

U.S.-Japan Organic Equivalency Arrangement Questions and Answers (updated: Oct. 1, 2025)

As amended in October 2025 to reflect the scope expansion to include alcohol beverages
(Provisional Translation)

※ Please note that “Organic Algae-Based Processed Foods” mentioned in this Q&A mean the organic processed foods etc. that are produced with 5% or more organic algae ingredients and fall under the category of “Other Organic Processed Foods” specified in 3.5 of JAS for organic Processed Foods (JAS 1606).

(Q1) With the bilateral equivalency recognition in place between the US and Japan, what will be made possible?

(A1) It means that the USDA-NOP certified organic products and JAS certified organic products may be sold, labeled, and represented as organic in both countries within the scope of this bilateral equivalency recognition. As the operators certified by their own country’s 3rd party certification bodies do not need to obtain the other country’s organic certification additionally, it will make it easier for the USDA or JAS certified operators to ship their organic certified products to each other’s organic market under this equivalency recognition.

(Q2) Is it permissible to apply Organic JAS seal to the products that are exported from Japan to the US under the US-Japan bilateral equivalence arrangement? Also, is it permissible to apply USDA organic seal to the products that are imported into Japan from the US?

(A2) Yes, under the US-Japan bilateral equivalence recognition, it’s permissible to label the relevant organic products (certified by either USDA or JAS) for export with both USDA and JAS organic seals*. Please note that the products traded under the equivalency recognition must meet the labeling requirements for the destination country. Labeling requirements for the organic products distributed in the U.S. are available on the following webpage:

<http://www.ams.usda.gov/rules-regulations/organic/labeling>

※ In the cases where the Japanese operators apply USDA seals to their organic products for export to the US, they need to obtain organic JAS certification for Foreign Grade Labeling Operators.

(Q3) Is it permissible to apply both “USDA organic seal” and “organic JAS seal” to the products sold in both the U.S. and Japan?

(A3) Please note that the US-Japan organic equivalency recognition has been in place on the premise of bilateral trade, with a view to promoting import and export between the U.S. and Japan. Therefore, it would be against the spirit of the equivalency recognition to apply the partner country’s organic seals to the products which aren’t exported to the organic equivalent partner country, Furthermore, that may mislead the consumers into believing that the relevant products are certified to both organic JAS and USDA organic standards. So please be sure not to apply the partner country’s organic seals or logos to the products which aren’t exported to the organic equivalency partner country.

(Q4) Which organic products can be exported or imported under the bilateral equivalency recognition?

(A4) The scope of the products covered under this equivalency recognition includes organic products of plant origin (including fungi, the same shall apply hereinafter.), organic livestock products and organic processed foods (excluding organic algae-based processed foods and including alcohol beverages. The same shall apply hereafter.), that are:

- (1) produced within the U.S. or Japan or
- (2) products for which final processing or packaging and labeling has occurred in the U.S. or Japan. (Including those organic foods that are produced in accordance with Organic JAS or

USDA-NOP standards in the 3rd countries, packaged and labeled as organic in the US or Japan.※)

For more information, please refer to the following webpage.

Reference: http://www.maff.go.jp/e/jas/specific/pdf/diagram_of_organic_trade.pdf

※ Organic alcohol products for which final processing must have occurred in the US or in Japan.

(Q5) What happens if an organic operation or a certifying body violates the terms and conditions of this bilateral equivalency recognition?

(A5) Depending on the nature of the violation, the relevant competent authority (MAFF or USDA) will inform the counterparty government authority of such non-compliance, and the necessary actions will be taken in accordance with the governing regulations in the respective country.

In the cases where the USDA-NOP certified organic products are imported from the US to Japan.

(Q6) What is required to import USDA-NOP certified organic products to Japan?

(A6) These products must be imported into Japan by JAS certified importers, since they are certified to the USDA-NOP organic standards, and when they are sold in the Japanese market, they must meet all Japanese organic labeling requirements (including the proper application of the organic JAS seal).

(Q7) Which products may bear the JAS organic seal?

(A7) Under the US-Japan bilateral equivalency recognition, it is permissible to apply organic JAS seal to those organic products such as organic products of plant origin, organic livestock products and organic processed foods (excluding organic algae-based processed foods and including organic alcohol beverages). On the other hand, under this equivalency recognition, it is not permissible to apply organic JAS seal to any products (such as honey, etc.), that are not included in the scope of organic JAS certification system.

(Q8) How can a U.S. operation apply the organic JAS seal to their products?

(A8) In order to sell the relevant organic products※, as organic (labeled as「有機」、「オーガニック」) in Japan, it is compulsory to import such products through the organic JAS certified importers and apply the organic JAS seal to the products accordingly, while the application of USDA organic seal to the organic foods distributed in the US is optional for the certified operations under the US organic system.

※ such as organic products of plant origin, organic livestock products and organic processed foods (excluding organic algae based processed foods and including organic alcohol beverages)

There are two ways to apply organic JAS seal to the relevant organic products imported into Japan under the US-Japan bilateral equivalency recognition as follows.

