


July 9, 2015

**TO:** Swiss Control Bodies and Control Authorities  
**FROM:** Miles McEvoy, Deputy Administrator   
**RE:** Exporting Swiss Organic Products to the United States

Beginning July 10, 2015, certified organic products of the United States and Switzerland can be represented as organic in each other's market. This memo provides instructions for Swiss-authorized control bodies to ensure that organic products exported to the United States are within the terms of the U.S. – Switzerland Organic Equivalency Arrangement.

**Terms of the Arrangement.** All products traded under the arrangement must:

1. Be certified organic to the Switzerland Federal Department of Economic Affairs, Education and Research (EAER) Ordinances on Organic Farming and the Labelling of Organically Produced Products and Foodstuffs (910.18) and Organic Farming of 22 September 1997 (910.181) and its regulations ("Swiss Organic Ordinances");
2. Be either grown in Switzerland, produced in Switzerland, or be a product for which final processing or packaging has occurred in Switzerland;
3. For any wine product, be produced and labeled according to the USDA organic regulations; and,
4. For livestock products or any ingredients used in such products, be derived from animals not treated with antibiotics.

**NOP Import Certificate.** Swiss-authorized bodies must complete a National Organic Program (NOP) import certificate for all products traded under the arrangement. Swiss-authorized control bodies must provide the signed NOP import certificates to the certified operation so that it may travel with the product to the United States. Download the NOP import certificate at <http://1.usa.gov/nop-import-certificate> and the instructions at <http://1.usa.gov/nop-import-instructions>.

## Labeling

### *Retail Products*

An overview of the four retail labeling categories recognized by the USDA organic regulations is provided below. All labels of traded retail products must state, "Certified Organic By (insert name of Swiss-authorized control body or authority), and may also include the code assigned to each Swiss-authorized control body or authority.

**Organic products.** Products certified as "organic" in Switzerland and are within the scope of the equivalency arrangement may be labeled as "organic" in the United States. Products may include the USDA organic seal.

**100 percent organic products.** Products that are certified as “organic” in Switzerland, are within the scope of the equivalency arrangement, use only organic processing aids, and contain 100 percent organic ingredients may be labeled as “100 percent organic” in the United States. Products may include the USDA organic seal.

**“Made with” organic products.** Products that contain 70 – 95 percent organic ingredients and are within the scope of the equivalency arrangement may include the statement, “made with organic (insert specified organic ingredient or category)” on the principle display panel. For example, a bag of tortilla chips that contains at least 70 percent organic corn; non-organic, non-GMO canola oil; and salt may be labeled “made with organic corn.” These products may not be labeled with the USDA organic seal. More information about the “made with organic” labeling category is available in [Guidance 5032](#) in the NOP Handbook.

**Less than 70 percent organic products.** Products that contain less than 70 percent organic ingredients may not be traded under the arrangement.

#### *Wholesale Products*

The name of the Swiss-authorized control body is not required to be stated on wholesale containers. However, lot numbers must be displayed that allows for a complete audit trail to verify the product’s identity.

For more information on each of the labeling categories, please review the labeling section of the USDA organic regulations: <http://bit.ly/organic-labeling-regulations>.

#### **Wine**

Swiss organic wine may be exported to the United States under the arrangement if it meets the criteria for the labeling categories described below:

**Organic wine.** Substances not listed under 7 CFR 205.605 are prohibited. A Swiss control body must verify that prohibited substances, such as sulfur dioxide or potassium metabisulphite, were not added to the wine. Wine meeting this criteria may be exported to the U.S. under the arrangement and labeled with the USDA organic seal.

**Wine “made with” organic grapes.** Sulfur dioxide may be used in wine labeled as “made with” organic grapes. A Swiss control body must verify that the total sulfite concentration does not exceed 100 parts per million. Substances not listed under 7 CFR 205.605, such as potassium metabisulphite, are prohibited and may not be used. Wine meeting these criteria may be exported to the United States under the arrangement. The front label may state, “made with organic grapes,” provided that the statement appears in letters that do not exceed one-half of the largest type size on the panel. The USDA organic seal must not be used.

All wine sold in the United States must be approved by the Alcohol and Tobacco Tax and Trade Bureau. Application information is available at <http://bit.ly/organic-alcohol>.