

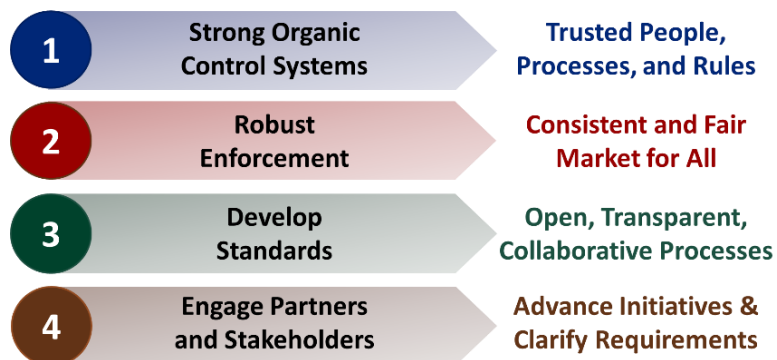
USDA Organic Oversight and Enforcement Update
Summary of Activities – February 2021



The USDA Agricultural Marketing Service (AMS) National Organic Program (NOP) develops and enforces voluntary standards for organically produced agricultural products sold in the United States.

Congress established the NOP as a regulatory program that operates as a public-private partnership.

The program accredits and provides oversight of third-party organizations, called certifiers, who certify organic farms and businesses to the USDA organic regulations. USDA and accredited certifiers also enforce the organic standards, protecting farmer and consumer confidence in the integrity of the USDA organic seal.



The number of certified organic farms and businesses continues to steadily grow. At the start of 2021, there were 45,578 certified organic businesses worldwide; 28,454, about 62 percent, were in the United States. The program serves a growing organic market. U.S. organic sales totaled a record \$55.1 billion in 2019, up approximately 5 percent from 2018. Increased funding has allowed NOP to significantly increase its staff over the past year. As of January 2021, there are 63 people on staff, with more than half of the staff now in the Accreditation Division and the Compliance and Enforcement Division.

This report continues our ongoing 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 published in [May 2018](#), [May 2019](#), and [February 2020](#) are available on the USDA National Organic Program website.

Domestic and Overseas Investigations and Compliance Actions

NOP continued to apply risk analysis to focus resources where they have the greatest impact in protecting organic integrity. This section of the report provides updates on the following topics:

- Complaints Overview
- Modernized Customer Complaint Portal
- Domestic and International Investigations
- Investigation Highlight: Materials Fraud
- Investigation Highlight: Grain Fraud
- Livestock Organic Compliance Initiative
- Certifier Oversight, Training, and Data Quality Awards
- Appeals
- Strengthening Organic Enforcement Rulemaking

Additional information on Import Oversight activities is in the third section of this report.

Complaints Overview

NOP applies risk analysis to focus resources where they have the greatest impact in protecting organic integrity. This includes tiering complaints using a risk-based complaint management process to prioritize investigations that are complex or have a high market impact.

Approximately 40 percent of the concerns submitted through the NOP complaints system are inquiries, which can be

resolved quickly with educational information. Inquiries allow the NOP to educate consumers about organic labels and resources like the Organic Integrity Database. For example, one out of four inquiries is easily closed after the NOP confirms for a consumer that a farm or business is certified organic. Keeping these inquiries out of the complaints system allows the program to dedicate more resources to complex, high-risk investigations.

Many investigations conclude that, while the initial allegations raised concerns, the evidence did not show any violations of the organic rules. These investigations provide an opportunity to verify compliance, without drawing time away from cases where there have been violations.

For cases where there are violations of the regulations, the program's overarching goal is compliance. Most of our investigations end when farms and businesses have fully complied with the organic rules. Examples include:

- An uncertified farm or business getting certified, so it can legally label product as organic
- A certified farm or business correcting noncompliances
- A certified business exiting the organic market

