

# CUSTOMER INFORMATION 26-04

## March 25, 2026

kiwa

## Clarification and Implementation of a Common USDA NOP Anniversary Date for All USDA NOP Kiwa BCS Operators

Dear valued operators,

With this customer information letter, Kiwa BCS would like to provide further clarification regarding the anniversary date, its significance, and the decision to implement a common anniversary date for all NOP USDA Kiwa BCS operators.

### 1 WHAT IS THE USDA NOP ANNIVERSARY DATE?

The USDA NOP Organic certificates don't include expiration dates, and operation remains certified until *surrendered, suspended, or revoked*.

USDA NOP Organic certificates have **an anniversary date** which is the last day until operation must submit its annual update (existing certified operations).

For an annual update, certified operation must submit to Kiwa BCS:

- *A summary of any deviations, changes to, modifications to, or other amendments made to the **OSP** submitted during the previous year, pursuant to § 205.406(a)(1);*
- *Any additions or deletions to the previous year's OSP intended to be undertaken in the coming year, pursuant to § 205.406(a)(2)-(3);*
- *and pay the **fees** to Kiwa BCS as per offer to continue its organic certification.*

Each certified operation **MUST receive at least one physical on-site inspection per calendar year** to determine whether its certification should continue. If a certified operation fails to submit an annual update, Kiwa BCS will issue a *Notice of Noncompliance*.

However, the failure of an operation to submit an annual update does not relieve Kiwa BCS nor the operator of its obligation to conduct/receive an annual on-site inspection § 205.403(a)(1).

### 2 COMMON ANNIVERSARY DATE (30<sup>TH</sup> SEPTEMBER) FOR ALL KIWA BCS OPERATORS

Starting from the certification and inspection season 2026 (means effective in 2027), all USDA NOP Kiwa BCS certified operators will have a common **Anniversary Date set as 30.09**, displayed on

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their USDA NOP Certificate and Addendum.

### What does this mean in practice?

- For new operators, the anniversary date will be set from the year of the first inspection until 30.09. of the following year, regardless of the certification date.
- For existing, already certified operators, the current anniversary date will be extended to 30.09. of the following year, regardless of the certification date.

### Example of effectiveness in the season 2027 in the practice?

As explained in **Chapter 1**, each certified operation is required to submit the **Annual Update once per year**, and no later than the **Anniversary Date**.

“Latest” means that if an operator has a scheduled inspection for the **calendar year 2027**, for example in **February 2027**, and submits the Annual Update (including the **Organic System Plan (OSP)** and payment of the fee as outlined in the annual invoice) **prior to the inspection** (preferably no later than 4 weeks prior the inspection since the review of the updated OSP must be finished prior the inspection starts), this will be considered as fulfillment of the operator’s annual obligation for the **calendar year 2027**, even though the official Anniversary Date is set for **30.09.2027**.

However, for operators whose annual inspection is normally scheduled **after 30.09.**, the Annual Update (as outlined in Chapter 1) must be submitted **no later than 30.09**.

Failure to submit the Annual Update by this date will require Kiwa BCS to issue a **Notice of Noncompliance** in accordance with the applicable certification requirements.

### More examples:

| <b>INSPECTION DATE<br/>(start date scheduled)</b> | <b>ANNIVERSARY<br/>DATE</b> | <b>Kiwa requests an annual update (OSP and<br/>fee paid) prior to the inspection.</b>   |
|---|-----------------------------|---|
| 05.05.2027  | <b>30.09.2027</b>           | Annual update MUST be provided preferably no later than 4 weeks <b>prior</b> 05.05.2027 |
| 14.11.2027  | <b>30.09.2027</b>           | Annual update MUST be provided <b>latest</b> on 30.09.2027                              |
| 12.12.2027  | <b>30.09.2027</b>           | Annual update MUST be provided <b>latest</b> on 30.09.2027                              |

The implementation of a common anniversary date will allow Kiwa BCS to more effectively monitor whether all certified Kiwa BCS operators submit their Annual Update at least once per year and no later than the anniversary date set for **30.09**.

