

DEVELOP COMPLIANT ORGANIC LABELS

Understanding Common Labeling Issues

The USDA labeling standards dictate how you may design your certified organic product label. Some of the most common labeling mistakes CCOF sees include:

<ul style="list-style-type: none"> >> Wrong USDA seal color >> Certifier name missing or in the wrong location >> Ingredients listed on label do not match product formula 	<ul style="list-style-type: none"> >> Not identifying organic ingredients as organic in the ingredient statement >> Incorrect size of USDA and certifier seals >> Printing before certifier has approved the label
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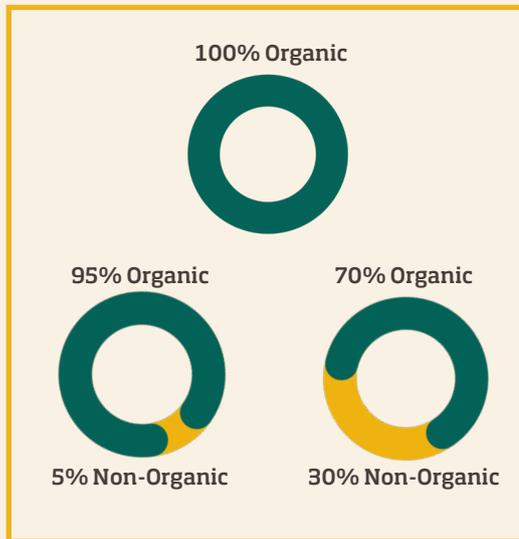
Labeling noncompliances add unnecessary costs such as a longer inspection, staff time to respond to noncompliances, changing printing plates, and regulatory exposure of the brand and company. Severe labeling issues can include the cost of disposing of noncompliant label stock, or costs associated with modifying existing labeling stock and already labeled product. Lastly, major issues can result in substantial fines or suspension of certification.

1

The Product's Composition Determines the Claim

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

The USDA has defined three categories of organic products: "100% Organic," "Organic," and "Made with Organic" 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.



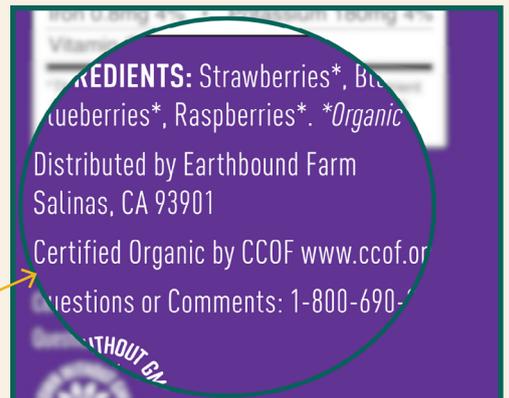
- >> **100% Organic**
 - Each ingredient in the product must be certified 100% organic
 - Processing aids used in the manufacturing process must be organic
- >> **Organic (≥95%)**
 - Organic content must be at least 95%
 - Nonorganic ingredients and processing aids must be on the National List of Allowed and Prohibited Materials, NOP § [205.605](#) and [205.606](#)
- >> **Made With Organic (≥70%)**
 - Organic content must be at least 70%
 - Nonorganic, nonagricultural ingredients and processing aids must be on the National List of Allowed and Prohibited Materials, NOP § [205.605](#).

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, directly below the company information.

>> 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, instead of their name, preceded by the language "Certified Organic by (seal image)."



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



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3 Identify the Organic Ingredients on the Ingredient Panel

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 (as shown in previous image).

>> If your product is 100% organic and labeled with a “100% Organic” claim, you are not required to list each ingredient as organic on your label.

>> Closely review your label in comparison to your formula; they must match.

INGREDIENTS: ORGANIC BASIL, BALSAMIC VINAIGRETTE (organic soybean oil, organic balsamic vinegar, organic cane sugar, water, organic extra virgin olive oil, salt, organic apple cider vinegar, less than 2% of organic basil, organic black pepper, xanthan gum), ORGANIC ROMAINE LETTUCE, ORGANIC FRISEE, ORGANIC BROCCOLI, ORGANIC CAULIFLOWER, ORGANIC HERB SEASONED FLAT BREAD STRIPS (organic wheat flour, water, organic palm shortening), salt, organic yeast, organic sunflower oil, organic onion, organic garlic, organic maltodextrin, organic spices, organic tomato, organic butter flavor, organic carrot, organic parsley, organic celery, organic paprika, ascorbic acid), ORGANIC RED CABBAGE, ORGANIC FETA CHEESE (Organic Feta Cheese [Pasteurized Organic Milk, Salt, Cheese Culture, Enzymes], Organic Potato Starch [To Prevent Caking]), Powdered Cellulose [To Prevent Caking]), ORGANIC CARROT.

4 Correctly Format Percentage Statement and “Made with Organic ...” Claims

Some companies choose to include a percentage statement of organic ingredients on the label. 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:

>> Percentage statement font size must not exceed ½ the size of the largest type size on the panel. For example, if your logo type face is 24 point on the panel, your percent statement must be 12 point or smaller.

>> Percentage statement font must be uniform size, style, and color within the claim.

>> If you are using a percentage statement on the front panel of a “Made with Organic ...” product, the “Made with Organic ...” claim must appear on the same panel.



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If your product is certified as “Made with Organic...” because it contains <95% organic content or a nonorganic agricultural ingredient that is not on the National List, be sure your label meets the following requirements:

>> The “Made with Organic ...” statement can be anywhere on the label. The graphics must:

- Not exceed 1/2 the size of the largest type size on the panel.
- Be uniform size, style, and color within the claim.

>> The statement “Made with Organic”:

- The named ingredients or all ingredients in the named food groups must be organic.
- Must be followed by the named ingredients or all ingredients in the food groups must be organic



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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" or "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.



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. The black seal is the only other approved color and must be on a background that is white or transparent.

» 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, but must not be more prominent than the USDA seal.



CCOF green and yellow seal (preferred).

- Green = PMS 357
- Yellow = PMS 130



CCOF one color seal can be white, black, or green.

6

Send Labels to the Certification Agency for Pre-Approval

All labels must be pre-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 re-submit the revised label for approval. Following these steps will help you avoid printing labels with mistakes.

Send Label

Receive input & Make Changes

Send Revised Proof For Final Approval

Finalize Label Plates

Order Prints

Other Product Labeling Information & Resources

» Nonretail Containers

Any container used to ship or store organic products must identify the product as organic and display a production lot number or other unique information that links the container to the audit trail documentation. This includes temporary signage applied to unpackaged product during shipping and storage. It is optional to include the following: "Certified Organic by" statement; certifier seal; USDA seal.

» Alcoholic Beverages

Alcoholic beverages do not require ingredient statements. There is a [wine labeling guide](#) on the CCOF website and organic alcohol labeling guides at the [Tax and Trade Bureau](#).

» 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. Review CCOF's Organic Claims on Websites and Other Marketing" document for full details: www.ccof.org/marketing-organic-claims.

» Additional Information & 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.