Over 750
complaints and
inquiries received
each year

40% resolved with
educational
information

NOP investigates or
refers remaining
60% of complaints

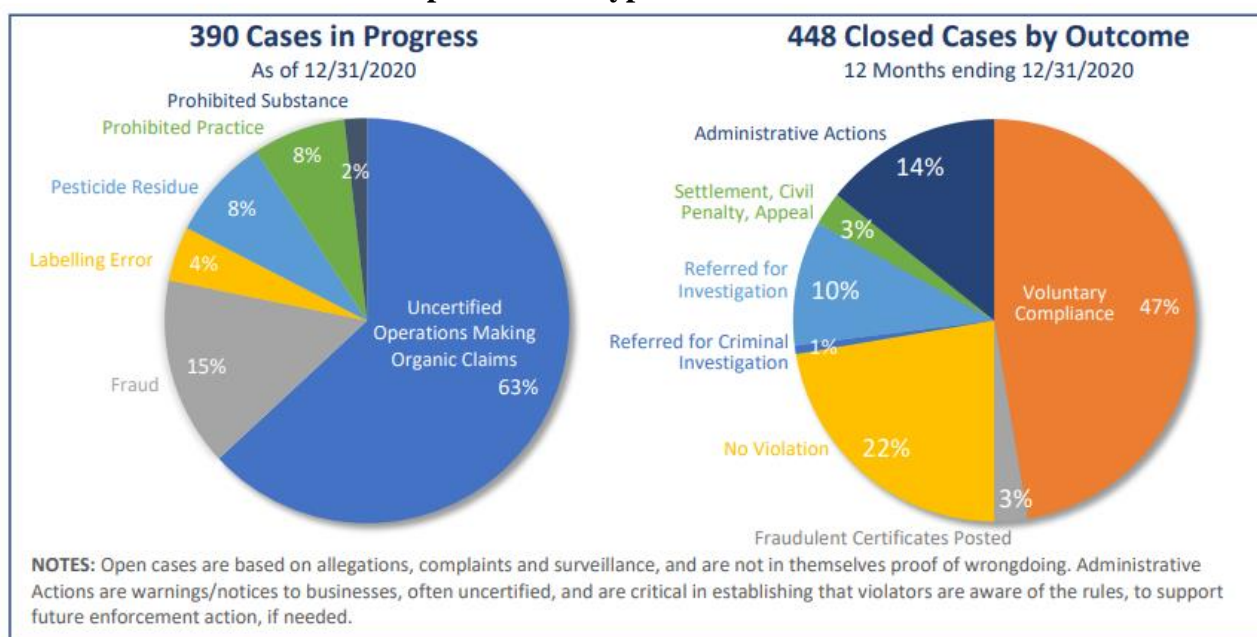
Most common
outcomes: voluntary
compliance, no
violation found

The outcomes of substantiated complaint investigations include different administrative actions, such as sending written warning notices, posting fraudulent certificates to the NOP website, or filing complaints for a hearing with an Administrative Law Judge.

When the NOP has the evidence to support enforcement actions, investigators use a variety of tools to levy civil penalties, establish settlement agreements, and in appropriate cases, refer bad actors for criminal investigation. The NOP continues to rely on the California State Organic Program and trading partners (e.g., the European Union and other country governments) to investigate complaints against operations in their geographic areas.

Using this risk-based approach, in 2020, the program closed 75 percent of its older investigations and resolved three-quarters of incoming complaints and inquiries within 12 months.

Overview of Complaint Case Types and Case Outcomes for 2020



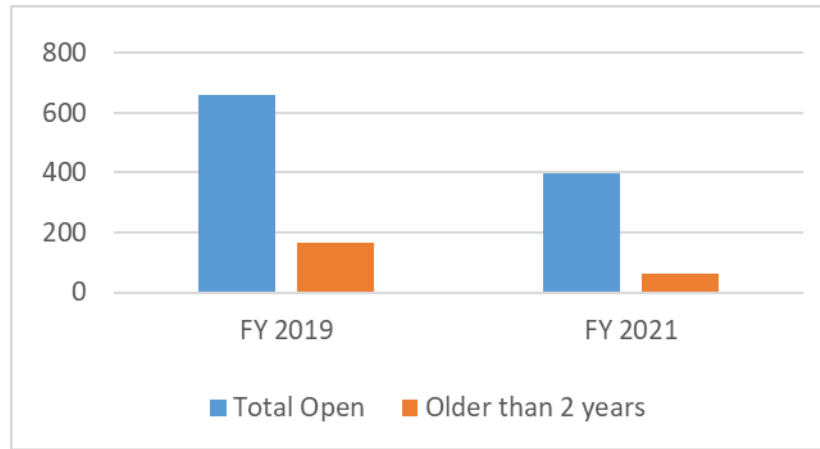
Modernized Customer Complaint Portal

In February 2020, the NOP launched an [online complaint portal](#) to make it easier for customers to file complaints. The portal outlines the information needed to evaluate a complaint, allowing for anonymous reporting, while also providing tracking information to all customers. Nearly 75 percent of the complaints and inquiries filed with the NOP are now received through the online portal, increasing efficiencies and streamlining complaint intake.

Domestic and International Investigations

The NOP invested heavily in enforcement staff during 2020 to support fast, fair investigations. As a result, the program closed more investigations and significantly reduced the number of open investigations, particularly in the older complaint backlog. The graphic below shows the number and age of open investigations at the beginning of fiscal year (FY) 2021, compared with the beginning of FY 2019. In that 2-year period, the NOP cut its open complaint load nearly in half and reduced its older complaint backlog by nearly two-thirds.

