



OEFFA Certification Fact Sheet

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Labeling Organic Products

Organic producers and handlers work very hard to follow the organic standards created by the National Organic Program (NOP). It is important that only products resulting from this hard work, which have undergone the rigorous organic certification process (as appropriate) be labeled as organic.

Depending on their contents, products may be labeled:

- 100% Organic
- Organic
- Made with Organic [Specific Ingredients]

OEFFA and USDA seals, and other label claims may also be used within certain limits.

All labels must be approved by your certifier (i.e. OEFFA) before they are used. Wait to print your labels until you have received final written approval of your design from your certifier. This practice helps you avoid spending money to print labels with mistakes, which can't be used. Noncompliant labels must be corrected.

Description & NOP Citation

Many processed, multiple ingredient, and even raw certified organic products carry labels that indicate the ingredients, producer, organic status of the product, and who has certified the product. Labels let consumers know your product deserves a premium because of the high standards it meets. Therefore, understanding organic labeling is vital, but it can also be confusing. More information about organic labeling can be found in the NOP Standards Subpart D— § 205.301- § 205.311.

Label Terminology

The organic regulations talk about two types of label “panels:”

- **Principal Display Panel** – this is the part of the retail package the consumer is most likely to see when purchasing the product (usually the front of the package.) Your certifier may refer to this as the “PDP.”
- **Information Panel** – this is the part of the retail package that includes the ingredient list and other product information, like your farm or company name and contact information (usually the back or side of the package.)

The last page of this Fact Sheet includes an example of each of these label panels.

Labeling Categories

1. 100% Organic

- Each ingredient (excluding water and salt) must be certified as 100% organic
- Any processing aid used to manufacture the product must be certified organic

This means the product cannot contain any nonagricultural (non-certifiable) ingredients such as baking soda or citric acid. At no point can the product be processed with a nonorganic substance. To confirm an ingredient is 100% organic, look for the ingredient to be listed as “100% Organic” on the supplier’s organic certificate.

Retail product label requirement:

- The statement, “Certified organic by [certification agency]” must appear directly below the certified operation’s name and/or contact information on the Information Panel. This statement is commonly called the “COB” (Certified Organic By) statement.

Example Information Panel with correct COB statement:

<p>100% Organic Dried Cranberries</p> <p>Ingredients: Organic Dried Cranberries.</p> <p>Someone, Inc. 123 Somewhere St Columbus, OH 43214</p> <p><i>Certified Organic by OEFFA</i></p>

Labels may use the USDA organic seal and/or certification agency logo, but this is not required.



2. Organic (≥95%)

- The product must contain at least 95% certified organic ingredients (excluding water and salt)
- The remaining ingredients must be either:
 - nonagricultural substances from the list of allowed materials under NOP § 205.605 (like ascorbic acid.)
- OR
- nonorganic agricultural substances from the list of allowed materials under NOP § 205.606 (like gelatin.)

In order to use a nonorganic ingredient from § 205.606, you must first show the ingredient is not available in organic form by conducting and documenting a search for it. See “Commercial Unavailability” Section on Page 3 for further details.

Retail product label requirements:

- The statement, “Certified organic by [certification agency]” must appear directly below the certified operation’s name and/or contact information on the Information Panel.
- Each organic ingredient must be identified in the ingredient list.
 - The word “organic” should appear before each organic ingredient.
- OR
- An asterisk (*) should appear next to each organic ingredient and a key showing the asterisk means the ingredient is “organic” should be below the list.

Example Ingredient List for Organic Soup Mix:

Ingredients: Great Northern Beans*, Dehydrated Carrots*, Thyme*, Rosemary*, Turkish Bay Leaves. *Organic

Note: Turkish Bay Leaves appear on § 205.606

You may choose to show the specific percentage of organic ingredients in the product (i.e. 97% organic ingredients.) The whole statement must be:

- the same size, color, and style.
- ½ the size or less of the largest type size on the label panel (i.e. 10 point font or smaller if your largest type size is 20 point font.)

Labels may use the USDA seal and/or certification agency logo, but this is not required.



3. Made with Organic [Specific Ingredients](≥70%)

- The product must contain at least 70% certified organic ingredients (excluding water and salt)
- The remaining ingredients may be:
 - nonagricultural substances from the list of allowed materials under NOP § 205.605 (like ascorbic acid.)
- OR
- nonorganic agricultural substances that have not been produced using sewage sludge, ionizing radiation, or genetic modification.

The product cannot be labeled generally as “Made With Organic Ingredients.” The words, “Made With Organic” must be followed by:

- Up to 3 organic ingredients in the product
- Up to 3 organic food groups in the product

All named ingredients in the “Made With Organic...” statement must be organic.

All words in the “Made With Organic...” statement must be:

- the same size, color, and style.
- ½ the size or less of the largest type size on the label panel

The same is true for an organic ingredient percentage statement.

