

Understanding Common Labeling Issues

The USDA labeling standards were formally implemented in the fall of 2002. Since that time and nearly a decade later, we have consistently found noncompliance(s) on the labels we review. Some of the most common mistakes include:

- Wrong USDA seal color
- Not listing organic ingredients
- Incorrect graphics/size of USDA and certifier seals
- Certifier ID missing or in the wrong location
- Incorrect product claims
- Printing before certifier has approved the label

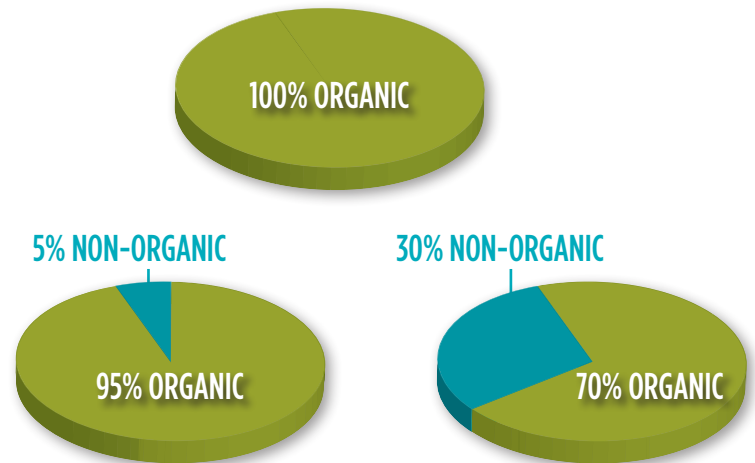
Addressing minor labeling non-compliances adds unnecessary costs such as a longer inspection, staff time to respond to non-compliances, changing printing plates, and regulatory exposure of the brand and company. Severe labeling issues can include costs of retrieving and disposing of non-compliant label stock, or labor costs associated with applying stickers to packages. Lastly, major issues can result in substantial fines.

1 The Product's Composition Determines the Claim

The USDA has defined three categories of organic products: "100% Organic," "Organic," and "Made with Organic Ingredients." Before you create your label, your company must calculate the exact organic composition for each of your product formulations. The actual organic content of each ingredient must be taken into account. Salt and water are excluded from the calculation and the final percentage is rounded down. For information on how to do this, download our [Calculating Organic Percentages](#) Excel spreadsheet, found at www.ccof.org/forms.php.

Your product can make the following claim only if it meets these criteria:

- » **100% Organic**
 - Each ingredient in the product must be 100% organic
 - Processing aids used in the manufacturing process must be organic
- » **Organic (≥95%)**
 - Organic content must be at least 95%
 - Non-organic ingredients must be on the National List
- » **Made With Organic (≥70%)**
 - Organic content must be at least 70%
 - Natural and synthetic ingredients must be on the National List



2 Identify the Organic Certification Agency



The USDA NOP standards require that the name of the certifier of the product be displayed on the information panel.

- Copy should include "Certified Organic by (Certifier)." You can use the certifier's full name or their recognized acronym. Or, you can use the certifier's seal, if it includes the language "Certified Organic by (name and/or acronym)."

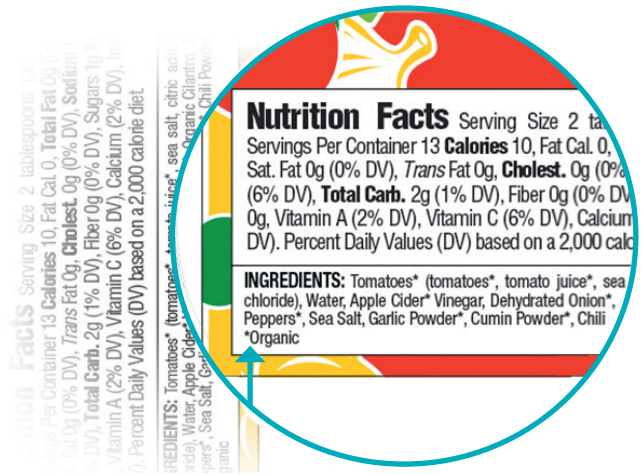
This copy must be placed below the name of the final product handler.

