



# Organic Import and Export Verification

Robert Yang

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USDA Agricultural Marketing Service  
National Organic Program





# Training Objectives



- Review certifier **responsibilities** for evaluating and verifying the import/export activities of its certified operations
- Review the **information** operations that export product or use product imported under an international organic trade arrangement should include in their organic system plan
- Review **documentation** certifiers and inspectors should verify during document reviews and on-site inspections



# USDA's International Trade Arrangements



1. Equivalency Arrangement (import/export)
  - Canada, EU, Japan, Korea, Switzerland
2. Recognition Agreement (import only)
  - India, Israel, New Zealand
3. Export Arrangement (export only)
  - Taiwan
4. Terms of Reference (import/export)
  - U.S. - Mexico Joint Organic Compliance Committee



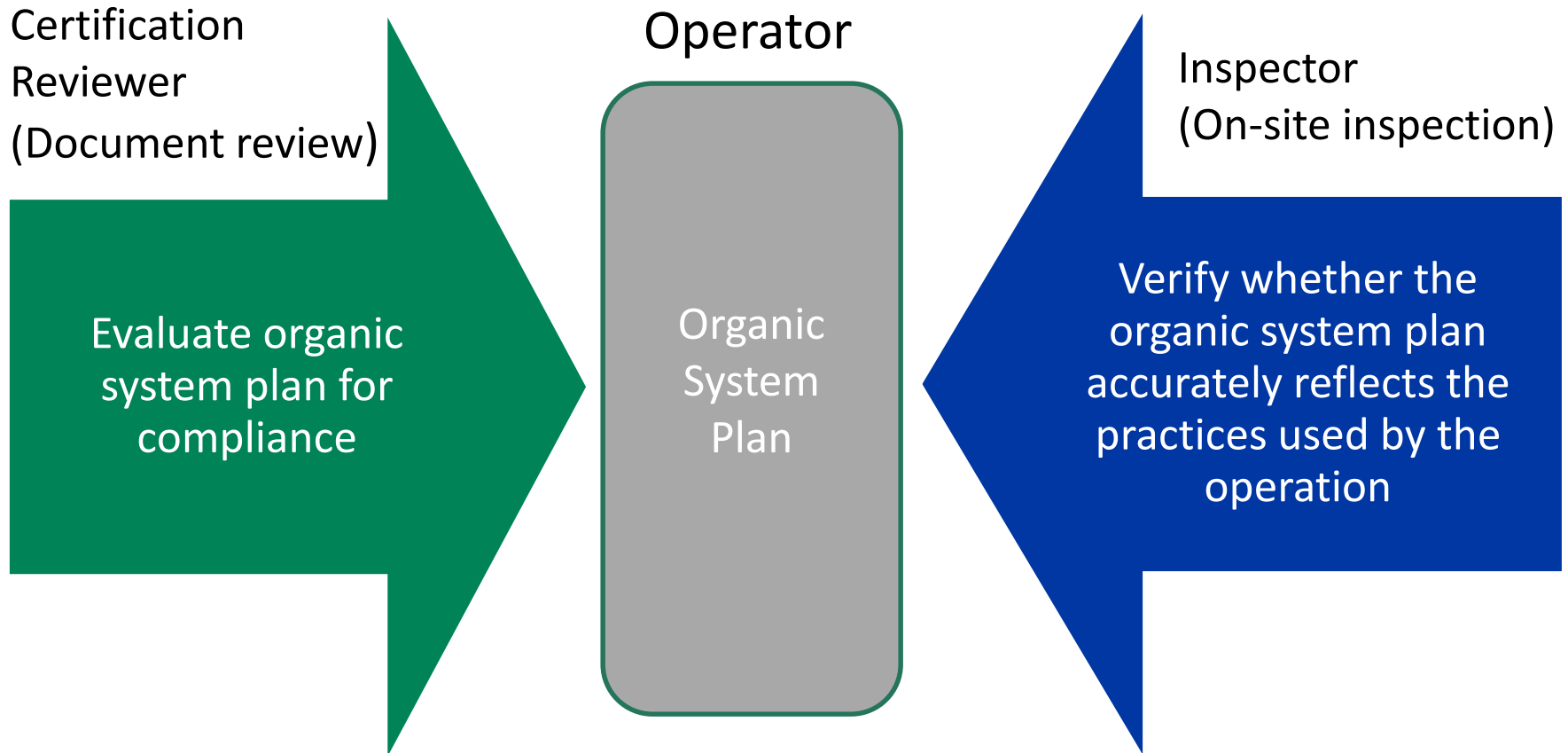


7 CFR § 205.402(a)(2) and § 205.403(c) require certifiers to ...

- ✓ Evaluate each client's application materials for compliance
- ✓ Verify during the onsite inspection whether the information in the organic system plan accurately reflects the practices used by the operation



# Certifier Evaluation & Verification Responsibilities





# Organic System Plan Requirements



*7 CFR § 205.201(a)*

An organic system plan (OSP) must include ...

- A description of practices and procedures to be performed and maintained ...

*Does the OSP disclose whether the operation exports its products under an international trade arrangement?*

*Does the OSP include the operation's procedures for verifying source and certification of ingredients imported under an international trade arrangement?*





An organic system plan (OSP) must include ...

- A list of each substance to be used as a handling input, indicating its composition and source

*Does the OSP identify ingredients imported under a trade arrangement, including the source of those ingredients?*



# Organic System Plan Requirements (cont.)



An organic system plan (OSP) must include ...

- A description of the recordkeeping system implemented to comply with the requirements established in §205.103;

*Does the OSP describe records the operation maintains for product imported/exported under a trade arrangement?*



# Organic System Plan Requirements (cont.)



An organic system plan (OSP) must include ...

- Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations

*Does the OSP include information (i.e. documentation) that demonstrates the imported ingredient complies?*

