

Materials and Preparation

Materials for Trainer

- Hats or other containers to hold the index cards for Activity 2 (one container per group of five participants)
- Beanie bags or something soft that participants can toss to each other for Activity 2 (one per group of five participants)

Advance Preparation

- Read the relevant sections of the NOP Standard (<http://www.ams.usda.gov/nop/NOP/standards.html>)
- Prepare lists of three food items for participants to purchase for Activity 1, or bring the food items themselves or their containers to the training session. If you elect the take home assignment option, you will need to give the lists to the teams the day before this activity. We suggest teams of three to five. We also suggest that you put the lists in sealed envelopes marked "Mystery Assignment."
- Prepare a set of 3 x 5 cards for each group of five participants. Each card in the set should have a different question on it, e.g., one card = one question. You can use the same set of questions for all groups, or you can give each group a different set of questions. All of the questions should be based on Sections 205.605 and 205.606 of the National Organic Standard, the sections that deal with handling and allowable ingredients in processed products. We provide examples of questions in our instructions for Activity 2. You may want to develop additional questions of your own that reflect the interests and areas of expertise of your participants.

Materials for Participants

- *Participant's Guide to Module 7*
- Relevant sections of the NOP Standards (<http://www.ams.usda.gov/nop/NOP/standards.html>)

Module Delivery (80 Minutes)

I. Module Objectives and Content (5 minutes)

1. Distribute the *Participant's Guide to Module 7* to all participants. Also distribute a copy of the relevant portions of the National Organic Standards if you have not already done so.
2. Review and discuss the ***application objective***.

After completing this module you will be able to explain the four categories of organic product labeling allowed by USDA and provide growers and processors with recommendations about the ingredients that are allowed in each category.

3. Review and discuss the **learning objectives**.

After completing this module you will understand:

How the four different categories of organic products are defined

When different kinds of organic labeling can be used

What non-agricultural substances are allowed as ingredients in products labeled as “organic” or “made with organic”

The documentation for record keeping and organic certification

4. Call attention to the **topics** that will be covered in this module.

Terminology, labeling, use of logos and seals

Types of processing and ingredients

Monitoring and quality assurance

Requirements for export

Requirements for certification

II. Materials and Resources (5 minutes)

Distribute a copy of the relevant sections of the NOP Standards to each participant if they did not receive them earlier in your training program.

1. Point out that the Guide includes a list of the **Relevant Sections of the NOP Standards** that will be covered by this module.

205.201 Organic production and handling system plan

205.270 Organic handling requirements

205.300 Use of the term “organic”

205.301 Product composition

205.303 Packaged products labeled “100 percent organic” or “organic.”

205.304 Packaged products labeled “made with organic (specified ingredients or food group(s)).”

205.305 Multi-ingredient packaged products with less than 70 percent organically produced ingredients

205.311 USDA Seal

205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food group(s)).”

205.606 Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food group(s)).”

2. Draw attention to the **Additional Reference Materials** provided in the Guide.

NCAT's *Organic Crops Workbook* (<http://attra.ncat.org/attra-pub/PDF/cropsworkbook.pdf>)

OMRI Products List (http://www.omri.org/OMRI_products_list.html)

Stored Grain Pest Management (<http://www.attra.ncat.org/publication.html>)

Postharvest Handling of Fruits and Vegetables (<http://www.attra.ncat.org/publication.html>)

Postharvest Handling for Organic Crops (<http://www.attra.ncat.org/publication.html>)

3. Draw participants' attention to the list of **Keywords** in the Guide.

Agricultural product. Any agricultural commodity or product, whether raw or processed, including any commodity or product derived from livestock, that is marketed in the United States for human or livestock consumption.

Allowed synthetic. A substance that is included on the National List of synthetic substances allowed for use in organic production or handling.

Audit trail. Documentation that is sufficient to determine the source, transfer of ownership, and transportation of any agricultural product labeled as "100 percent organic," the organic ingredients of any agricultural product labeled as "organic" or "made with organic (specified ingredients)" or the organic ingredients of any agricultural product containing less than 70 percent organic ingredients identified as organic in an ingredients statement.

Commercially available. The ability to obtain a production input in an appropriate form, quality, or quantity to fulfill an essential function in a system of organic production or handling, as determined by the certifying agent in the course of reviewing the organic plan.

Handler. Any person engaged in the business of handling agricultural products, including producers who handle crops or livestock of their own production, except such term shall not include final retailers of agricultural products that do not process agricultural products.

Handling operation. Any operation or portion of an operation (except final retailers of agricultural products that do not process agricultural products) that receives or otherwise acquires agricultural products and processes, packages, or stores such products.

Information panel. That part of the label of a packaged product that is immediately contiguous to and to the right of the principal display panel as observed by an individual facing the principal display panel, unless another section of the label is designated as the information panel because of package size or other package attributes (e.g., irregular shape with one usable surface).