3

Identify the Organic Ingredients on the Ingredient Panel

For product formulas that are organic (≥95%), you must identify each organic ingredient in the finished product on the ingredient panel.

- The word “organic” can be included before each ingredient listed. Or, to save space, you can use an asterisk next to each organic ingredient and include a key beneath the list.
- If your product is 100% organic, you are not required to list each ingredient as organic on your label.



4

Display Organic Percentage Statements and Graphics Correctly*



COMPLIANT!

Some companies choose to include a percentage statement on the label or within the product logo (optional). Of course, the percent statement must not be more than the actual organic content. You can include additional graphic design treatments such as banners or starbursts. However, you must adhere to the following graphic requirements:

- Font size must be ½ the size or less than the largest font in the logo or panel. For example, if your logo type face is 24 point, your percent statement must be 12 point or smaller.
- Font must be uniform. You cannot bold, italicize, or otherwise highlight individual words. You cannot use a “stronger” typeface to call attention to a specific word.
- Font color must be the same as the rest of the statement.

5

Use the Correct Graphics and Language to Convey the “Made with Organic” Claim*

The statement can be anywhere on the label. The graphics must:

- Be in the same font size, no more than ½ the size of the largest font on the package.
- The statement has to be in the same style. No part of the statement can be highlighted.

The statement “Made with Organic” must be followed by:

- Up to three actual ingredients.
- Three actual food groups.
- The named ingredients or all ingredients in the food groups must be organic.



COMPLIANT!



Steps 4, 5, and 6 are optional, or only apply to products of certain composition. Read the steps carefully and skip them if they don't apply to your product.

6

Show Correct USDA and Certification Agency Seals*

» If Using the USDA Seal

The USDA seal (optional) is only allowed on products with a “100% Organic” and “Organic” (≥95%) claim. It cannot be used on products labeled “Made with Organic (specified ingredients).” The USDA seal can be displayed anywhere on the package. It should be in a more prominent location and size than the certifier’s seal.



The USDA four color seal must be on a white background.

- Brown = PMS 175
- Green = PMS 348



If you do not use the colored seal, you can use the black seal. It is the only other approved color and must be on a background that is white or a lighter color.

» If Using the Certifier Seal

You may display the certifier seal on any product with a “100% Organic,” “Organic,” or “Made with Organic (specified ingredients)” claim (optional). The certifier seal can be placed anywhere on the label. The size should be the same or smaller than the USDA seal.

- Must not be more prominent than the USDA seal.
- Must be used as required by the NOP federal regulation.



CCOF green & yellow seal cannot be changed.

- Green = PMS 357
- Yellow = PMS 130



CCOF one color seal can be any color.

7

Send Labels to the Certification Agency for Approval

All labels must be approved by CCOF. Once your label is designed, you must submit it to CCOF or your certifier for their review, and obtain their approval before you order prints. If your certifier requests changes, you must submit the revised label for approval. Also, it is a good practice to request final approval in writing and place a copy of this in your records. Following these steps will help you avoid printing labels with mistakes.

SEND LABEL

RECEIVE INPUT &
MAKE CHANGES

SEND REVISED PROOF
FOR FINAL APPROVAL

FINALIZE PLATES

ORDER PRINTS

Other Product Labeling Information & Resources

» Non Retail Bulk Labels

You are required to display a production lot code to enable traceability. It is optional to include the following: “Certified Organic by” statement; Certifier seal; USDA seal.

» Alcoholic Beverages

Alcoholic beverages do not require ingredient statements.

» Promotional Materials

The same labeling rules apply to signage, store displays, promotional fliers, and your website. If your retailers or creative partners are responsible for producing these, be sure they know the requirements.

» Additional Information and Resources

Visit www.ams.usda.gov for information on:

- USDA NOP Label Standards §205.300 to 205.311: [NOP Subpart D - Labels, Labeling, and Market Information](#)
- Watch for changes to the “Made with Organic” regulations: [USDA NOP](#)

» About Our Partners

These guidelines were created in collaboration with [Organic Education Solutions LLC](#), who offers training programs and services to support organic businesses, and [Foerstel](#), a strategic branding and design firm who designed the mock labels.



» **Visit www.ccof.org/programs.php to learn more about CCOF’s organic education events.**