*Does the OSP include labeling information for product exported under a trade arrangement?*



# OSP Evaluation & Onsite Verification Process



Does the operation export product?  
Does the operation use imported product?



If yes, to/from which country?



Is the product exported/imported under a trade arrangement?



Is the product within the scope of the arrangement?



Does the product meet the terms of the arrangement?



# OSP Evaluation & Onsite Verification Process (cont.)



For imported/exported product, has the appropriate supporting documentation been provided?



Is the supporting documentation valid?



Does the operation maintain appropriate records for imported/exported product?

For exported product, has the operation provided information about its product labeling practices ?



Do the product labeling practices comply with the terms of the arrangement?





## *7 CFR § 205.103*

A certified operation must maintain records that fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited. Such records must be available for inspection.

*Inspectors should conduct thorough trace-back audits to verify traceability and record-keeping requirements.*





- A certified operation using product imported under an equivalency arrangement must maintain ...
  - ☐ **Organic certificate**
  - ☐ **NOP Import Certificate**
    - ❖ *Not required for Canada*
  - ☐ Shipment records (ex. Bill of Lading)
  - ☐ Purchase records (ex. Purchase order, Invoice)





- **Organic Certificate** should ...
  - attest that the product has been certified to the foreign government's organic regulations
  - be issued by a certifier approved by the foreign government





- **NOP Import Certificate** must ...
  - be issued by the final certifier of the product for the specific product, per shipment
  - include the applicable attestation statement
- ❖ *Product must meet the scope (i.e. type and point of export) of the equivalency arrangement*





- For Canada only, NOP Import Certificates are not required. The appropriate attestation statement issued by the certifier or certified operation may be stated on any documentation (ex. organic certificate, transaction certificate, bill of lading, purchase order)



# Exercise 1 – Import Verification



A certified USDA organic handler located in the U.S. plans to use certified organic goji berry imported from Bulgaria under the U.S. – E.U. Equivalency Arrangement. The operator submits an updated organic product profile that correctly indicates the producer of the ingredient and its certifier, along with an organic certificate.



