



Importing Organic Products Overview

The U.S. organic market depends heavily on imported ingredients and finished products, and imported supply chains have been the source of much of the organic fraud documented in recent years. For certified organic handlers who source from international suppliers, importing is a compliance obligation governed by a distinct set of regulatory requirements that run parallel to, and interconnect with, everything else in 7 CFR Part 205. This article orients handlers to those requirements: who they apply to, what the regulatory framework establishes, and why importing demands a higher level of diligence than domestic sourcing.



What You'll Learn

- The regulatory basis for import requirements.
- Which operations qualify as organic importers or organic exporters and what certification obligations follow from each classification.
- Why imported organic supply chains carry elevated fraud risk and what that means for your compliance responsibilities.
- How import-specific labeling requirements work, including that organic identification must appear on every shipment document.

There are only two pathways for organic product to enter the U.S. market: certification under the USDA organic regulations, or entry through a formally recognized equivalency or recognition arrangement. Both carry documentation obligations that begin before a shipment leaves the country of origin and extend through entry at a U.S. port. For certified handlers who source internationally, those obligations are not theoretical. They apply to every organic shipment, regardless of country of origin or the size of the transaction.

WHY IMPORTING IS DIFFERENT

The U.S. organic market depends heavily on imported ingredients and products. Many ingredients central to organic product formulation (cacao, coffee, turmeric, maca, most tropical fruits, and bulk organic grains such as soybeans) are sourced predominantly or entirely from foreign producers. For many handlers, importing is not a strategic preference but an operational reality.

Imported organic supply chains also carry a higher inherent risk of fraud than domestic supply chains. More steps between the origin farm and a U.S. receiving dock create more opportunity for substitution, falsified records, or certification gaps that are difficult to detect from a distance. Imported shipments also face a risk that domestic shipments do not, namely treatment with prohibited substances at the port of entry to protect domestic agriculture from pests, which can strip a shipment of its organic status.¹ This heightened risk is precisely why the regulations establish import-specific requirements.

“When you are working with agricultural products, it is very difficult to source only from domestic suppliers. The U.S. does not have the capability to provide a year-round supply, so you will likely work with foreign suppliers.”

Humberto Maldonado
Safety and Compliance Manager
Organically Grown Company

THE REGULATORY FRAMEWORK

All requirements specific to organic imports into the U.S. are established in [7 CFR §205.273](#), Imports to the United States. Products produced in a foreign country and exported for sale in the United States must comply with that section.²

The regulation establishes four requirements that must be satisfied for every imported organic shipment:¹

1. The shipment must be certified pursuant to the USDA organic regulations, or to a foreign standard the U.S. has determined to be equivalent.³
2. The shipment must be labeled pursuant to the USDA organic regulations.
3. The shipment must be declared as organic to U.S. Customs and Border Protection (CBP).
4. The shipment must be associated with valid NOP Import Certificate data.

Beyond these documentation requirements, an imported shipment must reach the possession of the importer without having been treated with a prohibited substance, since fumigation or irradiation voids organic status regardless of the paperwork.¹

No exemptions to these requirements exist based on country of origin, product type, product value, shipment size, or whether the exporting country has an organic equivalency arrangement with the U.S.

An operation's Organic System Plan must identify whether the operation is importing or exporting, describe what records are maintained for imported products, identify imported ingredients and their source, and describe procedures for verifying compliance with USDA organic requirements, including procedures for verifying that imports were not fumigated or irradiated in transit.^{1,4} Certifiers review these OSP sections at annual inspection.⁵ An OSP that does not describe import procedures is a compliance gap for any certified operation that is importing.

Because so much of the risk for fraud concentrates at the import stage, importers carry a heightened responsibility to verify their supply chains. Supplier and shipment verification is central to an organic fraud prevention plan, and a deal that looks too good to be true usually is.