Open NOP Investigations, Start of FY 2019 Versus FY 2021

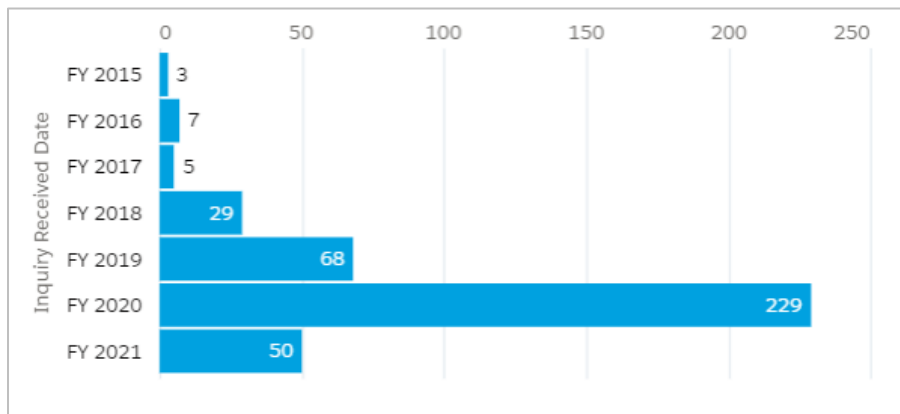


NOP=National Organic Program

FY=fiscal year

Thanks to increased resources, the NOP is now able to escalate a range of enforcement actions to resolve older complaints more quickly. With this additional capacity, NOP staff are making greater use of enforcement tools like civil penalties and subpoenas, where supported by the evidence.

Open Investigations by Fiscal Year of Complaint as of January 2021



A direct and effective measure of the impact of NOP and certifier investigations is the number of certified operations that lost their certification because of enforcement actions. In 2020, there were 676 operations in 45 countries that lost certification through suspension or revocation. Approximately 90 percent of those were in the nine countries listed in the table below.

Suspended and Revoked Operations in Different Countries – 2020

Country	Count of Operations Suspended or Revoked in 2020
United States of America	370
Mexico	51
Tunisia	51
Ecuador	35
Chile	27
China	24
Turkey	21
Peru	20
Indonesia	10

Note: While the number of suspended/revoked operations is highest for U.S. operations (55 percent of the total), U.S. operations represent 62 percent of the total count of certified operations. As such, these results do not imply that U.S. farms and businesses are suspended or revoked at a higher rate than international operations.

Investigation Highlight: Materials Fraud

In 2020, two States issued stop use notices for organic producers regarding a fertilizer that was found to contain prohibited pesticides. The States of California and Washington conducted repeated testing, which led them to quarantine the fertilizer for violating State laws. The NOP had also been investigating multiple complaints regarding the manufacturer.

The Organic Foods Production Act (OFPA) does not give NOP authority over material review organizations. As such, the program relies on third-party certifiers and other reviewers to determine which substances may be used in organic production and handling. All certifiers have been notified of the quarantines, and the NOP will coordinate with the Environmental Protection Agency and State agencies of agriculture for further action.

Investigation Highlight: Grain Fraud

Over the past year, NOP further deepened our partnerships with enforcement agencies to advance priority initiatives. These “many hands” support surveillance and enforcement across complex organic supply chains. For example, a Missouri man pleaded guilty in Federal court in December 2020 to his role in a \$142-million scheme to sell non-organic grain as organic. This is the sixth guilty plea in an ongoing criminal investigation. Five other individuals have already been sentenced to prison and multi-million-dollar asset forfeitures.

In November 2020, a South Dakota man pleaded guilty to his role in a similar scheme amounting to about \$75 million in fraud. His sentencing hearing is pending. The NOP continues to investigate regular complaints of grain fraud in cooperation with accredited organic certifiers and the USDA Office of the Inspector General (OIG).

Livestock Organic Compliance Initiative

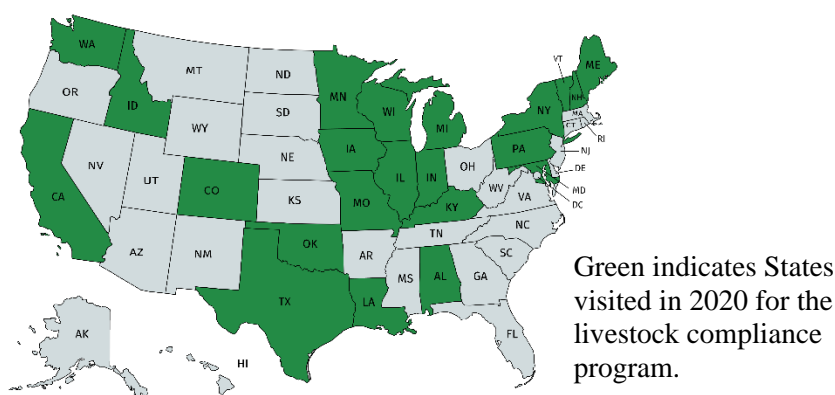
In 2018, NOP initiated a Livestock Organic Compliance Project to better assess dairy compliance with the USDA organic regulations, particularly with respect to the pasture standard. The NOP expanded this initiative over the last 2 years with on-the-ground visits by Federal auditors to assess both certifier and operation compliance.

