Global Market Access

Program Manual

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INTRODUCTION

The market for organic products continues to grow worldwide. CCOF has developed the Global Market Access (GMA) program, described in this manual, to provide CCOF clients with compliance review to export arrangements between the USDA National Organic Program (NOP) or Canada Organic Regime (COR) and various foreign governmental bodies. Our GMA program currently offers NOP certified operations equivalence verification for export to Canada, the European Union (EU), the United Kingdom (UK), Switzerland, Japan, Korea, and Taiwan, and COR certified operations equivalence verification for export to the US, the EU, the UK, Switzerland, Japan, and Taiwan.

While the equivalence agreements dramatically simplify the organic regulations for producers of exported products certified to NOP or COR regulations, there are some critical variances and labeling requirements in the agreements that entail certifier review and approval. This program is designed to allow CCOF clients to receive the service and support they need to ensure seamless export of their products.

This manual contains information on exporting from the US to Canada, the EU, the UK, Switzerland, Japan, Korea, and Taiwan, from Mexico to Canada, and from Canada to the US, the EU, the UK, Switzerland, Japan, and Taiwan including additional production and labeling requirements. Please review this manual carefully for each export market that applies to your operation. If you are exporting your products to other markets, or from origins outside the US or Canada, please contact CCOF to discuss what your operation needs to do.

As foreign countries develop new mandatory national regulations and export requirements change, CCOF continues to modify and expand our GMA program to ensure foreign market access.

For additional information about the NOP organic equivalences, please visit: https://www.ams.usda.gov/services/organic-certification/international-trade

For additional information about the COR organic equivalences, please visit: https://inspection.canada.ca/en/food-labels/organic-products/equivalence-arrangements

SECTION ONE: FREQUENTLY ASKED QUESTIONS

Q1: HOW MUCH DOES THE CCOF GMA PROGRAM COST?

A1: To be the most cost efficient for operations that are shipping to limited export markets, CCOF only charges operations that are exporting products directly, or that grow or handle products to be exported that need additional verification to meet the critical variance of that market. Operations are only charged for those markets for which they require verification.

- Canada (from US or Mexico), EU & UK, Switzerland, Japan, Korea, Taiwan, US (from Canada): $300 annually each
- EU & UK wine, Switzerland wine: $750 annually each

The annual fees are due at the time of initial application (regardless of compliance outcome) and due January 1 every year after.

There are additional Transaction Certificate fees for certificates issued under this program, per the CCOF Certification Services Program Manual.

Q2: IS MY OPERATION ELIGIBLE FOR THE CCOF GMA PROGRAM?

A2: All operations currently certified by or applying for NOP or COR certification with CCOF are eligible for the CCOF GMA program, with the following exceptions:

- If you are a broker/trader and your products are shipped directly from a foreign supplier to the export buyer without first coming to the US or Canada, they are not eligible for the US or Canada equivalence arrangements with the EU, UK, Switzerland, Japan, Korea or Taiwan. These terms of these arrangements require that the products have final processing or packaging in the US or Canada prior to export.
- If your operation is located in Mexico and shipping directly to the EU, UK, Switzerland, Japan, Korea, or Taiwan, you are not eligible to enroll in the CCOF Global Market Access program for these markets. Mexico does not have

equivalence arrangements with these markets and the US equivalences only apply to operations located in the United States. You must apply for certification to these regulations with an accredited certifier.

- If your operation is located in Mexico and you export to Canada, CCOF reviews your products to the US/Canada equivalence arrangement under the GMA program. Currently, the CCOF GMA program does not include the Canada/Mexico Organic Equivalency Arrangement (CMOEA) as CCOF certifies organic products in Mexico with full compliance to both USDA NOP and LPO regulations.
- If your operation is located in Canada and you are interested in exporting products to Costa Rica, South Korea, or Mexico, please contact export@ccof.org. Currently, the CCOF GMA program does not offer these markets due to the lack of sufficient demand from clients.
- If your operation is located in Mexico, you need to enroll in the Mexico Compliance program.
- If your operation is located in the United States and you are exporting products to Mexico or work with a buyer who requires certification to the Mexican organic regulations, you need to enroll in the Mexico Compliance program.
- Additional restrictions for each equivalence are outlined in the equivalence-specific sections in Section Two of this manual.

Q3: WHO NEEDS TO BE ENROLLED IN THE CCOF GMA PROGRAM?