LEARN MORE

Read the following articles for best practices for [Building an Effective Organic Fraud Prevention Plan](#) and [Building and Maintaining a Supplier Approval Program](#).

What is Required for Every Organic Import Shipment



**Certified to the
USDA Organic
Regulations**



**Labeled pursuant
to 7 CFR Part 205
Subpart D**



**Declared as organic
to U.S. Customs and
Border Protection**



**Associated with valid
NOP Import Certificate
data entered into
CBP-ACE**



**Not treated with
prohibited substances,
fumigation, or
irradiation**

Applies to all imported organic products, regardless of country of origin, product type, shipment size, or equivalency arrangement status.

The regulations define two specific roles that carry certification obligations in import transactions:⁶

- **Organic importer:** *“The operation responsible for accepting imported organic agricultural products within the United States and ensuring NOP Import Certificate data are entered into the U.S. Customs and Border Protection import system of record.”⁶*
- **Organic exporter:** *“The final certified exporter of the organic agricultural product, who facilitates the trade of, consigns, or arranges for the transport/shipping of the organic agricultural product from a foreign country to the United States.”¹²*

For both, their certification must specifically cover importing or exporting; being certified for other handling activities is not enough, and the operation’s Organic System Plan must include the import or export activity. A single operation can hold both roles. The importer must be certified by a USDA-accredited certifying agent. The exporter must hold certification from a USDA-accredited certifying agent or a foreign certifying agent authorized under an organic trade arrangement. Both must be listed in the Organic Integrity Database.⁷

AM I AN ORGANIC IMPORTER?

The organic importer, commonly known as the *importer of record*, is the operation that accepts the shipment on the U.S. side and takes responsibility for entering NOP Import Certificate data into CBP’s Automated Commercial Environment (ACE) and filing the CBP Entry Summary (Form 7501). This role is defined by function, not by how an operation describes its primary business. Different industries use the word “importer” in different ways, so what matters here is that the importer of record is the operation named on the NOP Import Certificate and certified for importing.

Two categories of operations that are adjacent to import transactions are specifically exempt from certification requirements:

- **Licensed customs brokers** whose sole activity is conducting customs business, facilitating entry and filing documentation, and who do not otherwise handle organic agricultural products are not required to be certified.⁸ A customs broker who takes physical possession of, or makes operational decisions about, organic product is no longer functioning only as a customs broker and may trigger certification requirements.
- **Transporters** that strictly transport organic products, without taking any action that constitutes “handling” under the regulations, are similarly exempt.⁹

One common misconception is that importing organic product in sealed, tamper-evident retail packaging is exempt from certification. The retail-packaging exemption does not list importing among the activities it covers,¹⁰ so an operation that imports must be certified even when the product arrives in sealed retail packages.

“If you are the first organic entity and you’re directly importing it from a supplier, so say you’re having something shipped from France or India or somewhere, and you are the first one receiving it, you need to talk to your organic certifier to establish the proper audit trail to guarantee that you have maintained the organic integrity of that product coming to your business. Because at that point, you are an organic importer.”

Jessica Jones
Brewer/Co-Owner
Giant Jones Brewing

LABELING OBLIGATIONS FOR IMPORTED PRODUCTS

Imported organic products sold in the U.S. must be certified and labeled to the same standards that govern domestically produced organic products.² All imported products must be clearly marked and identified as organic on all packaging and documentation, including invoices, packing lists, bills of lading, and CBP entry data. Each shipment must also carry a unique identifier, such as a lot number, that ties the product back to its documentation. Organic identification must appear on every commercial document linked to the shipment, not just the physical container.¹

WATCH OUT

For bulk and nonretail shipments, the labeling requirements described go beyond what is required for shipments of products produced and sold domestically.^{1,11}

For retail-packaged imported products, the standard retail labeling rules apply: organic composition category, required certifier identification, and product-specific requirements.