In prior years, dairy compliance visits were unannounced; however, during the pandemic, AMS inspectors have provided limited advance notice to verify public safety protocols. The NOP uses a risk-based approach to select the participants; factors included operation complexity, previous compliance history, and farm characteristics such as acreage and herd size. The 2020 program was expanded to audit all certifiers and States with 10 or more certified organic dairies, focusing on those areas that NOP had not previously reviewed.



The NOP visits in 2019 confirmed that all the targeted dairies demonstrated at least 120 days of grazing, and all cows received at least 30 percent dry matter intake from pasture during the season. Several correctable issues were identified, requiring action from both certifiers and operations. The NOP visits in 2020 deepened evaluations of certifier controls on key practices, such as temporary confinement of cows and calculations of nutrition consumed from pasture.

Location of Visits for Dairy Compliance Project - 2020



Additional activities related to dairy compliance and enforcement were as follows:

- In March 2020, NOP livestock specialists conducted a multi-day in-service training in California for Federal auditors, State Organic Program staff, and accredited certifiers. The training included onsite mock audits at certified organic dairies. USDA expanded onsite visits during the 2020 grazing season, adding safety practices to address public health concerns and maximize social distancing during outdoor audits.

- Complaints of fraud in live animal sales increased in 2020. Investigations initiated at the direction of the NOP resulted in several livestock sale barns surrendering their organic certificates immediately following on-site inspections. NOP has recruited additional Federal investigators with significant experience in USDA livestock enforcement to improve traceability in organic cattle movement nationwide.
- In August 2020, NOP conducted a focused compliance audit of a domestic certifier's livestock certification program, with a specific focus on pasture rule implementation. This audit was conducted to assess the certifier's corrective actions resulting from a settlement agreement between the certifier and NOP initiated in August 2019.

Certifier Oversight

The NOP accredits and oversees 77 third-party certifiers that operate in the United States and around the world. Some of these certifiers maintain separate satellite offices that require separate oversight and audits.

NOP continues to invest significant resources to oversee the work of these certifiers who have the critical role of certifying farms and businesses to the USDA organic regulations.



NOP certifiers continued to oversee certified operations and implement adverse actions, such as suspensions and revocations, throughout 2020.

During 2020, NOP refocused its accreditation audits and assessments on core regulatory criteria needed for certifier success: staff capability and capacity, regulatory knowledge, and organic control systems. In response to travel restrictions, NOP developed and implemented new virtual certifier audit protocols. As a result, NOP auditors were able to safely complete 32 virtual accreditation audits to ensure continuous, strong oversight of the certifiers. Virtual audits are an effective and efficient tool for verifying a certifier's organic control system for compliance with the USDA accreditation requirements.

In cases where a certifier fails to meet accreditation compliance criteria, NOP proposes the suspension of the certifier's accreditation. The NOP may also encourage the certifier to surrender its accreditation or, in some cases, may choose to enter into settlement agreements to bring the certifier back into full compliance. As a result, more than 10 percent of certifiers exited the organic market over the last 5 years, and others have significantly narrowed their geographic scope, reducing risk to the market.

Certifier Training

The Organic Integrity Learning Center, launched in April 2019, continues to provide free, on-demand, online training to support the professional development and continuing education of certifier staff, inspectors, and compliance specialists working to protect organic integrity.

As of January 2021, there are 73 lessons across 20 courses in the Learning Center, covering topics from basic certification to advanced enforcement techniques. Examples of courses added in 2020 include: Organic System Plans, Certification Review, Traceability Techniques, Input Material Review, Preventing the Organic Fraud Opportunity, and Sampling and Testing. As of January 2021, more than 4,200 people have accounts in the Learning Center.

In January 2021, the NOP conducted virtual training with more than 800 certifier staff and inspectors, representing almost all domestic and international certifiers. This annual training is a vital part of our enforcement mission to further develop certifier oversight and enforcement capabilities. Sessions included Risk-Based Oversight, Livestock Compliance, Import Oversight, and Fraud Prevention.

Certifier Data Quality Awards

Ten certifiers were recognized in January 2021 for exceptional quality and timeliness of data provided to the Organic Integrity Database. Better data deters fraud by making it faster for investigators to identify higher risk activities and focus additional enforcement resources.



The team at the certifier Marin Organic Certified Agriculture in California displays its Data Quality Award.

The regulations currently require the annual reporting of basic facts regarding certified operations by all USDA-accredited certifiers; this will change with the finalization of the Strengthening Organic Enforcement rule, which will significantly update the USDA organic regulations.

The 10 certifiers who won Data Quality Awards in January 2021 include:

- CCOF Certification Services, LLC
- Colorado Department of Agriculture
- Global Organic Alliance, Inc
- IMOCert Latinoamerica LTDA
- Iowa Department of Agriculture and Land Stewardship
- Marin Organic Certified Agriculture
- NOFA-NY Certified Organic
- Primus Auditing Operations
- Utah Department of Agriculture and Food
- Yolo County Department of Agriculture

The 10 certifiers receiving awards significantly exceeded minimum requirements, supplying additional detail on their certified operations, and submitting updates on a rolling basis throughout the year.