# Exercise 1 – Import Verification



Examples of questions certifiers should ask (not limited to):

- 1. Does the product fall within the scope of the arrangement?*
- 2. Is this organic certificate valid?*
- 3. Is there any additional documentation that needs to be requested and verified?*





- A certified operation using product imported under a recognition agreement must maintain ...
  - ☐ **Organic certificate**
  - ☐ **Transaction Certificate (only India)**
  - ☐ Shipment records (ex. Bill of Lading)
  - ☐ Purchase records (ex. Purchase order, Invoice)





- **Organic Certificate** must ...
    - be issued by a certifier approved by the recognized foreign government
    - attest that the product was certified under the USDA organic regulations (NOP technical standards)
- ❖ *Product must meet the scope (i.e. type and point of export) of the recognition agreement*



# Import Documentation Verification – U.S. – India Recognition Agreement



- **Organic Certificates** must be issued by the certifier from Tracenet (since June 2010)
- A **Transaction Certificate** issued by the certifier from Tracenet must accompany each shipment (since November 2014)



# Import Documentation Verification – U.S. – India Recognition Agreement



## Sample organic certificate

**Certificate**

**Certificate No. ORG/SC/1009/001099**

SHAKTI ISABGOL INDUSTRIES  
SHOP NO 3, KHICHAD BHAVAN, AMBEDKAR CIRCLE  
VILLAGE- KHARA, TALUKA PHALODI, Jodhpur, Rajasthan-342301

This is to certify that the product(s) and area(s) of the mentioned organisation inspected by OneCert Asia Agri Certification Pvt. Ltd. are in accordance with requirements of **the National Programme for Organic Production (NPOP), India and the National Organic Program (NOP) technical standards (USA)**

For the following process:  
**Production**

Effective date of initial certification: 13/07/2016

For the purpose of NOP, this certificate is valid until the certificate has been surrendered by or suspended/revoked by OneCert Asia Agri Certification Pvt. Ltd. The next inspection is due on or before 17/05/2017

For the purpose of NPOP, this certificate is valid until 17/05/2017

This certificate is valid for those product(s) and area(s) that have been specified in the annex Certification Characteristics ORG/SC/1009/001099 A.



The validity of the certificate solely depends on the company's continued compliance standard(s), which is subject to annual surveillance inspections, and on the status of our accreditation by NAB.

Accreditation No under NPOP  
NPOP/NAB/008  
File No: ORG-0912-000184-1

OneCert  
INDIA ORGANIC  
USDA ORGANIC

Authorised By:  
Mr. Sandeep Bhargava  
Chief Executive Officer  
Issued Date: 27/07/2016

(253) 8903001179010072016001730



**NOP CERTIFICATE**

Field of Attention  
**Organic Production Methods**

Certificate No. E403357NOP-11-2014

Issued To  
**Lala Jagdish Prasad & Co.**  
Tilaiys Chowk, Kannauj (U.P.) India  
Project In: India

Control Union Certifications (CU) declares to have inspected the unit(s) and/or product(s) of the above mentioned client and have found them in accordance with the standards mentioned below. The client was first certified from the effective date of certifications mentioned below. The scope of the certificate is as mentioned in the Annex of the certificate.

Standards  
**The National Organic Program of the United States Department of Agriculture**

The certificate is in force until further notice provided the above mentioned client continues meeting the conditions as laid down in the contract with Control Union. Certification and/or is suspended or revoked in accordance with the NOP regulation. According to 205.404 of the National Organic Program this this certificate has no validity date.