A3: You should enroll in the CCOF GMA program if you do any of the following:

- Export USDA NOP certified organic products to Canada, the EU, the UK, Switzerland, Japan, Korea, or Taiwan from the US.
- Export USDA NOP certified organic products to Canada from Mexico.
- Export COR certified organic products to the US, the EU, the UK, Switzerland, Japan, or Taiwan from Canada.
- Design labels for products that are sold in Canada, the EU, the UK, Switzerland, Japan, Korea, or Taiwan.
- Produce wine exported to the EU, the UK or Switzerland from the US.
- Sell CCOF certified organic products to any buyer who requires international verification of certification.

Q4: DOES MY OPERATION HAVE TO BE NOP OR COR CERTIFIED IF I ONLY WANT TO EXPORT PRODUCTS ABROAD?

A4: Yes. All operations must first be certified according to the NOP or COR regulations before the CCOF GMA program can apply. Operations that export to the United States from Canada must be certified organic entities to comply with US requirements, even though the COR regulations do not require exporters to be certified.

Q5: DOES MY SHIPMENT REQUIRE A TRANSACTION CERTIFICATE?

A5: Most products being shipped to a market under a USDA NOP or CFIA COR Organic Equivalence Arrangement must be accompanied by a Transaction Certificate, also referred to as a Certificate of Inspection (COI), import certificate or export certificate. These certificates are specific to the market and must be issued by CCOF.

CCOF issues operations certified to a GMA program an organic certificate addendum that describes the equivalence arrangements they are compliant with. This certificate addendum, referred to as the GMA certificate, is given to buyers along with the Transaction Certificate. The Client Profile Addendum indicates the specific products approved for each market.

EU, UK, Switzerland, Japan, Korea, Taiwan: A shipment specific Transaction Certificate is required for each shipment to any of these locations.

United States: An NOP Import Certificate is required for exports to the US. This document may be issued for a single shipment or may cover multiple shipments during a specific timeframe. Each certificate covers one commodity and one Harmonized Tarriff System (HTS) code.

Canada: Provide your Canadian importer digital copies of your NOP Certificate, GMA Certificate, and Client Profile. Your importer will upload these certificates to the Canadian import database.

Q6: HOW DO I OBTAIN TRANSACTION CERTIFICATES FROM CCOF?

A6: CCOF provides Transaction Certificates only to clients enrolled in the GMA program for the corresponding market and products reviewed as compliant. CCOF strives to process Transaction Certificate requests within 5 business days of receipt. Submit requests as early as possible to avoid delays. CCOF offers a Same-Day and Two-Business-Day Rush Review service for an additional fee. Transaction Certificate fees, Rush Service fees and terms, and shipping fees, when applicable, can be found in the Certification Services Program Manual.

Transaction Certificates for Great Britain (England, Scotland, Wales), Japan, Korea, and Taiwan may be requested by accessing the Export Certificate Request Packet at www.ccof.org/export for the specified market and submitting the completed packet to export@ccof.org. Transaction Certificates for Great Britain must be approved by CCOF *before* the shipment leaves the US or Canada.

Transaction Certificates for the EU, Switzerland or Northern Ireland are electronic only and processed in TRACES. The Certificate of Inspection (COI) must be authorized by CCOF *before* the shipment leaves the US or Canada, per EU regulation 2021/2306. CCOF is not permitted to issue COIs for shipments that have already departed from the US or Canada. Consignments that depart before obtaining an authorized COI are denied entry or have the organic status removed by the EU or Swiss border control authorities. Review our TRACES COI Request Instructions and email export@ccof.org for assistance.

Q7: WHAT ARE THE LABELING REQUIREMENTS FOR EXPORTED PRODUCTS?

A7: Labels must meet the organic labeling requirements of the destination market. Canada, the EU, the UK, Switzerland, Japan, Korea, and Taiwan all have specific labeling requirements, explained in detail in the CCOF International Market Labeling Guide. US labeling requirements are outlined in the Organic Labeling Guidelines available at www.ccof.org/resources/labeling-logos/. All labels should be submitted to CCOF for approval prior to printing. The fees charged for each export market verification include the review of labels to ensure compliance with the export market requirements. When submitting labels for review, indicate the export market on the Product Application, H2.6 Broker Suppliers list, or in the email body.

Various products may also be subject to national regulations and laws regarding food labeling or other standards. CCOF strongly recommends working with your importer to ensure compliance to all food labeling requirements for the destination market.

Q8: HOW DO I OBTAIN CCOF GMA VERIFICATION?

