



International Trade Arrangements

When a certified organic handler sources ingredients from a foreign supplier, the organic standard that supplier operates under may not be the USDA organic regulations. For a significant portion of U.S. organic imports, it doesn't need to be, because the U.S. government has determined that certain foreign organic certification programs are at least equivalent to its own. These equivalency arrangements and recognition agreements are what allow certified organic grain from Canada, certified organic herbs from the EU, and certified organic ingredients from Japan and Korea to enter the U.S. market without requiring every foreign operation to obtain a separate USDA NOP certification. Understanding how these arrangements work, what they cover, what they don't cover, how they affect the exporter's certifier, and when they can be terminated, is foundational knowledge for any handler whose supply chain crosses international borders.

What You'll Learn

- The distinction between equivalency arrangements and recognition agreements, and which countries fall under each
- What these arrangements change about the certifier, the NOP Import Certificate, and the export documentation
- The arrangement scope limitations, including the fact that arrangements apply to specific products and conditions and may exclude certain substances or production requirements
- That arrangements can be terminated or modified
- Where to find up-to-date information on active arrangements and their specific terms

The U.S. organic market depends on imported products. For many ingredients, including European Union (EU) herbs and grain, Canadian grain and pulses, Japanese tea, and Korean specialty crops, the supply chain necessarily crosses international borders.

Many foreign operations certify directly to the USDA National Organic Program (NOP) through USDA-accredited certifying agents. But for some operations and countries, eligibility to export into the U.S. market is done through special trade arrangements. Trade arrangements are not the only pathway, but they give partner countries an additional route that does not require every foreign operation to hold a separate USDA NOP certification.

The USDA organic mechanism behind these trade arrangements is an equivalency determination: a formal finding by the U.S. government that a foreign country's organic certification program provides technical requirements and a conformity assessment system that are at least equivalent to the USDA National Organic Program. When that determination is made, products certified under that foreign program may be sold in the U.S. as organically produced.¹

Equivalency arrangements reduce the documentary burden on import transactions from partner countries and reflect a shared baseline of organic integrity. But "equivalent" is not the same as "identical."

“Something that we really appreciate is the fact that the NOP has equivalency programs with different countries around the world. And that gives us a little bit more trust because then we understand that the NOP has done a lot of work already evaluating what those requirements are and giving us that confidence that those countries can source product that is compliant with the organic standards here in the US.”

Abel Sánchez
Product Innovation Manager
Tradin Organic

THE REGULATORY FRAMEWORK

The USDA organic regulations establish the procedures for creating, overseeing, and terminating equivalency determinations. The relevant provision states: *“foreign products produced and handled under another country’s organic certification program may be sold, labeled, or represented in the U.S. as organically produced if the U.S. Government determines that such country’s organic certification program provides technical requirements and a conformity assessment system ... that are at least equivalent to the requirements of the Act and the regulations.”*¹

In plain terms, a foreign program qualifies when it has both a set of rules that are substantively equivalent to the NOP (technical requirements) and a government enforcement and oversight apparatus that ensures those rules are actually followed (conformity assessment system). A program with good rules but weak enforcement would not qualify. Equivalency is not automatic even where a foreign program looks equivalent on its face; the U.S. government must affirmatively determine that the program’s rules are equivalent and that its oversight is sufficient.

DEFINITION

The regulations define the two key terms that a foreign program must satisfy:

Technical requirements: “A system of relevant laws, regulations, regulatory practices, standards, policies, and procedures that address the certification, production, and handling of organic agricultural products.”²

Conformity assessment system: “All activities, including oversight, accreditation, compliance review, and enforcement, undertaken by a government to ensure that the applicable technical requirements for the production and handling of organic agricultural products are fully and consistently applied.”³

EQUIVALENCY ARRANGEMENTS VS. RECOGNITION AGREEMENTS

The U.S. maintains two types of organic trade arrangements with foreign governments.

