



National Organic Program (NOP) Update for the National Organic Standards Board (NOSB) Rescheduled Fall 2025 Meeting

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Key Program Priorities

- Import Oversight
- Technology and Reporting
- Certifier Oversight and Collaboration
- Enforcement and Appeals
- Streamlining Certification: Common Organic System Plan
- NOSB Support, National List Rules
- Advance New Administration Policy Priorities



Import Oversight: Successes

- Realizing Benefits of Strengthening Organic Enforcement Rule:
 - Maximizing Impact Through Brokers
 - Using Customs and Border Protection (CBP) Authorities
 - Importer-Exporter Handshake Speeds Investigations
 - Data Inform Harmonized Tariff Schedule (HTS) Codes
 - Data Support Risk-Based Oversight: Country-Level Activity
 - Certifiers Strengthening Control Systems
- With Work to Be Done.....



Import Oversight: Challenges

- Certifiers Need to Deepen Capabilities and Avoid Overextension
 - Producer Group Oversight
 - Mass Balance-Traceability Exercises and Interpretation
 - Subcontractor Oversight, Quality, and Competency Gaps
 - Poor/Incomplete Data in Organic Integrity Database
- Challenges Enforcing Against International Operations
- Limitations of Equivalence Arrangements
- Data/Enforcement Reporting is a Challenge and Priority
- **Lots of Places to Be All at Once**

Import Certificates: 2025



302,599 (~3.5K/Week)
e-NOP-IC's from OID
(3/19/24-12/3/25)

