

Guidance for Handling and Labeling

**This guideline does not replace the current Regulation.
It provides some explanations on main requirements for organic handling and labeling.
To understand the complete organic requirements, it is necessary to download and read carefully
the NOP Regulation on the USDA website:
<http://www.ams.usda.gov/AMSV1.0/NOP>**

I. Introduction

This abstract summarizes the NOP requirements for Handling, processing and labeling organic products. Further study of the entire standard is required for anyone involved in organic handling. As explained in the [NOP Certification Process \(TS02\)](#), the Organic System Plan must include all information needed to show how the NOP requirements will be met.

II. Practices and ingredients (§ 205.105)

The NOP prohibits the use of genetically modify organisms or products resulting from the use of genetically modified organisms (GMOs). Additionally the use of ionizing radiation on organic products or ingredients is prohibited.

III. Organic Handling Requirements (§ 205.270)

- For processing of organically produced agricultural products, a variety of mechanical or biological measures may be used.
- For non-agricultural ingredients or processing aids, only the substances allowed under § 205.605 may be used (for products to be labeled “organic” or “made with organic”).
- Both synthetic and natural substances are listed at 205.605, and some have special annotations or restrictions for their use. If substances from this list are used, the product can no longer be labeled as “100% organic”.
- Agricultural products that are not (yet) commercially available as organic may be used as ingredients for “organic” products when listed in § 205.606.

IV. Facility Pest Management (§ 205.271)

- In an organic facility, **pests must be prevented through good sanitation measures** and control of environmental factors such as temperature, light, humidity, etc.
- The pests may be controlled through mechanical and physical means as well as the use of lures and repellents in compliance with the NOP National List.
- If the above mentioned measures are not adequately effective, substances (pesticides) compliant with the National List may be applied.
- If the pest problem can still not be controlled, other synthetic substances may be used. In this case the operator must ask **ECOCERT ICO for approval before any application**, take appropriate measures to avoid contamination of organic products or ingredients, and adapt their OSP accordingly.

V. Commingling and Contamination (§ 205.272)

- In the operation, measures must be implemented to prevent commingling of organic and nonorganic products (by physical separation, labeling, etc.), and to protect organic products from contact with prohibited substances.
- Special care must be taken not to use or re-use (without thorough cleaning) packing materials, containers, etc. that has been in contact with substances which might compromise the integrity of organic products.
- The integrity of incoming ingredients and products must be checked by verifying that proper packaging, labeling, certificates, etc. are being used.

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VI. Categories for Certification (§ 205.301)

- Under NOP, only the following product categories are allowed:
 - “100% organic”
 - “Organic”
 - “Made with organic (specified ingredients or food groups)”
 - “Products with less than 70% organically produced ingredients”
 - “Livestock feed”.

- For all further details concerning the composition, labeling, and seal use please see part IX.

VII. Calculating the percentage of organically produced ingredients (§ 205.302)

$$\text{Percentage of organic ingredients} = \frac{\text{Total Organic Ingredients } *(\text{net weight})}{\text{Total Ingredients (total net weight)}}$$

- Water and salt are excluded from the calculation. The water content of multi-ingredient ingredients which do not have a standard of identity can complicate these calculations.
- The same applies for fluid measures if all of the products and ingredients are liquid. The calculation must be done either in all weight measures or all fluid measures.
- The percentage must be rounded down to the nearest whole number. (97% instead of 97.7%)

* Combined organic ingredients at formulation

VIII. Labeling of nonretail containers (§205.307)

- Nonretail containers used for only shipping or storage must display the production lot number of the product (if applicable), and they may display the certifying agent’s name and seal, the USDA seal, special handling instructions, and identification of the product as organic.



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IX. Labeling of Organic Products according to the NOP (§§ 205.303 – 205.308)



Pursuant to §205.303(a).5 of the NOP, both the ECOCERT ICO and the USDA seals can be used on the same label if ECOCERT ICO seal is not displayed more prominently than the USDA seal.

If your client who is certified by another certifying agency, does not want ECOCERT ICO to appear on their labels, then the label approval shall be done by their certifying agency before issuing the NOP certificate by ECOCERT ICO (a written approval is required).

