National Organic Program (NOP) Update for the National Organic Standards Board (NOSB) Fall 2026 Meeting

October 2026

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Key Program Priorities

- Import Oversight
- Technology and Reporting
- Certifier Oversight and Collaboration
- Enforcement and Appeals
- Streamlining Certification
- International Arrangements
- NOSB Support, National List Rules
- Administration Policy Priorities

Import Oversight Tools

- No Organic Import Certificate? Brokers Don’t File as Organic
- Organic Harmonized Tariff Schedule (HTS) Codes: “Must File” Gates
- U.S. Customs and Border Protection (CBP) and NOP Hold Product
- Emergency Action Notices & Notices of Non-Organic Purchase Warn Importers
- Certifier Directives & Supply Chain Investigations Disrupt Bad Actors
- Data-Driven Country-Commodity Reviews Assess System Challenges

Import Certificates:

Oct. 1, 2025-Sept. 30, 2026



~3.5K/Week
Import Certificates from Organic Integrity Database

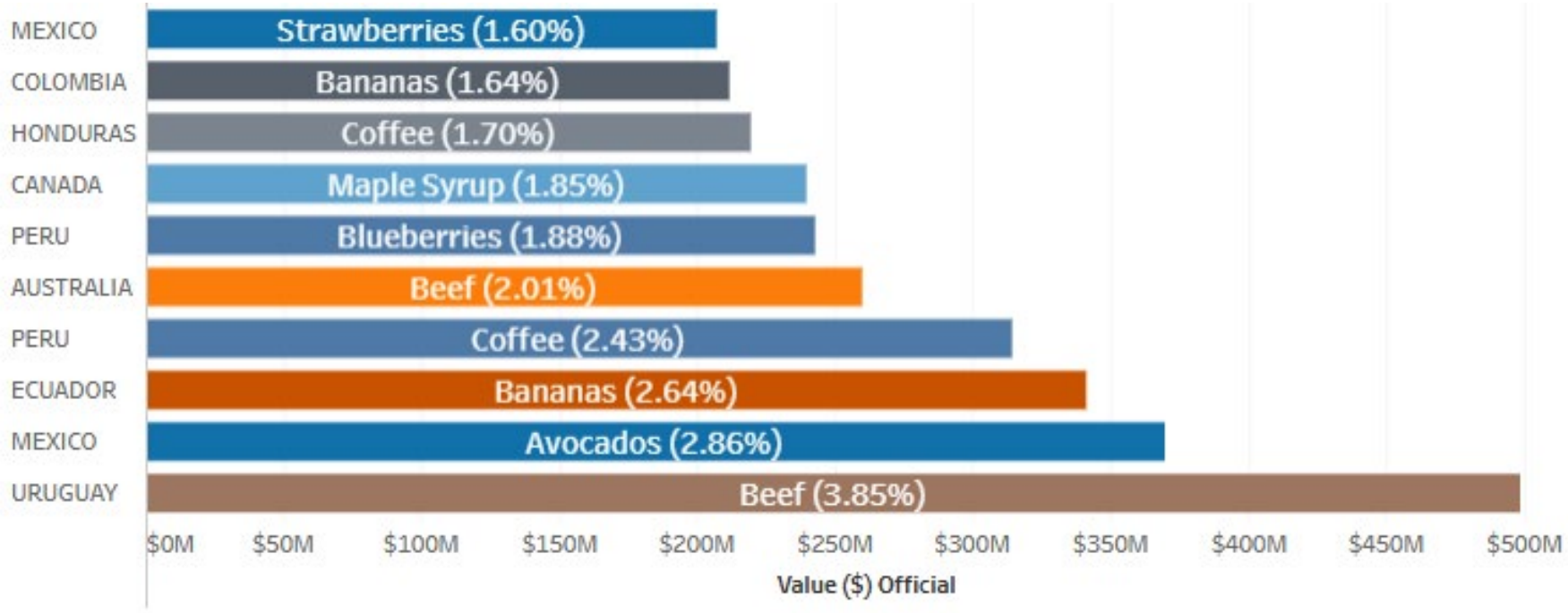


>98% Import Certificates & U.S. Customs and Border Protection Filings Match



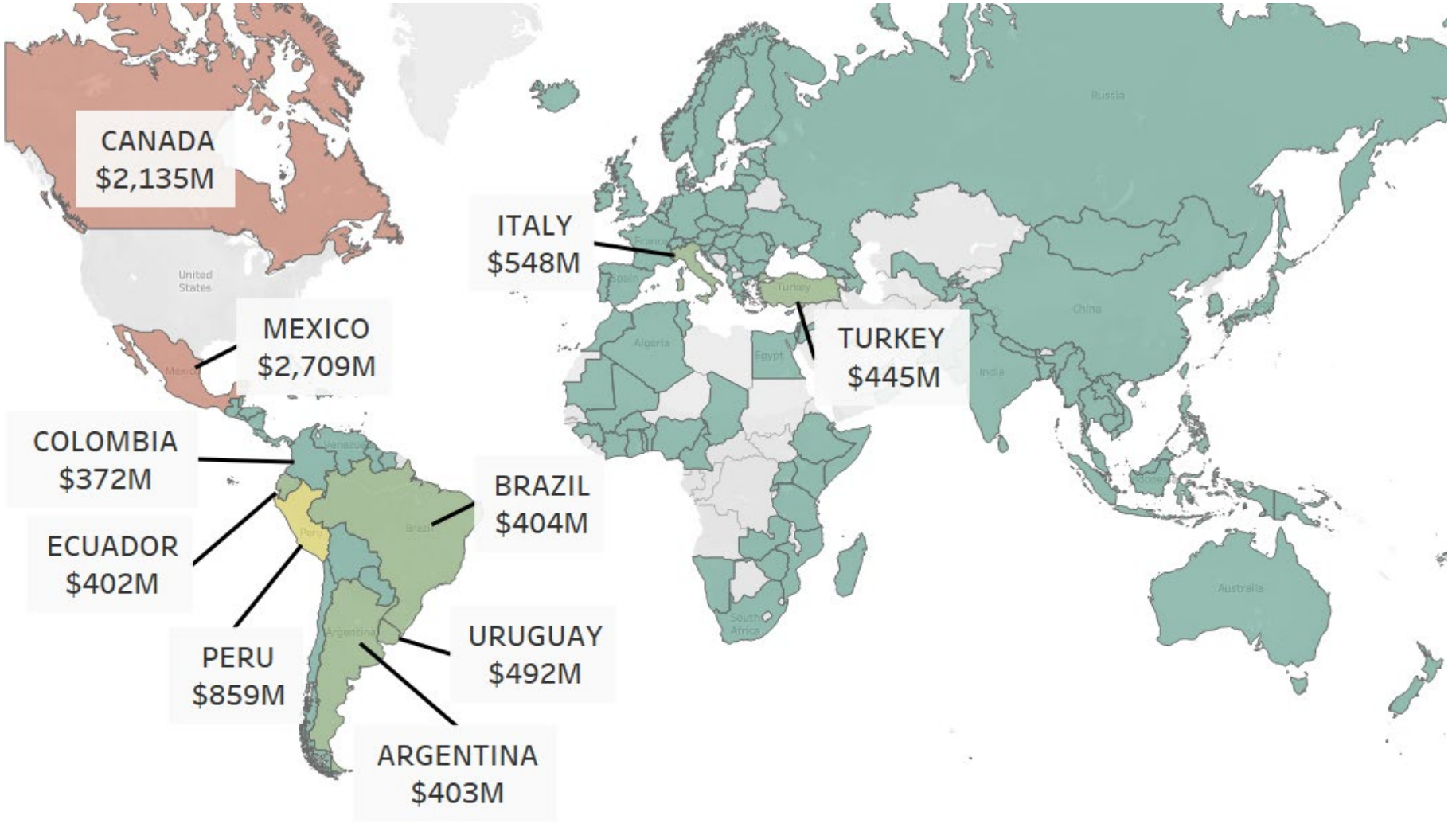
>70% Import Certificates Issued by USDA Certifiers; Most others by EU, Canada, NZ, Japan