A8: Submit the CCOF GMA application or GMA Wine Application indicating your desired export markets. CCOF performs a desk audit of your operation and issues a Certificate of Compliance, otherwise called GMA Certificate, for the equivalence arrangements that you comply with.

Q9: WHAT ELSE DO I NEED TO KNOW ABOUT INTERNATIONAL EXPORTS?

A9: In addition to the requirements of governmental bodies, some buyers may desire direct governmental certification, such as to JAS in Japan. While the need for certification with regulations in addition to those described in this manual are uncommon, CCOF has worked to develop programs and partnerships to provide the necessary documentation where possible. If you believe that you need additional export documentation other than what is provided by the CCOF GMA program, please contact CCOF at export@ccof.org to discuss your needs.

Additionally, please note that organic regulation agreements do not negate the need to meet foreign market labeling laws or other food or fiber regulations that may affect labeling, product composition, or other aspects of your products. CCOF is only qualified to address organic regulation issues.

SECTION TWO: EXPORT ARRANGEMENTS & REQUIREMENTS BY FOREIGN MARKET

PART A: CANADA/US

The Canadian Food Inspection Agency (CFIA) and USDA NOP organic regulation equivalence arrangement establishes the regulations of the two countries as equivalent, with the exception of some critical variances that must be addressed in the certification and/or import/export process. For CCOF operations certified to either the NOP or COR regulations, the CCOF GMA program documents compliance with the US/Canada Organic Equivalence Arrangement.

All NOP or COR certified products crossing the borders into Canada or the US must be accompanied by an attestation statement that the product has been produced in accordance with the terms of the US/Canada Organic Equivalence Arrangement, including having met the critical variances, described below. This attestation statement must be provided by the certifier (CCOF) and must accompany all shipments of organic products exported through this equivalence. For NOP operations, the attestation statement must be displayed on the organic certificate or associated documents. The CCOF GMA program organic certificate addendum fulfills the attestation requirement, and a digital copy must be provided to the importer for upload into the Canadian import system AIRs. For COR certified operations, the attestation statement must also appear on the NOP Import Certificate required for entry into the US.

All ingredients in products destined for Canada or the US must be certified or equivalent to the regulations of the Canadian Organic Regime (COR) or National Organic Program (NOP), for the final product to receive GMA compliance for the US/Canada Equivalence.

Canada Labeling Requirements:

All labels for organic products sold in Canada must be labeled in full compliance with Canadian labeling requirements. All labels must be approved by CCOF prior to printing. Requirements for labeling organic products for export to Canada can be found in the CCOF International Market Labeling Guide.

US Labeling Requirements:

All labels for organic products sold in the US must be labeled in full compliance with US labeling requirements. All labels must be approved by CCOF prior to printing. Requirements for labeling organic products for export to the US can be found on the CCOF website at www.ccof.org/resources/labeling-logos/.

Requirements for Product Entering Canada from the US:
To be eligible for export to Canada, USDA certified organic products must:

- Be raised or produced in the United States; or
- Have final processing or packaging occur within the United States; or
- Be produced or have the final processing or packaging occur within a third country in compliance with the terms of this arrangement.
    - The U.S.-Canada organic equivalence arrangement (USCOEA) does not extend to the USDA recognition agreements with Israel and New Zealand. USDA organic products certified by Israel and New Zealand accredited certification bodies are for direct export to the U.S. only.

The following are additional requirements certified organic products exported to Canada:

- Sodium nitrate may not be used to produce products.
- Hydroponic or aeroponic production methods may not be used to produce products.
- Nonruminant animals must be produced according to livestock stocking rates as set out in the Canadian organic regulations, CAN /CGSB32.310 (outlined in the table below).

If a portion of the crops are produced without the use of sodium nitrate, they must be segregated from crops produced using sodium nitrate. Fields are not required to undergo transition after the use of sodium nitrate.

If you source products or ingredients that will be exported to Canada, they must be verified as meeting the terms of the equivalence. Many crops are not at risk of being grown using one of the production techniques outlined as a critical variance. To ensure the Equivalence Arrangement verification process is as simple and efficient as possible, CCOF has created a list of crops that are at high risk of being grown using one of the prohibited production techniques, available at www.ccof.org/canada.

