National Organic Standards Board Spring 2025 Meeting: NOP Update



Christopher Purdy, Deputy Administrator (Acting) National Organic Program April 29, 2025

SOE: Where We Are

- Certification Coverage Facilitating Oversight
- Actively Stopping Products Without Import Certificates
- Certifiers Are Strengthening Control Systems
- Watching/Learning Data Patterns and Flows
- Blending Education with Enforcement
- Continuing to Address Technology Needs

Increased Certification

- January September 2024: Intensive Outreach and Warning Letters to Uncertified Importers
- All Regulatory Discretion Ended September 19, 2024 (6 months in)
- Fall: Completed Desk Audit with
 Certifiers Improvements Happening
- NOP is in Full Enforcement Phase

3,378New U.S. Handlers (1/1/24 – 3/31/25)

7,105New Handlers
Worldwide
(1/1/24 – 3/31/25)

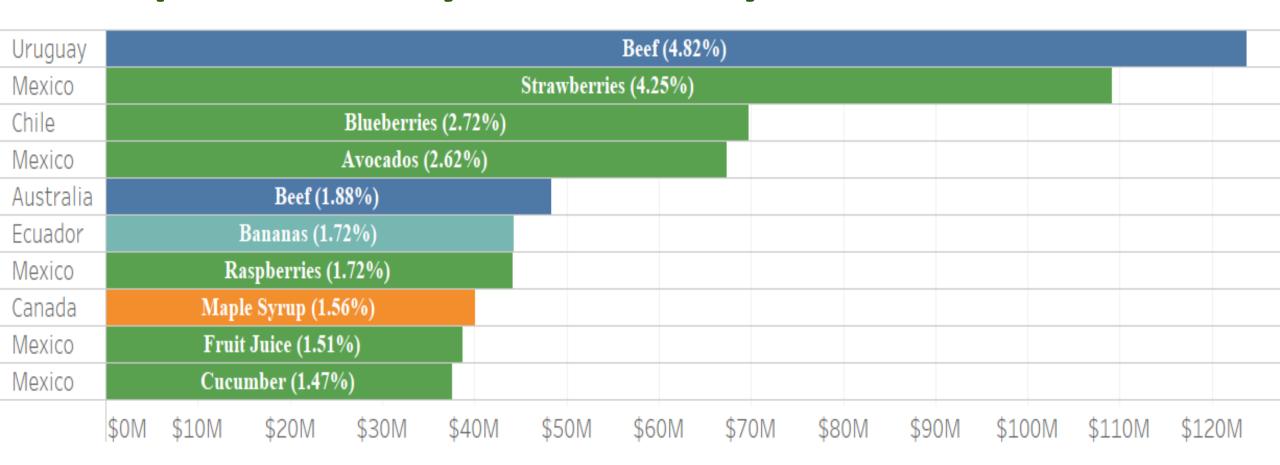
Import Certificates

177,715 e-NOP-IC's from OID (3/19/24-2/28/25) **104,337**Certificates
in CBP-ACE
(As of 2/28/25)

94% of e-NOP-IC's & ACE Filings Match (1/1/25-2/28/25)

68% e-NOP-IC's Issued by USDA Certifiers; Rest under EU, Canada, Japan

Top 10 Country-Commodity Pairs



Standards Division Updates

- Rule Updates
- Board Nominations

Market Development: Final Rule for Organic Pet Food and Mushrooms

- Published December 2024
- Effective March 21, 2025
- Will expand organic market opportunities & clarify standards
- Two years to comply





Organic Livestock and Poultry Standards (OLPS) Final Rule



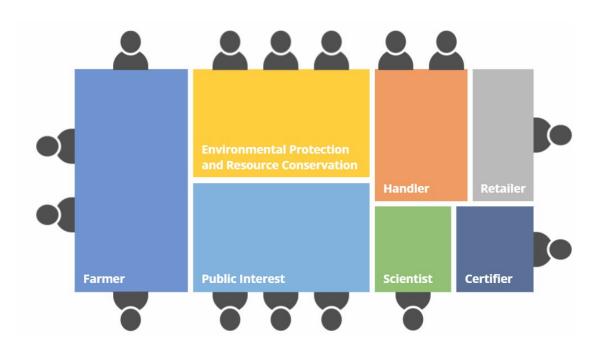
- Clarifies indoor and outdoor space requirements for avian species, animal health care practices, transportation, and slaughter.
- Compliance Date: January 2, 2025; however certain poultry operations have extended compliance timelines for certain provisions.
- Online Training in Learning Center (NOP-360)

National Organic Standards Board

Call for Nominations: Publishing this Summer

Five seats with terms starting January 2026:

- 2 public/consumer interest seats
- 2 organic farmer seats
- 1 certifier seat





Sound and Sensible, Risk-Based Oversight

- SOE introduces the concept of risk in our oversight
- Avoid applying a one-size-fits-all approach
- Reduce unnecessary burden while holding the operation accountable for compliance

Enforcement: Organic Imports

New import data is useful and essential for oversight

NOP Compliance focus:

- High-risk livestock feed commodities
- West Africa Certifier Directive
- Turkey soybean and grain supply chains



Residue Testing

- Focus: high-risk organic feed commodities, including:
 - -Soybeans, soybean meal, corn
 - -Imported from Black Sea, India, and Africa
- Testing for pesticides, GMOs, herbicides, and solvents
 - -Over 50 samples collected to date
 - -Finding: Testing for hexane may help to detect fraud in organic oilseed meals

Enforcement: Livestock Directive Results Notices Issued by Certifiers

Notice of Noncompliance	134
Notice of Proposed Suspension	15
Notice of Proposed Revocation	1
Notice of Suspension	1
Notice of Revocation	1
Notice of Denial of Certification	2
Operation Surrendered	2

USDA Agricultural Marketing Service

U.S. DEPARTMENT OF AGRICULTURE | NATIONAL ORGANIC PROGRAM



No major concerns with operations or certifiers

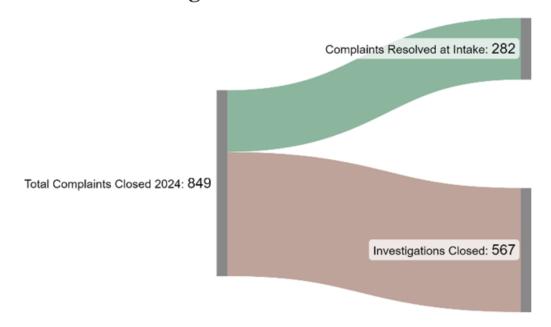
Livestock and Livestock
Products Import
Oversight

Identifying high-risk factors and expanding surveillance to livestock imports

Organic Livestock and Poultry Standards

NOP is preparing surveillance activities

Total Complaints Resolved at Intake and Total Investigations Closed CY2024



The NOP closed 849 complaints in CY2024. 282 of those complaints were resolved at the intake stage without further investigation. This includes complaints with a lack of evidence, out of scope products, complaints referred to other NOP Divisions, etc. 567 complaints moved on for further investigation and were closed in CY2024.

Collaboration and partnership with U.S. Customs and Border Protection (CBP) through the Commercial Targeting and Analysis Center (CTAC)

- Enhanced access to trade and shipment data to increase import oversight.
- Proactive targeting capabilities to identify potentially violative shipments.
- Collaboration with CBP personnel at ports of entry for shipment sampling, examinations, detentions and seizures.
- Coordination of seizures and/or denials of entry of violative goods.
- Trademark protection/enforcement of the USDA organic seal usage.



Questions from the Board