Appeals

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 and assesses enforcement actions taken both by certifiers and the program itself.

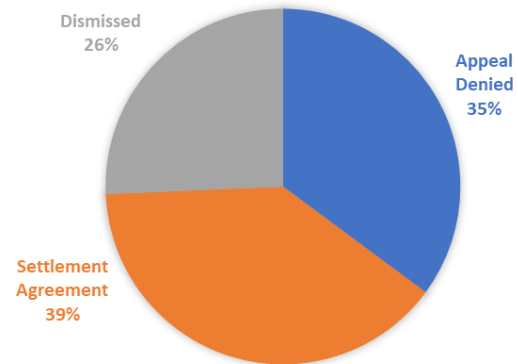
The team resolved 74 appeals during 2020, a significantly higher rate of case closures than in previous years. Of these, 26 resulted in an AMS Administrator's Decision upholding the certifier's or NOP's proposed action.

An additional 29 were resolved using a settlement agreement, designed to bring the appellant into full compliance using alternative dispute resolution techniques.

The remaining appeals were dismissed because they were either received after the allowable time period or the incoming appeal was not of an appealable action (e.g., it was not in response to an appealable adverse action).

The program received 74 appeals in 2020; the number of incoming annual appeals has doubled over the past 3 years. This can be attributed to certifier improvements in the non-compliance process, as certifiers are more assertively implementing proposed adverse actions against operations that fail to fully comply with the organic regulations.

Distribution of 74 Appeal Closures in 2020



Strengthening Organic Enforcement Rulemaking

The increased complexity of organic trade and supply chains has highlighted the need for changes to the USDA organic regulations. To this end, in fall 2020, AMS published a proposed rule, Strengthening Organic Enforcement, to strengthen the oversight and enforcement of the production, handling, and sale of organic products.

When finalized, the rule will implement provisions related to handler certifications, import certificates, and certifier oversight called for in the 2018 Farm Bill. It will also include other provisions, based on NOP's experience, National Organic Standards Board (NOSB) recommendations, and public comments. AMS expects the rule to enter USDA and interagency review in 2021.

Transforming the organic regulations to meet market needs: Increasing accountability and visibility



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 group was to involve USDA and U.S. Customs and Border Protection (CBP) for coordination and information sharing related to organic imports and supply chain integrity.

The official CBP–USDA Interagency Organic Working Group, now in its second year, has furthered coordination and strengthened the relationship between CBP, AMS, and the USDA Animal and Plant Health Inspection Service (APHIS) regarding 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 training needs on organic product oversight.



U.S. Customs and Border Protection Director of Interagency Agreements, Lea-Ann Bigelow, presented the role of CBP and International Trade at the public National Organic Standards Board (NOSB) meeting in October 2020.

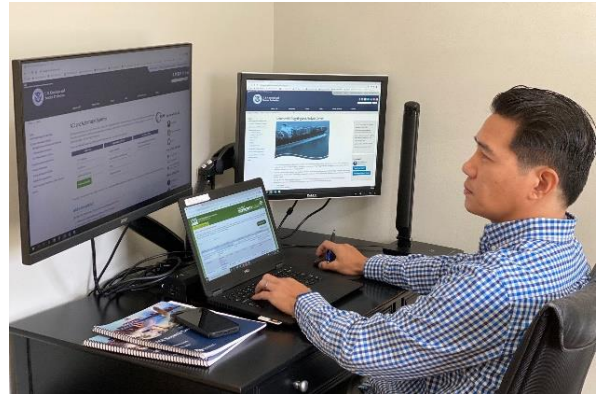
The major priorities and initiatives that the Working Group focused on in 2020 were:

- **Organic Import Certificate:** In April 2020, CBP and NOP deployed the electronic organic import certificate in the CBP Automated Commercial Environment (ACE), which is the Government’s primary import tracking system. The technology is now available for use by the trade community; the organic certificate was launched first as an optional filing step. When fully implemented, the system will provide critical import data to support oversight and investigations.

The NOP conducted over 15 briefings in 2020 to the import trade community discussing the new electronic import certificate and gathering feedback. The program also conducted a tabletop exercise with a large produce broker in the Northeast United States to review the workflows and to assess the impact of the new requirements and technology.

- **Commercial Targeting and Analysis Center:** In July 2020, a senior National Organic Program analyst began working as part of the interagency Commercial Targeting and Analysis Center (CTAC) based at U.S. Customs and Border Protection (CBP).

CTAC is an operational extension of One-U.S. Government at the Border that works to prevent, deter, and investigate violations of U.S. import and export laws by facilitating information and resource sharing among participating Government agencies.



Andrew Regalado, a senior NOP analyst, now works as part of the CBP Commercial Targeting and Analysis Center (CTAC).