**Place and date of issue : 07<sup>th</sup> November, 2014**

Effective Date of Certification  
07<sup>th</sup> November 2014

Control Union Certifications is the legal Successor to Skal International. Control Union Certifications is accredited By The United States Department of Agriculture

Control Union Certifications  
P.O. Box 161,8000 AD Zwolle  
The Netherlands  
<http://www.controlunion.com>, tel.: +31(0)36-4260100

**FRAUDULENT CERTIFICATE**



# Import Documentation Verification – U.S. – India Recognition Agreement



Page 1 of 1



## CERTIFICATE OF INSPECTION FOR IMPORT OF PRODUCTS FROM ORGANIC PRODUCTION INTO THE UNITED STATES OF AMERICA



(253) 8508021179034012017000089

1. Issuing body or authority (name & address) Demo Certification Body August Kranti Marg, New Delhi			
2. Serial number of the Certificate of Inspection ORG/TC/YMM/000000		3. Reference No.	
4. Exporter (name and address) Demo Indian Exporter Pvt. Ltd. Paharganj, Central Delhi, New Delhi-110011		5. Inspection body or authority (name and address) Demo Certification Body August Kranti Marg, New Delhi	
6. Producer or preparer of the product (Name and address) Demo Indian Exporter Pvt. Ltd. Paharganj, Central Delhi, New Delhi-110011		7. Country of Dispatch INDIA	
		8. Country of Destination U.S.A.	
9. First consignee (name and address) Demo USA Importer PO BOX 200, FN 17500 USA		10. Name and address of the importer Demo USA Importer PO BOX 200, FN 17500 USA	
11. Marks and numbers. Container No(s), Number and kind.			
Trade name of the products			
Product	Pack Size (in Kgs.)	Number(s)	Total Quantity (in Kgs.)
Soyabean/ Soybean Meal	20300 000000	1	20300 000000
Invoice Details			
S.No.	Invoice No.	Invoice Date	
1	SOY/ISO/175	01/01/2017	
Lot No.: SOPL/78 Ship No.: IU632A Ship Name: MSC RACHELE Bill No.: FGSM-APF-AA-26687 Bill Date: 01/01/2017 Container No.: DRYU2604332, GATU0156348, MSCU3392189 Trade Name of Product: ORGANIC SOYBEAN MEAL			
12. Declaration of body or authority issuing the certificate referred to in box 1. This is to certify that this certificate has been issued on the basis of the checks required under National Organic Programme(NOP) of US and National Programme for Organic Production(NPOP) of India. Additional Declaration (If appropriate) Demo Certification Body is Accredited under NPOP of Govt. of India. Accreditation No.: NPOP/NAB/000 Issued Date: 12/01/2017			
Name and Signature of the authorised person Mr. RAM Singh Chief Executive Officer		Stamp of issuing authorised body	

*Sample transaction certificate*



Stamp of issuing authorised body





- A certified operation exporting product under an international trade arrangement must maintain ...
  - ❑ Applicable **export certificate** (per shipment)
    - EU: Certificate of Inspection
    - Switzerland: Certificate of Inspection
    - Korea: NAQS Import Certificate
    - Japan: TM-11
    - Taiwan: TM-11





- During the onsite inspection, inspectors should also verify that ..
  - **Export Certificates** have been issued by the operation's certifier
  - For Canada, the **appropriate attestation statement** is being used by the operation, if not issued by the certifier





- Certifier and inspector should verify that the operation's **labeling practices** and **product label(s)** meet labeling requirements of the foreign country ...
  - Compliant use of any additional organic seals (for Switzerland, no seal)
  - *For Japan*: who is applying the JAS seal
  - *For Canada*: use of dual language
  - *For EU*: use of certifier code on the label
  - *For Korea*: use of certificate number on the label





- [NOP International Trade page](#)
- Access to lists of approved certifiers:
  - [Canada](#)
  - [EU](#)
  - [Japan](#)
  - [Korea](#) (Korean only)
  - [India](#)
  - [Israel](#)
  - [New Zealand](#)
- [NOP Fraudulent Certificates page](#)



# Questions?

