



# Ecocert Transitional Program Guidance for Labelling

## I. Introduction

This abstract summarizes the Ecocert Transitional Program requirements for labeling transitional products.

The Transitional System Plan must include all information needed to show how the transitional requirements will be met.

## II. Categories for Certification

- Under Ecocert Transitional Program, only the following product categories are allowed:
  - "100% transitional"
  - "Transitional"
  - "Made with Transitional (specified ingredients or food groups)"

## III. Calculating the percentage of transitional produced ingredients

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

- 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%)

## IV. Labeling of nonretail containers

- Nonretail containers used for only shipping or storage must display the production lot number of the product (if applicable) and identification of the product as transitional.

### Warning

**Pursuant to §205.102 of the NOP, the term "organic" and/or the USDA seal MUST not be used by an operation certified transitional.**



All other terms<sup>1</sup> such as "organically produce/grown/processed" or any reference to USDA National Organic Program won't be allowed in the labeling of the products and/or the communication materials of the company.



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<sup>1</sup> Not exhaustive


**V. Labeling of Transitional Products**

**WARNING: The client acknowledges that the ECOCERT transitional logo may be modified at any time by Ecocert, in particular upon request of the USDA or in the event of changes in national or international regulations and/or interpretation thereof, generally or relating to the definition of organic farming and/or certification thereof, which would result in the impossibility for Ecocert to maintain the said logo.**

The client may label its certified Products as follows:

Product Composition	Labeling	Seals
<p><b>Category: 100% Transitional</b> Must contain <b>100% transitional</b> produced ingredients (excluding water and salt).</p>	<p><b>Required information:</b></p> <ul style="list-style-type: none"> <li>- Directly below the information identifying the handler or distributor of the product, the following statement must be added <b>"The ingredients /processing in/of this product were made following regulations for a transition to a more sustainable production." OR "The ingredients /processing in/of this product were made following ECOCERT transitional Standard."</b></li> </ul> <p><i>Example: "100% Transitional Olive Oil"</i></p>	
<p><b>Category: Transitional</b> Must contain <b>at least 95% transitionally</b> 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. <b>(no mention of organic in the Principal Display Panel)</b></p>	<p><b>Required information:</b></p> <ul style="list-style-type: none"> <li>- Identification of each transitional ingredient in the ingredient statement with the word "transitional" or with an asterisk or other reference mark.</li> <li>- Identification of each organic ingredient in the ingredient statement with the word "organic" or with an asterisk or other reference mark.</li> <li>- Directly below the information identifying the handler or distributor of the product, the following statement must be added <b>"The ingredients /processing in/of this product were made following regulations for a transition to a more sustainable production." OR "The ingredients /processing in/of this product were made following ECOCERT transitional Standard."</b></li> </ul>	

	<p><i>Example: "Transitional Lemon Soda" - Ingredients: Water, Transitional Sugar, Organic Lemon Juice, Citric Acid.</i></p>	
<p><b>Category : Made with transitional (specified ingredients or food group(s))</b> Must contain at least 70% transitional produced ingredients All remaining agricultural ingredients may be organically produced but no ingredient <b>may be produced using ionizing radiation, sewage sludge, or genetic engineering.</b> Non-agricultural ingredients may be used if they are listed on §205.605.</p>	<p><b>Required information:</b></p> <ul style="list-style-type: none"> <li>- Identification of each transitional ingredient in the ingredient statement with the word "transitional" or with an asterisk or other reference mark.</li> <li>- Identification of each organic ingredient in the ingredient statement with the word "organic" or with an asterisk or other reference mark.</li> <li>- Directly below the information identifying the handler or distributor of the product, the following statement must be added "The ingredients /processing in/of this product were made following regulations for a transition to a more sustainable production."</li> </ul> <p><b>Optional information:</b></p> <ul style="list-style-type: none"> <li>- The "made with" statement <b>may not list more than three</b> transitional produced ingredients.</li> <li>- The letters "made with..." <b>may not exceed</b> one-half the size of the largest type size on the panel.</li> <li>- The percentage of transitional ingredients in the product <b>may be displayed</b> on the panel, provided that a "made with" statement is also displayed.</li> <li>- The name and contact information for the distributor of the finished product</li> </ul> <p><i>Example: "Pizza made with transitional flour and tomatoes" -Ingredients: Transitional flour, Water, Organic tomatoes, Cheese, Olive oil, Yeast, Mushrooms, Peppers.</i></p>	
<p><b>Product containing less than 70% transitionally produced ingredients. (no mention of transitional in the Principal Display Panel)</b></p>	<p><b>Optional information:</b></p> <ul style="list-style-type: none"> <li>- The transitional content of the product <b>may only be identified in the ingredient statement</b> with the word "transitional" or with an asterisk or similar reference mark.</li> <li>- The product's percentage of transitional contents <b>may be identified</b> on the <u>information</u> panel, only if each transitional ingredient is clearly identified.</li> </ul> <p><i>Example:" Milk Chocolate" - Ingredients: Sugar, transitional <b>Cocoa</b>, Butter, transitional <b>Milk</b>, Soy Lecithin.</i></p>	