Andrew Regalado represents NOP and other Agricultural Marketing Service (AMS) programs as part of a collaborative Governmentwide team. This collaboration gives NOP a direct line to CBP stakeholders and data and provides unique insights into how other Federal enforcement agencies work.

- **Strengthening Organic Enforcement Rule:** Working Group members have provided valuable feedback to NOP on the proposed Strengthening Organic Enforcement rule. This rule will improve farm-to-market traceability and import oversight and facilitate robust enforcement of USDA organic regulations. CBP and APHIS have been instrumental in assisting NOP with messaging on the status of the rule to their stakeholder networks.
- **Intellectual Property Protection:** AMS has started a long-term intellectual property protection project to register the NOP organic seal and other AMS marks with the U.S. Patent and Trademark Office (USPTO) for official trademark protection. The NOP trademark package was submitted to the USPTO for official trademarking in September 2020. Federal copyright enforcement rules will provide another important authority to further restrict fraudulent usage and allow prosecution and commodity seizures for misuse of the of seal.
- **Stakeholder Engagement:** A key outcome of the Working Group has been the true partnerships created by the group's formation. For example, in March 2020, the USDA Under Secretary for Marketing and Regulatory Programs was scheduled to deliver the keynote address at the annual CBP Global Trade Symposium in California to discuss the partnership and work of both agencies. While the conference was postponed as a result of the global pandemic, the process highlighted the priority USDA-CBP places on the collaboration. Establishing interagency relationships has reduced wait times for

interagency questions and decisions and has supported consistency and clarity in messaging to key stakeholders.

- **New Data Technology Projects:** NOP is investing in technology through the Global Organic Oversight Project. The project will improve data reporting and increase visual analytics, using data from internal databases, import and export data, and APHIS fumigation data. The project also lays the foundation for the possible future use of Blockchain for supply chain oversight.

Report on Enforcement Actions Taken on Organic Imports

The 2018 Farm Bill included the requirement that USDA and 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 port of entry
- Data on domestic enforcement actions taken on 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

For the first two items above, NOP and CBP continue to make progress in piloting the newly programed electronic organic import certificate. The Strengthening Organic Enforcement final rule will fully implement import certificate requirements and is needed to allow us to provide the detailed quantitative data outlined in the Farm Bill.

Fumigation Update

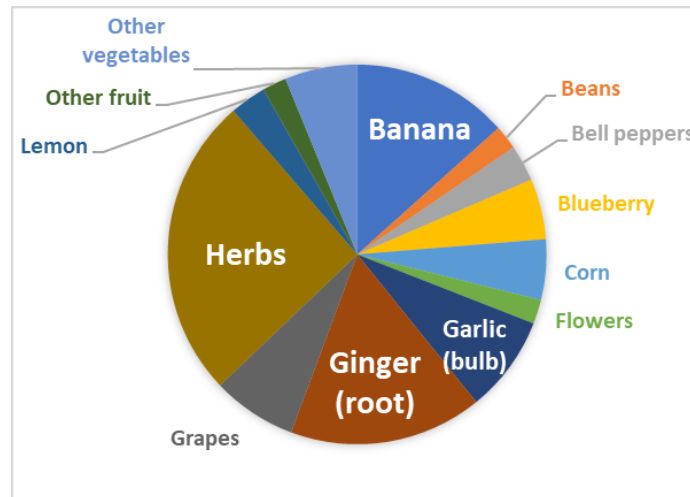
NOP continues to work with APHIS to identify options for aligning fumigation reporting with the existing CBP import system and the upcoming organic import certificates. This will allow organic shipments that undergo fumigation to be immediately flagged. Concurrently, APHIS is working with CBP to facilitate stronger data partnerships.

In 2020, a small percentage of shipments of imported organic food, fewer than 100, were reported as fumigated on entry to the United States. Fumigated products are not eligible to be sold as organic. NOP has trained certifiers and provided a policy memo to educate industry on the requirement for removing organic labels from fumigated products. USDA investigations suggest that many of the fumigated commodities were relabeled for the conventional market. However, due to the current lack of organic import data and the current exemptions/exclusions in the USDA organic regulations related to organic traders, USDA cannot conclusively determine the ultimate labeling and sale of these imports. This is another area where the Strengthening Organic Enforcement rule, accompanied by technology development, is expected to significantly impact the NOP's ability to oversee the market.

