

# NOP Certification Program

## 美国有机认证方案

### 1. Purpose 目的

This policy governs how SRS Certification GmbH (hereinafter referred to as 'SRS') implements the USA National Organic Program (NOP) on the certification of organic products. It specifies the work related to certification based on the management policy, operation system, implementation method and other matters necessary for the implementation of business related to certification. NOP is based on the **US Organic Food Production Act (OFPA)**.

本政策旨在规范SRS Certification GmbH（以下简称“SRS”）实施美国国家有机计划（NOP）有关有机产品认证的规定。本政策具体说明了基于管理政策、操作体系、实施方法及其他与认证相关业务实施所必需事项的认证工作。NOP基于美国有机食品生产法案（OFPA）。

### 2. Scope 范围

NOP allows organic certification of products from farming (crops and livestock), crops collected in unmanaged areas (wild crops), and processed food products (handling). Non-food agricultural products, such as feedstuff, fibers, and medicinal products may also be certified.

NOP 允许对农业产品（农作物和畜牧）、从无人管理区域采集的作物（野生作物）以及加工食品产品（加工环节）进行有机认证。非食品农产品，如饲料、纤维和药用产品，也可以获得认证。

As an integral part of certification, material must be reviewed for its compliance with NOP.

作为认证的组成部分，必须审核材料是否符合 NOP 的要求。

All organic products which are imported to the United States must fully comply with NOP and be certified by a USDA-accredited certifying agent. For some countries and regions however organic trade arrangements exist (for details see chapter 5 below).

所有进口到美国的有机产品必须完全符合 NOP 要求，并由美国农业部批准的认证机构进行认证。然而，对于某些国家和地区，存在有机贸易协定（详情请参见下文第5

章)。

### 3. Quality Management for Implementation of NOP NOP实施的质量管理

- 3.1 SRS offers its certification service under a regime of impartiality, as required by OFPA

SRS根据OFPA §6515(g)的要求，在公正性制度下提供认证服务。

§6515 (g). Risks of impartiality are assessed annually, staff must disclose possible conflicts of interest, performance monitoring shall oversee implementation. **SOP-2 Impartiality Management** applies to NOP, except that the Impartiality Board, which is an external group of experts, does not deal with NOP certifications.

§6515(g) 公正性风险每年评估，员工必须披露潜在利益冲突，绩效监控应监督实施情况。**SOP-2 公正性管理**适用于NOP，但作为外部专家组的公正性委员会负责不处理NOP认证事务。

- 3.2 Confidential handling of all information related to certified operations, as required by OFPA §6515 (f), is ruled by **SOP-4 Confidentiality**. This includes disclosure of information to authorities and the public. More specific rules relating to NOP are covered in **ORG-Pol-1 Disclosure of information**.

根据OFPA §6515(f) 的要求，所有与认证运营相关的信息须保密处理，相关规定见**SOP-4 保密性**，包括向主管部门和公众的信息披露。有关NOP的更具体规则见于**ORG-Pol-1 信息披露**。

- 3.3 SRS shall employ a sufficient number of inspectors and certification staff to perform the services we offer. Inspectors have a crucial position in the entire certification process, therefore close attention shall be paid to their management. The rules for selecting, training, approving, and monitoring of staff can be found in **SOP-3 Personnel Management**. It applies to NOP. SRS聘用足够数量的检查员和认证人员，以执行所提供的服务。检查员在整个认证过程中具有关键作用，因此应高度重视对其的管理。有关人员的选拔、培训、批准及监督的规则详见**SOP-3 人事管理**。该规定适用于NOP。

- 3.4 When consulting the organic regulations (**Titel 7 C.R.F. Part 205**), SRS staff and clients are and shall be instructed to use the online version to ensure the

latest updated rules are applied. These updated rules can be found at <https://www.ams.usda.gov/rules-regulations/organic>. Especially the National List sees frequent changes, <https://www.ams.usda.gov/rules-regulations/organic/national-list> of which SRS must be aware. Where the NOP lacks provisions, the **Program Handbook** shall be searched for information. In some cases, the NOP has requested the Standard Board (NOSB) to work our **NOSB recommendations**, these may help to deal with some cases and shall be consulted (<https://www.ams.usda.gov/rules-regulations/organic/nosb/recommendations>).

