

NOP Import Certificates for Imports of Organic Products into the USA

Important: The following information reflects the current state of knowledge (as of July 2024) and may be subject to change. Please be sure to always double check for recent updates.

Abbreviations

NOP-IC	NOP Import C ertificate	Special type of transaction certificate for organic imports into the USA
OID	O rganic I ntegrity D atabase	Online platform / database of the USDA
CB	C ontrol B ody	Organic certification body
AWB	A ir W aybill	Official air transport document
B/L	B ill of L ading	Official maritime transport document
SWB	S ea W aybill	Official maritime transport document
CMR	C onvention Relative au C ontrat de Transport International de M archandises par R out	Official road transport document
ETD	E stimated T ime of D eparture	With regard to NOP-IC applications, meaning the day when the goods are going to depart from the country of export

1. Introduction

Starting **March 19, 2024**, the Strengthening Organic Enforcement (SOE) of the National Organic Program (NOP) will be implemented.

(NOP SOE publication: [Federal Register :: National Organic Program \(NOP\); Strengthening Organic Enforcement](#))

Amongst other amendments, it determines that all organic products imported into the USA will require an NOP Import Certificate (NOP-IC) as a mandatory part of import documentation.

This change expands the use of the NOP-IC. In the past, this special COI/TC type was only used for sales under specific equivalency agreements and was issued via a word or pdf template provided by the USDA.

With the implementation of the SOE, the USDA makes **NOP Import Certificates mandatory for all organic imports into the US**, to improve oversight and traceability. This new type of NOP-IC is to be issued via a new Import Certificate Module within the OID (Organic Integrity Database = online database of the USDA).

NOP Import Certificates are only mandatory for organic imports into the USA, not for any sales under NOP to other countries or products which are only transferred via the USA to a different final destination (e.g. Canada).

2. How it works

Step 1	Exporter sends NOP-IC application (application form as well as all required documents) to the responsible COI/TC department of their CB. This must be done well in advance before departure of the shipment, in accordance with the CB's general handling times!
Step 2	COI/TC department checks the documents and prepares the NOP-IC on the OID (Organic Integrity Database of the USDA)
Step 3	If everything is found to be correct and complete, the CB issues the NOP-IC on the OID and sends the PDF NOP-IC to the exporter (who in turn provides the NOP-IC to the importer). The NOP-IC must be issued before departure of the goods!
Step 4	The product is exported. The exporter must provide all final documents to their CB as soon as these are available.

3. NOP Import Certificate (NOP-IC) issuance – procedure and timeline

In the following, we will summarize the most important aspects regarding NOP-IC applications (according to the current state of knowledge as of February 2024):

- a) The NOP-IC is **mandatory for organic imports into the US that depart from the country of export on or after March 19, 2024, and must be issued via a new module within the OID (Organic Integrity Database).**
- b) The **NOP-IC must be issued BEFORE the goods leave the country of export.** **IMPORTANT:** Once the goods have left the country of export/origin, we will not be able to issue an NOP-IC for this shipment, seeing as this would not comply with the NOP SOE requirements. It is the responsibility of the exporter to make sure that the shipment does not leave the country of export before the NOP-IC is issued.
- c) Seeing as the NOP-IC requires some specific details that are unique to this COI/TC type, there is a separate application form specifically for NOP-ICs.
As always, a general list of required documents is included in the annex of the application form. CERES may ask for additional documents to complete traceability. (Depending on the individual sales and production chain etc.)
- d) The exporter must **apply for the NOP-IC as early as possible with enough time for CERES to check the documents and rule out any doubts before the shipment.**
Please take into account our regular handling times for COI/TC applications and, in case an application cannot be submitted with sufficient time in advance, also consider using the EXPRESS service option that we offer for all national sales as well as international shipments by vessel or train (NOT applicable for international air- and land freight; generates additional costs, see our price list).

For **international shipments** the application should be sent **at least 6-10 working days prior to the shipment..** (“Working days” do not include weekends and national holidays.)

Please **carefully check our General guidance for COI / TC applications** ([available on our website under Documents > COI/TC](#)) for a summary of the most important aspects regarding

COI / TC applications (all types) as well as an overview of handling times and service options.
This is crucial to avoid unnecessary delays and misunderstandings.

In case the official waybill (B/L, CMR or AWB) and commercial invoice are issued only after the departure of the goods, **we also accept draft versions of the waybill (or booking confirmations) and proforma invoices for NOP-IC issuance.**

In case it is actually impossible to provide a (draft) waybill (B/L, CMR or AWB) and/or (proforma) invoice in time for the application, we will accept the application without this document.

Once the original waybill (B/L, CMR or AWB) and commercial invoice are available, they must be sent to us immediately.

