint portal continues to improve customer experience by making it easier for the public to understand what information is needed for NOP to effectively evaluate a complaint. The portal expedites the intake process by automatically entering information into the NOP internal complaint management system and providing tracking information to the person filing the complaint or inquiry, while allowing for anonymous tips. Approximately 70 percent of complaints received in 2024 and 2025 came through the online portal.

Total Complaints Resolved at Intake and Total Investigations Closed



When there is evidence of a violation of the organic regulations, NOP's first goal is to bring the farm or business back into compliance or to remove it from the organic market as quickly as possible. Of the complaints NOP received in 2024 and 2025, approximately half were resolved when farms and businesses voluntarily complied with the organic regulations.

Examples of voluntary compliance include:

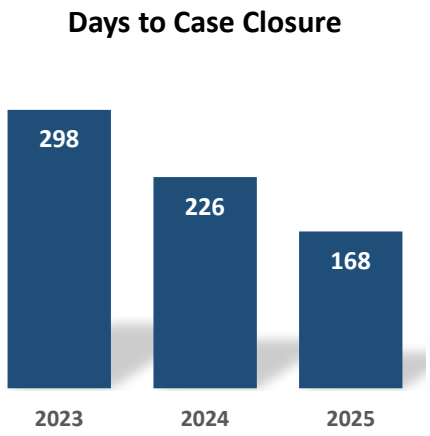
- An uncertified farm or business stops making organic claims on a website.
- An uncertified farm or business gets certified so it can legally label product as organic.
- A certified farm or business corrects a noncompliance.

- A certified business that is noncompliant exits the organic market.

Where complaints are substantiated through an investigation, the outcomes may include a range of administrative actions, including issuing warning notices to support future action, posting fraudulent organic certificates to the NOP enforcement website for market awareness, filing complaints for a hearing with an administrative law judge, and referring cases to other law enforcement agencies for further civil or criminal investigation and action.

When NOP has the evidence to support enforcement actions, the program may use its statutory and administrative authority to levy civil penalties, establish settlement agreements, and, when appropriate, refer offenders for criminal prosecution. NOP continues to work with the California State Organic Program (the only state with this type of NOP-delegated authority) and international trading partners with organic equivalence arrangements to investigate complaints against operations in their geographic areas, including Canada, the European Union, Israel, Japan, South Korea, New Zealand, Switzerland, Taiwan, and the United Kingdom.

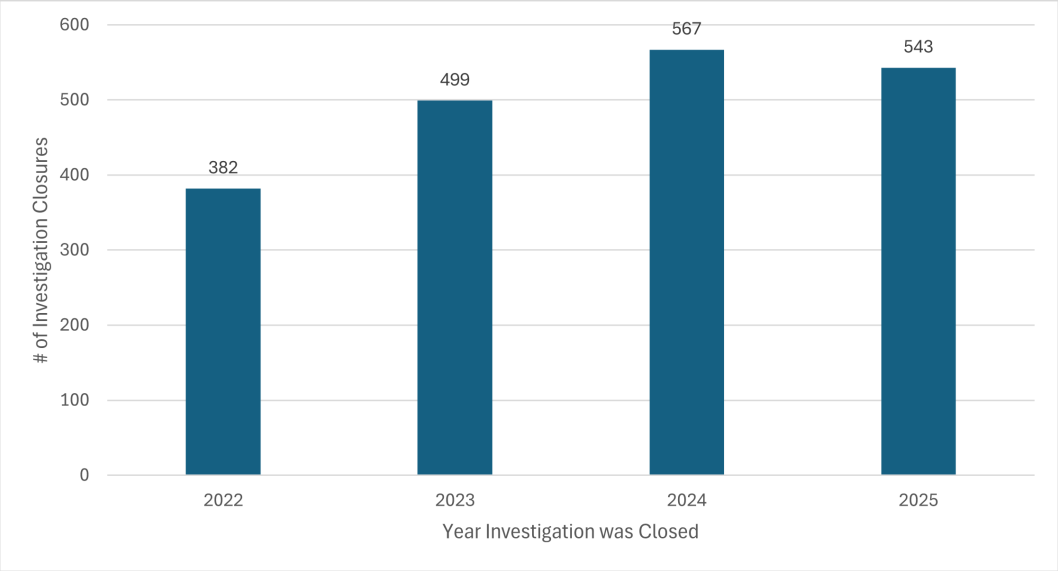
Technological enhancements to internal systems and process improvements continued to streamline our enforcement response, significantly decreasing the number of outstanding cases and days it takes to bring the investigation of a typical complaint to closure. In 2024, the average time to case closure was 226 days, down from 298 days in calendar year 2023. In 2025, the average time to case closure dropped to 168 days. These quicker case closures allow the NOP to protect the integrity of the USDA organic seal by removing false claims and bad actors from the market, increasing consistency across certified operations, and protecting those playing by the rules.



In 2024, NOP launched a new case management system for its compliance work, including investigations and surveillances. This single repository facilitates outcome tracking, documents supply chain relationships, links investigations, and integrates data across compliance activities. Throughout 2025, NOP refined the functionality of the case management system.

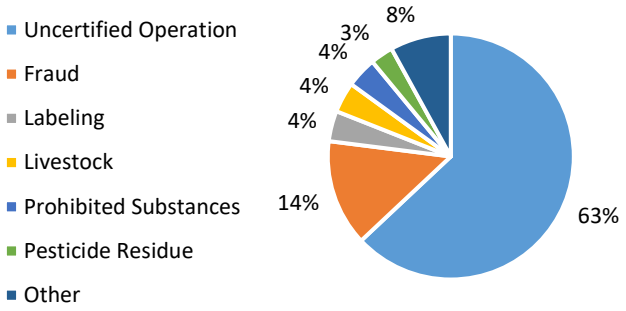
In 2025, NOP initiated new processes to streamline reinstatement of organic certification to suspended operations in specific situations. These procedures apply risk analysis to determine the impact of allowing certain businesses who have come into compliance with the USDA regulations to regain organic certification with minimal delays. This commonsense approach removes barriers to certification, particularly for U.S.-based rural farmers, offers better customer service to stakeholders, reduces burden on certifying agencies, and improves program efficiency. Implementing these improved procedures has allowed NOP to prioritize oversight of high-risk imports and fraudulent activities, while safeguarding the U.S. organic market.

Overview of Total Investigations Closed and Investigation Turnover

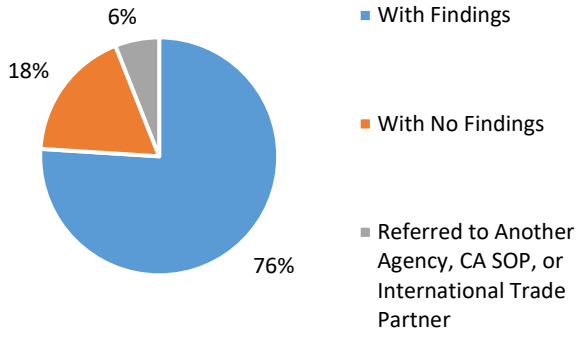


Overview of Investigation Case Types and Investigation Outcomes

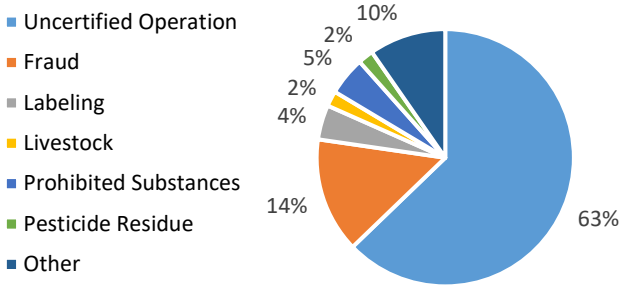
256 Investigations in Progress As of 12/31/2024



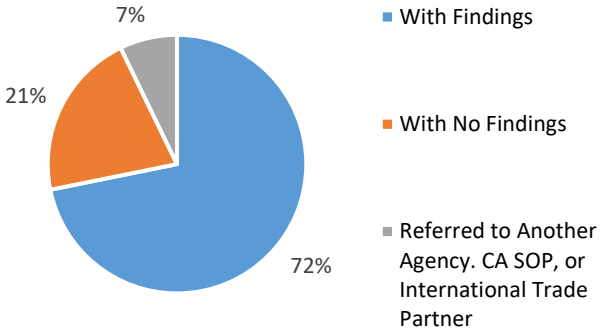
567 Investigations Closed in 2024



207 Investigations in Progress As of 2/2/2026



543 Investigations Closed in 2025



Cases in Progress are based on allegations, complaints, and surveillance, and are not in themselves proof of wrongdoing.

The NOP also initiated monitoring and surveillance activities of high-risk operations, verified oversight of high-risk areas of the organic regulations, and maintained oversight of certifiers. Oversight activities ensure an even playing field for operations and certifiers. For example, the livestock compliance program improved consistency across certifiers overseeing livestock traceability at handling operations. Certifiers stopped fraudulent activity where nonorganic livestock were sold as organic. There are more details about this initiative later in this report.

Domestic and International Investigations

The investigation landscape is always changing, with bad actors using new technology and methods to violate the USDA organic regulations. NOP investigative actions have adapted to the changes, and NOP learned and implemented new approaches to working with different stakeholders to stop fraudulent activity.

In 2024, NOP initiated and established relationships with online retailers which ensured quick enforcement actions to remove bad actors from the online market and provide certainty to consumers that the product being advertised as organic is organic. This includes obtaining contact information for sellers making unverified organic claims, so NOP can advise them of the violation and discuss steps to come into compliance. NOP also established a strong relationship with another online seller's regulatory group, in which NOP reviews listings for products with organic claims and advises the company to remove those products from its platform if NOP determines that the claims violate NOP's regulations.

New relationships with State-level officials have also helped NOP close investigations more quickly. For example, State officials provided NOP with contact information for operations in violation of the regulations. The State officials and the NOP then contacted the uncertified operations by going onsite or sending Notices of Warning, requiring the violators to remove incorrect organic claims. Most operations immediately removed the violative information and became compliant; however, some operations required additional warnings.