- Suppliers of high risk crops: If ingredients are high risk, you must provide certifier verification or a supplier self-attestation that the crops were grown without the use of sodium nitrate and/or hydroponic or aeroponic production.
- Suppliers of crops not identified as high risk: If ingredients are not high risk, CCOF will not seek additional documentation that the crops meet the critical variances, a USDA NOP organic certificate is sufficient.
- Suppliers of non-ruminant livestock products: All livestock products from non-ruminants, such as eggs from poultry, must be verified as having met the stocking density critical variance. You must provide certifier verification or supplier self-attestation.
- Suppliers of ruminant livestock products: CCOF will not seek additional documentation, a USDA NOP organic certificate is sufficient.

	Canadian Measurement	US Equivalent	Canadian Measurement	US Equivalent
Livestock	**Indoor Space**		**Outdoor Runs and Pens**	
SWINE				
Sows and piglets up to 40 days old	7.5 m^2 for each sow and litter	81 sq. ft. for each sow and litter	Not required	Not required
Growing pigs up to 30 kg. (66lb)	0.6 m^2/head	6.5 sq ft/head	0.4 m^2/head	4.3 sq ft/head
Growing pigs 30 – 50 kg. (66lb -110lb)	0.8 m^2/head	8.6 sq ft/head	0.6 m^2/head	6.5 sq ft/head
Growing pigs 50 – 85 kg. (110lb – 187lb)	1.1 m^2/head	12 sq ft/head	0.8 m^2/head	8.6 sq ft/head
Growing pigs > 85 kg (> 187lb)	1.3 m^2/head	14 sq ft/head	1.0 m^2/head	10.76 sq ft/head
Sows in group pens	3 m^2/head	32.3 sq ft/head	3 m^2/head	32.3 sq ft/head
Boars in individual pens	9 m^2/head	97 sq ft/head	9 m^2/head	97 sq ft/head
POULTRY				
Laying hens	6 birds/1 m^2	6 birds/10.76 sq ft	4 birds/1 m^2	4 birds/10.76 sq ft
Pullets 0-8 weeks	24 birds/1 m^2	24 birds/10.76 sq ft	16 birds/1 m^2	16 birds/10.76 sq ft
Pullets 9-18 weeks	15 birds/1 m^2	15 birds/10.76 sq ft	10 birds/1 m^2	10 birds/10.76 sq ft
Broilers	Maximum 21 kg/1m^2	4.3 lb /1 sq ft	21 kg/1 m^2	4.3 lb/1 sq ft
Turkeys, geese and large birds	Maximum 26 kg/1m^2	5.3 lb /1 sq ft	17 kg/1m^2	3.5 lb/sq ft
PASTURED POULTRY	**Mobile Housing**		**Outdoor - Pasture**	
Laying hens	6 birds/1 m^2	6 birds/10.76 sq ft	2000 birds /hectare	800 birds/acre
Broilers	Maximum 21 kg/1m^2	4.3 lb /1 sq ft	2500 birds /hectare	1000 birds/acre
Large birds	Maximum 26 kg/1m^2	5.3 lb /1 sq ft	1300 birds /hectare	540 birds/acre
RABBITS				
From weaning to slaughters	0.3 m^2/head	3.23 sq ft/head	2 m^2/head	22 sq ft/head
Pregnant does	0.5 m^2/head	5.4 sq ft/head	2 m^2/head	22 sq ft/head
Does and offspring	0.7 m^2 of floor space /doe and offspring	7.5 sq ft of floor space /doe and offspring	2 m^2/head	21.5 sq ft/head
Bucks	0.3 m^2/head	3.23 sq ft/head	2 m^2/head	22 sq ft/head
PASTURED RABBITS	**Mobile Housing**		**Outdoor - Pasture**	

	Canadian Measurement	US Equivalent	Canadian Measurement	US Equivalent
Livestock	**Indoor Space**		**Outdoor Runs and Pens**	
From weaning to slaughter	0.4 m^2/head	4.3 sq ft/head	5 m^2/head	54 sq ft/head
Pregnant does	0.5 m^2/head	5.4 sq ft/head	5 m^2/head	54 sq ft/head
Does and offspring	0.4 m^2/head in shelter 2.4 m^2 for grazing area	4.3 sq ft/head in shelter 26 sq ft for grazing areas	Not applicable	Not applicable
Bucks	0.4 m^2/head	4.3 sq ft/head	5 m^2/head	54 sq ft/head

Commodities such as cosmetics, pet food, and natural health products are outside the scope of the Canada Organic Regime overseen by the CFIA and therefore the equivalence arrangement. These products cannot bear the Canada Organic Logo or refer to the Canadian Organic Regime. However, they may be sold in Canada as USDA NOP certified and bear the USDA seal.

