



ORGANIC IMPORT RESPONSIBILITIES CHECKLIST

The NOP Import Certificate follows a specific sequence from the foreign supply chain to U.S. government systems. The physical shipment and the electronic certificate move independently. There is no requirement that a physical copy of the certificate accompany the shipment. Use the checklists below to review the responsibilities of each party to an import transaction.

NOP Import Certificate: Review of Actions and Timing

Action	Responsible Party	Timing
Request NOP Import Certificate	Exporter	Before departure
Issue NOP Import Certificate in OID	Exporter's Certifier	Before departure
Transfer NOP Import Certificate to Importer	Exporter	Before CBP filing deadline
Upload NOP Import Certificate data to ACE	Importer or Customs Broker	Per CBP filing requirements
Certify shipment is associated with a valid NOP Import Certificate	Importer	Upon receipt of shipment
Retain records for inspection	Both Exporter and Importer	For 5 years minimum

Responsibilities of the Exporter:

- ☐ Submit the NOP Import Certificate request to their certifying agent before the shipment departs.
- ☐ Transfer the final NOP Import Certificate to the importer before the importer's CBP filing deadline.
- ☐ Identify all products as organic on all export documents: invoices, packing lists, bills of lading, and CBP entry data.
- ☐ Maintain copies of all NOP Import Certificates and make them available for inspection by NOP and their certifier.
- ☐ Track cumulative volume for time-based certificates so shipments do not exceed the amount authorized on the certificate.
- ☐ Expect NOP Import Certificate records to be audited by their certifier during the annual inspection.



Responsibilities of the Importer:

- ☐ Receive the NOP Import Certificate from the exporter and retain a copy for records.
- ☐ Upload NOP Import Certificate data into CBP-ACE, or delegate this to a licensed customs broker, but the importer remains accountable regardless of who files with CBP.
- ☐ Verify that each shipment received is associated with a valid, finalized NOP Import Certificate, and that its data matches the CBP Entry Summary (Form 7501).
- ☐ Verify that the shipment has not been treated with a prohibited substance or irradiated since export.
- ☐ Maintain copies of all NOP Import Certificates and make them available for inspection by NOP and their certifier.
- ☐ Expect NOP Import Certificate records to be audited by their certifier during the annual inspection.

SOURCES CITED

USDA National Organic Program, [7 CFR 205.273](#).

USDA National Organic Program, [7 CFR 205.103\(b\)\(4\)](#).

U.S. Department of Agriculture, Agricultural Marketing Service. (2026, June). *Strengthening Organic Enforcement Frequently Asked Questions*, "Organic Imports and Import Certificates" section.

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