Retail product label requirements:

- The statement, “Certified organic by [certification agency]” must appear directly below the certified operation’s name and/or contact information on the Information Panel.
- Each organic ingredient must be identified in the ingredient list.

- The word “organic” should appear before each organic ingredient.

OR

- An asterisk (*) should appear next to each organic ingredient and a key showing the asterisk means the ingredient is “organic” should be below the list.

The product may include the certification agency’s logo. The USDA seal is not allowed.



Example of a “Made With Organic...” product label claim:

Sun Dried Tomato, Basil, & Pine Nut Cheddar

Made with Organic Milk & Sun Dried Tomatoes

Example Ingredient List for this product:

Ingredients: Organic Whole Milk, Salt, Organic Sun Dried Tomatoes (Organic Tomatoes, Sea Salt, Water, Citric Acid), Pine Nuts, Dried Basil, Cultures, Enzymes.

4. Other Labels with the Word ‘Organic’

Farmers and handlers who gross less than \$5,000 income from organic products annually are exempt from certification under the NOP. Exempt operations must follow the standards to use the term “organic” on their products and they cannot represent their products as “certified organic.” Also, anyone may use organic ingredients in a processed product (and list these ingredients as organic in the ingredient list) without certification, as long as they are not advertising the product as organic or using the USDA seal.

Under the NOP, cosmetics, body care products, dietary supplements, pet food, fertilizers and lawn care products, textiles, and other non-food/feed products are not specifically addressed.

When in doubt, look for the name of the product’s certification agency on the label. You may always contact the agency to obtain a copy of the grower’s or handler’s organic certificate, which is public record.

Using the USDA Seal

If your product falls in either the “100% Organic” or the “Organic” category and is certified, you may choose to use the USDA organic seal on your label. You must use one of the following approved versions:

Black



Must be on a white or transparent background.

Color



Must be on a white background using the following colors from the Pantone Color Matching System (PMS):
Brown = PMS 175
Green = PMS 348

You can download either version directly from the NOP website (recommended), or you can contact OEFFA to have the approved seal(s) sent electronically to you and/or your printer.

You can put the USDA organic seal anywhere on your label/package.

Using the OEFFA Certification Logo

If your product falls in the “100% Organic,” “Organic,” or “Made With Organic [specific ingredients]” category and is certified by OEFFA, you may choose to use the OEFFA Certification logo on your label:



There are no formal color restrictions. However, OEFFA prefers you use green or black.

If using both the USDA seal and the OEFFA Certification logo on your label, the OEFFA Certification logo cannot be larger or displayed “more prominently” than the USDA seal.

As long as you can read the words “OEFFA Certified Organic” on the logo, you may choose to use it as your COB statement. Just remember, if using it for this purpose, it must go directly below your name and/or contact information on the information panel of your label. Otherwise, you can put the logo anywhere on your label/package.

Contact OEFFA if you would like to use the OEFFA Certification logo.

Commercial Unavailability

If you are unable to find an agricultural ingredient that isn’t listed on § 205.606 in certified organic form for your proposed organic product, you may only use the nonorganic version of that ingredient if you label your product as “Made with Organic [Specific Ingredients].” The product must also fully comply with the requirements of § 205.304.

A product labeled as “Organic” may only contain:

- (1) organic ingredients,
- (2) nonagricultural (nonorganic substances) as listed in § 205.605, and
- (3) nonorganically produced agricultural products as listed in § 205.606, provided they are not commercially available as organic.

If you would like to use an ingredient from § 205.606, you must conduct a search for the organic form first to prove it is not ‘commercially available’ in organic form. At least 3 valid suppliers of organic ingredients should be checked. In order to request to use a nonorganic agricultural ingredient that is not listed at § 205.606 and label the product as “Organic” you would have to petition the National Organic Standards Board (NOSB), which makes recommendations to the NOP, to add the ingredient to § 205.606.

Other Label Claims (unrelated to organics)

Handlers of organic products may make additional label claims, provided such claims are truthful and do not violate the NOP regulations or other Federal or State labeling regulations.

Correcting Noncompliant Labels

When we discover a labeling error on an OEFFA-certified product, a noncompliance will be issued to the operation and the operation must submit label corrections. Any incorrect labels that have not entered the stream of commerce may not be used if they include the following errors:

- Improper use of the USDA organic seal
- Incorrect product classification – such as if a “Made With Organic [specific ingredients]” product is labeled “Organic”
- Omission of the COB statement (name of the certifying agent)
- Incorrect certifying agent in the COB statement
- Other errors, on a case-by-case basis

OEFFA may allow you to continue to use labels with other, minor errors only for the time necessary to get corrected labels, up to 90 days. You must keep documentation of this in your records. Minor errors might include incorrect formatting or placement of information.

OEFFA (as an NOP accredited certification agency) does not have recall authority for product already in the stream of commerce.