LEARN MORE

For full labeling requirements, including organic composition categories, certifier identification, and product-specific rules, see [Chapter 7](#).

WHY IMPORT COMPLIANCE MATTERS

In practice, the most common import problem is a missing or incorrect NOP Import Certificate. If the exporter does not request the certificate with enough lead time for the certifier to issue it before the product leaves, or the certificate data is wrong, the shipment can be held or forced to re-export, which is costly and disruptive. Make sure the exporter requests the NOP Import Certificate early enough for the certifier to issue it before departure.

A less common but more permanent risk is that a shipment may be treated with prohibited substances at a port of entry, either as a condition of entry under APHIS regulations, or due to a pest interception. Any fumigation with a prohibited substance, or any irradiation treatment, renders the shipment ineligible for sale as organic. A shipment can lose its organic status after it leaves the exporter and before it reaches the importer, through actions taken by government agencies that are entirely outside the supply chain.

Compliance risk does not stop with a fraudulent supplier. The regulatory accountability sits with the certified organic importer. The importer's certified status, and the certified status of the exporter, are what establish the legal chain of responsibility for the shipment.

WATCH OUT

Fumigation or irradiation at a U.S. port of entry permanently voids a shipment's organic status, even if the exporter's certification is valid and all documentation is in order.¹ Build procedures for addressing this risk into your Organic System Plan, and confirm with your certifier how to handle a shipment that is treated at the border before it reaches your facility.

LEARN MORE

For full coverage of fumigation, irradiation, and risk at the port of entry, see [Maintaining Organic Integrity for Imported Products](#).

CONCLUSION

For certified handlers who source internationally, the import requirements and the certification obligations they create are not a separate compliance track. They are part of the same system that governs every other aspect of organic handling. The organic importer role, the NOP Import Certificate obligation, and the documentation requirements for every shipment all flow from the same principle: organic status must be verifiable from the origin farm through to the U.S. receiving dock, and the certified importer is accountable for that chain.

ACTION ITEMS

- Determine if your operation requires certification as an importer or exporter.
- Include import sources, verification steps, and chemical prevention in your OSP.
- Ensure your international suppliers are listed in the Organic Integrity Database.
- Verify that all import documentation is complete and compliant with the regulations.

SOURCES CITED

1. USDA National Organic Program, [7 CFR §205.273](#).
2. USDA National Organic Program, [7 CFR §205.300\(c\)](#).
3. USDA National Organic Program, [7 CFR §205.511\(a\)](#).
4. USDA National Organic Program, [7 CFR §205.201\(a\)](#).
5. USDA National Organic Program, [7 CFR §205.403\(d\)](#).
6. USDA National Organic Program, [7 CFR §205.2 “Organic importer”](#).
7. USDA National Organic Program, [7 CFR §205.501\(a\)\(15\)](#).
8. USDA National Organic Program, [7 CFR §205.101\(g\)](#).
9. USDA National Organic Program, [7 CFR §205.101\(h\)](#).
10. USDA National Organic Program, [7 CFR §205.101\(f\)](#).
11. USDA National Organic Program, [7 CFR §205.307\(a\)](#).
12. USDA National Organic Program, [7 CFR §205.2 “Organic exporter”](#).

DIG DEEPER

1. U.S. Department of Agriculture, Agricultural Marketing Service. *Electronic NOP Import Certificates*. <https://www.ams.usda.gov/services/organic-certification/international-trade/Electronic-Organic-Import-Certificates>.
2. U.S. Department of Agriculture, Agricultural Marketing Service. (2026, June). *International Trade Resources for Organic Certification*. <https://www.ams.usda.gov/services/organic-certification/international-trade>.
3. U.S. Department of Agriculture, Agricultural Marketing Service. *Strengthening Organic Enforcement*. <https://www.ams.usda.gov/rules-regulations/strengthening-organic-enforcement>.
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United States Department of Agriculture
Agricultural Marketing Service
National Organic Program

