

Six Simple Steps to

DEVELOP COMPLIANT ORGANIC LABELS

Understanding Common Labeling Issues

The USDA labeling standards were formally implemented in the fall of 2002. These rules dictate how you may design your certified product label. Some of the most common labeling mistakes CCOF sees include:

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

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 labor costs associated with modifying existing labeling stock. Lastly, major issues can result in substantial fines or suspension of certification.

1 The Product's Composition Determines the Claim

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.

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

» 100% Organic

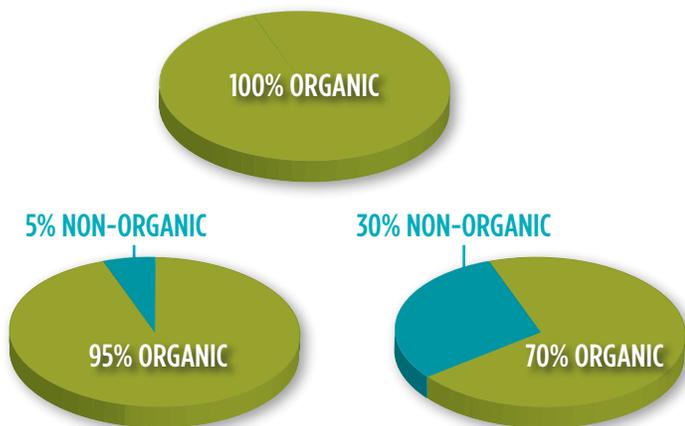
- Each ingredient in the product must be 100% organic
- Processing aids used in the manufacturing process must be organic

» Organic (≥95%)

- Organic content must be at least 95%
- Non-organic ingredients must be on the National List
- Processing aids must be on list of allowed materials

» Made With Organic (≥70%)

- Organic content must be at least 70%
- Processing aids must be on list of allowed materials



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, 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.

Develop Compliant Organic Labels

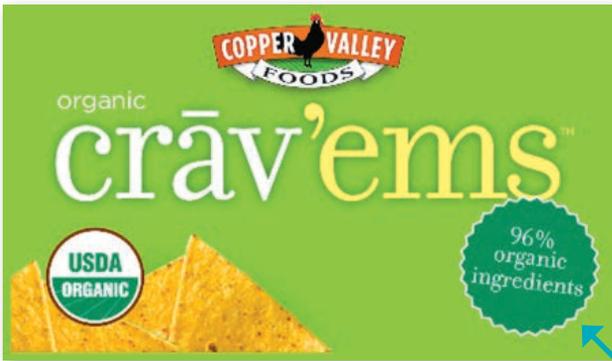
3 Identify the Organic Ingredients on the Ingredient Panel

For product formulas that are organic ($\geq 95\%$), 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 Correctly Format Percentage Statement and 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:

- Font size must not exceed 1/2 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.
- 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.

COMPLIANT!

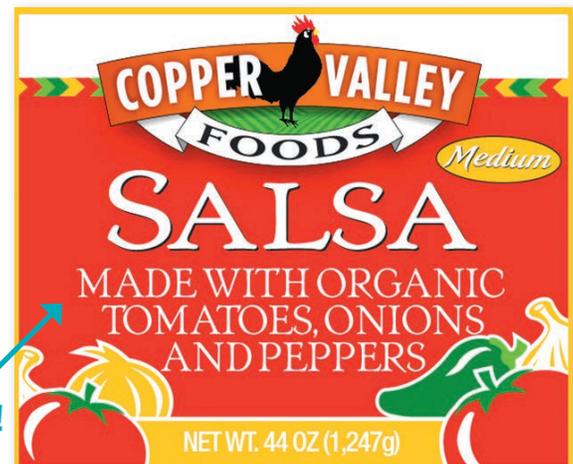
» The “Made with Organic ...” statement can be anywhere on the label. The graphics must:

- 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” must be followed by:

- Up to three ingredients.
- Up to three food groups.

» In the “Made with Organic ...” statement, the named ingredients or all ingredients in the food groups must be organic.



COMPLIANT!

* Step 4 is optional, or only applies to products of a certain composition. Read the step carefully and skip it if it doesn't apply to your product.

5 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 any color.

6 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 re-submit the revised label for approval. Also, it is a good practice to request final approval in writing and place a copy 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

» NonRetail Bulk Labels

You are required to display a production lot code to enable traceability. It is optional to include the following: organic composition claim; “Certified Organic by” statement; certifier seal; USDA seal. CCOF recommends that you indicate “organic” on bulk packaging so handlers downstream can help maintain organic integrity of the product.

» Alcoholic Beverages

Alcoholic beverages do not require ingredient statements. There are specific alcohol labeling guides on the [CCOF website](#) and the [NOP website](#).

» 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 & 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/education to learn about CCOF’s organic education programs.