在查阅有机法规（标题7 C.F.R. 第205部分）时，SRS工作人员及客户应使用在线版本，以确保适用最新修订的规则。这些更新的规则可在<https://www.ams.usda.gov/rules-regulations/organic> 查阅。国家清单尤其会频繁变更，网址为 <https://www.ams.usda.gov/rules-regulations/organic/national-list>，SRS必须密切关注。在NOP无相关规定时，应查阅项目手册以获取信息。在某些情况下，NOP已要求标准委员会（NOSB）制定NOSB建议，这些建议有助于处理相关问题，且应予以参考（<https://www.ams.usda.gov/rules-regulations/organic/nosb/recommendations>）。

- 3.5 Management of documents and the management of records are described in **SOP-8 Control of Documents** and **SOP-9 Control of Records**, both apply to NOP. The index of documents, **S8-F1** shows which documents relate to NOP. Records related to certification work are maintained for at least 10 years. 文件管理与记录管理详见**SOP-8 文件控制**和**SOP-9 记录控制**，二者均适用于NOP。文件索引**S8-F1**列示了与NOP相关的文件。与认证工作相关的记录应至少保存10年。

## 4. Inspection and Certification Work

### 检查与认证工作

- 4.1 The certification process is described in **SOP-6 Certification Process**. For the following steps of the process, separate policies and work instructions exist, all apply to NOP. 认证流程详见**SOP-6 认证程序**。对于后续步骤，设有独立政策和工作指导，均适用于NOP。

- a) Making cost estimates 制定成本估算: S6-Pol2
- b) ODP review ODP审核: ORG-Wi1.5
- c) Organic inspections 有机检查: ORG-Wi1.2
- d) Unannounced inspections 非通知检查: ORG-Wi6
- e) Sampling and testing 采样与检测: ORG-Pol2
- f) Material review NOP 材料评审: ORG-Pol4
- g) Seed and planting material 种子及繁殖材料: ORG-Pol-5
- h) Group certification 团体认证: ORG-Pol-6
- i) Pesticide residues handling 农药残留处理: ORG-Wi2
- k) Review and certification 复核与认证: ORG-Wi7
- l) Review of labels 标签审核: ORG-T6.2
- m) Amending certificates 证书修改: S6-Wi8

In addition to the policies and instructions of SRS, for the purpose of certification, the NOP **Noncompliance and Adverse Actions Flow Chart** and the **4002 Penalty Matrix** will be consulted.

除SRS的政策和指令外，认证时还应参考NOP违规与不利措施流程图及4002罚则矩阵。

- 4.2 Once an operation is certified, or a certificate has been updated, this information shall be entered into the USDA Organic Integrity Database (OID) in a timely manner and the generated certificate and operation profile are downloaded and filed in the respective operator's folder. In cases where certificates are suspended, revoked or surrendered the respective entry in the OID must be updated within 72 hours of the notification<sup>1</sup>.

当操作者实体获得认证，或证书得到更新，应将该信息及时录入美国农业部有机诚信数据库（OID），并将生成的证书及操作者档案下载归档至相应操作者的文件夹中。当证书被暂停、撤销或放弃后，应在通知的72小时内更新OID中相应记录<sup>1</sup>。

- 4.3 NOP determines that annual inspections for maintenance of certification must be conducted once every calendar year.

国家有机计划（NOP）规定，应至少在每个公历年度执行一次年度检查（再认证）。

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<sup>1</sup> §205.662(e)(3)