NOP began sending Rapid Response Warning letters in 2024, which informed operations of the organic regulations and requirements and told the violating operations to remove all indications of organic from their advertising and product labels or to become certified organic. As a result, 99 out of 159 operations that received the letter removed the violative language. NOP continued with this approach throughout 2025, issuing warning letters within 30 days of receiving an initial complaint. Violative operations typically responded in the following ways:

- Contacting NOP with concerns about how to become compliant,
- Immediately stopping and correcting the violations, with or without informing NOP,
- Notifying NOP that the operation was in progress to achieve organic certification, or
- No response at all, in which case NOP followed up to bring the operation into compliance.

As a result, 194 out of 244 operations that received the letter became compliant in 2025. Of the remainder, some operations applied to become certified organic, and others are evaluating next steps. NOP is monitoring these operations and will follow up where needed to ensure compliance.

Case Highlights

Sharing information and working with other enforcement agencies allows NOP to access additional authorities to protect the organic market and enables other agencies to use information from NOP to achieve their regulatory mission and objectives. This "many hands" approach supports enforcement across the organic community both domestically and internationally. The following case studies illustrate how NOP investigators work with other government entities and use diverse investigative tactics to bring operations into compliance.

Collaboration on Pesticide Residues on Imported Berries (2024-2025): In 2024, NOP worked with the California State Organic Program (CASOP) on pesticide residue investigations. Berries found at California retail sites were traced to an importer in Washington state. The importer unknowingly bought 6,384 cases of organic blackberries and raspberries from Mexico that had tested positive for residues of prohibited substances. The NOP and CASOP investigation found that the Mexican berry exporter purchased the berries from a broker in Mexico who used three different fraudulent organic certificates to represent the nonorganic berries as organic. The Mexican exporter stopped sourcing from the broker, became certified organic, and is being monitored as a high-risk operation by their organic certifier. The related fraudulent certificates were posted to the NOP website for public awareness.

In 2025, NOP investigated another complaint from CASOP that alleged a certified trader in Mexico sold organic raspberries that had tested positive for a prohibited substance to a large U.S. berry brand. Investigators traced the residues to a grower who failed to clean equipment previously used with a prohibited material on nonorganic onions. The affected lots were not eligible for sale as organic in the United States, and 191 cartons of raspberries were destroyed before entering the marketplace. In response to a noncompliance from its certifier, the trader conducted staff training to improve its supplier management system and implemented a residue testing program. The grower entered a settlement agreement requiring surrender of certification for the affected fields, additional inspections and staff training, dedicated organic equipment and storage, and prompt reporting of positive detections and operational changes. This case illustrates how collaboration between certifiers can strengthen oversight, improve contamination prevention, and reduce repeat residue violations on organic imports.

NOP and FGIS Partner to Detect Prohibited Substances in Organic (2024): NOP expanded its interagency agreement with the USDA's Federal Grain Inspection Service (FGIS) to collect samples of organic soy and corn commodities for laboratory analysis of prohibited substances. This partnership helps USDA monitor domestic and imported feed supply chains from regions with elevated risk factors and extends NOP's geographic sampling capacity to new ports and handling sites across the United States.

NOP directed the collection of over 50 feed samples, of which FGIS field inspectors collected 29. At NOP's request, a USDA AMS National Science Laboratory added solvent testing to its portfolio and analyzed FGIS-collected feed samples for a broad spectrum of residues of prohibited substances, including pesticides, solvents, genetically modified organisms (GMOs), and herbicides such as glyphosate and 2,4-D. Seven of the samples collected by FGIS tested positive for GMO residues, including organic corn, whole soybeans, soybean meal, and dairy mix, from both imported and domestic sources. The organic dairy mix also tested positive for glyphosate. NOP is overseeing active investigations to address these findings.

For all organic samples, NOP conducts supply chain traceability audits back to the farm to determine whether the product was grown organically, and to identify any documentary evidence of fraud. Investigations or audits that show prohibited residues above regulatory tolerances, or lack of organic traceability result in enforcement actions such as noncompliance and exclusion from organic sale.

Collaboration with CBP to Enforce Trademark Authority (2024): NOP collaborates with U.S. Customs and Border Protection (CBP) to enforce trademark authority of the USDA organic seal at borders to stop entry of unauthorized organic product into the U.S. One case from 2024 involved a shipment of imported retail packaged certified organic essential oils displaying a confusing and altered USDA organic seal. The shipment was seized by CBP under trademark authority and referred to NOP for investigation, where NOP also learned of two more unauthorized shipments of organic retail packaged essential oils. The certifiers of all three operations in India initiated noncompliance and adverse action proceedings while the importer has removed all organic claims from products. For more information on NOP's use of its trademark authority, see the second section of this report.

Case Highlight—Diversion of Fraudulent Soybean Meal and Corn (2024): NOP received a complaint alleging that Turkish nationals, formerly indicted by the U.S. Department of Justice for large-scale organic fraud, directed a major fraud scheme to export nonorganic corn and soy as organic from Turkey to the United States.

NOP's investigation substantiated the allegation and found that the shipment of feed that was the subject of the complaint was associated with inadequate and falsified transaction records. These records were provided by a group of operations certified by the same USDA-accredited certifier, with connections to one another and with one confirmed connection to one of the formerly indicted Turkish nationals. The operations involved in the supply chains provided records that showed unusual transfers of ownership, which could not be authenticated in Turkey's transaction verification systems. The operations also concealed information and refused facility access during unannounced inspections, which prevented NOP from verifying the organic traceability of the complained shipment.

As a result, 10 of the operations involved are no longer certified and 5 received an adverse action notice. Additionally, NOP issued a Notice of Noncompliance to the certifier for various failures including insufficient traceability auditing and fraud detection practices, lack of administrative capacity in Turkey, and use of an undisclosed sub-contractor in Turkey. Finally, due to evidence of fraud, NOP issued a Notice of Nonorganic Purchase to the U.S. importer of the complained shipment. This notice resulted in the diversion of more than 12,000 metric tons of soybean meal and 13,000 metric tons of corn from the U.S. organic marketplace, thereby protecting domestic grain farmers from unfair competition.

Case Highlight—Targeted Sampling of High-Risk Commodity Regions (2025): NOP directed the collection of 43 samples covering supply chains for livestock feed and other imported commodities from regions with known risks to organic integrity, and collaborated with certifiers and CBP to target, collect, and test samples. Organic import data and information from NOP's West Africa soy directive also enabled NOP to target the collection of 26 samples of West Africa organic soy commodities at more than a dozen operations, in some cases spanning multiple lots or products.

The NOP instructed certifiers to pair sampling activities with supply chain traceability audits for a more comprehensive review of recordkeeping and compliance. This comprehensive approach revealed critical lapses in fraud prevention practices even when there are no detectable residues.

The NOP also directed the collection of 17 samples from other high-risk commodity region pairings. While most samples tested negative for prohibited substances under the USDA organic regulations, there were actionable results, such as:

- Samples collected from a high-volume soy exporter in Ghana tested positive for prohibited substances. This triggered NOP coordination of a collaborative investigation by three certifiers and the diversion of approximately 1,600 metric tons of ineligible soybeans from the organic market.
- Prohibited substances detected in samples collected from a newly certified exporter in West Africa resulted in diversion of 1.5 metric tons of soybean meal from the organic market and issuance of multiple noncompliances to the operation.
- Samples collected from high-volume soy processors in Nigeria and Togo did not show detections of prohibited substances. However, records obtained in coordination with the sampling did not adequately support the large production capacity reported by both processors, and NOP has initiated investigations and additional monitoring of their certifiers' oversight.
- Eight samples of organic soybean meal imported from Turkey and India, collected by the importer's certifier during an unannounced inspection at its contracted storage facility, showed residues of prohibited pesticides, GMOs, and glyphosate on the Turkish origin product. The certifier issued an exclusion from organic sale and is working through the adverse action process with the importer and storage facility to address systemic violations.

Fraudulent Soybeans Downgraded for Entry (2025): NOP received a complaint alleging that fraudulent organic soybeans were en route to the United States from Turkey. NOP's prompt investigation confirmed that an exporter based in Turkey sent a shipment of 12,000 metric tons of fraudulent organic soybeans, valued at approximately $8 million, to the United States. The soybeans were sourced and handled by noncertified operations, fumigated with a prohibited substance, and accompanied by fabricated and falsified documents to obscure the soybeans' true origin and status. NOP and CBP successfully collaborated to deny entry of this shipment into the U.S. as organic. This was the first collaboration between NOP and CBP to interrupt a fraudulent organic bulk shipment and represents a significant enforcement milestone for the organic industry. The soybeans were downgraded to nonorganic status at the port of entry, and NOP informed the U.S. importer that the soybeans may not be sold or further represented as organic.

NOP's investigation included multiple handlers in supply chains in Turkey. The investigation resulted in the suspension of the key operation responsible for the fraud, a proposed suspension and proposed revocation for two connected and implicated operations, denials of certification for two operations that surrendered and then attempted to obtain certification with different certifiers, as well as a notice of noncompliance for a certifier. As a result of collaboration between NOP and certifiers, numerous operations are newly identified as high-risk and under increased oversight with potential for additional adverse actions.

The Black Sea region remains an area of concern with respect to fraudulent organic imports. Certified organic operations, many with shared connections, frequently switch certifiers or surrender certification to evade investigation or potential adverse action. NOP has been actively cautioning entities that import directly from, or import organic products originating from, or in transit through, the Black Sea region. Imported organic feed supply chains continue to be high priority for oversight and enforcement, and NOP is committed to protecting the integrity of the market for U.S. farmers, businesses, and consumers.