Requirements for Product Entering the US from Canada:

To be eligible for export to the U.S., COR certified organic products must:

- Be raised or produced in Canada; or
- Have final processing or packaging occur within Canada; or
- Be produced or have the final processing or packaging occur within a third country in compliance with the terms of this arrangement.
    - Canada signed a Memorandum of Understanding with Mexico recognizing the two national organic systems as equivalent. Mexican organic products certified to the Mexican organic standard and imported to Canada cannot be re-exported to the U.S. or used as ingredients in products destined for the U.S. market under the U.S.-Canada Organic Equivalency Arrangement.

All livestock and livestock products must:

- Be produced without the use of antibiotics.

PART B: EUROPEAN UNION AND UNITED KINGDOM

The USDA NOP and CFIA COR have both established organic regulation equivalence arrangements with the European Union Commission. The USDA and CFIA COR have also established organic regulation equivalence arrangements with the UK's Department for Environment, Food & Rural Affairs (DEFRA). The UK retains the EU 834/2007 regulations after its exit from the EU, until full implementation of the UK regulations come into force. Because of these similarities, CCOF reviews to both the EU and UK equivalences at this time. If the UK regulation differs from the EU regulations, operations exporting to the UK must undergo an additional review.

These arrangements establish the regulations of the US and Canada as equivalent with the EU and UK regulations, with the exception of some critical variances that must be addressed in the certification and/or import/export process.

European Union Member States may interpret the EU regulations in different ways, which may result in some countries requiring additional documentation without prior notice. CCOF works to prevent situations like this and works with you and your importer to solve any requests of this nature.

European Union (EU) Labeling Requirements:

All retail labels for organic products sold in the EU are required to display the certifier control number. All labels for organic products sold in the EU must be labeled in full compliance with EU labeling requirements. All labels must be approved by CCOF prior to printing. Requirements for labeling organic products for export to the EU can be found in the CCOF International Market Labeling Guide.

United Kingdon (UK) Labeling Requirements:

All retail labels for organic products sold in the UK are required to display the certifier control number. All labels for organic products sold in the UK must be labeled in full compliance with UK labeling requirements. All labels must be approved by

CCOF prior to printing. Requirements for labeling organic products for export to the UK can be found in the CCOF International Market Labeling Guide.

Requirements for products entering the EU from the US:

- Products must be produced or have had their final processing[1] occur within the U.S.
  - 'Processing' means cooking, baking, curing, heating, drying, mixing, grinding, churning, separating, extracting, slaughtering, cutting, fermenting, distilling, eviscerating, preserving, dehydrating, freezing, chilling, or otherwise manufacturing and includes the packaging, canning, jarring, or otherwise enclosing food in a container.
- Organic wine and wine "made with organic grapes" must meet the following criteria:
  - Contains 100 percent organic grapes and organic ingredients. Non-organic substances not allowed under NOP 205.605 are prohibited.
  - Have been produced only using the winemaking practices and substances detailed in the EU organic regulations (EU) 2018/848, (EU) 2021/1165, and outlined below.

Operations exporting NOP wine to the EU must complete the GMA Wine Approval Application.

Wine Production Material/ Practice	EU status	EU regulation reference
Casein, Egg albumin, Gelatin, Gum Arabic, Tannins, Pea protein, Potato protein, Wheat protein, Yeast, Yeast extracts	Must be organic when commercially available	(EU) 2021/1165 Annex V Part D
Aleppo pine resin, Potassium Acid Tartrate (Cream of Tartar)	Allowed	(EU) 2021/1165 Annex V Part D
Nonorganic agricultural ingredients/processing aids not listed above	Prohibited	(EU) 2021/1165 Annex V Part D
Nonorganic flavors (other than pieces of oak)	Prohibited	(EU) 2021/1165 Annex V Part D
Enzymes (other than Cellulase, Hemicellulase, Pectin lyases, Pectin methylesterase, Polygalacturonase)	Prohibited	(EU) 2021/1165 Annex V Part D
Partial dealcoholisation of wine	Prohibited	(EU) 2018/848 Annex II Part VI 3.2(d)
Electrodialysis treatment	Prohibited	(EU) 2018/848 Annex II Part VI 3.2(c)
Treatment with cation exchangers	Prohibited	(EU) 2018/848 Annex II Part VI 3.2(e)
Partial concentration through cooling	Prohibited	(EU) 2018/848 Annex II Part VI 3.2(a)
Elimination of sulphur dioxide by physical processes	Prohibited	(EU) 2018/848 Annex II Part VI 3.2(b)
Centrifuging and filtration with or without an inert filtering agent	Restricted: the size of the pores shall be not smaller than 0.2 micrometer	(EU) 2018/848 Annex II Part VI 3.3 (b)
Heat treatments	Restricted: temperature shall not exceed 75 °C (167 °F)	(EU) 2018/848 Annex II Part VI 3.3 (a)