- 4.4 Procedures **SOP-7 Handling of Complaints** rules how SRS deals with complaints, appeals, and allegations.  
**SOP-7 投诉处理程序**规定了SRS在处理申诉、投诉及争议时的具体程序。
- 4.5 The use of the USDA logo or marks by its customers, implying that a product is produced organically, must be reviewed by SRS. **SOP-1 Use of Certificates and Marks** is implemented with relation to NOP certification. Clients sign a contract (**S6-Con1**) to ensure they are aware of the requirement as determined by OFPA §6505 (1) and (2).  
客户在使用包含USDA的标志或标识、暗示产品为有机生产前，应通过SRS的审查。**SOP-1 证书与标识使用规范**依据NOP认证要求实施。客户须签署**S6-Con1 认证合同**，以确认其了解《有机食品生产法》(OFPA) §6505 (1) 与(2)条款的相关要求。
- 4.6 If investigations become necessary following the receipt of complaints, the NOP Administrator needs to be informed.  
如因收到投诉需进行调查，须及时通知NOP项目专员。
- 4.7 Some cases of residue detections must be reported to the USA, Food and Drug Administration (FDA) or to the Environmental Protection Agency (EPA), respective rules and SRS procedures can be found in **ORG-Wi2 Residue Handling – NOP**.  
部分农药残留检测案例必须报告美国食品药品监督管理局（FDA）或环境保护署（EPA），具体规定及SRS程序详见**ORG-Wi2 农药残留处理– NOP**。
- 4.8 When certified operations sell organic product to the US, Import Certificates are mandatory. Operators apply to SRS and SRS will use the OID to generate the document, **ORG-Wi8 Issuance of Transaction Certificates** explains the specific procedures.  
认证操作者向美国销售有机产品时，必须提供进口证明。操作者向SRS提出申请，SRS将通过OID生成相关文件，具体程序详见**ORG-Wi8 签发交易证书**。

## 5. Organic Trade Arrangements

### 有机贸易协定

- 5.1 The most common type of organic trade arrangement that USDA has with states or communities of states (EU, Taiwan, Japan, Korea, Switzerland, UK) is an

organic equivalency agreement. It is important to note, that these trade arrangements do not include third countries, i.e. a product certified NOP but produced outside of a country with which a trade arrangement exists cannot be accepted as equivalent under the arrangement. However, such products, when used as raw material and further processed in the “equivalent country”, may qualify after processing. The current list of (communities of) states including information on the respective agreement, e.g. on the scope and terms, can be accessed at: <https://www.ams.usda.gov/services/organic-certification/international-trade>.

美国农业部（USDA）与各州或州际社区（欧盟、台湾、日本、韩国、瑞士、英国）之间最常见的有机贸易安排为有机等效协议。需注意的是，这些贸易安排不涵盖第三国，即经过NOP认证但原产自与贸易协定国之外的产品，不能根据该协定被视为等效。然而，当这类产品作为原料，且在“等效国家”经进一步加工后，可能符合资格。当前（州或州际社区）名单及相关协议信息（例如范围和条款）可通过以下链接获取：<https://www.ams.usda.gov/services/organic-certification/international-trade>。

5.2 Trade arrangement with regard to export of NOP certified products from the USA does not affect the work of SRS as SRS does not certify operations in the United States of America.

针对美国出口的NOP认证产品的贸易协定不影响SRS的工作，因为SRS不对美国境内的操作主体进行认证。

5.3 The US-Canadian equivalency arrangement is of special importance because all USDA certified organic products are eligible for trade under the equivalence agreement with Canada, including third countries (for exceptions see below link). Also aquatic plants are eligible for USDA organic certification under the crop standards (see [Policy Memo 12-1](#) of NOP Handbook) and may be sold or marketed as organic in Canada. However, there are some stipulations. In order to be sold, labeled or represented as organic in Canada, NOP organic products must meet the following additional requirements (see <https://inspection.canada.ca/organic-products/guidance-documents/us-canada-organic-equivalency-arrangement/eng/1598281316410/1598281317018>):

美加有机等效协定具有特殊重要性，因为所有 USDA 认证的有机产品均有资格依据与加拿大的等效协定进行贸易，包括第三国（例外情况见下方链接）。此

外，根据作物标准（参见 **NOP 手册第12-1号政策备忘录**），水生植物有资格获得USDA有机认证，并可在加拿大作为有机产品进行销售或宣传，但存在若干限制。当在加拿大销售、标示或宣传有机产品时，NOP 有机产品必须满足以下附加要求（参见 <https://inspection.canada.ca/organic-products/guidance-documents/us-canada-organic-equivalency-arrangement/eng/1598281316410/1598281317018>）：

- Agricultural products produced with the use of sodium nitrate shall not be sold or marketed as organic in Canada.  
使用硝酸钠生产的农产品**不得**在加拿大作为有机产品销售或宣传。
- Agricultural products produced by hydroponic or aeroponic production methods shall not be sold or marketed as organic in Canada.  
采用水培或气培生产方法生产的农产品**不得**在加拿大作为有机产品销售或宣传。
- Agricultural products derived from animals (with the exception of ruminants) must be produced according to livestock stocking rates as set out in the most recent version of Canadian organic regulations (CAN/CGSB32.310).  
除反刍动物外，动物来源的农产品**必须**按照最新版本的加拿大有机法规（CAN/CGSB32.310）中规定的畜禽放养密度进行生产。

5.3.1 Operators are requested by SRS to list all countries they might want to export to in their Organic Project Description (OPD), part G (**ORG-F3 series**).