Nonretail Labels – Bulk/Wholesale

Nonretail product label requirement:

- Must show the production lot code so the product is traceable backwards through production and handling records.

It is good practice to note organic status on nonretail labels to help other handlers in the supply chain maintain organic integrity. However, this is not required. You may also choose to include an organic composition claim (i.e. 100% Organic), a COB statement, the USDA organic seal, and/or the certifier’s logo.

Resources

For more information about the NOP labeling requirements, visit:

www.ams.usda.gov/NOPOrganicLabeling

Organic sources for agricultural ingredients listed on NOP § 205.606:

<http://www.606organic.com/>

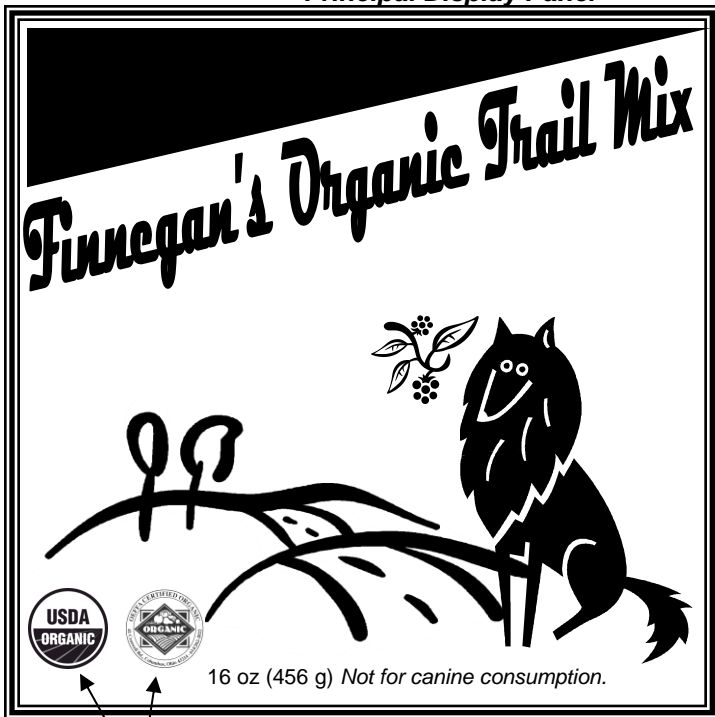
More information on petitioning the NOSB is located at: <http://www.ams.usda.gov/AMSV1.0/NOSB>

For more information or to have a sample label reviewed by OEFFA Staff, please contact the Certification Office at 614-262-2022.



EXAMPLE

Principal Display Panel



The word "Organic" may appear in the name of the product, but this is optional. [§ 205.303(a)(1)]

While the processor of this product did not choose to, s/he may list the % of organic ingredients on the label, following certain size & style specifications. [§ 205.303(a)(2)]

Information Panel

Nutrition Facts

Serving Size 1 cup (228g)
Servings per Container 2

Amount Per Serving

Calories 200 Calories from Fat 100

% Daily Value*

Total Fat 13g 20%

Saturated Fat 5g 25%

Trans Fat 2g

Cholesterol 2mg 10%

Sodium 660mg 28%

Total Carbohydrate 31g 10%

Dietary Fiber 3g 0%

Sugars 5g

Protein 5g

Vitamin A 4% Vitamin C 2%

Calcium 15% Iron 4%

*Percent Daily Values are based on a 2000-calorie diet. Your daily values may be higher or lower depending on your calorie needs.

	Calories:	2,000	2,500
Total Fat	Less than	65g	80g
Sat Fat	Less than	20g	25g
Cholesterol	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Total Carbohydrate		300g	375g
Fiber		25g	30g

Calories per gram:

Fat 9 Carbohydrate 4 Protein 4

The USDA seal & Certification Agency Seal may be used on products labeled "Organic" or "100% Organic," but they are not required. The USDA logo must meet certain color specifications, and the Certification Agency Logo must not be more prominent than it. [§ 205.303(a)(4-5), [§ 205.311(b)]]

All organic ingredients must be identified as such, either with the word "organic" in front of each one, or with an asterisk which refers to "Organic" written underneath. [§ 205.303(b)(1)]

"Certified Organic By [Agency]" must appear below the information identifying the final handler or distributor of the product. [§ 205.303(b)(2)]

Finnegan's Trail Mixes are made of the finest organic ingredients. Throw some in your bag & head out on the trail.

INGREDIENTS: Peanuts*, Raisins*, Dried Cranberries*, Dried Blueberries*, Dried Cherries*, Almonds*, Salt.
*Organic

FINNEGAN'S TRAIL MIX CO.
COLUMBUS, OH 43214

CERTIFIED ORGANIC BY OEFFA

This sample label represents a product labeled as "Organic" (≥95% organic ingredients). These notations only refer to the organic aspect of a label—processors should check with their state department of agriculture for label review as well.