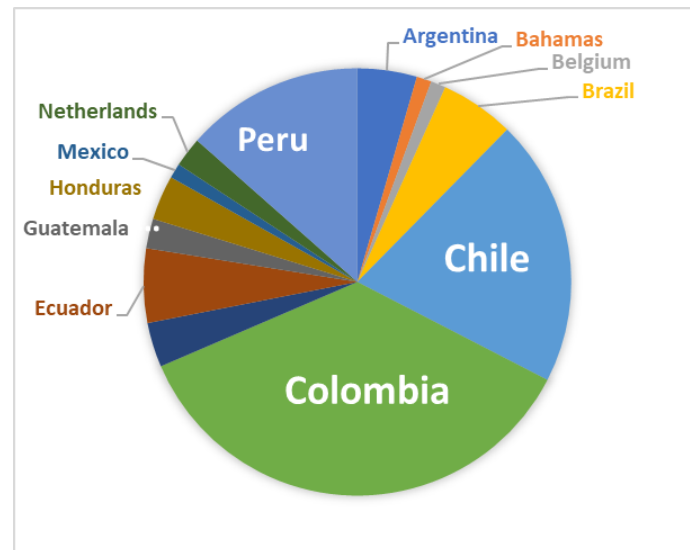
The two figures below describe the types of organic products that were reported as fumigated in 2020 and their originating countries. Approximately 13 kinds of organic products were fumigated in 2020; nearly all were fruits or vegetables. The top four fumigated items were ginger root, garlic bulbs, bananas, and herbs. Similar to prior years, most fumigated organic imports came from Central and South America. This region was the largest supplier of organic imports to the United States, particularly fresh produce.

Colombia was the biggest source of organic imports fumigated at U.S. ports, accounting for most of the organic herb imports. Argentina, Brazil, and Chile supplied the garlic bulbs and ginger root. Fumigated bananas came from Colombia, Costa Rica, and Ecuador. Once the Strengthening Organic Enforcement rule is finalized, the proposed expanded authorities over handlers brokering imported organic products will ensure additional controls on fumigated imports.

Organic Imports Commonly Fumigated at U.S. Ports – 2020
(Not Eligible for Organic Sale Post-Fumigation)



Origin of Organic Products Fumigated at U.S. Ports – 2020
(Not Eligible for Organic Sale Post-Fumigation)

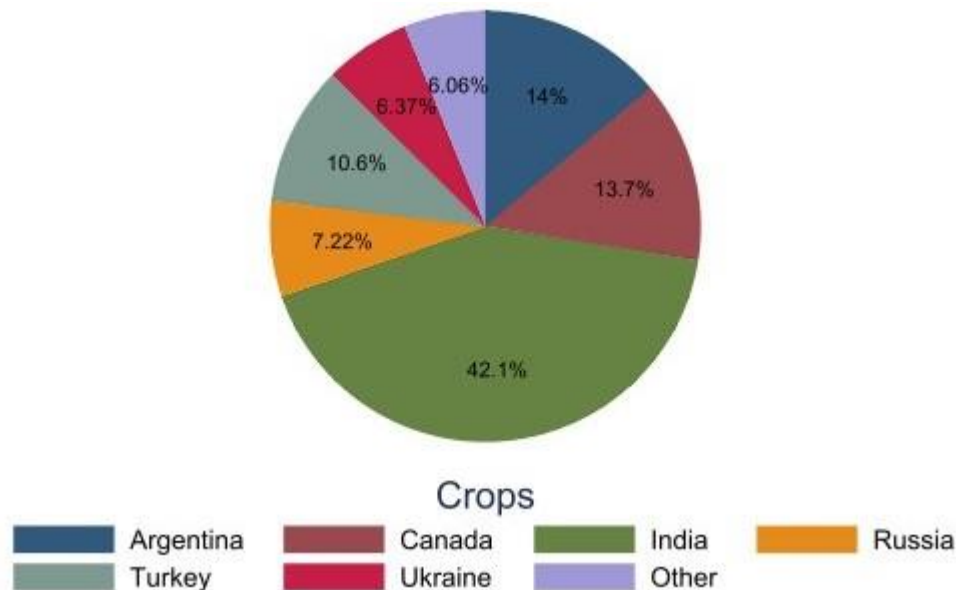


Import Oversight

As the value of imported organic agricultural goods into the United States continues to grow, the NOP continues to focus on import oversight and enforcement around the world. North and South America continued to be the main international regions supplying the U.S. organic market, with Mexico accounting for about 20 percent of the total value of organic imports to the United States. While lower in value, imported organic feedstuffs continued to represent a strong portion of the U.S. organic livestock feed supply. These imports came primarily from the Black Sea region, Argentina, and India.

- **Trade Data Analyses:** NOP continues to monitor trade flows and certification trends from the Black Sea region. NOP uses the Organic Integrity Database to review new certifications, surrenders, and the total number of certified organic operations in key supplier countries. NOP also monitors import data from the USDA Foreign Agricultural Service (FAS) and U.S. trade databases. Using these data, NOP identifies spikes or declines in organic imports. Findings from data analysis inform certifier inquiries, improve industry oversight through targeted training, and, where appropriate, trigger
- the opening of surveillance cases on specific operations.