<p><b>Transitional Livestock Feed</b></p>	<p><b>Required information:</b></p> <ul style="list-style-type: none"><li>- Must comply with Federal agency or State feed labeling requirements as applicable.</li><li>- Directly below the information identifying the handler or distributor of the product, the following statement must be added "The ingredients /processing in/of this product were made following regulations for a transition to a more sustainable production."</li></ul> <p><b>Optional information:</b></p> <ul style="list-style-type: none"><li>- Identification of each transitional ingredient in the ingredient statement with the word "transitional" or with an asterisk or other reference mark.</li></ul> <p><i>Example: "Layer Feed" – Ingredients: transitional Corn Meal, transitional Soymeal, Organic kelp, Vitamin E, Vitamin D3, DL Methionine, Zinc Sulfate, transitional Lecithin...</i></p>	
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## VI. NOSB recommendation 2002

This guidance had been elaborated based on guidance recommended by the National Organic Standards Board (NOSB)<sup>2</sup>

### § 205.2 Terms defined.

**Transition:** The act of establishing organic management practices in accordance with the Act and the regulations in this part.

**Transition period:** The time between the start of organic management and when an operation or portion of an operation is eligible for organic certification.

**Transitional product:** A product from an operation or portion of an operation which has completed one or more years of the transition period towards becoming a certified organic operation and is certified by an accredited certifying agent as operating in accordance with the Act and the regulations in the part.

### § 205.104 Use of the term "transitional".

(a) Products of farms in transition to organic certification may be labeled or represented as "certified transitional" or "transitional" after the operation has been certified by an accredited certifying agent as operating in compliance with the requirements in this part.

(b) In order to market products as "certified transitional" or "transitional" an operation must maintain records as set forth in § 205.103 and develop an organic production plan as set forth in § 205.201.

(c) Annual inspections are required with at least one inspection occurring prior to harvest of transitional crops in order for the crops to be labeled or represented as "certified transitional" or "transitional".

(d) Transitional status may only be granted to an operation or portion of an operation where the applicant can provide evidence of:

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<sup>2</sup> <https://www.ams.usda.gov/rules-regulations/organic/nosb>

- (1) At least 12 months active organic management prior to harvest; or
  - (2) Twelve (12) months with no application of prohibited materials prior to planting and organic management of any area of the farm that is or will be used for transitional crop production.
- (e) "Transitional" and "certified transitional" products must not:
- (1) Be labeled or represented as "organic" or "transition to organic";
  - (2) Be used as organic ingredients in the formulation of products labeled as "100% organic," "organic," or "made with organic (specified ingredients or food group(s))";
  - (3) Use the USDA organic seal; or
  - (4) Use the seal of a certifying agent, unless that seal is specifically designed for transitional products and is clearly distinguishable from the certifying agent's seal used on organic products.