Chinese Organic Pea Protein Supply Chain Investigation and Surveillance (2025): NOP initiated an investigation after receiving a complaint from a U.S. business that organic pea imports into China were insufficient to support the country's organic pea protein production, raising concerns about fraud. The U.S. entity had also filed a successful countervailing and antidumping (CV/AD) petition against Chinese pea protein manufacturers. Using the complaint, CV/AD findings, and CBP import data, NOP targeted suspect operations in China, spanning three certifiers, four pea protein handlers, and two farms.

NOP partnered with CBP officers at the Port of Long Beach to sample and test incoming shipments of organic pea protein from China. Two shipments were found violative. One shipment displayed the USDA Organic seal but lacked a certified NOP importer and a valid NOP Import Certificate (NOP-IC). A second shipment tested positive for a prohibited substance. With these findings, NOP authorized CBP to detain and deny entry of these shipments, and a subsequent investigation confirmed that one shipment was conventional, not organic.



Fraudulent organic pea protein denied entry at the Port of Long Beach.

As a result, more than 21 tons of fraudulent organic pea protein, valued at $14,000, were prevented from entering the organic market. Enforcement actions included suspension of the exporter's organic certification, prohibiting it from handling organic products. NOP also worked with certifiers to ensure noncompliant products were destroyed or removed from the organic market. The operation that handled the pea protein with the prohibited substance detected is also now under increased oversight by its certifier, which includes increased sampling and testing from its suppliers. NOP will continue monitoring this country-commodity pair to safeguard U.S. organic farmers, ranchers, producers, and consumers.

Nonorganic Cold-Pressed Juice Stopped from Being Represented as Organic (2025): NOP investigated an operation marketing non-organic packaged cold-pressed juice as organic on its business website. After several unsuccessful attempts were made to contact the operation, NOP contacted the City of Cleveland Permits and Licenses Department and requested assistance from its city clerk, who provided contact information for the owner. The owner immediately responded to NOP and removed the violative labeling. This brought the business into compliance.

Enforcement Against Uncertified Green Bean Sales (2025): NOP initiated an investigation based on information provided by an organic certifier that a Wisconsin farmer sold green beans as organic after surrendering its organic certification, in violation of the organic regulations. Invoices showed a buyer paid organic prices for nonorganic green beans. The uncertified crop harvested totaled 29.4 tons. Two certification agencies were involved in the investigation and collaborated to take enforcement action against the different entities involved. The actions included a Notice of Noncompliance that was issued to the buyer and a Notice of Denial of Recertification that was issued to the farmer. The certifier and farmer subsequently reached a settlement agreement that reinforced organic certification requirements and indicated the potential for monetary civil penalties that could be issued for future willful violations of the USDA organic regulations. The farmer agreed to the conditions proposed in the settlement agreement and is again certified organic.

Livestock Organic Compliance Initiative
This long-term Federal boots-on-the-ground surveillance program assesses compliance with the USDA organic livestock regulations. Previously, there had been a lack of certifier oversight, industry complaints about ruminant grazing, and livestock handling surveillance that identified fraud. In response, NOP created a livestock-focused surveillance program to provide a level playing field in the market.

NOP's livestock and livestock products surveillance activities focus on the following risk factors: market trends, current events, and operation characteristics such as size, location, and compliance history. Active surveillance improves consistency in organic practices and enforcement, supports a level playing field across the organic livestock industry, and strengthens producer and consumer confidence in the organic livestock market.

In 2023, NOP issued an 18-month Livestock Directive to all certifiers that certify U.S. livestock producers and handlers. The directive required that certifiers provide the NOP with updated organic system plans and inspection report templates that verify compliance with livestock regulations at livestock processors/handlers. The directive also required that certifiers evaluated livestock handlers, identified risk factors, and issued noncompliances or adverse actions as necessary to their certified operations. As a result, certifiers have taken enforcement actions including issuing 156 noncompliances and adverse actions to their operations. These activities either brought the operations into compliance or removed bad actors from the market. NOP also found that some certifiers were not verifying livestock regulations at livestock handlers and not performing sufficient oversight of high-risk operations, potentially allowing fraud to occur. NOP issued Notices of Noncompliance to noncompliant certifiers.

In 2024, USDA livestock technical experts reviewed 10 of the 33 domestic livestock certifiers to confirm consistent and complete implementation of the organic regulations. NOP worked with certifiers to address 22 findings of deficiencies related to:

- Origin of livestock, animal feed used, animal healthcare, and livestock housing at slaughter and auction facilities.
- The percentage of dry matter intake obtained from pasture at dairy operations.
- Access to pasture throughout the entire grazing season for ruminants.
- Verification of organic status of the animals through traceback and mass balance exercises.

NOP completed its surveillance for compliance with the Origin of Livestock final rule in 2024. NOP reviewed 12 operations and six certifiers and found all to be compliant with the rule. As a result of this surveillance, certified organic dairy operations have improved record keeping systems and increased compliance with grazing requirements, and there is more consistency in certifier oversight of organic livestock handlers. In 2025, USDA livestock technical experts reviewed six domestic livestock and livestock handling operations. NOP worked with the operations' certifiers to address findings regarding origin of livestock, further strengthening the organic livestock market.

Certifier Issued Actions to Operations Violating the USDA Organic Livestock Regulations - 2024

TOTAL Operations Issued Notices and Adverse Actions	**156**
Notice of Noncompliance	134
Notice of Proposed Revocation	1
Notice of Proposed Suspension	15
Operation Surrendered	2
Notice of Suspension	1
Notice of Revocation	1
Notice of Denial of Certification	2

Oversight of High-Volume Beef Imports

Since March 2024, the United States has imported over $394 million of organic beef from Australia, which is second to South America. In 2025, NOP travelled to Australia and performed onsite audits of organic beef farms, slaughter facilities, and cold storage export facilities. The team also verified organic livestock and handling oversight of two Australia-based organic certifiers. The operations NOP audited were compliant with USDA's organic livestock and livestock handling regulations. NOP found minor oversight issues with the two organic certifiers and issued noncompliances. NOP continues to monitor imports from Australia to protect U.S. farmers, handlers, buyers, and consumers of organic beef products.

NOP will perform onsite audits in South America in 2026. This ongoing risk-based oversight and subsequent timely enforcement actions ensures the NOP continues to protect U.S. interests and U.S. beef producers.

Certifier Oversight

Accreditation is a keystone of the public-private partnership between NOP and its accredited certifiers. Through accreditation and ongoing oversight, NOP ensures there is a robust and capable pool of certifiers able to meet the growing and evolving demands for USDA organic certification. Through its oversight activities, NOP ensures that certifiers are providing USDA organic certification in a fair, compliant, and consistent manner, while maintaining the integrity and credibility of the USDA organic seal.

During 2024 and 2025, NOP provided oversight and training to more than 70 third-party USDA-accredited certifiers that operate in the United States and around the world. Through directives and training, NOP worked to strengthen certifier compliance with the USDA organic regulations, assess certifier performance, and verify consistent enforcement of the organic regulations worldwide.

Accreditation audits of certifiers are an effective and efficient tool for assessing a certifier's organic control system for compliance with USDA organic regulations and NOP accreditation requirements. In 2024, NOP conducted accreditation audits of 41 certifiers in 14 countries. The audits resulted in the identification of 209 noncompliances against certifiers who failed to fully comply with NOP accreditation requirements. In 2025, NOP audited 36 certifiers in 13 countries, including 14 U.S. states, resulting in 175 noncompliances for certifiers.

When appropriate, the NOP uses other tools, such as desk reviews, to assess certifiers' compliance with the USDA organic regulations. In 2024, the NOP conducted a comprehensive desk review of all USDA-accredited certifiers to determine whether they had adequately implemented the provisions of the Strengthening Organic Enforcement (SOE) final rule, which NOP began enforcing in March 2024. The NOP specifically assessed provisions related to personnel qualifications, producer groups, fraud prevention, and import oversight to ensure that certifiers are consistent and fair with what they are requiring of organic farms and businesses.

The review found that approximately two-thirds of certifiers had made sufficient updates to their management systems to implement the provisions of the SOE final rule. NOP also found that 24 certifiers had not implemented the requirements in full but had made updates to their management systems. NOP issued noncompliances to each of these certifiers listing the specific deficiencies and evaluated the certifiers' plans to correct the identified issues. Three certifiers had significant issues related to their implementation of the SOE final rule. NOP issued noncompliances to these certifiers and informed them that the NOP would propose suspension of their accreditation should they fail to take appropriate corrective actions.

NOP continued to assess USDA-accredited certifiers' implementation of the provisions of the SOE final rule through onsite certifier accreditation audits in 2025. Overall, the audits confirmed that certifiers were implementing the requirements in compliance with the USDA organic regulations. Where deficiencies were identified, NOP issued noncompliances with an opportunity to correct. NOP also addressed high-risk implementation issues through targeted certifier training, further strengthening consistent application of the SOE requirements across the organic certification system.

When an accredited certifier does not meet accreditation compliance criteria, NOP issues a noncompliance to identify the deficiency and provides the certifier an opportunity to submit corrective actions to bring their program back into compliance with the USDA organic regulations. If the corrective actions are insufficient, NOP proposes suspension of the certifier's accreditation. NOP may also encourage voluntary surrender of accreditation or, in some cases, enter into a settlement agreement to expedite the certifier's return to full compliance.

In 2024, NOP proposed suspending the accreditation of three certifiers, all headquartered outside the United States and primarily serving foreign farms and businesses; in response, one certifier entered into a settlement agreement, one surrendered its accreditation, and one filed an appeal, while one additional domestic certifier also surrendered its accreditation that year. In 2025, NOP entered into a settlement agreement with an international certifier that had appealed a proposed suspension and conducted oversight activities, including desk reviews and onsite audits, to monitor two international certifiers' compliance with their settlement terms; both were headquartered outside the United States and primarily served foreign operations. That year, one domestic and one international certifier also surrendered their accreditation.