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### Repeating, Anniversary date is **NOT** an expiration date, and operation remains **certified** until surrendered, suspended, or revoked.

Status of certified operations are publicly available and can be checked in [Organic Integrity Database](#) by **(1)** typing the name of the operation and **(2)** setting status to “All”.

The screenshot shows the USDA Organic Integrity Database search results. The search filter is set to 'Kondima Enghardt GmbH Co.KG' (marked with a red circle 1). The status dropdown menu is set to 'All' (marked with a red circle 2). The search results table shows one entry: 'Kondima Enghardt GmbH Co.KG' certified by 'BCS Kiwa BCS Öko-Garantie GmbH' with a status of 'Certified'.

| Program  | Operation                   | Certifier                      | Info | Status    | City     | State/Province | Country | Certified Products       |
|----------|-----------------------------|--------------------------------|------|-----------|----------|----------------|---------|--------------------------|
| USDA NOP | Kondima Enghardt GmbH Co.KG | BCS Kiwa BCS Öko-Garantie GmbH |      | Certified | Rehndorf | ER-09          | Germany | HANDLING: Other: Choc... |

In cases where a certified operation may encounter concerns with business partners due to the anniversary date being in the past, Kiwa BCS can issue a **“Confirmation of Continuous Control and Good Standing for USDA/NOP Certification”**. This document serves to confirm that the company remains under the continuous oversight of Kiwa BCS in accordance with the US National Organic Program (NOP) 7 CFR Part 205. Basis for such confirmation is that operator submitted at least Annual Update latest until **30.09**.

Please note that this confirmation is available for a **fee** (outlined in the local service fees).

Kind regards,

**Kiwa BCS Öko-Garantie GmbH**

i. V. Karlo Zeljko  
-Head of Team Operations international-

i. V. Ronald Wesner  
-Technical Management-

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If you have any queries or general questions about the control procedures, we will be happy to help you during our office hours by telephone (+49 911 42439 - EXT) or all day by e-mail.

On our website, you will find the current versions of relevant documents for the preparation of the inspection.

- <https://www.kiwa.com/de/en/downloads-kiwa-bcs/important-documents-for-your-organic-certification/>

### Office hours (Central European Time)

Monday to Thursday: 9:00 am to 3:00 pm

Friday: 9:00 am to 2:00 pm

### Service: OSP updates, company name/ address change/ tour-planning/ submission of documents for correction of NCF (non-conformities)



[de.service-international.bcs@kiwa.com](mailto:de.service-international.bcs@kiwa.com)



#### Contact

- Beate Erlbeck (EXT -33)
- Roxana Cruz (EXT -68)

### Quotations, additional certification services, contracts



[de.sales.bcs@kiwa.com](mailto:de.sales.bcs@kiwa.com)



#### Contact

- Oliver Altwasser (EXT -37)
- Kristina Grocholl (EXT -76)

### Request / creation of import control certificates (COI), transaction certificates (TC)



[de.tc.in.bcs@kiwa.com](mailto:de.tc.in.bcs@kiwa.com)



#### Contact

#### Applications Germany, Eastern Europe and Africa

- Tobias Süß (EXT -53) Deputy: Claudia Valencia (EXT -54)

#### Applications Asia, Saudi Arabia, China, Türkiye

- Claudia Valencia (EXT-54) Deputy: Tobias Süß (EXT -53)

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### Invoicing

For questions  
about your  
invoice



[Dimitri.regel@kiwa.com](mailto:Dimitri.regel@kiwa.com)



#### Contact

- Dimitri Regel (EXT -63)

### Residues cases



[de.residues.bcs@kiwa.com](mailto:de.residues.bcs@kiwa.com)



#### Contact

- Marlene Radolf (EXT -29)
- Natalia Redam (EXT -49)

### Head of Team Operations International 49702 & 49703

Coordination of  
control  
implementation,  
certification,  
technical support  
of control  
procedures



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#### Contact

- Karlo Zeljko (EXT -62)

### Technical Management



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#### Contact

- Ronald Wesner (EXT -14)

### General Management



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#### Contact

- Ivonne Wimmer (EXT -10)