- (1) If a USDA-NOP certified operation in the U.S. intend to apply the organic JAS seal to their products in the U.S. by themselves, they need to enter into an outsourcing contract with a JAS-certified importer, in order to apply the organic JAS seal to their products in the U.S. and ship them to the JAS-certified importer.
- (2) If a USDA-NOP certified operation in the U.S. doesn't intend to apply the organic JAS seal by themselves, a JAS-certified importer must apply the organic JAS seal to the product in Japan. A list of JAS-certified importers (only those that have agreed to publish their information) is available on the following webpage.

https://www.maff.go.jp/e/policies/standard/specific/organic_JAS.html#Organic%20Standards
(List of certified importers)

(Q9) Is it permissible to import USDA-NOP certified “Made with Organic (*ingredients*)” foods into Japan under the bilateral equivalency recognition?

(A9) No, it is not permissible to import such products under the bilateral equivalency recognition, because the organic products included in the scope of equivalency recognition are limited only to those that contain 95 % or more organically produced ingredients.

However, for USDA NOP "made with organic grapes" wine, it is required that the product be produced with at least 95% organic ingredients, 100% organic grapes must be used and if sulfur dioxide* is used as an antioxidant, it must be used in accordance with §205.605). Therefore, USDA NOP certified "made with organic grapes" wine imported into Japan under the mutual recognition of equivalence agreement can affix the Organic JAS mark and be labeled as "organic" for sale.

*A food additive that can be used in organic alcoholic beverages in accordance with the JAS for Organic Processed Foods

In the cases where such “made with organic grapes” wines (imported to Japan outside of equivalency recognition) are labeled with organic ingredients, organic JAS seal may not be applied. However, it is required that the relevant products must be produced by using organic JAS certified or USDA-NOP certified organic ingredients.

In the cases where such products other than wines (that are not labeled as organic) are to be labeled with organic ingredients, it is required that the relevant products must be produced by using organic JAS certified organic ingredients.

(Q10) Is it permissible to import USDA-NOP certified “100% Organic” products into Japan under the bilateral equivalency recognition?

(A10) Yes, it is permissible to import USDA-NOP certified “100% Organic” products into Japan under the bilateral equivalency recognition and sell them as organic (labeled as「有機」、「オーガニック」) in Japan, because they contain more than 95% organically produced ingredients, while there are not any specific certification available for “100% Organic” labeling category products under organic JAS system.

(Q11) What documents are required for importing organic products under the US-Japan bilateral equivalency recognition?

(A11) All the organic products^{※1} imported from the US into Japan under the US-Japan bilateral equivalency recognition must be accompanied by a USDA export certificate (Form TM-11).

※1 Such as organic products of plant origin, organic livestock products, and organic processed foods (excluding organic algae based processed foods and including organic alcohol beverages)

Such USDA export certificate is used for identifying the place of production as well as the relevant certification bodies, proving that the mutual equivalency requirements are met, and enabling product traceability.

The USDA Export Certificate Form TM-11 is available on the following webpage.

TM-11 Export Certificate and Instructions

Export certificates aren't required for any products^{※2} that are not subject to the organic labeling regulations in Japan.

※2 Any products other than those such as organic products of plant origin, organic livestock products and organic processed foods (excluding organic algae-based processed foods and including organic alcohol beverages).

(Q12) How can U.S. certified operations obtain an USDA Export Certificate (TM-11)?

(A12) First of all, U.S. certified operations should inform their certification bodies that they intend to

export their organic products to Japan. Then, the relevant certification bodies will ask the certified operators a few questions about the relevant organic products for export or any other required information and issue the relevant export certificate accordingly.
A list of USDA-accredited certification bodies is available on the following webpage.
<http://www.ams.usda.gov/services/organic-certification/certifying-agents>

Exporting organic JAS certified products to the US

(Q13) What about the scope of organic products permitted for export under the bilateral equivalency recognition, and what are the requirements to comply with when exporting?

(A13) This equivalence is limited to country-to-country trade. For plant and plant-based products (excluding alcohol beverages) and livestock products, the arrangement is limited to products certified to the USDA or JAS organic regulations that are either:

(1) Grown or produced in the U.S. or Japan; or

(2) Have their final processing or packaging occur in the U.S. or Japan.

For alcohol beverages, the arrangement is limited to products certified to the USDA or JAS organic regulations that are either:

(1) Produced in the U.S. or Japan; or

(2) Have their final processing and packaging occur in the U.S. or Japan.

This means that the transshipping or pass-through of organic alcohol beverages from a third country where only storage, bottling and/or labeling occurs in the U.S. or Japan would not be permitted. The final processing, including the blending of alcohols, must occur in the United States or Japan

When exporting to the US, it is necessary to fully satisfy USDA labeling requirements (including the compliant use of the USDA organic seal) and a U.S. National Organic Program (NOP) Import Certificate must be issued for the specific export to the US by the accredited certification bodies through the USDA's Organic Integrity Database (OID).