Top Country-Commodity Pairs



Country of origin by commodity group - 10/01/2025 to 09/30/2026

Top 10 Export Countries



Country of export - 10/01/2025 to 09/30/2026

Update From Accreditation: 2026

- 49 certifier audits conducted so far in 2026; 8 more planned
- 53 certifier audits planned for 2027
- Key Findings Across Certifier Audits:
  - **Supply chain integrity**: Gaps in mass balance and traceability verification
  - **International trade**: Weaknesses in import certificate processes and product eligibility determinations
  - **Producer groups**: Internal control systems are absent or do not fully comply with USDA organic requirements

Certifier Audits 2026: Critical to Oversight

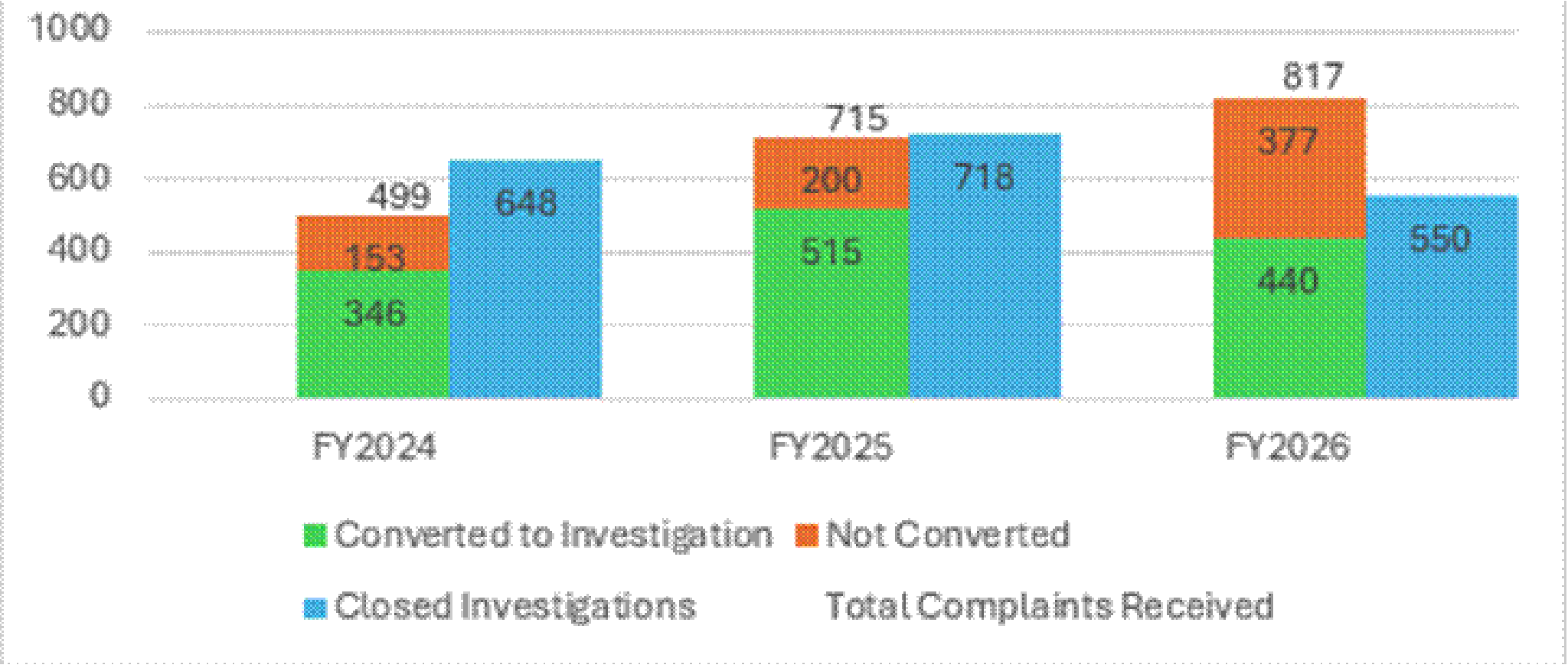


Case Study: Africa Certifier Review

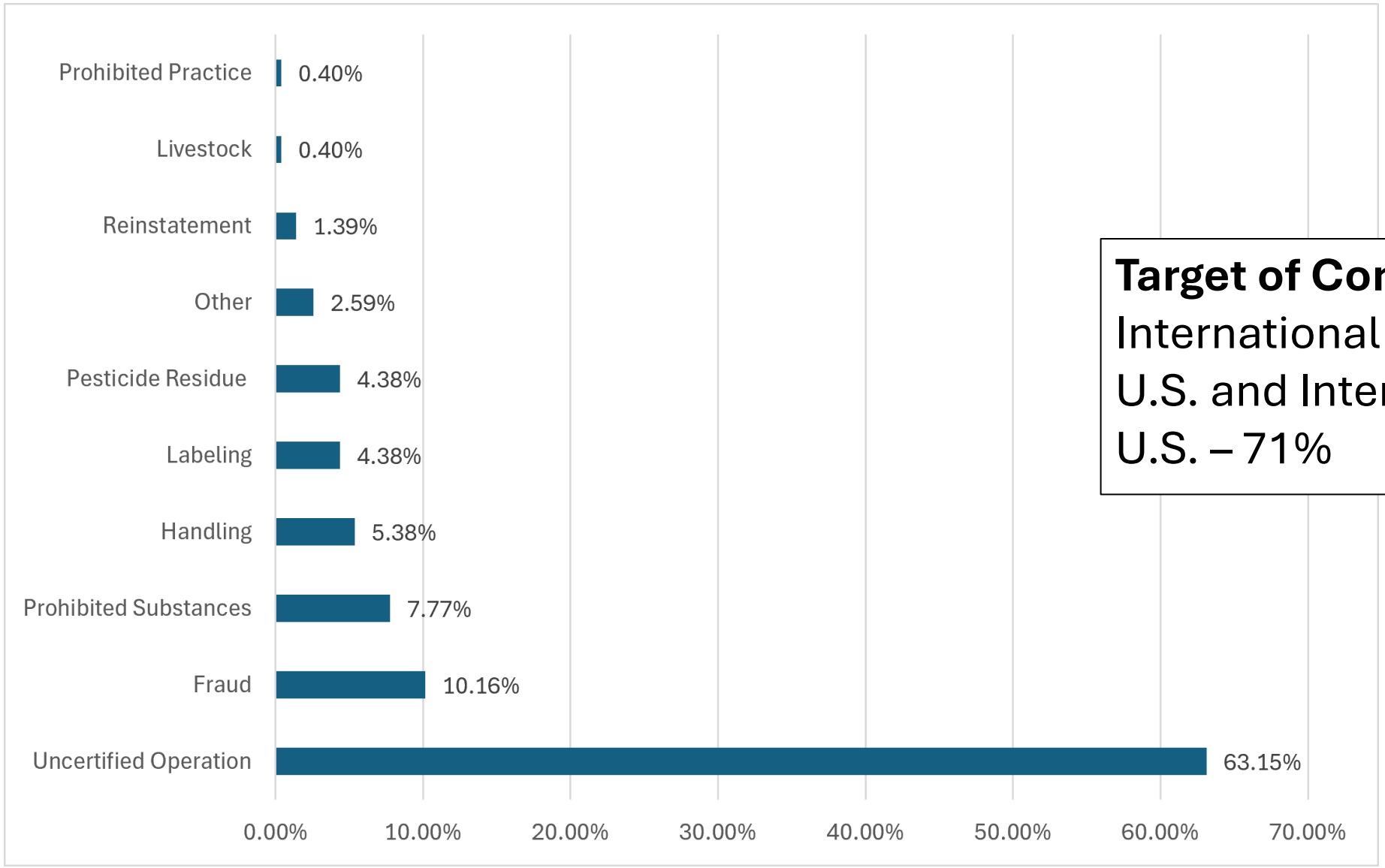
- **Broader Initiative:** Strengthen oversight of organic certification in West Africa.
- **Scope:** 7 certifiers, 20 operation visits. Focused on certifier inspections, certification reviews, and certifier oversight of producer groups.
- **Key Findings:** Uneven certifier performance; gaps in maps, parcel sizes, weaknesses in producer group oversight, and missed compliance problems.
- **Next Steps:** Issue noncompliances and take enforcement action proportionate to the certifier performance issues found.