This must happen automatically without need for reminders by CERES. Necessity of **reminders may generate extra costs and lead to temporary COI/TC stops until the final documents are received.**

In case of **changes between application / proforma / draft and original (final) version** of invoice or waybill (B/L, CMR or AWB), **it is the responsibility of the exporter to actively inform CERES about this when sending the final documents.**

- e) Starting from 01.08.2024: **By default, CERES will not include any shipping details (AWB, B/L, SWB, CMR, Container number etc.), to allow an improved and simplified issuance workflow.** These details are not mandatory for the NOP-IC in any way (according to USDA requirements), seeing as they are entered by the importer along with the NOP-IC number in the ACE system of the CBP (= Customs and Border Protection).
 (If the draft BL/AWB/CMR or similar is available before issuance of the NOP-IC, the details may be included by special client request. If needed, this must be highlighted in the application email, same as any other special requests. Any updates of shipping details after issuance of the NOP-IC will generate extra costs, same as any other non-mandatory updates or corrections that are not caused by a mistake of CERES.)

By consequence, the NOP-IC as issued before departure of the goods is usually the final version (without any need for updates) and will be provided as PDF version.

Naturally, **exporters must send all final documents as soon as these are available.** This should be an automatic process, without need for reminders.

Necessity of **reminders may generate extra costs and lead to temporary COI/TC stops until the final documents are received.**

- f) The NOP SOE final rule determines that **one NOP-IC can always only cover one product / HTS Code** ([Harmonized Tariff Schedule \(usitc.gov\)](https://www.usitc.gov)). This means that, if a shipment contains various products, we will have to issue various NOP-ICs for this shipment.
 However, **it is possible to include various lots / batches of one product into one NOP-IC, even if these batches are different variations of the product. The only condition is that it must all be the same product / HTS Code.**
 For example, one NOP-IC could be issued for the general product “100% Organic Green Tea” and include several lots of varying packaging (small packages, green tea bags, green tea in bulk) quality grades etc.
 In any case, the product name on the NOP-IC must, of course, match the labelling. Further instructions form OID manuals: *“Product as Labeled - for raw products, enter the*

common name of the product(s) (e.g. lemons or limes). For packaged products, enter the name shown on the principal display panel (front of the package)."

Make sure to take this into account when filling in the application form.

Also, **one application can still include various products**, same as for other COI/TC types. We will generally issue one NOP-IC per product as listed in the application form.

For the NOP-IC it is mandatory that the **HTS code** consists of exactly **10 digits**. It must be listed on the **official HTS website** ([Harmonized Tariff Schedule \(usitc.gov\)](https://www.usitc.gov)) and the **description must fit the product**. The exporter must verify the correct HTS code (possibly with support from the importer) according to the above conditions and include it in the application form.

g) **One NOP-IC may include several shipments (of the same product, same final handler and for the same importer).**

The SOE determines that it is entirely up to the issuing Control Body (CB) to decide whether they apply this option, depending on risk assessment, individual control systems and general procedures.

Starting from 01.08.2024: **CERES offers the option to include multiple shipments that are made within max. 3 months to be included in one single application (= multiple-shipment application).**

This rule may be updated at any time, for all clients or individual operators, due to individual circumstances (including but not limited to residue cases, alerts, suspensions, risk detection etc.) or general changes of CERES procedures.

This option is intended for exporters that plan various shipment within a limited time to the same US importer. It allows to greatly simplify the NOP-IC issuance and lower the corresponding costs for exporters in these cases.

The following conditions apply for multiple-shipment applications:

- The exporter must clearly **define the start and end date of the relevant shipping time period in the application form**. Shipping time period means the time period from departure of the first shipment until departure of the last shipment included in this application. **The maximum shipping time period is 3 months per application.**
- All shipments must have the **same importer** ("Recipient" on NOP-IC) and **same Final Handler** (= operator responsible for final step of preparation (e.g. packing, labelling).
- **Traceability regarding origin of the product must be clear already at the time of application.**
This means that:
 - All products of all shipments are either of the exporter's own agricultural production / wild collection (in case of clients with multiple farms, the quantities per farm must be clear)
 - or the exporter must be able to provide the corresponding evidence documents for the purchase of the products or raw material.
(Check annex 1 of the NOP-IC application form for acceptable options of purchase documents.)
- Exporters must provide the corresponding **Purchase Order** for the planned shipments (from the importer to the exporter, for all shipments of this application) as well as the

estimated total net weight per product of all shipments included in the application.

The actual total net weight of the exports must be within a max. 10% tolerance of this estimation.

(If additional orders by the importer cause the planned net weight to increase more than this, the exporter must send an additional application.)

- Any important changes during the shipping time period, especially regarding the exported weight, must be shared with CERES immediately.
- **All final documents must be sent all together to CERES for final cheking**, including the filled in overview excel list (template available for download on our website) **within two weeks after the end of the shipping time period**.
This must happen **automatically** without need for reminders by CERES. Necessity of **reminders may generate extra costs and lead to temporary COI/TC stops until the final documents are received**.