Equivalency Arrangements

Under an equivalency arrangement, a foreign government’s organic production standards and certification program is determined to be substantively equivalent to the NOP. Organic products certified under that foreign program may be imported and represented as organic in the U.S., without the foreign operations needing to be separately certified to the NOP by a USDA-accredited certifier. As of 2026, the U.S. has organic equivalency arrangements with Canada, the European Union, Japan, Republic of Korea, Switzerland, Taiwan, and the United Kingdom.⁴

Under a recognition agreement, the foreign government is authorized by USDA to accredit certifying agents in its country, and those agents certify farms and processing facilities directly to the USDA organic standards. The production standards applied are the USDA organic regulations, not a foreign equivalent. As of 2026, the U.S. has recognition agreements with Israel and New Zealand.⁴ Certification under a recognition agreement is valid for export to the United States only.

Feature	Equivalency Arrangement	Recognition Agreement
Structure	Foreign program certified to their own equivalent standard	Operations certified directly to USDA Organic Standard
Countries (as of 2026)	Canada, EU, Japan, Korea, Switzerland, Taiwan, UK	Israel, New Zealand
Foreign Certifier	Accredited under foreign country's system	Accredited under foreign country's system and authorized to apply USDA organic standards
Standard Applied	Foreign country's equivalent standard	USDA Organic Standard
Implication for Importer	Accept NOP Import Certificate issued by foreign accredited certifier	Accept NOP Import Certificate issued by foreign accredited certifier or foreign government

WHAT “EQUIVALENT” MEANS AND WHAT IT DOESN’T

The threshold for equivalency is that a foreign program provides safeguards and standards that are “at least equivalent” to the NOP. This does not mean every rule is identical. Different countries have made different regulatory choices about what substances are permitted, what livestock practices are required, and how organic content is defined in processed products.

A practical example: the “100 percent organic” composition category exists under the USDA organic regulations but has no equivalent category under EU organic regulations. This matters for handlers sourcing high-content ingredients from EU suppliers. If you need a certifier-level organic content statement to support formulation calculations above 95% organic content, you may run into difficulty.

“Asking a European or Canadian company to give you a statement about the percentage of organic content, you can often get pushback because their rules on it are different than ours... You can have difficulty getting them to give you the statement because a statement from someone at the handler that is producing the ingredient isn’t good enough. You need the statement from their certifier, and that’s the point where it can get difficult.”

Jessica Jones
 Brewer/Co-Owner
 Giant Jones Brewing

Each equivalency arrangement is negotiated separately and may include specific exclusions, conditions, or additional requirements. NOP calls these arrangement-specific exceptions the “critical variances” and “terms” of the arrangement, and that is the language used throughout NOP’s trade resources. Some arrangements do not cover all product categories, require specific labeling provisions, or specify how particular production inputs are handled differently under the foreign program.

Labeling is one of the most common compliance gaps. Retail-labeled products imported from an equivalency country must meet the USDA organic labeling requirements in full, and imported labels frequently fall short.⁵ Every equivalency also requires products to be labeled according to the destination country’s standards, so an operation exporting from the U.S. will usually need labels that differ from its domestic labels.

The Common Organic System Plan for Handling asks exporters to U.S. trading partners to: “Describe how you ensure the product meets the requirements of the destination country for the arrangement (e.g., labeling, production restrictions, etc.).”⁶ The authoritative source for arrangement-specific terms is the USDA NOP’s [International Trade Partners](#) web page.⁴ Handlers and their certifiers should consult this resource rather than assuming all NOP rules translate directly to partner country requirements.

HOW ARRANGEMENTS AFFECT THE EXPORT/IMPORT TRANSACTION

Under an equivalency arrangement, the exporting country’s certifier (accredited by the foreign government’s organic program) must generate NOP Import Certificates through the Organic Integrity Database (OID) or the Global Integrity Database for trade partner countries.⁵ A U.S. importer receiving organic grain from a Canadian operator under the Canada-U.S. equivalency arrangement will receive an NOP Import Certificate generated by that Canadian certifier of that operator, not by a USDA-accredited certifier. This is permitted and compliant. The Canadian certifier is authorized under the arrangement to issue NOP Import Certificates for eligible products.