Complaints & Investigations

In FY 2026, 85% of complaints and investigations were completed within 6 months.



Violation Types (FY 2026)



Target of Complaint:
International – 8%
U.S. and International – 21%
U.S. – 71%

Holds Through U.S. Customs and Border Protection

- NOP partners with CBP to detain, destroy, or redirect products when evidence indicates that an imported organic shipment does not comply with NOP standards.
- In FY 2026, USDA and CBP collaborated to:
  - Prevent entry of more than 683 metric tons of imported products valued at over $8.9 million (declared value).
  - Divert 62 metric tons of product – worth approx. $37,000 – from entering organic markets.
  - Examples of blocked commodities/products: Soybean meal, flour, mangos, herbs/spices, honey, roasted seaweed

International Arrangements: Priorities

NOP works in collaboration with the Foreign Agricultural Service (FAS) and the U.S. Trade Representative (USTR)

- Canada Oversight & Update
- European Union Negotiations
- United Kingdom Update
- New Zealand Equivalence

Key Challenge:
Equivalence Drift When Standards Change or Systems No Longer Align

Organic Integrity Is a Public Trust

- The public-private partnership includes **joint protection of the brand.**
- Organic businesses are our **first line of defense**, with visibility on the ground that we do not have.
- **Import certificates** are required and vital, but do not on their own guarantee compliance.
- Submit a complaint when there is a viable **thread to pull.**
- If it sounds too good to be true, it probably is. **Choose carefully who you buy from**.
- We all own this playing field: How do we actively and assertively protect the **organic public good of trust**?

Learn More! Quarterly & Annual Reports

Now Posted: Summary of Activities – Calendar Years 2024 and 2025

USDA Agricultural Marketing Service
U.S. DEPARTMENT OF AGRICULTURE

National Organic Program

Organic Oversight and Enforcement Report

https://www.ams.usda.gov/services/enforcement/organic-enforcement-activity

The NOSB has made **737** recommendations to USDA.
91% of them have been completed.

Standards Update and Policy Priorities

- Sunset Renewal Notice – In Clearance
- National List Final Rule – Entering Clearance
- Inerts Proposed Rule – In Legal Review
- Compost Advance Notice of Proposed Rulemaking – Being Drafted
- Ivermectin for Use to Treat New World Screwworm – Pending

USDA Organic Regulations

§ 205.672 Emergency pest or disease treatment.