NOP conducts rigorous desk reviews of applicants for accreditation as organic certifiers to ensure that only organizations that are qualified and capable of complying with NOP accreditation requirements are approved to certify organic farms and businesses. In 2025, NOP denied five applicants that failed to correct noncompliances identified during the desk review and failed to demonstrate the ability to operate a compliant USDA organic certification program; one denial is under appeal. All five applicants were headquartered outside the United States and would have primarily provided certification services to foreign farms and businesses.

Certifier Training

To provide consistent messaging and expand access to organic education, NOP maintains the Organic Integrity Learning Center, a free online training platform offering 39 courses, 178 contact hours, and 33 micro learnings. In 2024 and 2025, NOP added core courses on the Strengthening Organic Enforcement and Organic Livestock and Poultry Standards final rules; released three new micro learnings: A Newcomer's Guide to Organic Handler Certification, Overview of the USDA Organic Certificate, and Retail Toolkit; and updated several existing courses to reflect the SOE rule.

NOP continued to advance government technology and innovation by delivering media-rich, self-paced courses with assessments, interactive knowledge checks, and multimedia content. More than 13,000 producers, inspectors, certifiers, and compliance professionals are enrolled in the Learning Center, with an average course satisfaction rating of 93 percent.

In addition, NOP hosted webinars for certifiers on responding to accreditation audit noncompliances and on organic equivalency arrangements. NOP also held annual onsite trainings for certifier staff and inspectors in Albuquerque, NM, and Nuremberg, Germany, covering topics such as risk-based and streamlined certification, import oversight, and risk-based compliance.

Certifier Awards

Every year, NOP recognizes the work of accredited organic certifiers whose efforts demonstrate extraordinary support of the USDA organic regulations. Awards are presented during the annual NOP Certifier Training, which convenes USDA-accredited organic certifiers and organic inspectors from around the world. Award-winning certifiers distinguish themselves through consistent and effective communication and collaboration with NOP across a broad range of programmatic and operational activities, including compliance oversight. This sustained engagement enhanced NOP's understanding of how organic standards are applied in practice and supported greater consistency in certification decisions for USDA-certified organic farms and businesses.



Representatives of two of the four 2025 award-winning certifiers with NOP staff.

For their outstanding contributions to work in organic certification throughout the previous calendar year, the National Organic Program Director's Award winners were:

2025

- ACO Certification Ltd. – Brisbane, Australia
- Maryland Department of Agriculture – Annapolis, MD
- Quality Assurance International – Ann Arbor, MI
- Oregon Tilth Certified Organic – Corvallis, OR

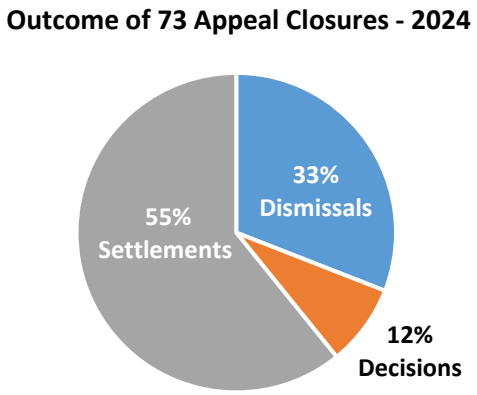
2026

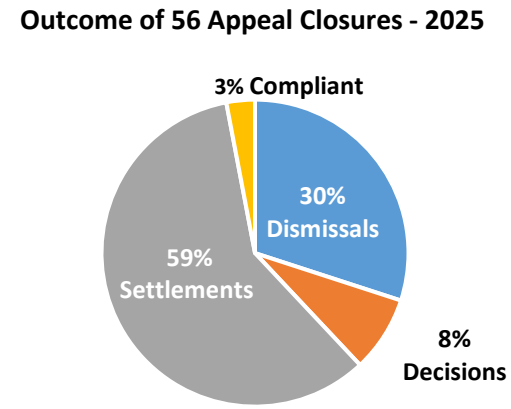
- Ecocert SAS – L'Isle Jourdain, France
- Iowa Department of Agriculture and Land Stewardship – Des Moines, IA
- Quality Certification Services – Gainesville, FL

Appeals

The appeals process allows certifiers and businesses to contest proposed enforcement actions they believe are unfair. AMS and NOP address appeals of proposed adverse actions, such as proposed suspensions and revocations, when the organic rules have been broken. This work is an important component of the program's enforcement mission because it provides due process to organic certifiers, farms, and businesses. Appeals also help the program assess and improve the quality of enforcement actions taken both by certifiers and the program.

In 2024, NOP processed and closed 73 appeals with an average processing time of about 87 days, completing 96 percent within the 180-day target; more than half were resolved through settlement agreements, which helped operations return to compliance more quickly. NOP also handled 25 reports of settlement breaches and prepared one Complaint for Hearing. In 2025, NOP closed 56 appeals with an average processing time of 152 days, with 63 percent completed within the 180-day target, and as in the prior year, most appeals were resolved through settlement agreements. Additionally, NOP closed two cases after certifiers reported that the operations had already reached full compliance before NOP began its review.





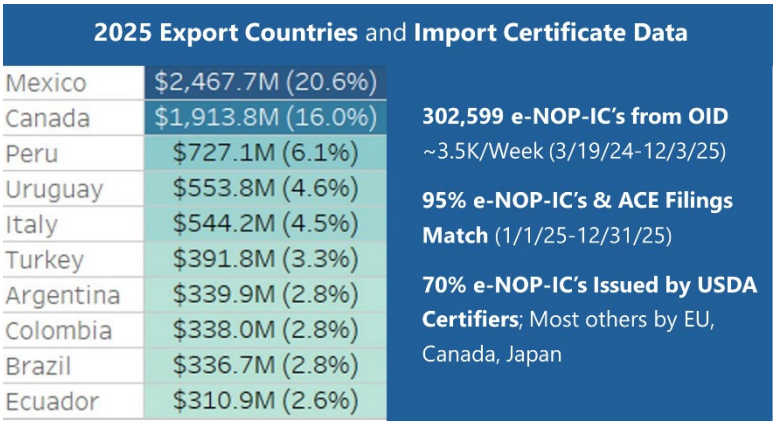
Breaches of Settlement Agreements occur when an operation does not correct the issues that led to a proposed adverse action, requiring additional enforcement. In 2024, NOP closed 23 breach cases. Seven of these resulted in Administrator's Decisions that confirmed the certifier's findings of ongoing violations. The remaining 16 cases were resolved after the operations corrected the problems and returned to compliance. These totals also include several breaches reported in 2023 that were finalized in 2024.

In 2025, NOP received 21 reports of settlement breaches and closed nine of them. Two cases resulted in Administrator's Decisions affirming ongoing violations, while seven were resolved once the operations came back into compliance. Twelve cases remain open, awaiting responses from the operation or the certifier. NOP's continued oversight helps ensure that operations follow Settlement Agreements and comply with organic regulations overall.

Organic Trade Enforcement Interagency Coordination Report

In the 2018 Farm Bill, Congress called on the Secretaries of Agriculture and Homeland Security to establish an "Organic Agricultural Product Imports Interagency Working Group." The official U.S. Customs and Border Protection (CBP)–USDA Interagency Organic Working Group has furthered coordination and partnerships and has strengthened the relationship between CBP, AMS, and the USDA's Animal and Plant Health Inspection Service (APHIS) in the areas of organic import oversight, organic enforcement, and data sharing.

This report outlines the actions being taken by the working group to identify and resolve barriers to cooperation between the agencies involved in organic product import oversight, advance activities that integrate organic trade enforcement into import inspection procedures and identify needed training on organic product oversight. The working group focused on the following major priorities and initiatives in 2024 and 2025.



Electronic Organic Import Certificates

NOP's Global Organic Integrity Database (GLOBAL INTEGRITY) strengthens USDA's oversight of organic imports. Launched fall 2023, GLOBAL INTEGRITY allows USDA-accredited certifiers and trade partner certifiers to issue electronic import certificates for organic products being imported to the United States. NOP's regulations require all shipments of organic agricultural goods imported into the United States to be associated with a valid NOP Import Certificate (NOP-IC). The NOP-IC provides verification of organic integrity with traceability from the port of export to the port of entry and ensures an auditable electronic record trail to effectively trace organic imports back to exporters. The data collected through import certificates allows NOP to monitor market trends, surveil imports, and detect and prevent fraud.

Stakeholder engagement and outreach included 100+ meetings and presentations in 2024. Topics included NOP organic import certificate regulations, implementation, and enforcement. NOP also partnered with a key stakeholder, the National Customs Brokers and Forwarders Association of America and Regulatory Agency Committee to assist with the global rollout of the organic import certificate requirements, which NOP began enforcing in March 2024.

In 2025, NOP invested in technology enhancements, fixes, data analytics and cybersecurity measures to ensure that this system remains current and stable as the number of users increases by thousands each year.

Commercial Targeting and Analysis Center Activity

As part of its emphasis on import oversight, NOP continued its partnership with the CBP's Commercial Targeting and Analysis Center (CTAC). This law enforcement data center is based at CBP and is staffed by 13 federal agencies (including NOP) with border enforcement authority. NOP continues to leverage its access to trade and import data to increase its oversight of organic imports through surveillance of known violators and targeting potentially fraudulent organic

shipments. Through CTAC, NOP conducted document reviews and/or coordinated physical examinations of more than a dozen imported organic shipments in 2024 to confirm compliance with USDA organic regulations. In 2025, that number grew substantially, with more than 50 potentially fraudulent shipments examined. These reviews are part of ongoing surveillance of high-volume, high-value, and high-risk commodities worldwide, supporting NOP investigations and identifying new violative products and operators.

Additionally, the NOP increased its import oversight and continued the sampling and testing of organic grains imported into the United States where NOP has identified an elevated risk for fraud. In 2024, NOP sampled and tested a dozen bulk containers of organic soybean meal and corn imported into the Port of Baltimore. Samples of organic corn imported from Turkey and samples of organic soybean meal imported from Ethiopia, Togo, and Turkey showed no detectable levels of prohibited substances or GMOs. The NOP continues to monitor imports of organic commodities from high-risk regions and conducts spot checks at U.S. ports of entry and certified handling sites as part of the overall compliance and enforcement process.