Requirements for products entering the EU from Canada:

- Products must be produced or have had their final processing[2] occur within Canada.
  - All unprocessed plant products, live animals or unprocessed animal products and vegetative propagating material and seed for cultivation must be grown in Canada.
  - Processed agricultural products for use as food or feed must be processed in Canada with organically grown ingredients grown in Canada or imported into Canada in accordance with the Organic Products Regulations.

[1] NOP 205.2

[2] Regulation (EC) No 852/2004 Article 2(1)

        - ‘Processing’ means any action that substantially alters the initial product, including heating, smoking, curing, maturing, drying, marinating, extraction, extrusion or a combination of those processes.
        - ‘Unprocessed products’ means foodstuffs that have not undergone processing, and includes products that have been divided, parted, severed, sliced, boned, minced, skinned, ground, cut, cleaned, trimmed, husked, milled, chilled, frozen, deep-frozen or thawed.
        - Products that are only packaged and/or labeled in Canada do not meet the terms of the equivalence arrangement.
- Wine is included in this equivalence and requires no additional verification outside the CCOF GMA Program.

Requirements for products entering the UK from the US:

- Products must be produced or have had their final processing[3] occur within the U.S.
    - ‘Processing’ means cooking, baking, curing, heating, drying, mixing, grinding, churning, separating, extracting, slaughtering, cutting, fermenting, distilling, eviscerating, preserving, dehydrating, freezing, chilling, or otherwise manufacturing and includes the packaging, canning, jarring, or otherwise enclosing food in a container.
- Wine must be produced and labelled according to the organic regulations of the UK.

Operations exporting NOP wine to the UK must complete the GMA Wine Approval Application. Following Brexit, the UK has maintained EU regulations (EC) 834/2007 and (EC) 889/2008 which have since been repealed by the EU. The CCOF GMA Wine Approval program reviews exported wine under the equivalent current EU regulations noted in the table above.

Requirements for products entering the UK from Canada:

- Products must be produced or have had their final processing[4] occur within Canada
    - All unprocessed plant products, live animals or unprocessed animal products and vegetative propagating material and seed for cultivation must be grown in Canada.
    - Processed agricultural products for use as food or feed must be processed[5] in Canada with organically grown ingredients grown in Canada or imported into Canada in accordance with the Organic Products Regulations.
        - ‘Processing' means any action that substantially alters the initial product, including heating, smoking, curing, maturing, drying, marinating, extraction, extrusion or a combination of those processes.
        - 'Unprocessed products' means foodstuffs that have not undergone processing, and includes products that have been divided, parted, severed, sliced, boned, minced, skinned, ground, cut, cleaned, trimmed, husked, milled, chilled, frozen, deep-frozen or thawed.
        - Products that are only packaged and/or labeled in Canada do not meet the terms of the equivalence arrangement.
- Wine is included in this equivalence and requires no additional verification outside the CCOF GMA Program.

PART C: JAPAN

The USDA NOP and CFIA COR have both established organic regulations equivalence arrangements with the Japanese Ministry of Agriculture, Forestry and Fisheries (MAFF). Both arrangements establish the regulations of the US and Canada as equivalent with Japan’s, with no critical variances. For CCOF operations where the final processing or packaging of organic

[3] NOP 205.2

[4] Regulation (EC) No 852/2004 Article 2(1)

[5] Regulation (EC) No 852/2004 Article 2(1)

product occurs in the United States or Canada, the CCOF GMA program documents compliance with the Japan Organic Equivalence Arrangements with the US and Canada.

All ingredients in products destined for Japan must be JAS certified or equivalent for the final product to receive GMA certification for Japan.

Japan Labeling Requirements:

All retail labels for organic products sold in Japan are required to display the JAS seal. The seal may be applied in Japan by a JAS-certified importer or applied in the US or Canada through a consignment contract with a JAS-certified importer. See www.ccof.org/japan for more information about applying the JAS seal and working with certified importers and consignment contracts.