When a prohibited substance is applied to a certified operation due to a **Federal or State** emergency pest or disease treatment program … **the certification status of the operation shall not be affected as a result of the application of the prohibited substance:** ***Provided,*** That:

- (a) Any harvested crop or plant part to be harvested **that has contact with a prohibited substance** applied as the result of a Federal or State emergency pest or disease treatment program **cannot be sold, labeled, or represented as organically produced**; and
- (b) Any livestock that are **treated with a prohibited substance** applied as the result of a Federal or State emergency pest or disease treatment program or product derived from such treated livestock **cannot be sold, labeled, or represented as organically produced**: *Except,*
  - Milk and milk products from treated animals can be sold as organic 12 months after treatment
  - Offspring of treated breeder stock can be considered organic if the breeding animal was not in the last trimester

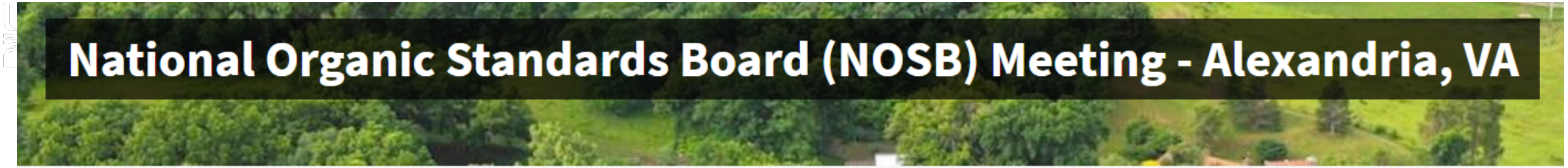
Call for NOSB Nominations/Applications is OPEN

- Applications Due: December 28, 2026
- See Organic Insider and Federal Register Notice

1 individual who owns or operates an organic **farming operation** or employee of such individual

1 individual who represents a **public interest or consumer interest** group

1 individual with expertise in toxicology, ecology, or biochemistry (aka **Scientist** seat)



National Organic Standards Board (NOSB) Meeting - Alexandria, VA

Home
Market News
Rules & Regulations
Grades & Standards
Services
Resources
Commodity Procurement

Location
Alexandria, VA

Beginning Date: May 4, 2027

Ending Date: May 6, 2027

Location:
Sheraton Suites Old Town Alexandria
801 North Saint Asaph Street
Alexandria, VA 22314
703-836-4700

Recent Uptick in Domestic Interest: Apiculture

- There are no specific standards for organic beekeeping.
- Bees are treated as a type of livestock. These operations can be certified under the organic livestock standards.
- All certifiers under the USDA organic program are held to the same standards – both in the U.S. and internationally.
- This means that organic honey can be produced both in the U.S. and other countries.
- To be certified, the beekeeping operation must demonstrate to a certifier that it complies with organic livestock standards.

Historical Context

- NOSB issued an apiculture recommendation in 2010, and USDA considered developing specific apiculture standards.
- After much deliberation, USDA decided not to propose apiculture standards. Rulemaking is listed as “Inactive” on the Office of Management and Budget’s (OMB) Unified Regulatory Agenda.
- Some certifiers have used NOSB recommendation as a resource when evaluating apiculture operations.
- Certification decisions need to be grounded in the published USDA organic regulations and the operation’s site-specific circumstances.
- This includes requirements related to organic feed, material use, and other elements of the organic livestock rules.

Streamlining Certification: Common Organic System Plan (OSP)

- Common Organic System Plan template is on AMS website
- Common baseline and expectations for showing and assessing compliance: for operations and certifiers
- Supports information sharing for investigations; reduces learning curve across inspectors and others
- Facilitates changes for operations if certifier exits and helps detect changes by those switching certifiers

Next Steps

- ACA leading collaborative work on a Common Inspection Form and Governance Structure for the Common Organic System Plan (OSP).
- To include structured working groups, feedback models, and supporting resources—such as "Best Practices" guidelines, and training modules.
- Key Partners: ACA, Quick Organics, IOIA

Thank You!

- AMS National Organic Program Team
- National Organic Standards Board
- Certifiers and Inspectors
- Certified Farmers, Producers, Processors
- Importers and Exporters
- CBP Government Partners
- Brokers
- Material Reviewers
- Trade Associations and Advocacy Groups
- Transitioning Farms and Businesses
- Other Federal Partners
- Transition to Organic Partnership Program