NOP staff sampling grain at the Port of Baltimore.

Trademark Authority

In 2022, AMS recorded its trademark of the USDA organic seal with the CBP Intellectual Property Rights Coordination Center. This action significantly increased CBP authority to enforce the USDA organic trademark at the border and substantively increase the penalties for organic import fraud. Registration of the trademark increased the number of federal agencies with authority to enforce the trademark and gives CBP the authority to detain, seize, forfeit, and destroy products that fraudulently use the USDA organic seal and potentially contain harmful ingredients. Registration of the organic seal grants additional intellectual property rights to further restrict the use of the trademark or a confusingly similar marking by uncertified farms and businesses.



Shipments of herbal powders denied entry and seized by CBP due to fraudulent organic trademark markings.

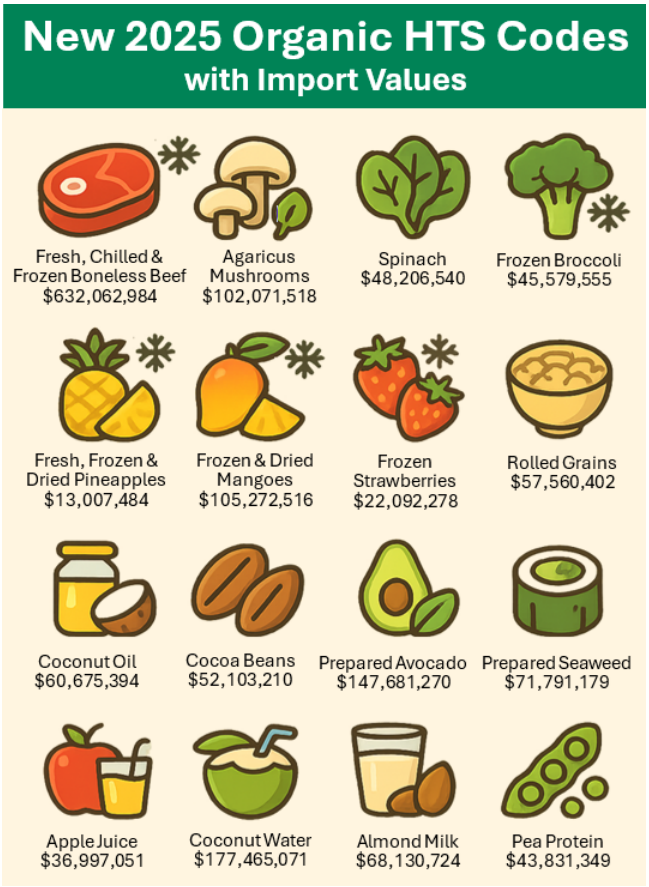
The trademark registration works in conjunction with the Organic Foods Production Act and the organic regulations, providing another enforcement tool against misuse of the seal. As the trademark owner, USDA can seek additional civil remedies such as injunctive relief and monetary damages under the Lanham Act. Operations trafficking counterfeit organic goods or otherwise misusing the USDA organic seal may be subject to fines and imprisonment under the Trademark Counterfeiting Act.

Through its partnership with CBP during 2024-2025, the NOP coordinated the seizure and/or denial of entry of various imported shipments with a market value of over $85,000 that were found to be in violation of the USDA organic regulations. These seizures/denials of entry

consisted of items such as sugar, dietary supplements, coffee, herbal powders, and specialty oil which were marked with the USDA organic seal without authorization or certification, or confusingly similar markings. Additionally, one detained shipment was found to be a direct counterfeit of a legitimately certified product and subsequently seized by CBP.

New Organic Harmonized Tariff Schedule (HTS) Codes

The strategic partnership between AMS and the International Trade Commission led to a continued increase in the number of organic HTS codes. Introducing new organic HTS codes allows for more accurate data analysis on imported products. Prior to the addition of organic HTS codes, all products were identified using conventional HTS codes, and organic status was only listed on the bill of lading, or packing list, making it difficult to distinguish in reporting data. In 2024, 16 new organic HTS codes were created. In 2025, AMS added more than 20 new organic HTS codes - all high-risk, high-volume, and high-value commodities, bringing the total number of organic HTS codes to more than 200. Organic imports under these new HTS codes were valued at more than $2.4 billion in 2025 alone.



Having codes for more products and subsets of organic products increases the level of detail and visibility in data on organic products coming into the United States. The increase in the specificity of available organic HTS codes, and the implementation of electronic import certificates, allows NOP to take a more proactive approach in monitoring and accurately reporting on commodities entering the United States. NOP now receives more real-time import data and can track commodities through the supply chain from final handler and overseas exporter to the recipient in the United States more quickly and efficiently than in any previous year.

Report on Enforcement Actions Taken on Organic Imports

The 2018 Farm Bill required that USDA and Customs and Border Protection (CBP) provide a report with specific quantitative measures on organic imports oversight, including:

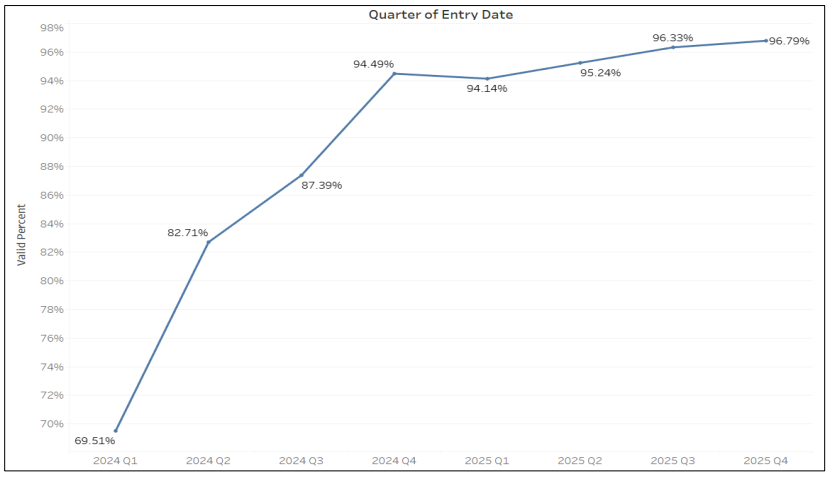
- Quantitative data on imports of agricultural products represented as organically produced but found to be fraudulent or lacking documentation at the time of entry.
- Data on domestic enforcement actions taken on (nonorganic) imported agricultural products represented as organically produced, including the number and type of actions taken by U.S. officials at ports of entry.

- Data on fumigation of agricultural products represented as organically produced at ports of entry and notifications of fumigation actions.
- Information on enforcement activities under this chapter involving overseas investigations and compliance actions.

In March 2024, NOP began fully enforcing the requirements in the Strengthening Organic Enforcement (SOE) Final Rule. For organic imports, the organic regulations now require both the exporter and importer of organic agricultural products to be certified organic. In addition, the organic certifier of the exporting entity must generate an NOP Import Certificate (NOP-IC) to be associated with the imported agricultural products in the Organic INTEGRITY database. Organic imports that arrive in the United States without a valid NOP-IC may not enter into commerce. NOP began tracking the usage and compliance of NOP-ICs as required under SOE. When SOE launched, compliance with the NOP-IC requirement was approximately 75 percent. By the end of 2024, approximately 95 percent of organic shipments were associated with a compliant NOP-IC; by the end of 2025, that compliance rate reached 97 percent.

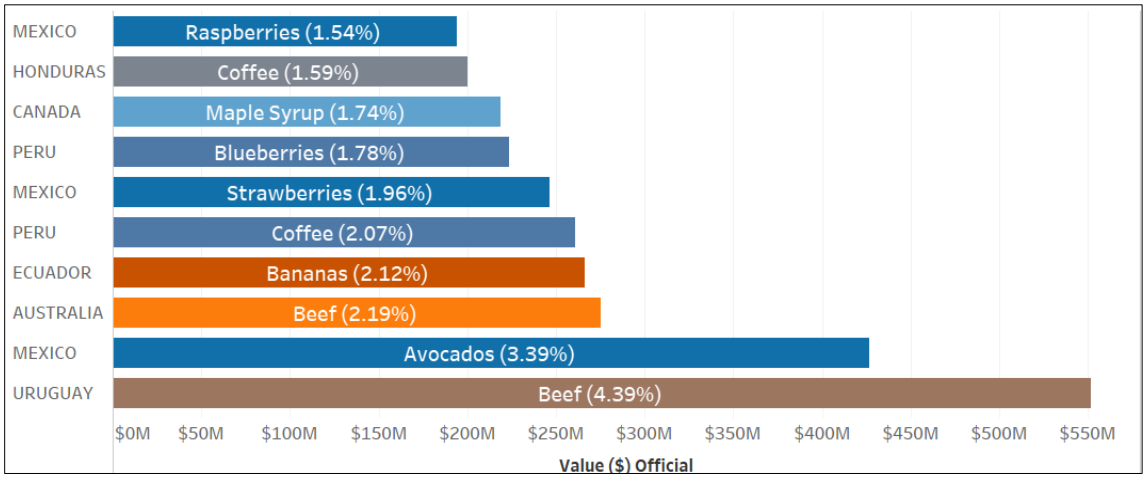
Trade Data Analysis and Import Oversight

Implementation of the SOE Final Rule provided NOP with new information and more visibility into import trade data. Access to trade data from CBP's Automated Commercial Environment (ACE) helps NOP identify and target non-compliant shipments as well as intentional fraudulent shipments. The data was also used to prepare industry and promote compliance with new certification and import certificate requirements. NOP sent over 1,000 notices to uncertified importers to inform them of the requirement to be certified in order to legally import organic products. More than 35 percent of these operations obtained certification as part of the more than 2,300 handlers that became certified in 2024. Many others exited the market, changed practices to become compliant, or demonstrated eligibility for exemption from organic certification requirements. The NOP issued warning letters to 85 operations that did not respond to the notification. These activities were essential to prepare industry for full implementation of new requirements. The steady climb in the percentage of organic imports with fully compliant NOP-ICs to 97 percent is an indicator of success.