U.S. Imports of Organic Soy and Corn – 2020

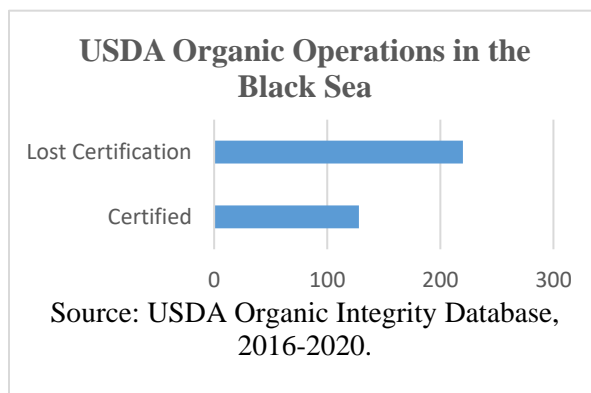


Notes: Graph includes organic corn, worked corn, organic soybeans, organic soy meal and cake, and soy cake and meal. Due to data availability these statistics reflect data only through October 2020. Source: USDA Foreign Agricultural Service's Global Agricultural Trade System Database.

- **Ongoing Import Surveillance:** Through communication with industry and FAS, NOP has identified non-organic trade codes to monitor critical imports such as worked corn and soybean meal cake, which appear to have major impacts on the U.S. market with no specific organic tracking mechanism available to the government. In the absence of these

data, NOP is working closely with accredited certifiers to develop sound baselines for evaluating trade data by aggregating individual farm-level reports.

- **Country-Commodity Studies:** In 2019, NOP commissioned a country-commodity study on corn and wheat from the Black Sea region as well as specialty crop supply chains from Central America. NOP used the findings to inform subsequent audits and investigations. NOP is now repeating these yield analyses on a regular basis to evaluate whether reported yields per acre appear plausible for the local region. NOP is also engaging on a government-to-government level to share best practices on evaluating the integrity of organic products.
- **Black Sea Feedstuff Imports:** Throughout 2018-2019, NOP analyzed production data on corn, soybeans, wheat, sunflowers, rapeseeds, and barley over a 3-year period in Russia, Ukraine, and Kazakhstan. For each commodity, NOP calculated a yield ratio which compared the operation's own yield reports with the average conventional yield for that country or region. Overall, NOP's analysis found that several operations reported yields that were higher than expected for organic farms for several key commodities.



This analysis resulted in numerous Notices of Noncompliance to certifiers, which have implemented corrective actions to strengthen their evaluations of producer harvest and yield records. NOP also addressed this problem with trainings for certifiers through in-person training, webinars, and the Organic Integrity Learning Center. The number of USDA-certified organic farms and businesses in the region has dropped nearly two-thirds since 2016.

- **South American Feedstuff Imports:** NOP applied similar yield analysis methods in response to complaints against grain suppliers from Argentina, followed by a multi-week, in-country audit to evaluate certifier and supply chain controls. Within months of the NOP analysis, 50 percent of the supply chain under investigation surrendered USDA organic certificates. The NOP continues to conduct follow-up analyses to ensure ongoing compliance and the integrity of imported organic feedstuffs.
- **South American Specialty Crops Focus:** In 2020, NOP initiated several import analyses of organic fruit and vegetable imports, which tend to originate in South America. NOP is applying data analysis, virtual audits, and general market research to broaden its evaluation of supply chain integrity. Several specialty crops currently have no organic trade codes, posing significant challenges to analysis of these perishable commodities.
- **Soybean Meal from India:** In early 2020, NOP expanded its import analyses to examine soybeans from India. Collaboration with trading partner governments on investigations, where permitted by law, helped speed up a case where the NOP identified and stopped

imports from a revoked supplier within 2 months of receiving a complaint. The NOP investigation of connected importers is ongoing.

Global Organic Control Systems: Equivalency and Recognition

Organic trade arrangements, including equivalency and recognition arrangements, support global organic control systems and market access. The United States holds arrangements with Canada, the European Union, the United Kingdom, Switzerland, Japan, Korea, New Zealand, India, Israel, and Taiwan. Recent activities include:

- In May 2020, USDA announced a new equivalence arrangement to streamline organic trade with **Taiwan**. The arrangement allows organic products certified to the USDA or Taiwan organic standards to be sold as organic in either market. This protects access for U.S. organic farmers, ranchers, and businesses to this significant export market.
- In July 2020, the U.S. and **Japan** expanded the existing organic equivalence arrangement to include organic livestock. Japan continues to be an important export market.
- Effective January 1, 2021, the NOP has a U.S.-**United Kingdom** equivalency arrangement for traders continuing to ship to Great Britain (England, Scotland, Wales) and Northern Ireland after Brexit.
- NOP hosts and attends regular meetings of organic programs involved in equivalency arrangements and coordinates on investigations involving global supply chains.

The success of organic trade arrangements requires strong oversight and enforcement by both participant countries. In early January 2021, AMS announced it is **ending U.S.-India organic recognition**, which has been in place since 2006. This action was needed because NOP audits consistently found India's organic control system to be insufficient to protect the integrity of the USDA organic seal. This announcement started a transition period that will minimize market disruption by allowing organic operations previously certified by India-accredited certifiers to apply for direct certification and oversight by USDA-accredited certifiers.

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

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