All labels must be approved by CCOF prior to printing. Requirements for labeling organic products for export to Japan can be found in the CCOF International Market Labeling Guide.

Requirements for products entering Japan from the US:

For plant and plant-based products (excluding alcohol beverages) and livestock products:

- Must be grown or produced in the U.S.; **or** have their final processing or packaging occur in the U.S.

For alcohol beverages:

- Must be produced in the U.S.; or have their final processing **and** packaging occur in the U.S.
- "Organic" and "Made with organic grapes" wine processed using sulfites in accordance with 7 CFR part 205.605 may be sold as "organic" in Japan if it complies with all terms of the arrangement. To be exported under the equivalence, these wines must be labelled as "organic", display the JAS seal, and require a TM-11 export certificate.

USDA certified wines labeled as "made with organic grapes" are not regulated by JAS law and can enter the Japanese organic market outside of the equivalence arrangement. They do not require a TM-11 export certificate. They may not display the JAS organic seal or USDA organic seal. Labels may use a certifier seal, provided that it does not include an "organic" claim. See the CCOF Labeling & Logos webpage to download a CCOF seal that does not include the term "organic". Japan has granted a grace period until March 31, 2027, allowing continued use of certifier logos that include the term "organic".

USDA certified livestock feed, honey, products containing over 5% honey, seaweed and other products not regulated by the JAS law can enter the Japanese organic market outside of the equivalence arrangement. They may not display the JAS organic seal and do not require a TM-11 export certificate.

Requirements for products entering Japan from Canada:
To be eligible for export to Japan:

- Products must be produced, processed, or repacked within Canada.

Organic alcohol is included in the terms of this equivalence and may display the JAS organic seal.

Products for which there are no JAS organic standards are not within the scope of this arrangement (e.g., honey, seaweed, livestock feed). These products may be exported to Japan but may not display the JAS seal. COR certified organic livestock feed requires an export certificate.

PART D: KOREA

The Korean Ministry of Agriculture, Food and Rural Affairs (MAFRA) and the USDA NOP organic regulations equivalence arrangement establishes the regulations of the two countries as equivalent for processed foods, as defined in the Korean Organic Food Code, with the exception of some critical variances that must be addressed in the certification and/or import/export process. See www.ccof.org/korea for more information about the processed food definition. For CCOF operations, where the final processing of organic foods occurs in the United States, the CCOF GMA program documents compliance with the US/Korea Organic Equivalence Arrangement.

All ingredients in products destined for Korea must be certified or equivalent to the Korean organic regulations for the final product to receive GMA certification for Korea.

Korean Labeling Requirements:

All labels for organic products sold in Korea must be labeled in full compliance with Korean labeling requirements. All labels must be approved by CCOF prior to printing. Requirements for labeling organic products for export to Korea can be found in the CCOF International Market Labeling Guide.

Requirements for products entering Korea from the US:

- Final processing must occur within the United States.
- Only processed foods, as defined by the Korean Food Code, are allowed to be exported to Korea.

Korean Food Code defines "processed food" as foods, processed and packaged by: adding food or food additives to food ingredients (agricultural, forest, livestock, or fishery products, etc.); transforming into unrecognizable forms (grinding or cutting, etc.); mixing such transformed ones; or adding food or food additives to such mixture. However, this excludes the agricultural/forest/animal/fishery products that are simply cut, peeled, salted, ripened, or heated (except for the purpose of pasteurization or where such treatment causes significant changes to the ingredients) without using food additives or other ingredients, to the extent that their original forms can still be recognized; provided that during such process, there are no concerns about sanitary risks and that the quality of food can be identified organoleptically.

Products may be classified as processed foods if they meet one of the following criteria:

- Classification by addition of food or food additive: Products that have another food or additive added to them.
- Classification by processing: Products that have undergone a processing step as defined above.
- Classification by concern over possible hazards: Minimally processed products that can be consumed right away without cleansing, cooking, etc.

Exporters are encouraged to consult a Korean importer or Korea's National Agricultural Products Quality Management Service (NAQS) if they have questions about whether their product qualifies as a "processed food."

PART E: SWITZERLAND

The USDA NOP and CFIA COR have both established organic regulations equivalence arrangements with the Swiss Federal Office for Agriculture (FOAG). Both arrangements establish the regulations of the US and Canada as equivalent with Switzerland's, with the exception of some critical variances that must be addressed in the certification and/or import/export process. For CCOF operations, where the final processing of organic product occurs in the United States or Canada, the CCOF GMA program documents compliance with the Swiss Organic Equivalence Arrangements with the US and Canada.

