

## Strengthening Organic Enforcement: Certificates of Organic Operation and the Organic Integrity Database

The Strengthening Organic Enforcement (SOE) final rule updates how information about organic operations is generated and shared. The rule requires that certifiers:

- Generate standardized certificates of organic operation using USDA’s Organic Integrity Database (INTEGRITY); and
- Maintain up-to-date operation profiles in INTEGRITY.

These updates support organic integrity by giving certifiers and operations access to consistent and high-quality information that they use to validate organic products, ingredients, and supply chain operations. Uniform certificates of operation will also reduce confusion across the organic industry and deter fraud.

This document combines regulatory text from three sections ([E. Certificates of Organic Operation](#), [G. Paperwork Submissions to the Administrator](#), and [K. Compliance and Noncompliance Procedures](#)) with a plain-language description of what the changes mean. **Bolded text** in the table below indicates a **key concept**.

**General Comments from the National Organic Program:** The Organic Integrity Database (INTEGRITY) is a globally respected database that plays a central role in organic market development and oversight. These provisions maximize the use of INTEGRITY as a definitive source of data and certificates for organic trade. The provisions also remove some reporting requirements for certifiers, to balance the added update requirements to INTEGRITY. We expect that standardizing the operation-level certificate through INTEGRITY will both deter fraud and increase the regularity of reporting. Certifiers can still issue addenda to the standard operation certificate if they wish to.

### E. Certificates of Organic Operation

Section	Regulatory Text	Key Takeaways
205.2	Terms defined.	
205.2	<i>Organic Integrity Database</i> . The National Organic Program's electronic, <b>web-based reporting tool</b> for the submission of data,	This is a <b>newly defined term</b> that explains the core functions of INTEGRITY—including that certificates of organic operation must be generated in INTEGRITY.



Section	Regulatory Text	Key Takeaways
	completion of <b>certificates of organic operation</b> , and other information, or the tool’s successors.	
205.404	Granting certification.	
205.404 (b)	The certifying agent must issue a certificate of organic operation. The certificate of organic operation <b>must be generated from the Organic Integrity Database</b> and may be provided to certified operations electronically.	Certifiers can no longer create certificates of organic operation using their own formats. Generating certificates in INTEGRITY will ensure <b>consistent formatting and information</b> , making it easier for certifiers and operations to verify suppliers, products, and ingredients. Certifiers can provide either <b>electronic or paper copies</b> to operations.
205.404 (c)	<p><i>[Redesignate former § 205.404(c) as (d) and add new paragraph (c) on certificate addenda.]</i></p> <p>In addition to the certificate of organic operation provided for in paragraph (b) of this section, a certifying agent <b>may issue its own addenda</b> to the certificate of organic operation. If issued, any addenda must include:</p> <ul style="list-style-type: none"> <li>(1) Name, address, and contact information for the certified operation;</li> <li>(2) The certified operation's <b>unique ID number/code</b> that corresponds to the certified operation's ID number/code in the Organic Integrity Database;</li> <li>(3) A <b>link to the Organic Integrity Database</b> or a link to the certified operation's profile in the Organic Integrity Database, along with a statement, “You may verify the certification of this operation at the Organic Integrity Database,” or a similar statement;</li> <li>(4) Name, address, and contact information of the certifying agent; and</li> <li>(5) “Addendum issue date.”</li> </ul>	<p>Paragraph (c) on certificate addenda is new. Former paragraph (c) is moved down to (d). Issuing an addendum is <b>optional</b>. Addenda can provide additional useful information about the operation that is not included in the certificate of operation.</p> <p>If an addendum is issued, certain mandatory information must be included on the addendum to make it clear how someone can verify the operation’s status. Specifically, the addendum must <b>connect back to the operation profile in INTEGRITY</b> and must have a clear statement that the <b>operation’s status can be verified in INTEGRITY</b>.</p> <p>A certifier may generate addenda in INTEGRITY, or they may generate addenda using their own system.</p> <p>This is a <b>new paragraph</b>.</p>

## G. Paperwork Submissions to the Administrator

Section	Regulatory Text	Key Takeaways
205.405	Denial of certification.	
205.405 (c)(3)	<i>[Remove paragraph (c)(3)]</i>	SOE <b>removes former paragraph (c)(3)</b> , which required a certifier to notify NOP when they took corrective actions on a notice of noncompliance issued to an operation. The INTEGRITY data requirements below make these notifications redundant.
205.501	General requirements for accreditation.	
205.501 (a)(15)	Maintain <b>current</b> and <b>accurate data</b> in the Organic Integrity Database for each operation which it certifies;	<p>This <b>replaces</b> the former requirement to send NOP copies of denials of certification and notifications of noncompliance, noncompliance correction, proposed suspension or revocation, and suspension or revocation. It also removes the requirement to provide NOP a list of certified operations each year.</p> <p>Instead, operations must keep current and accurate operation data in INTEGRITY, <b>including information about the certification status of the operation.</b></p> <p>INTEGRITY will specify what types of information is required. Some of this information will be public (such as certification status and areas of operation) and other types of information will only be available to NOP and certifiers (such as acreage).</p>



## K. Compliance and Noncompliance Procedures

Section	Regulatory Text	Key Takeaways
205.662	Noncompliance procedure for certified operations.	
205.662 (e)(3)	<p><b>Within 3 business days</b> of issuing a notification of suspension or revocation, or the effective date of an operation's surrender, the certifying agent must <b>update the operation's status</b> in the Organic Integrity Database.</p> <p><i>Note: This primer only covers <u>part</u> of section K; this section makes additional changes to compliance/noncompliance procedure!</i></p>	<p>Certifiers must update INTEGRITY with <b>changes in an operation's certification status</b> within 3 business days. This will ensure that other operations and certifiers are promptly made aware of the change.</p> <p>This is a <b>new paragraph</b>.</p>