Percent of organic imports with fully compliant NOP-ICs. Trade data show values and volumes of imported organic products by exporting country. NOP uses this information to look for emerging new trends and uses NOP-ICs to look at shipment and supply chain information for potential sample collection and review.

As the value of imported organic agricultural goods into the United States grows, NOP continues to prioritize import oversight and enforcement by analyzing trade data to identify import trends that inform risk-based enforcement practices in partnership with the USDA Foreign Agricultural Service (FAS) and CBP. NOP uses import data and analysis from multiple sources to screen for shipping activity that may indicate the need for closer inquiry. Key indicators in trade data include changes in volume, region/port history of compliance, unexpected spikes or shifts in production, and discrepancies in import information provided by certifiers and CBP ACE data. When anomalies are identified for shipments, NOP initiates surveillance of the commodity, growers, handlers, exporters, and/or importers in that supply chain so the product fraudulently represented as organic does not disrupt U.S. organic markets or create a competitive disadvantage for organic operations that play by the rules. Visible surveillance and actions taken against offenders in the supply chain are significant deterrents to fraud and support fair competition and prices that accurately respond to supply and demand.



Top ten 2025 organic imports by country-commodity pair with percentage of total imports in parentheses. 2025 marked the first full year with organic import data.

Case Highlight—Leveraging Import Data for Proactive Oversight (2025): The USDA organic regulations require all shipments of organic agricultural products imported in the United States to be associated with valid NOP-IC data. NOP trialed a proactive approach to import investigations using NOP-IC data filed with CBP. NOP identified operations importing organic products into the U.S. using irregular NOP-IC numbers to represent associated imports as organic. NOP initiated investigations of two operations importing from China: one importer of high-value plant extracts and fruit/vegetable juices, and one importer of frozen vegetables.

Both investigations confirmed the operations imported organic products without required NOP-ICs and sold those products as organic in violation of the USDA organic regulations. In one investigation, the operation could not demonstrate the organic status of the imported products. The certifier issued adverse actions and executed a settlement agreement, bringing the operation into compliance. In addition, the certifier obtained evidence of violations by the operation's supplier, leading to a collaborative investigation by two certifiers and suspension of the supplier. The second investigation resulted in certifier issuance of noncompliances to the operation and re-export of recently received noncompliant products, bringing the operation into compliance. NOP verified the exporter began obtaining NOP-ICs and initiated surveillance of the exporter to verify its certifier's knowledge of, and response to, the noncompliant export activity.

NOP will continue to use available data in 2026 to identify organic importers for high-impact import compliance assessments. Initiating importer investigations with a wide range of certifiers will improve certifier awareness of important records and methods for verifying import activity. These investigations will simultaneously provide NOP with information on root causes leading to irregular NOP-IC data entry and refine methods for identifying noncompliant import activity.

Soybean Market Surveillance (2024-2025): Demand for organic livestock feed, including organic soybeans, increases year over year in the United States. Organic feed comes with a price premium, so U.S. farmers often seek the lowest cost option: imported feedstocks. Organic soybean meal is a high impact commodity due to its role as an important protein source in the diets of organic livestock and poultry, which produce organic milk, eggs, and meat. Market intelligence and data analysis indicate that long supply chains, shelf life, and price premiums make organic soybeans an attractive market for fraud. Industry estimates indicate that U.S. buyers import between 70 and 85 percent of organic soybeans needed to meet the domestic demand for organic livestock feed. Imports were primarily exported from Turkey, West Africa, Canada and Argentina.

In 2024, NOP investigated and surveilled multiple soybean supply chains to include the biggest export markets to the United States. This work included disrupting the distribution of a large shipment of fraudulent organic soybean meal and corn, collaborating with certifiers to suspend and revoke operations in Turkey. This enabled a strong settlement agreement for bolstered oversight over a large grower group in West Africa and testing shipments at import. In addition, NOP reviewed the procedures of importers and handlers involved to verify the integrity of suppliers and imported shipments.

In 2025, NOP again investigated and surveilled multiple soybean supply chains, including the biggest exporters to the United States. This work resulted in fraudulent soybean meal and soybean shipments being diverted from organic distribution in the United States. It also involved collaboration with a trade partner government to strengthen oversight of organic soy exported to the United States through case referrals and a review of effective import oversight practices. NOP coordinated with certifiers to ensure that multiple operations complicit in, or connected to, responsible operations exit the organic market through suspensions, revocations, surrenders, and subsequent denials of certification.

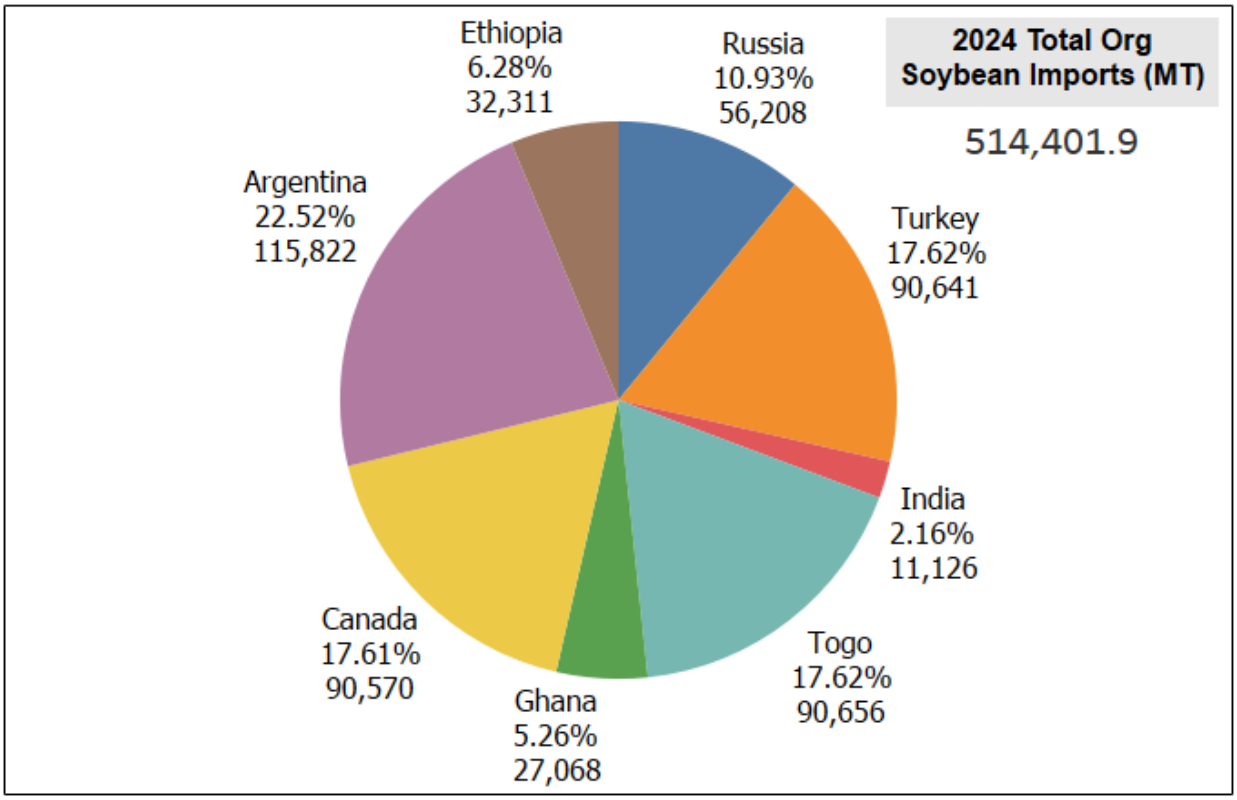
Another result of the public aspects of surveillance across international soy supply chains has been the newly created organic HTS codes mentioned earlier. This allowed for the distinction between conventional soy and organic soy reported in the CBP import system. As importers utilize these organic codes to satisfy buyers requiring increased traceability of organic goods, the true volume of organic soy imports becomes easier to track.

NOP's extensive soy import surveillance also yielded refinements in identifying risk-factors and targeting for potential fraud, intelligence about soybean supply chains, and leveraging collaboration with federal and industry partners for responding to and mitigating fraud.