Product Composition	Labeling	Seals
<p><b style="color: red;">Category: 100% Organic §205.303 Must contain 100% organically produced ingredients (excluding water and salt). Note: No substances listed in § 205.605 and 205.606 may be used.</p>	<p>Required information:</p> <ul style="list-style-type: none"> - Directly below the information identifying the handler or distributor of the product, the certifying agent must be identified (preceded by “certified organic by...” or similar phrase). <p>“Certified Organic by...” acceptable phrasing include:</p> <ul style="list-style-type: none"> - Certified Organic by ECOCERT ICO - This required statement may be replaced by an ECOCERT ICO logo containing the “Certified Organic by...” language but it must still be placed directly below the information identifying the handler or distributor. <p><i>Example: “100% Organic Olive Oil”</i></p>	
<p><b style="color: red;">Category: Organic §205.303 Must contain at least 95% organically produced raw or processed agricultural products (excluding water and salt). Any remaining agricultural ingredients may be conventionally produced only if listed in §205.606, and if not available in organic quality. Non-agricultural ingredients may be used if they are listed on §205.605.</p>	<p>Required information:</p> <ul style="list-style-type: none"> - Identification of each organic ingredient in the ingredient statement with the word “organic” or with an asterisk or other reference mark. - Directly below the information identifying the handler or distributor of the product, the certifying agent must be identified (preceded by “certified organic by...” or similar phrase). <p>“Certified Organic by...” acceptable phrasing include:</p> <ul style="list-style-type: none"> - Certified Organic by ECOCERT ICO - This required statement may be replaced by an ECOCERT ICO logo containing the “Certified Organic by...” language but it must still be placed directly below the information identifying the handler or distributor. 	



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	<p>Optional information:</p> <ul style="list-style-type: none"> - The percentage of organic ingredients in the product - The contact information for the distributor of the finished product <p><i>Example: “Organic Lemon Soda” - Ingredients: Water, Organic Sugar, Organic Lemon Juice, Citric Acid.</i></p>	
<p>Category : Made with organic (specified ingredients or food group(s)) §205.304 Must contain at least 70% organically produced ingredients All remaining agricultural ingredients may be conventionally produced but no ingredient may be produced using ionizing radiation, sewage sludge, or genetic engineering. Non-agricultural ingredients may be used if they are listed on §205.605.</p>	<p>Required information:</p> <ul style="list-style-type: none"> - Identification of each organic ingredient in the ingredient statement with the word “organic” or with asterisk or other reference mark, defined below the ingredient statement. - Directly below the information identifying the handler or distributor of the product, the certifying agent must be identified (preceded by “certified organic by...” or similar phrase). “Certified Organic by...” acceptable phrasing include: <ul style="list-style-type: none"> - Certified Organic by ECOCERT ICO - This required statement may be replaced by an ECOCERT ICO logo containing the “Certified Organic by...” language but it must still be placed directly below the information identifying the handler or distributor. <p>Optional information:</p> <ul style="list-style-type: none"> - The “made with” statement may not list more than three organically produced ingredients. - The letters “made with...” may not exceed one-half the size of the largest type size on the panel. - The percentage of organic ingredients in the product may be displayed on the panel, provided that a “made with” statement is also displayed. - The name and contact information for the distributor of the finished product <p><i>Example: “Pizza made with organic flour and tomatoes” -Ingredients: Organic flour, Water, Organic tomatoes, Cheese, Olive oil, Yeast, Mushrooms, Peppers.</i></p>	 