Ingredient. Any substance used in the preparation of an agricultural product that is still present in the final commercial product as consumed.

Ingredients statement. The list of ingredients contained in a product shown in their common and usual names in the descending order of predominance.

Label. A display of written, printed, or graphic material on the immediate container of an agricultural product or any such material affixed to any agricultural product or affixed to a bulk container containing an agricultural product, except for package liners or a display of written, printed, or graphic material which contains only information about the weight of the product.

Labeling. All written, printed, or graphic material accompanying an agricultural product at any time or written, printed, or graphic material about the agricultural product displayed at retail stores about the product.

Nonagricultural substance. A substance that is not a product of agriculture, such as a mineral or a bacterial culture, that is used as an ingredient in an agricultural product. For the purposes of this part, a nonagricultural ingredient also includes any substance, such as gums, citric acid, or

pectin, that is extracted from, isolated from, or a fraction of an agricultural product so that the identity of the agricultural product is unrecognizable in the extract, isolate, or fraction.

Nonsynthetic (natural). A substance that is derived from mineral, plant, or animal matter and does not undergo a synthetic process as defined in section 6502(21) of the Act (7 U.S.C. 6502(21)). For the purposes of this part, nonsynthetic is used as a synonym for natural as the term is used in the Act.

Processing. Cooking, baking, curing, heating, drying, mixing, grinding, churning, separating, extracting, slaughtering, cutting, fermenting, distilling, eviscerating, preserving, dehydrating, freezing, chilling, or otherwise manufacturing and includes the packaging, canning, jarring, or otherwise enclosing food in a container.

Processing aid. (a) substance that is added to a food during the processing of such food but is removed in some manner from the food before it is packaged in its finished form; (b) a substance that is added to a food during processing, is converted into constituents normally present in the food, and does not significantly increase the amount of the constituents naturally found in the food; and (c) a substance that is added to a food for its technical or functional effect in the processing but is present in the finished food at insignificant levels and does not have any technical or functional effect in that food.

Synthetic. A substance that is formulated or manufactured by a chemical process or by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral sources, except that such term shall not apply to substances created by naturally occurring biological processes.

III. Activity 1: Mystery Assignment (30 minutes)

1. There are **two options** for this assignment. The trainer should determine which will best accommodate the overall length of the training program. The first option, the take home assignment, provides a better learning experience because it involves the participants more actively in exploring the meaning of organic labeling. However, your total training program must include an evening (2 day or longer) for you to be able to give a take home assignment. This option works best when the training program occurs in a location that is in close proximity to a store with an organic section. The in-session activities are the same for both options.

Option 1: Take home assignment. Hand out the take home assignment at the end of the first day of training. Divide the participants in teams of three to five. Give each team a sealed envelope that contains a list of three items for them to purchase. Tell the teams that their mystery homework assignment is to bring the three items on their list to the training session the next day.

Option 2: In-class activities only. When the take home assignment is not possible, the trainer should purchase the items (or bring empty containers for the items) on the list to the training and distribute them to the groups. Make sure that you provide a range of products including, for example, products that are advertised as “all natural,” as well as products that do meet the organic standards.

2. Each team must purchase or examine three **differently** labeled items from the same general food category. Make sure that at least two of the three items falls within a different organic labeling category defined by the NOP Standards. These are: (a) “100% organic,” (b) “organic”

Examples

Example of a single product. Cereal is a good choice. Have the team buy items in three categories: “100% organic,” “made with organic ingredients,” and conventional (not organic). This example shows the differences between the categories well because all three items are processed.

Example of raw and processed products. Another team could be asked to bring in an organic apple, organic dried apples and organic apple sauce. This would show how processing may affect labeling. The organic apple would be an example of a “100% organic” product. The dried apples would probably be “organic” or “100% organic.” The applesauce may be “made with organic apples.”

Other suggested items. Other good choices are products like juice, chips, granola bars, rice, noodles, sugar or salad dressing. Select the items based on their cost, local availability and personal preferences. If you use the take home assignment option, we recommend that you select items like drinks and snack foods that can serve as the day’s snack!

and (c) “made with organic ingredients.” You can also include conventional products if you want.

3. Have each team discuss the similarities and differences among the products in relation to labeling. Tell them to pay attention to the amount of organic ingredients in the product and different levels of processing, as well as the similarities and differences between the labels on the product. Allow 15 minutes for the participants to examine and discuss the products. Refer them to the following sections of the NOP Standard:

205.300 Use of the term “organic”

205.301 Product composition

205.303 Packaged products labeled “100 percent organic” or “organic.”

205.304 Packaged products labeled “made with organic (specified ingredients or food group(s)).”

205.305 Multi-ingredient packaged products with less than 70 percent organically produced ingredients

205.311 USDA Seal

4. Ask each team to prepare a short presentation (3 minutes) explaining how the three products they examined differ, which, if any, of the three categories defined by the NOP Standards apply to the product, and why. Allow 15 minutes total for all group presentations.