The NOP Import Certificate Requirement Still Applies

Regardless of whether a shipment originates from an equivalency country, all imported organic products must still be accompanied by NOP Import Certificate data entered into CBP-ACE.⁵ Equivalency arrangements change the certifier on the export side. They do not eliminate the NOP Import Certificate requirement, the certification requirement for the organic importer on the U.S. side, or the importer’s verification obligations. When importing under an equivalency arrangement, the importer must also verify that the arrangement’s critical variances are met for each specific product being imported and that the NOP Import Certificate includes any required attestation statement. The NOP Import Certificate lists the standard the product is certified under, which tells the importer which set of terms applies.

Export Certificates for U.S. Exporters

The arrangements are bilateral; U.S. organic products can also be exported to partner countries under the arrangement. When exporting, U.S. handlers must meet the destination country’s terms for the arrangement, which typically include that country’s labeling requirements and its own critical variances (for example, where the product was produced or whether specific inputs such as sodium nitrate were used). Equivalent countries also have their own transaction certificate requirements and will not accept a NOP Import Certificate in place of their own documentation. If you export organic products to any equivalence arrangement countries, your OSP should describe how you request, verify, and maintain the required export certificates and how you meet each destination’s terms.

SUPPLY CHAIN VERIFICATION

An equivalency arrangement tells you that the foreign certification program has been assessed by USDA and found to meet the USDA organic standard overall. It does not tell you that every specific supplier within that country’s program is compliant, that every product category is covered, or that the arrangement’s terms have not changed since you last checked.

Your supplier verification obligations apply whether or not the supplier is in an equivalency country: confirm active certified status in the OID or equivalent database, verify that the organic certificate covers the specific product and indicates compliance with equivalence arrangement terms (if relevant), and check the NOP Import Certificate for each shipment. Arrangements remove the need for the foreign operation to hold a separate USDA NOP certification, but they add verification on your side and do not change your other obligations as the U.S. organic importer. Before you begin sourcing from a new international supplier, talk to your certifier. To approve a new supplier under an equivalency arrangement, your certifier may require verification that the arrangement’s critical variances are met, which can mean additional documentation from the exporter’s certifier.

WATCH OUT

Arrangements can be and have been terminated or modified. The USDA NOP [International Trade Partners](#) web page is the authoritative source for which arrangements are currently active and what conditions apply. Confirm current status before entering any new purchasing agreement, especially for new suppliers or new product categories. Do not assume that an arrangement in place when you last checked is still in place, or that its terms are unchanged.

CONCLUSION

Equivalency arrangements and recognition agreements are what make international organic trade workable at scale. They reflect government-to-government assessments that specific foreign programs meet the NOP's substantive threshold, allowing certified organic products from those countries to enter the U.S. without requiring full NOP certification of every foreign operation. For U.S. importers, arrangements do not make sourcing simpler than buying from a directly NOP-certified foreign operation; sourcing under an equivalency actually adds verification, because the importer's certifier must confirm the arrangement's critical variances are met. What arrangements do is expand the range of countries that organic ingredients can come from and the markets that U.S. organic products can be sold into. They do not eliminate the NOP Import Certificate requirement, the importer's verification obligations, or the need to understand arrangement-specific scope limitations.

ACTION ITEMS

- Check the USDA NOP web page for each sourcing country to confirm active trade arrangements.
- Review specific terms for each country because arrangements often exclude certain product categories.
- Continue standard supplier verification steps like checking certificates in the Organic Integrity Database.
- Update your Organic System Plan to detail how you manage required export certificates.
- Verify trade arrangement statuses before signing new foreign sourcing agreements or renewing contracts.

SOURCES CITED

1. USDA National Organic Program, 7 CFR §205.511(a).
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6. U.S. Department of Agriculture, Agricultural Marketing Service. *Organic System Plan Template*. Retrieved from <https://www.ams.usda.gov/reports/organic-system-plan-template>



United States Department of Agriculture
Agricultural Marketing Service
National Organic Program