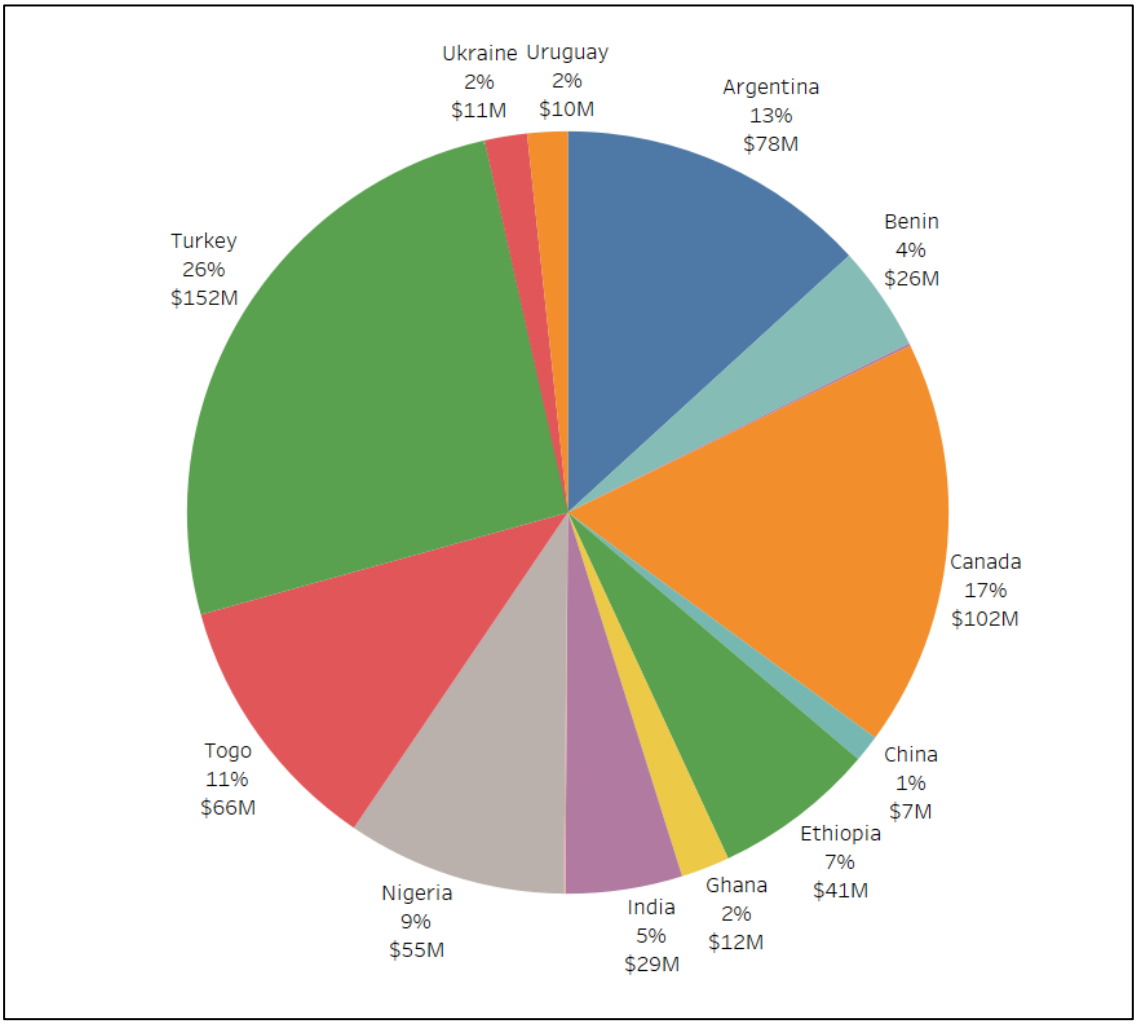
Turkey, West Africa, Canada, and Argentina continue to be major exporters of organic soy to the United States. The 2025 data reflect NOP import certificate and entry data. Imported soy commodities are high-risk and continue to be a focus of NOP surveillance and oversight.

U.S. Imports of Organic Soy by Quantity (Metric Tons)

January 1, 2024-December 31, 2024 (Origin by country)



U.S. Imports of Organic Soy by Quantity (Dollars)
January 1, 2025-December 31, 2025 (Export country)



Data from NOP Import Certificates for organic soybean, soy meal, soy oil, and soy cake.

West Africa Soybean and Soybean Meal Directive (2024-2025): As introduced above, in 2024, NOP issued a directive to USDA-accredited certifying agents requiring increased oversight of high-risk organic soybean supply chains originating in West Africa. The directive initiated supply chain traceability audits, collaborative surveillance with a trade partner government, and import data monitoring. Oversight continued throughout 2025, including USDA certifier and NOP sampling events, and investigations of all exporters of USDA-certified soy in the region as well as several U.S. and Canadian importers. In total, NOP initiated 28 surveillances and 20 investigations of operations handling West African soy.

In one such investigation, NOP review of import data identified anomalies for 878,000 pounds of organic soybean meal imported from Canada by a U.S.-based importer handling large volumes of organic feed ingredients. The investigation confirmed the importer sourced soybean meal of West African origin without required NOP-ICs. Systemic failures were also found in its organic system plan, including inadequate supplier verification, recordkeeping, and a history of sourcing products with prohibited pesticide residues. The certifier issued adverse actions and executed a settlement agreement to bring the operation into compliance. NOP initiated an investigation of the West African supplier and referred the Canadian distributor to its trade partner government, resulting in additional noncompliances and increased testing of soybean meal.

As of January 2026, USDA-accredited certifiers suspended certification for more than 20 percent of soy operations in West Africa that were certified at the start of the directive. Ongoing cases and supply chain traceability audits are still in process, with final outcomes anticipated later this year. NOP expects certifiers to maintain heightened oversight due to the elevated risk demonstrated by these findings. Future surveillance and sampling of suppliers and domestic storage facilities will exclude noncompliant soybean meal from the organic market and further safeguard U.S. farmers, handlers, and buyers of organic soy.

Fumigation Data Collaboration with APHIS (2024-2025): If APHIS determines that a shipment at a port of entry is infested with a pest that poses a threat to the United States, APHIS may require the shipment to be fumigated with methyl bromide to prevent the introduction of that pest. Fumigated products are not eligible to be sold as organic and are electronically flagged by CBP Agricultural Inspection Officers.

In 2024, only 23 shipments of imported organic food were reported as fumigated on entry to the United States, a very small percentage of incoming organic goods. USDA investigations indicate that many of the fumigated commodities were relabeled for the conventional market.

Shipments of Organic Imports Fumigated at U.S. Ports – 2024
(Not Eligible for Organic Sale Post-Fumigation)

	Commodity	Country Origin
1	Asparagus	Peru
2	Basil, Rosemary, Marjoram, Mint	Colombia
3	Mint	Columbia
4	Ginger	Peru
5	Mint	Colombia
6	Lemon	Peru
7	Solidago (Goldenrod)	Ecuador
8	Mint	Guatemala, Colombia
9	Cilantro, Parsley	Mexico
10	Ginger	Peru
11	Lettuce	Mexico
12	Mint, Basil, Marjoram, Rosemary	Colombia
13	Marjoram, Mint, Rosemary	Colombia, Guatemala
14	Fresh Green Beans	Mexico
15	Lettuce, Chard	Guatemala
16	Kiwifruit	Italy
17	Grapes	Chile
18	Cotton	Turkey
19	Lemon	Argentina
20	Cotton	Turkey
21	Cotton, Linen, Silk	Turkey
22	Cotton	Turkey
23	Cotton	Turkey

In 2025, NOP and APHIS launched an ongoing collaboration to flag and monitor organic shipments that are fumigated for entry to the United States. APHIS flags imported shipments that enter the United States with an organic Harmonized Tariff Schedule (HTS) code and are fumigated and then shares this data, including a copy of the Emergency Action Notification, with NOP. The NOP then communicates with the certifier of the importer to confirm that the fumigated product was diverted from the organic stream of commerce.

This collaboration expanded to include organic shipments without organic HTS codes. This fumigation data for August through December 2025 shows 75 fumigation events for organic products. NOP conducts investigations for a sample of these shipments to verify that products in question were diverted from the organic market through appropriate means such as donation, destruction, or conversion for sale as conventional product. In one recent instance, a certifier acted with appropriate enforcement measures and proposed revocation for an operation that was aware of a fumigated shipment but sold the product into the organic market. The project is capturing more fumigated shipments and will provide important data for risk-based monitoring and enforcement.

Shipments of Organic Imports Fumigated at U.S. Ports –2025 (partial)
(Not Eligible for Organic Sale Post-Fumigation)

Number of Fumigation Events	Commodity
15	Rosemary
11	Banana
8	Oregano
7	Mint
6	Basil
6	Thyme
4	Squash/zucchini
3	Green Bean
3	Broccoli
2	Pea
2	Carrot
1	Corn
1	Dill
1	Garlic
1	Marjoram
1	Celery
1	Blueberry
1	Parsley
1	Ginger

Global Organic Control Systems—Organic Equivalence and Recognition

The United States has organic equivalence arrangements with Canada, the European Union (EU), Japan, South Korea, Switzerland, Taiwan, and the United Kingdom (UK). Despite some differences between each country's respective organic regulations, these arrangements allow mutual acceptance of certification standards, reducing trade barriers for organic goods. The United States also has recognition arrangements with Israel and New Zealand, authorizing their governments to oversee USDA organic certification through their accredited certifiers. Products

certified under the recognition can be exported to the United States. Both types of trade arrangements strengthen global organic control systems, open markets for U.S. farms and businesses, and expand consumer choice.

NOP manages all trade arrangements to ensure partners maintain strong organic programs on par with USDA requirements and that the trade they facilitate is compliant and fair. In 2024 and 2025, NOP met regularly with authorities from all nine trade partner countries. Meetings focused on maintenance of the trade arrangements through information-sharing and collaboration between organic regulators on certifier oversight, international investigations, and other surveillance and enforcement activities.

NOP also regularly evaluates trade partner organic programs through onsite audits to confirm compliance with arrangement terms and strong oversight of production and trade. In 2024, NOP staff completed onsite audits in Taiwan, the European Union (Spain, Sweden, Denmark), and Japan to verify these trade partners continued to operate robust organic oversight programs and uphold the terms of trade with the United States. NOP also received an onsite peer review from Taiwan as part of their routine assessment of our equivalence arrangement. In 2025, NOP staff conducted onsite audits in the UK, Canada, and Switzerland.

Under organic equivalence arrangements, each partner is responsible for investigating complaint referrals about products grown or manufactured under their system. Working with the NOP Compliance and Enforcement Division, the NOP Trade Activities Division continues to improve the process for handling complaints received from and referred to equivalence partners, including communication with the foreign government. This two-way information exchange has enhanced transparency across certification programs, promoting stronger, more efficient oversight.

Organic Infant Formula Compliance (2024): USDA received two complaints against a United Kingdom (U.K.) organic infant formula manufacturer. In November 2023, a first complaint alleged that, under regulatory discretion on formula provided by FDA, the U.K. company was importing infant formula certified organic under the U.K. organic program that contained ingredients not verified to be produced without antibiotics, which violates the U.S.-U.K. organic equivalence arrangement terms. USDA worked with the U.K.'s Department for Environment, Food and Rural Affairs (Defra) to investigate and ultimately substantiated the allegations.

