



Organic Policy Statement Packaged Product Label Requirements

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REQUIREMENTS FOR LABELING OF PACKAGED PRODUCTS UNDER THE NATIONAL ORGANIC PROGRAM (NOP)

Pertinent NOP rule sections: § 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.

The NOP Rule allows four categories of products to use the word “organic”. These are “100% organic”, “organic”, “made with organic (specified ingredients or food group(s))”, and products with less than 70% organic ingredients. The percentage of organic ingredients is calculated by dividing the total net weight or volume of combined organic ingredients by the total weight or volume of all ingredients (excluding salt and water).

When labeling products it is critical to first verify that the composition of the product meets the label you are using. §205.301 describes how to figure the percent of organic ingredients and specifies the requirements for each category.

The NOP Rule has specific requirements for principal display panel information relating to the use of the term “organic,” depending on the percentage of organic ingredients in the finished product. For all products, the organic ingredients must be identified in the ingredient information panel. Up to three ingredients or food groups may be listed on the principal display panel for products labeled as “made

with organic (ingredients or food group(s)).” The term “organic” may not be used to describe a non-organic ingredient in a product name. Water and salt may not be identified as “organic.” The name of the certifying agent (Colorado Department of Agriculture) must be identified on the information panel below the name of the handler or distributor, preceded by the statement, “Certified organic by...” or similar phrase.

The USDA seal may be used on “100% organic” or “organic” products, but not on products labeled “made with organic....” The Colorado Department of Agriculture (CDA) Organic Certification Program seal can be used on “100% organic,” “organic” or “made with organic...” (only on ingredient information panel). Products with less than 70% organic ingredients may not display either the USDA seal or the CDA name, seal or logo.

If both the USDA seal and the Colorado organic program seal are used on a “100% organic” or “organic” product, the CDA seal cannot be displayed more prominently than the USDA seal.

Other sources of information are available from USDA on organic labeling:

<http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELDEV3004446&acct=nopgeninfo>

<http://www.ams.usda.gov/AMSV1.0/ams.fetchTemplateData.do?template=TemplateN&navID=NationalOrganicProgram&leftNav=NationalOrganicProgram&page=NO PAQSSLabeling&description=NOP-AQSS:%20%20Labeling&acct=AQSS>

Labeling Requirements for Organic Packaged Products

100% Organic Packaged Products

The label must:

- 1) Show an ingredient statement when the product consists of more than one ingredient.
- 2) Have the statement "Certified organic by ____" or similar phrase *on the information panel* below the name and address of the handler of the finished product

Note: Certifying agent seals may not be used to satisfy this requirement.

The label may:

- 1) Show the term "100 percent organic" to modify the product name
- 2) Show the term, "organic" to identify the organic ingredients on the information panel

Note: Water and salt included as ingredients must not be identified as organic.

- 3) Show the USDA organic seal.
- 4) Show the CDA organic program seal.

Made with Organic. . . Packaged Organic Products

The label must:

- 1) Show an ingredient statement
- 2) List the organic ingredients as "organic"
Note: Water and salt included as ingredients must not be identified as organic.
- 3) Have the statement "Certified organic by ____" or similar phrase *on the information panel* below the name and address of the handler of the finished product

Note: Certifying agent seals may not be used to satisfy this requirement

The label may:

- 1) The term "Made with organic ____ (specified ingredients or food groups)."
- 2) Show "X% organic" or "X% organic ingredients."
- 3) The CDA organic program seal.

The label must not display:

- 1) the USDA organic seal

Organic Packaged Products

(95% or more organic ingredients)

The label must:

- 1) Show an ingredient statement.
- 2) List the organic ingredients as "organic" or identify ingredients as or organic with an asterisk or other reference mark which is defined immediately below the ingredient statement.

Note: Water and salt included as ingredients must not be identified as organic.

- 3) Have the statement "Certified organic by ____" or similar phrase *on the information panel* below the name and address of the handler of the finished product

Note: Certifying agent seals may not be used to satisfy this requirement.

The label may

- 1) Show the term "Organic" to modify the product name.
- 2) "X% organic" or "X% organic ingredients."
- 3) Show the USDA organic seal.
- 4) Show the CDA organic program seal.

Products with Less than 70 Percent Organic Ingredients

The label may:

- 1) Identify the organic content of the product only by:
 - (a) Identifying each organically produced ingredient in the ingredient statement with the word, "organic," or with an asterisk or other reference mark which is defined below the ingredient statement to indicate the ingredient is organically produced, and
- (2) Display the product's percentage of organic contents on the information panel if the organically produced ingredients are identified in the ingredient statement,

The label must not:

- 1) Display the USDA seal
- 2) Display any certifying agent seal, logo, or other identifying mark which represents organic certification of a product or product ingredients.

Disclaimer: This policy statement is provided as guidance to organic producers/handlers and is not to be used as a substitute for or in place of the National Organic Program rules.