

Dr. Wen-Der Chen  
Director General, Agriculture & Food Agency  
Council of Agriculture  
Taipei, Taiwan

Dear Director-General Chen:

Thank you for your continuing review of USDA's National Organic Program (NOP) regulations for equivalence determination.

In consideration of your concerns relating to maximum residue levels, we propose the following language be included on the USDA export certificate to accompany products entering Taiwan:

“Organic agricultural products and organic processed products, accompanied by this certificate, were produced or processed using zero prohibited substances.”

In consideration of your concerns about the use of analgesics in animal care, we propose the following language also be included on the USDA export certificate to accompany livestock products entering Taiwan:

“Organic livestock products, accompanied by this certificate, were managed and produced without the use of systemic pain killers or analgesics, including Lidocaine or procaine.”

The NOP has undertaken to ensure that all accredited certifying agents are informed of the specifications of the export arrangement with Taiwan. This will be achieved through the issue of notice to all certifying agents seeking authorization for export to Taiwan and requirement of attestation on the export certificate that zero prohibited substances are used in products exported to Taiwan. Should organic products be found to contain prohibited substances of a violative level, NOP regulatory protocol would be immediately implemented to determine the cause and take appropriate steps to address each situation on a case by case basis.

Attached are the NOP procedures for export arrangements and obtaining authorization for export certificates through the NOP by accredited certifying agents. We propose that the TM-11 export certificate be accepted to fulfill Taiwan's request for a discrete certificate per shipment of products under Article 5 of Taiwan's Imported Organic Agricultural Product and Organic Agricultural Processed Product Management Regulation.

Again, thank you for consideration of this proposal toward equivalence determination of the NOP regulations.

Sincerely,

Barbara C. Robinson, Ph.D.