

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.

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

Topics

Terminology, labeling, use of logos and seals

Types of processing and ingredients

Monitoring and quality assurance

Requirements for export

Requirements for certification

Relevant Sections of the NOP Standards

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)).”

Materials and Resources

Relevant sections of the NOP Standards (<http://www.ams.usda.gov/nop/NOP/standards.html>)

Additional Reference Materials

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>)

Keywords

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.

Activity 1: Mystery Assignment

Hey, it's a **MYSTERY**. Your trainer will provide you with instructions.

Activity 2: Hey, what is Potassium acid tartrate doing in my organic food?

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. Read carefully! Your colleagues may pick on you to answer a question based on these parts of the Standards and you'll have to be fast on the draw!

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.