IV. Activity 2: Hey, what is Potassium acid tartrate doing in my organic food? (30 minutes)

1. Advance Preparation (see page 1 for more details). Prepare a set of 3 x 5 cards for each group of five participants. Each card in the set should have a different question on it, e.g., one card = one question. You can use the same set of questions for all groups, or you can give each group a different set of questions. All of the questions should be based on Sections 205.605 and 205.606 of the National Organic Standards.
2. Give the participants a few minutes to read Sections of § 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as “organic” or “made

with organic (specified ingredients or food groups(s))” and § 205.606 Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food group(s))” before starting this exercise.

3. Divide the participants into groups of five. Direct each group of participants to stand in a circle. **All groups will complete the exercise concurrently.**
4. Place a hat or suitable container with one set of questions in it in the center of each circle.
5. Give one person in each circle a beanie bag (or some other item that can be tossed from participant to participant without risk).
6. The person with the beanie bag should draw **one** of the questions from the hat, read it aloud, and then throw the beanie bag to whomever they would like to answer the question.
7. After the person who caught the beanie bag answers the question, s/he draws another question from the hat, reads it aloud, and throws the beanie bag to another person.
8. Participants may consult Sections 205.605 and 205.606 to answer the questions, but you want to keep this activity moving. If you decide to allow consultation, put a time limit on how long each participant can take to answer a question. We suggest one minute.
9. Allow 20 minutes for this activity.

Example Questions & Answers

Can a soft drink labeled as organic contain natural flavors?

YES

Can a lemonade contain natural lemon flavors that contain an artificial preservative?

NO

Can perlite be used as a filter aid in food processing?

YES

Can ammonium bicarbonate be used as a leavening agent when making organic bread?

YES

Is there such a thing as organic wine and beer?

YES

Can organic wine and beer contain sulfites?

NO

Can wine labeled “made with organic grapes” contain sulfur dioxide?

YES, provided that total sulfite concentration does not exceed 100 ppm

Can 100% organic cereal contain tocopherols as a natural preservative?

NO

Can organic cereal contain tocopherols as a natural preservative?

YES

Can 100% organic frozen french fries contain sea salt?

YES

Does the water added to a “100% organic” processed product have to be from a natural spring?

NO

Can the water added to a “100% organic” processed product come from a municipal water supply that contains chlorine?

YES

Can organic bananas be ripened with ethylene gas?

YES

Can tomatoes be ripened with ethylene gas?

NO

Can tortilla chips labeled “made with organic corn” contain artificial flavors?

YES

Can a product that contains GMO soybeans also contain organic corn?

YES, but the only place where the word organic could be used would be on the ingredient statement indicating the corn was organic. The product could not display the USDA seal or any certifying agent seal, logo or identifying mark which represents organic certification of a product or product ingredients.

V. Closure Discussion (10 minutes)

1. Call participants' attention to the last page of the Participant's Guide, “Key Points about Organic Labeling.”
2. Ask participants to sum up, in their own words, what each of the three categories of labels means. You may want to use the **directed question** technique, or you can call upon volunteers. Make sure that all of the defining characteristics of each label category are discussed.

Key Points about Organic Labeling

Products sold, labeled or represented as “**100% organic**” can be raw or processed agricultural products which contain (by weight or fluid volume, excluding water and salt) 100% organically produced ingredients. These products may display the term “100% organic”, “organic”, and/or the USDA seal and logo anywhere on the packaging of the product and on any marketing information concerning the product. The certifier’s logo or mark may be displayed but less prominently than the USDA’s.

Products sold, labeled or represented as “**organic**” can be raw or processed agricultural products that must contain (by weight or fluid volume, excluding water and salt) not less than 95% organically produced raw or processed agricultural products. Any remaining product ingredients must be organically produced, unless not commercially available in organic form, or must be nonagricultural substances or nonorganically produced agricultural products on the National list sections 205.605 and 205.606. These products may display the term “organic” and/or the USDA seal and logo anywhere on the packaging of the product and on any marketing information concerning the product. The certifier’s logo or mark may be displayed but less prominently than the USDA’s.

Products sold, labeled or represented as “**made with organic** (specified ingredients or food group(s))” must contain (by weight or fluid volume, excluding water and salt) at least 70% organically produced ingredients. No ingredients may be produced using excluded methods, sewage sludge or ionizing radiation. The remaining nonorganic ingredients may be produced without regard to the requirements placed on organic ingredients. Labeling: “Made with Organic (up to three specified ingredients or food groups)” may be displayed anywhere on the package. The product cannot display the USDA seal.

Products with less than 70% organically produced ingredients. The organic ingredients must be produced and handled pursuant to organic requirements. The nonorganic ingredients may be produced without regard to the requirements placed on organic ingredients. Organic products may only be labeled as organic within the ingredient list. No USDA or certifier seal may be displayed.