In response, USDA worked to phase-out the U.K. company's shipments of noncompliant product. To mitigate market impacts, in December 2023, USDA and Defra agreed to a 2-month phase-out period, allowing the U.K. company to export existing organic infant formula to the United States from January through February 2024 in quantities not exceeding the company's average monthly shipments in 2023. During its investigation, USDA also identified and stopped shipments from a different, Australia-based company that was also found to be exporting noncompliant organic formula under FDA's enforcement discretion policy.

In September 2024, USDA received a second complaint, alleging that the same U.K. organic infant formula manufacturer exported product during the January-February 2024 phase-out period that exceeded the agreed terms. The complaint also raised concerns about the company resuming shipments of organic infant formula to the U.S. in mid-2024 and whether these products contain compliant ingredients.

USDA worked with FDA and Defra to investigate this second complaint. The investigation identified the increased shipment volumes shown in publicly available FDA import data were

due to counting of shipments put into the stream of commerce prior to the phase-out agreement between USDA and Defra and data entry errors. Ultimately, the investigation confirmed that the U.K. company generally abided by the terms of the market phase-out period in early 2024. However, investigators did identify that the company shipped a small amount of product in January 2024 without an NOP-IC, which was a key requirement of the phase-out agreement.

In response to these investigative findings, Defra issued a sanctions letter to the U.K. company instituting additional oversight controls and inspections. As a financial penalty, Defra also required that the U.K. company forfeit $2.3 million worth of organic infant formula (based on retail value) destined for the U.S. market. Finally, Defra confirmed that the organic formula the company begin shipping to the U.S. in mid-2024 complies with the current U.S.-U.K. organic equivalence arrangement, including the critical variance that requires that ingredients be from livestock not treated with antibiotics.

NOP's work with Defra on this investigation was an important test of the NOP's organic equivalence arrangement control systems and terms. Both countries identified important best practices and areas for improvement in investigations and oversight of trade arrangements.

U.S.- Japan Organic Equivalence Arrangement Expansion—Alcohol Beverages (2025): The U.S. and Japan added alcoholic beverages to the list of products that may be traded under the U.S.-Japan organic equivalence arrangement. This means that alcoholic beverages certified under the USDA organic regulations or the Japanese Agricultural Standard for organic products and that comply with the arrangement terms can be sold in the other country's market without an additional certification.

Adding alcoholic beverages to the U.S.-Japan arrangement maintains and expands access to the Japanese market for USDA-certified producers. The arrangement also supports enforcement of a level playing field by ensuring that U.S. and Japanese alcohol producers follow equivalent requirements for production, processing, ingredients and labeling claims. The terms of the arrangement permit NOP officials to conduct on-site evaluations in Japan to verify ongoing compliance and require the Japanese government to provide annual reporting on its oversight activities of Japanese organic alcohol exports to the United States, including any instances of noncompliance. Prior to the expansion of the U.S.-Japan organic equivalence arrangement, the U.S. had no enforcement authority over ingredient compliance and labeling claims for organic alcohol produced in Japan and exported to the United States.

U.S.-United Kingdom Organic Equivalence Arrangement Peer Review (2025): The U.S.-UK Organic Equivalence Arrangement was established in 2021 when the UK left the European Union. The following year, NOP published the Origin of Livestock final rule that amended the USDA organic regulations to further specify livestock management practices, including organic dairy herd conversions. In 2025, NOP conducted a routine peer review assessment of the UK organic program. During the assessment, NOP auditors identified that the UK's current dairy herd conversion and management practices do not align with the amended USDA organic regulations regarding the "no antibiotics" critical variance in the existing equivalence. These differences have produced market conditions unfair to U.S. farmers and businesses.

Under the UK interpretation, dairy animals treated with antibiotics may continually cycle into the organic herd if they meet a 12-month post-treatment withdrawal period. The amended USDA organic regulations, however, require that all organic livestock be managed organically from the last third of gestation onward – any use of antibiotics is prohibited. The USDA regulations only permit a one-time conversion of a farm's entire nonorganic dairy herd into organic production.

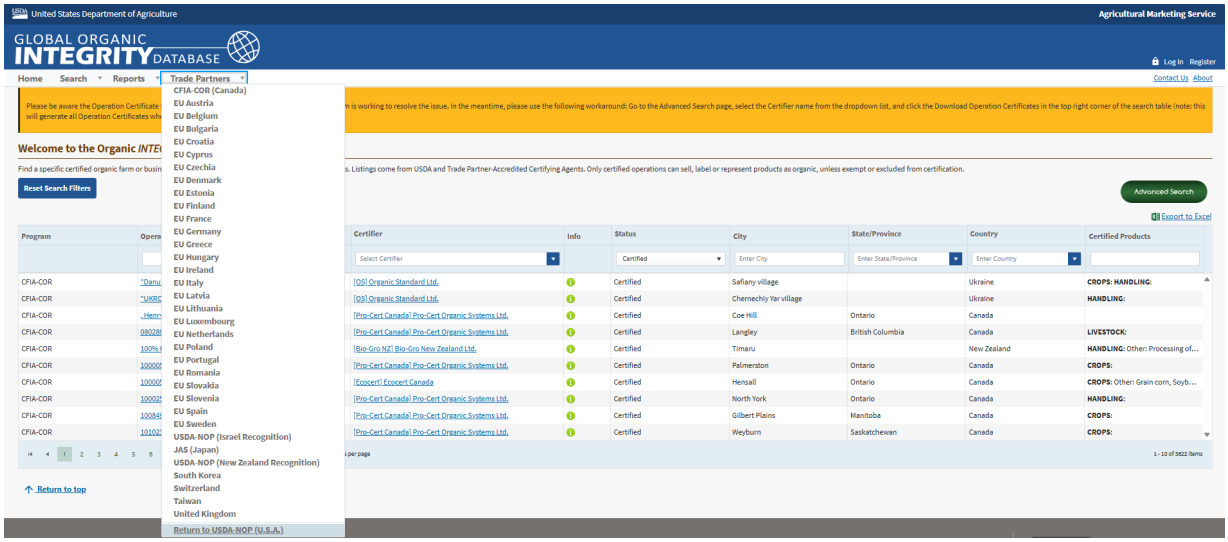
For new or existing farms using the one-time allowance to convert to organic production, a 12-month transition period under organic management is required before certain products like milk may be sold or labeled as organic. Once the herd is converted, the USDA regulations also require that any new or replacement livestock must be managed organically from the last third of gestation. Conversely, the UK program allows a limited percentage of nonorganic replacement animals to join the existing organic herd annually.

During the peer review, NOP auditors focused on Defra and KNC's UK-accredited certifier's oversight of dairy operations and implementation of the U.S.-UK equivalence arrangement terms. NOP auditors did identify the current regulatory imbalance on origin of livestock and antibiotics; however, they also observed a satisfactory Defra audit of a key certifying agent, conducted document reviews, and interviewed certifier personnel and did not have any additional findings.

In response to the UK peer review findings, the NOP is actively engaged with UK and U.S. government partners identify a swift resolution to existing regulatory differences. It is possible that the US-U.K. equivalence arrangement will need to be updated to further clarify the requirements that U.K. producers must meet regarding origin of livestock and antibiotic so that they are meeting the same standards as U.S. producers. NOP is committed to ensuring compliance of products and ingredients imported under all organic equivalence arrangements. Therefore, we are also in the process of reviewing whether other arrangements need to be changed to address livestock differences and are submitting a report to Congress on the matter.

NOP Import Certificate for Equivalence and Recognition Partners (2024-2025): NOP has provided ongoing support for organic equivalence and recognition partners implementing the new NOP-IC system. This included integrating all international certifiers participating in an equivalence or recognition program, as well as the exporting farms and businesses that they certify, into the USDA's Global Organic Integrity Database (GLOBAL). NOP also provided trade partner competent authorities and certification bodies individual training sessions and support to build their capacity to use GLOBAL and issue valid NOP Import Certificates. Additionally, NOP staff responded to more than 3,000 emails, resolving issues or answering questions about the NOP-IC and GLOBAL INTEGRITY database.

User accounts in the GLOBAL INTEGRITY module continued to grow in 2025. Currently, there are over 2,000 registered users from 34 equivalence and recognition countries that include over 10,700 organic businesses certified under other countries' systems. The registered users include staff of foreign governments and their accredited certifying agents. The list of certified businesses in GLOBAL INTEGRITY is searchable by the public, which enhances transparency of the international supply chain, provides an auditable record trail of the import process, supports traceability, and encourages real-time verification of organic integrity.



Screenshot from GLOBAL INTEGRITY showing 34 foreign countries that export to the United States. In 2025, the number of registered users jumped from 900 to over 2,000, and there are over 10,700 foreign businesses in the system.

Organic Equivalence Arrangement Working Group (2024-2025): The NOP is an active member of the Organic Equivalence Arrangements Working Group (OEAWG), an intergovernmental group of regulatory authorities from countries that have organic trade arrangements with each other. The OEAWG promotes collaboration between the world's major organic trading partners to improve the management of organic equivalence arrangements and strengthen oversight of international organic trade. The NOP is in its final year of a three-year term as chair of the OEAWG.

In February 2025, NOP organized the annual OEAWG in-person meeting in Nuremberg, Germany in conjunction with BIOFACH, the world's largest organic trade fair. Representatives from the United States, Canada, Chile, European Union, South Korea, Switzerland, and the United Kingdom exchanged information and continued workplan projects focused on fraud prevention efforts, enforcement actions on high-risk commodities and regions, and regulatory clarifications that impact equivalence trade. Workplan activities are expected to be completed in 2026.

These enforcement activities illustrate how NOP works with other governments and certifiers to ensure that all imports comply with trade arrangements and the USDA organic regulations, and to protect organic farms and businesses that are following the rules around the globe.

In conclusion, farmers and consumers choose the organic option for many reasons. Our goal is to protect that choice as we work toward our ongoing vision: **organic integrity from farm to table, consumers trust the organic label.**

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