Operators who list Canada as one of the countries must answer additional questions and demonstrate that their products fulfil the additional requirements. This will be verified by the SRS inspector during the inspection.

SRS要求操作者在其有机项目说明（OPD）G部分（**ORG-F3系列**）中列出所有拟出口的国家。将加拿大列为拟出口国家之一的操作者，必须回答额外问题并证明其产品符合附加要求。SRS检查员将在检查过程中对此进行核实。

5.3.2 NOP organic products exported to Canada must be accompanied by an organic certificate issued by a USDA-accredited certifying agent recognized under the terms of the U.S.-Canada equivalence arrangement (USCOEA). When compliance criteria are met, the NOP organic certificate (ORG-T3.2) that is issued by SRS to operators who might export to Canada will include the following attestation statement: “Certified in accordance with the terms of

the U.S.-Canada Organic Equivalency Arrangement.”

出口至加拿大的NOP有机产品必须附有由根据美加有机等效安排条款

（USCOEA）认可的美国农业部（USDA）授权的认证机构出具的有机证书。

在满足合规标准的情况下，SRS向拟出口至加拿大的操作者颁发的NOP有机证书（ORG-T3.2）将包含以下认证声明：“依据美加有机等效协定条款认证。”

### 5.3.3 All product labels for exports to Canada must be in English and in French.

Under USCOAE, the USDA as well as the Canadian organic logo maybe used (though voluntary). Labelling rules for Canada can be found at

<https://inspection.canada.ca/food-labels/labelling/industry/organic-claims/eng/1623967517085/1623967517522?chap=5>

所有出口至加拿大的产品标签必须使用英语和法语。根据美加有机等效协定，可使用USDA及加拿大有机标志（自愿）。加拿大的标签规则可查阅：

<https://inspection.canada.ca/food-labels/labelling/industry/organic-claims/eng/1623967517085/1623967517522?chap=5>

### 5.4 A trade arrangement which existed between the USDA and the Indian government terminated on July 12, 2022, after an 18-month transitional period. It is important to note, that NPOP (National Programme for Organic Production of India) certified products which did not enter the NOP chain before July 12, 2022 can no longer be sold to the US as organic. And since that date all organic products produced in India must be certified by an NOP accredited certification agency (ACA), as is the case for all other countries without a trade arrangement. However, NOP established special oversight for ACAs active in India, which includes additional requirements:

在经历18个月的过渡期后，美国农业部（USDA）与印度政府之间的贸易协定于2022年7月12日终止。需要特别注意的是，未于2022年7月12日前进入美国国家有机计划（NOP）体系的印度国家有机生产项目（NPOP）认证产品，现已不得作为有机产品销往美国。自该日期起，印度生产的所有有机产品必须通过由美国国家有机计划（NOP）认可的认证机构（ACA）进行认证，此规定与所有无贸易协定的国家一致。然而，NOP对在印度运营的认可认证机构实施了特别监督，包含以下额外要求：

- reporting of active staff

报告活跃工作人员情况

- reporting of applicable policies and procedures, including a procedure for verification of documents for shipment of organic produce and issuance of TCs  
报告适用政策和程序，包括有机农产品运输单证核验及交易证书（TC）签发程序
- issuance of transaction certificates for shipments of organic products to the US  
为出口至美国的有机产品运输批次签发交易证书（TC）
- reporting of all positive test results of samples taken at Indian organic operations  
报告印度有机作业中采样的所有阳性检测结果
- testing of soybean meal before shipment.  
在发运前对豆粕进行检测。

Further and current information on requirements and rules for offering NOP in India can be found on the USDA website at

<https://www.ams.usda.gov/services/organic-certification/international-trade/India>.

有关在印度提供美国有机产品规范（NOP）服务的最新要求和规则，敬请访问美国农业部网站。