The **application** must **always** be sent **well in advance BEFORE departure of the goods**, with sufficient time for the document check, clarification of any potential questions and issuance / update of the NOP-IC **in time before departure of the shipment**. (Regardless of whether it is a single- or multiple-shipment application.) Please make sure to take into account our general handling times (see [General Guidance for COI/TC applications on our website under Documents > BIO > COI/TC](#)).

- h) All NOP-ICs have a start and end date to define the effective period of the NOP-IC. After the end date, the NOP-IC status becomes invalid. **The NOP-IC must be valid at the time of departure of the product from the country of export (for all included shipments)**, i.e. departure of the goods must take place before the end date of the effective period. This is essential. Also, updates of an issued NOP-IC (see below) are only possible during the NOP-IC effective period.
If the shipment reaches the US after the NOP-IC end date, i.e. the NOP-IC becomes invalid while the goods are in transit, this is acceptable (as long as the NOP-IC was valid at the time of departure of the shipment).
- i) The following details can be updated after issuance of the NOP-IC.
(Errors or changes regarding any other details will require a replacement NOP-IC. Updates are only possible during the NOP-IC effective period.)
 - Certificate End Date
 - Total Net Weight in KG
 - Total Number of Containers
 - Shipping Identification (which may include Flight or Vessel Number, Container Number, Lot Number, etc.)
 - Remarks

4. NOP-IC content and notes

1. CERTIFIED TO [XXXXX] ORGANIC STANDARDS: Standard under which the goods are imported into the US as organic (NOP or equivalent)
2. CITY AND STATE OF PRODUCT DESTINATION: Autopopulated based on the entry for Recipient (box 7)
3. DATE: Start and End Date of the effective period of the NOP-IC
4. IMPORT CERTIFICATE NUMBER: Serial number of the NOP-IC, assigned by OID. The NPO-IC number length is a minimum 21 digits with dashes (123-1234567890-123456). The first three digits are the country code of the CB issuing the NOP-IC. The next 10 digits are the certified Exporter or Final Handler NOP Operation ID that the NOP-IC is issued on behalf of by their CB. The next two digits are the last two digits of the year when the import certificate is issued. The last four digits are an incremental number based on the number of certificates issued for the Exporter or Final Handler operation. That number resets every year on Jan 1. If more than 9,999 certificates are issued for a single operation in one calendar year, the certificate number will be extended to 22 or more digits (123-1234567890-1234567).
5. EXPORTED BY (NAME AND ADDRESS): Individual or business that is exporting the product to the U.S. If the best contact information for international trade issues for the operation is different from the primary contact listed in the OID, it is possible to enter alternate exporter contact information (contact first name, last name, phone number and email).
6. PRODUCT EXPORTED FROM: Country of export
7. RECIPIENT IN U.S. (NAME AND ADDRESS): Importer of the goods. If the best contact information for international trade issues for the operation is different from the primary contact listed in the OID, it is possible to enter alternate importer contact information (contact first name, last name, phone number and email).
8. CERTIFYING BODY ISSUING CERTIFICATE (NAME AND ADDRESS): CB who issues the NOP-IC
9. TOTAL NET WEIGHT: Total net weight of all goods covered by the NOP-IC
10. TOTAL CONTAINERS: Total number of air or vessel containers carrying the goods covered by the NOP-IC
11. PRODUCT AS LABELED: Name of the product covered by the NOP-IC. (Every NOP-IC can only cover one product. For raw products, enter the common name of the product (e.g. lemons or limes). For packaged products, enter the name shown on the principal display panel (front of the package).)
12. HARMONIZED TARIFF CODE AS APPLICABLE: Harmonized Tariff Schedule (HTS) code for the product. HTS codes are listed at <https://hts.usitc.gov/>
13. SHIPPING IDENTIFICATION: Identification / reference numbers of the shipment(s), for example lot / invoice / waybill / container number etc.

14. FINAL HANDLER: Can be identical with the exporter or different. Final Handler is the operator who performed the last activity of production or preparation (processing, packaging, labelling). If the best contact information for international trade issues for the operation is different from the primary contact listed in the OID, it is possible to enter alternate Final Handler contact information (contact first name, last name, phone number and email).
15. CERTIFYING BODY OF FINAL HANDLER: Autopopulated based on Final Handler NOP ID
16. REMARKS AND ATTESTATIONS: Attestation applies to products certified under Trade Partner programs. Remarks can include other additional details that could not be entered in any other box.
17. SIGNATURE OF CERTIFYING BODY
18. DATE: Date of issuance of the NOP-IC (in case of update after first issuance, this date changes accordingly)