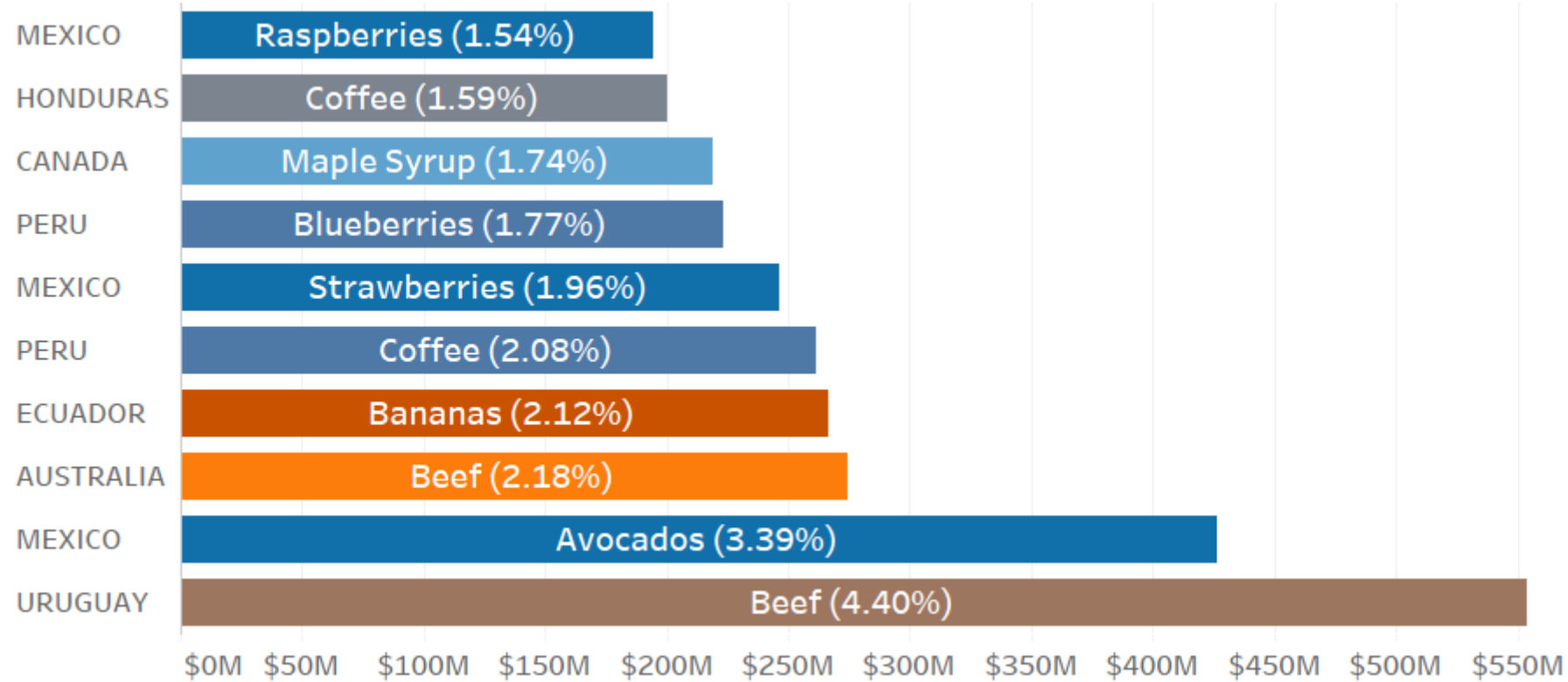


95% e-NOP-IC's & ACE Filings
Match (1/1/25-12/31/25)