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<p>Product containing less than 70% organically produced ingredients. (no mention of organic in the Principal Display Panel) §205.305</p>	<p>Optional information:</p> <ul style="list-style-type: none"> - The organic content of the product may only be identified in the ingredient statement with the word “organic” or with an asterisk or similar reference mark. - The product’s percentage of organic contents may be identified on the <u>information</u> panel, only if each organic ingredient is clearly identified. <p><i>Example:” Milk Chocolate” - Ingredients: Sugar, Organic Cocoa, Butter, Organic Milk, Soy Lecithin.</i></p>	
<p>Category: Organic Livestock Feed §205.306 All agricultural ingredients must be certified organic and all other ingredients must be listed in §205.603.</p>	<p>Required information:</p> <ul style="list-style-type: none"> - Must comply with Federal agency or State feed labeling requirements as applicable. - Directly below the information identifying the handler or distributor of the product, the certifying agent must be identified (preceded by “certified organic by...” or similar phrase). <p>“Certified Organic by...” acceptable phrasing include:</p> <ul style="list-style-type: none"> - Certified Organic by ECOCERT ICO <p style="margin-left: 20px;">- This required statement may be replaced by an ECOCERT ICO logo containing the “Certified Organic by...” language but it must still be placed directly below the information identifying the handler or distributor.</p> <p>Optional information:</p> <ul style="list-style-type: none"> - Identification of each organic ingredient in the ingredient statement with the word “organic” or with an asterisk or other reference mark <p><i>Example: “Layer Feed” – Ingredients: Organic Corn Meal, Organic Soymeal, Organic kelp, Vitamin E, Vitamin D3, DL Methionine, Zinc Sulfate, Organic Lecithin</i></p>	


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Product Composition	Labeling	Seals
<p>Category: Nonretail containers used for shipping or storage § 205.307 Non retail container of product meeting the “100% Organic”, “Organic”, or “Made with Organic (specified ingredient or food groups)”</p>	<p>Required information:</p> <ul style="list-style-type: none"> - The production lot number of the product if applicable. - Shipping containers of domestically produced product labeled as organic intended for export to international markets may be labeled in accordance with any shipping container labeling requirements of the foreign country of destination or the container labeling specifications of a foreign contract buyer: Provided, That, the shipping containers and shipping documents accompanying such organic products are clearly marked “For Export Only” and: Provided further, That, proof of such container marking and export must be maintained by the handler in accordance with recordkeeping requirements for exempt and excluded operations under §205.101. <p>Optional information:</p> <ul style="list-style-type: none"> - The name and contact information of the certifying agent which certified the handler which assembled the final product; - Identification of the product as organic; - Special handling instructions needed to maintain the organic integrity of the product; <p><i>Example: Organic Soy Oil – Lot # 123456</i></p>	<div style="text-align: center;">  </div> <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="text-align: center;">  </div> <div style="text-align: center;">  </div> </div> <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="text-align: center;">  </div> <div style="text-align: center;">  </div> </div>
<p>Category: Agricultural products in other than packaged form at the point of retail sale that are sold, labeled, or represented as “100 percent organic” or “organic.” § 205.308</p>	<p>Optional information:</p> <ul style="list-style-type: none"> - May use the term, “100 percent organic” or “organic,” as applicable, to modify the name of the product in retail display, labeling, and display containers: Provided, That, the term, “organic,” is used to identify the organic ingredients listed in the ingredient statement. <p><i>Example: “Organic Red Leaf Lettuce” plant</i></p>	<p>If product is prepared in a certified organic facility:</p> <div style="text-align: center;">  </div> <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="text-align: center;">  </div> <div style="text-align: center;">  </div> </div> <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="text-align: center;">  </div> <div style="text-align: center;">  </div> </div>

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<p>All categories</p>	<p>Optional:</p> <ul style="list-style-type: none">- May use optional QR Code. A QR code is linked to the annual certificate and thus changes every year at the time a new certificate is issued. Anyone with a QR code reader may use it to link directly to a copy of your certificate on our website. It is appropriate to be used at the bottom of a label for the purpose of buyer/consumer verification of certification or for other marketing purposes. ECOCERT ICO will still verify products as requested, even with use of such code for verification as needed. <p>It is the responsibility of the client to use the most recent QR code provided by ECOCERT ICO and to size/test it prior to use.</p>	 <p>Note: the code above links to ECOCERT ICO website, unique codes to be provided to link to each individual client certificate.</p>
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You will find information about the NOP on the USDA-NOP homepage:

<http://www.ams.usda.gov/AMSV1.0/nop>

You can check the compliance of many inputs for use under the NOP on the OMRI website www.omri.org (the Brand Name Products list is available for free, the Generic Materials list is charged for).

If you need further information, we are available to answer technical questions.

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