All ingredients in products destined for Switzerland must be certified or equivalent to the Swiss regulations, for the final product to receive GMA certification for Switzerland.

- For exports from the US, all NOP certified ingredients, except wine, are automatically considered Swiss equivalent. Wine requires additional equivalence verification.
- For exports from Canada, live or unprocessed agricultural products and vegetative propagating material and seeds for cultivation must be grown in Canada. All COR certified processed agricultural products, including wine, are automatically considered Swiss equivalent.

Swiss Labeling Requirements:

All labels for organic products sold in Switzerland must be labeled in full compliance with Swiss labeling requirements. All labels must be approved by CCOF prior to printing. Requirements for labeling organic products for export to Switzerland can be found in the CCOF International Market Labeling Guide.

Requirements for products entering Switzerland from the US:

- Products must be produced or have had their final processing occur within the U.S.
- Organic wine and wine "made with organic grapes" must meet the following criteria:

- Contains 100 percent organic grapes and organic ingredients. Non-organic substances not allowed under NOP 205.605 are prohibited.
- Have been produced only using the winemaking practices and substances detailed in the Swiss Organic Ordinances, and outlined below:

Wine Production Material/ Practice	Swiss status	Swiss regulation reference
Casein, Egg albumin, Gelatin, Gum Arabic, Tannins, Pea protein, Potato protein, Wheat protein, Yeast, Yeast extracts	Must be organic when commercially available	EAER Ordinance on Organic Farming Article 3b
Aleppo pine resin, Potassium Acid Tartrate (Cream of Tartar)	Allowed	EAER Ordinance on Organic Farming Article 3b
Nonorganic agricultural ingredients/processing aids not listed above	Prohibited	EAER Ordinance on Organic Farming Article 3b
Nonorganic flavors (other than pieces of oak)	Prohibited	EAER Ordinance on Organic Farming Article 3b
Enzymes (other than Cellulase, Hemicellulase, Pectin lyases, Pectin methylesterase, Polygalacturonase)	Prohibited	EAER Ordinance on Organic Farming Article 3b
Partial dealcoholisation of wine	Prohibited	EAER Ordinance on Organic Farming Article 3c
Electrodialysis treatment	Prohibited	EAER Ordinance on Organic Farming Article 3c
Treatment with cation exchangers	Prohibited	EAER Ordinance on Organic Farming Article 3c
Partial concentration through cooling	Prohibited	EAER Ordinance on Organic Farming Article 3c
Elimination of sulphur dioxide by physical processes	Prohibited	EAER Ordinance on Organic Farming Article 3c
Centrifuging and filtration with or without an inert filtering agent	Restricted: the size of the pores shall be not smaller than 0.2 micrometer	EAER Ordinance on Organic Farming Article 3c
Heat treatments	Restricted: temperature shall not exceed 75 °C (167 °F)	EAER Ordinance on Organic Farming Article 3c

PART F: TAIWAN

The USDA NOP and CFIA COR have both established organic regulations equivalency arrangements with the Government of Taiwan**.** Both arrangements establish the regulations of the US and Canada as equivalent with Taiwan's with the exception of a critical variance that must be addressed in the certification and/or import/export process. For CCOF operations, where organic product is raised or grown or where the final processing of organic product occurs in the United States or Canada, the CCOF GMA program documents compliance with the Taiwan Organic Equivalence Arrangements with the US and Canada.

Products sent to Taiwan must meet NOP or COR requirements.

Taiwan Labeling Requirements:

All labels for organic products sold in Taiwan must be labeled in full compliance with Taiwan labeling requirements. All labels must be approved by CCOF prior to printing. Use of Taiwan's organic mark is restricted for use only by Taiwan businesses and may not be applied by US or Canadian exporters. Requirements for labeling organic products for export to Taiwan can be found in the CCOF International Market Labeling Guide.

Requirements for products entering Taiwan from the US:

- Products must be produced or have had their final processing occur within the U.S.
- Single-ingredient honey is not allowed. Organic honey is allowed as an ingredient in products with no limit on the percent content.

Requirements for products entering Taiwan from Canada:

- Products must be produced or have had their final processing occur within Canada.
- Livestock products and processed food products containing livestock ingredients are limited to the Taiwan organic specific scope of livestock. Honey is not covered by the equivalency arrangement.

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