70% e-NOP-IC's Issued by
USDA Certifiers; Most others
by EU, Canada, Japan

Top Country- Commodity Pairs: 2025



Country of origin by commodity group - 01/01/2025 to 12/31/2025

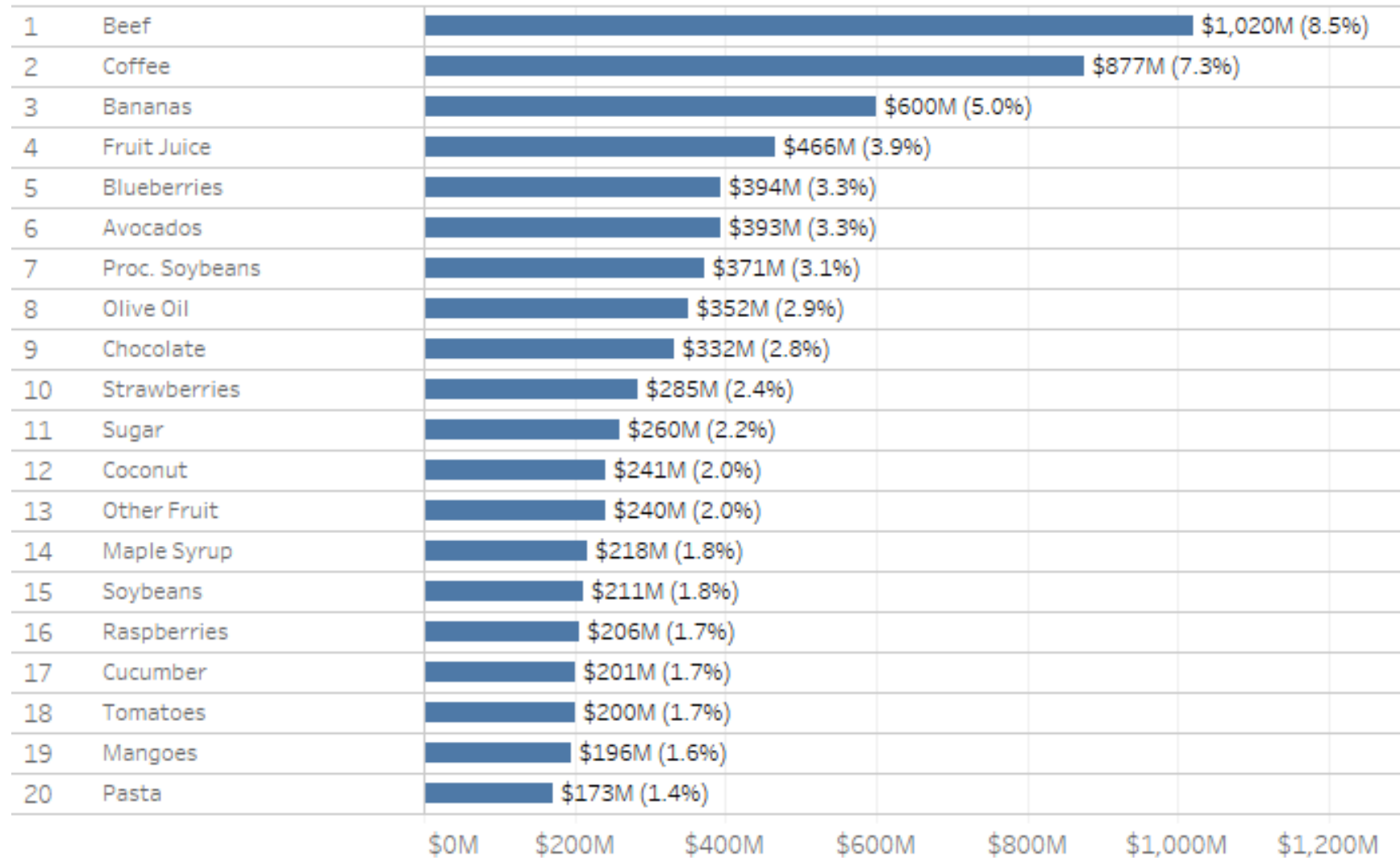
**Export
Countries:
2025**

Mexico	\$2,467.7M (20.6%)
Canada	\$1,913.8M (16.0%)
Peru	\$727.1M (6.1%)
Uruguay	\$553.8M (4.6%)
Italy	\$544.2M (4.5%)
Turkey	\$391.8M (3.3%)
Argentina	\$339.9M (2.8%)
Colombia	\$338.0M (2.8%)
Brazil	\$336.7M (2.8%)
Ecuador	\$310.9M (2.6%)

Country of export - 01/01/2025 to 12/31/2025

Countries with import values >\$100-million made up about 87% of imports in 2025 (N=22).

Commodities: 2025



Commodity groups - 01/01/2025 to 12/31/2025

Commodities with import values >\$100-million made up about 71% of imports in 2025 (N=30).