To issue a NOP Import Certificate through the OID, the Organic JAS certified producers etc. and NOP certified US importers must be registered and listed in the OID. (Japanese exporters do not need to be certified or registered in the OID.)

It is possible to search for and confirm the registration status of the operations in the OID. According to the USDA labeling requirements, the name of the certification body must be displayed on the label as "Certified organic by XXXX" etc. below the name of the final handler or distributor. English names and abbreviations of Registered Certification Bodies in Japan are listed on the following webpages.

https://www.maff.go.jp/e/policies/standard/specific/Organic_CB_domestic.pdf

For your references:

- NATIONAL ORGANIC PROGRAM subpart D (Provisional Translation)

http://www.maff.go.jp/j/jas/jas_kikaku/pdf/nop_subpart_d.pdf

- USDA Organic Labeling

<https://www.ams.usda.gov/rules-regulations/organic/labeling>

(Q14) Regarding the organic products that are not subject to the organic labeling regulations in Japan, is it permissible to sell such products as organic with organic labels in the US?

(A14) As these organic products* such as marine products, honey etc. are not included in the scope of the bilateral equivalency recognition, it is necessary to obtain NOP Certification from the USDA accredited certification bodies in order to sell them as organic in the US.

※ Excluding organic products of plant origin, organic livestock products (excluding Honey) and organic processed foods (excluding organic algae-based processed foods).

(Q15) Is it permissible to export “organic in-conversion products of plant origin” or “organic in-conversion processed foods” to the US under the bilateral equivalency recognition?

(A15) No, it is not permissible to export “organic in-conversion products of plant origin” or “organic in-conversion processed foods” to the US under the bilateral equivalency recognition, because “in-conversion” products are not included in the scope of USDA organic certification program in the US.

(Q16) Regarding those organic JAS certified products that have been produced in foreign countries or other countries outside of Japan, is it permissible to export such organic JAS certified products to the US under the mutual equivalency recognition?

(A16) “In order to export organic products from Japan to the United States under the mutual equivalence arrangement, they must:
(1) be produced in Japan,
(2) have had the final processing or packaging, and be labeled as organic, in Japan.
Therefore, organic JAS products produced abroad can only be exported to the United States if they meet condition (2).
However, for organic alcoholic beverages, this must be final processing and packaging carried out in Japan.”

(Q17) Regarding the organic JAS certified processed foods that have been produced by using only organic JAS certified products*as their ingredients, is it permissible to sell such products as “100% organic” in the US?

※ such as organic products of plant origin, organic livestock products and organic processed foods (excluding organic algae-based processed foods and including organic alcohol beverages)

(A17) Provided that the relevant organic products contain only 100% organically produced ingredients and processing aids, excluding salt and water, it is possible to sell them as “100% organic” in the US.

(Q18) Regarding those organic alcohol beverages that have been produced by using sulfur dioxide or potassium metabisulfite as antioxidants, is it permissible to export such organic alcohol beverages to the US under the bilateral equivalency recognition?

(A18) No, it is not permissible to export such organic alcohol beverages (excluding wines) to the US under the bilateral equivalency recognition, if they have been produced by using sulfur dioxide or potassium metabisulfite as antioxidants
Organic alcoholic beverages, other than grape wine, that contain potassium pyrosulfite or sulfur dioxide cannot be exported to the United States under the mutual equivalence arrangement.
Wines that contain additives not listed in the US organic standards §205.605, such as potassium pyrosulfite, cannot be exported to the United States under the mutual equivalence arrangement.
Wines that are processed with sulfur dioxide, in accordance with §205.605, can be exported to the United States under the mutual equivalence agreement and labeled as "made with organic grapes."*

*1 US Organic Standards §205.605

<https://www.ecfr.gov/current/title-7/subtitle-B/chapter-I/subchapter-M/part-205#205.605>

*2 In the United States, foods that fall under the "made with organic" category cannot be labeled with the organic certification logo, and therefore cannot be labeled with the Organic JAS mark or USDA organic seal.

(Q19) How can organic JAS certified operators obtain a USDA-NOP import certificate?

(A19) First of all, organic JAS certified operators should inform their organic JAS accredited certification bodies that they intend to export their organic products to the U.S. The organic JAS accredited certification bodies will register their certified operations in the Organic Integrity Database, and they will issue the NOP Import Certificates through the Organic Integrity Database, after confirming the following with the relevant certified operators.

- (1) whether their organic products (such as organic products of plant origin, organic livestock products, and organic processed foods) for export are certified under the Organic JAS System,
- (2) whether the relevant organic products meet the origin, scope and other requirements of the US-Japan organic equivalence arrangement.
- (3) whether their organic products meet all the USDA organic labeling requirements. (Please refer to Q-13)

A list of all the organic JAS accredited certification bodies, that can issue a NOP Import Certificate, is available on the following webpage.

https://www.maff.go.jp/j/jas/jas_kikaku/attach/pdf/yuuki-490.pdf