Certifier Audits: Critical to Oversight

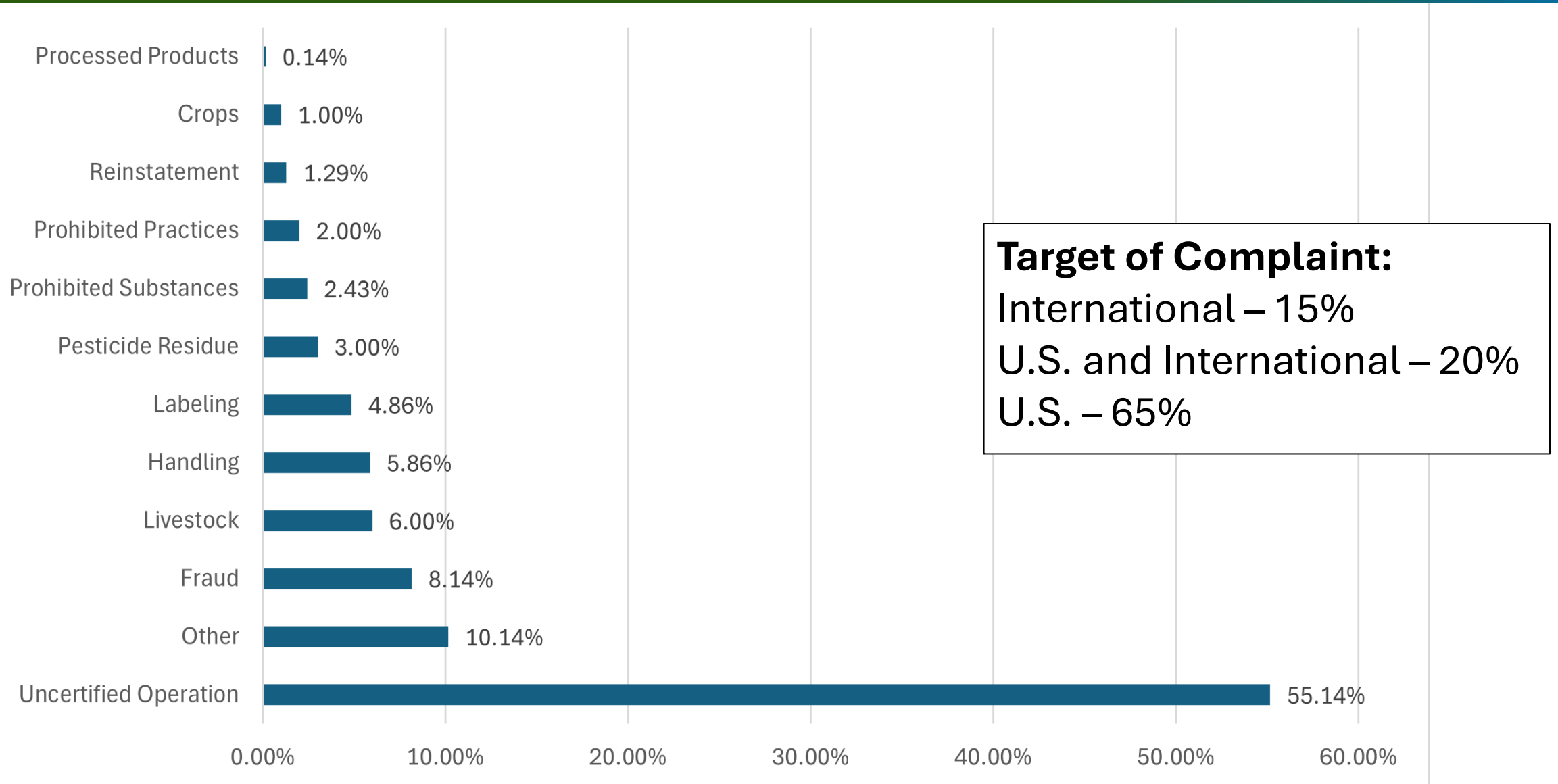




Enforcement Statistics: FY 2025

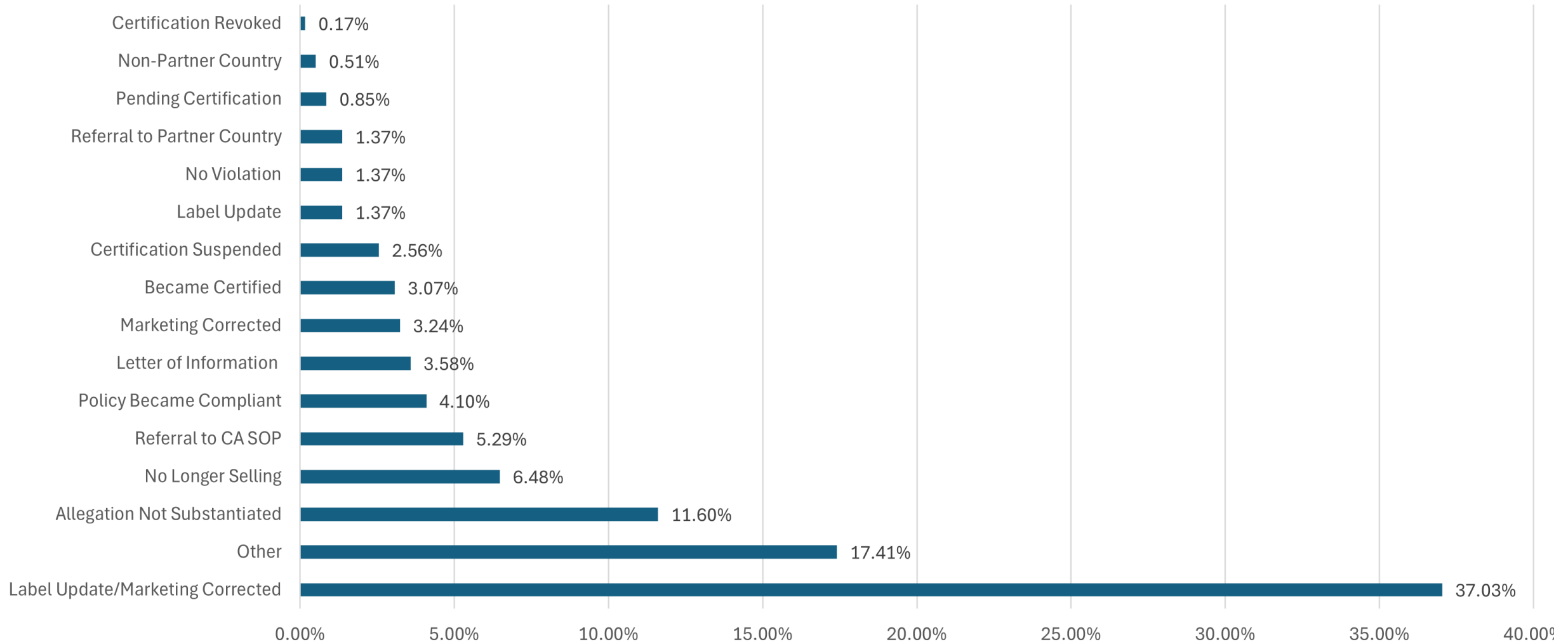
- NOP received 755 complaints
- 700 cases were resolved
- 241 cases were closed at intake
- Levied over \$845K in civil penalties, focusing on repeat violators and high value/high volume complaints

Violation Types (FY 2025)



What Happened Next?

FY25 Operation Compliance Details After Investigation





Investigation Case Studies

Import Investigation

- Tools: West Africa Directive and Import Data Review
- Large Volume Importer Complied (Did Not Sell as Organic)
- NOP/Certifier Collaboration: Increased Capability and Producer Compliance
- Collaboration/Capability Development with Canada

Domestic Investigation

- Surrendered operation sold as organic
- NOP issued and farm paid civil penalty to clear violation and keep system fair
- Operation reentered certification with strict settlement agreement that enables faster enforcement if operation violates again

Holds Through U.S. Customs and Border Protection

- NOP partners with CBP to detain, destroy, or redirect product when there is evidence that an imported organic shipment is fraudulent.
- In 2025, USDA worked with CBP to seize and/or deny entry of:
 - >20 metric tons (>2300 packages) of product valued at over \$20K.
 - 12,000 metric tons of product (approx. \$7.7M) were diverted from organic trade into the conventional market.
 - Examples of blocked commodities/products: Soybeans, protein powders, coffee beans, teas, specialty cooking oils, and dried spices.



Streamlining Certification

- How do we apply sound and sensible, risk-based approaches to streamline certification for farmers playing by the rules, reduce the paperwork burden, AND catch bad actors and deter fraud?
- **Requires changes and action at all levels:**
NOP, certifiers, and organic sector participants.

Common Organic System Plan (OSP)

- NOP communicated need and call for action at Fall 2024 National Organic Standards Board meeting.
- Anticipated outcome: Updated, compliant OSP template posted on NOP website that can be adopted by certifiers.
- Certifiers can choose to adopt; it is not mandatory.
- OSP is in development, we are getting feedback, and we are developing long-term governance strategy.



Standards Update and Policy Priorities

- National List Proposed Rule – Drafted, In Review
- Inerts Proposed Rule – Workplan in Review
- NOSB Applications/Nominations Under Review
- Continuing Board Support: Administrative/Technical
- Discussing Policy Topics with New Political Team



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

Transition to
Organic
Partnership
Program

Transitioning
Farms and
Businesses

Other Federal
Partners

ORGANIC



Protected
by law

Inspected
yearly by experts

Traced
from farm to store

Shaped
by public input

USDA
ORGANIC

