



TS04(NOP)v05en

Guideline n°4 NOP – Handling and Labeling

According to the USDA National Organic Program (NOP)



**This guideline does not replace the current Regulation.
It provides some explanations on main requirements for organic handling and labeling.**

To know the main organic requirements, it is necessary to download and read carefully the NOP Regulation available on the USDA website:

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



I. Introduction

This guideline summarizes the NOP requirements for the activity of distribution and labeling i.e. the sale, processing or packaging of agricultural products.

Further study of the standard is required for anyone involved in organic handling.

As explained in the guideline NOP n°1 (part 2 – page 3), the Organic System Plan must include all information explaining how the NOP requirements will be met.

II. Practices and ingredients (§ 205.105)

The NOP excludes:

- the use of Genetically Modified Organisms (GMOs)
- the use of ionizing radiation and the spreading of sewage sludge
- burning must not be used as a mean of removing crop residues, but can be used to stop the spread of disease or to stimulate seed germination

III. Organic Handling Requirements (§ 205.270)

- For processing of organically produced agricultural products, a variety of mechanical or biological measures may be used.
- As non-agricultural ingredient or processing aid, only the substances as allowed under § 205.605 may be used (for products to be labeled “organic” or “made with organic”).
- Both synthetic and natural substances are listed here, and some with 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 ingredient for “organic” products when listed on § 205.606.

IV. Facility Pest Management (§ 205.271)

- In the organic facility, **pests must be prevented through good sanitation measures** and control of environmental factors such as temperature, light, humidity, etc.
- The control of pests may be done through mechanical and physical controls as well as lures and repellents in compliance with the NOP National List.
- If above mentioned measures are not effective enough, substances compliant with the National List may be applied.
- If the pest problem can still not be controlled, other synthetic substances may be applied. In this case the operator has to ask **ECOCERT for approval before application**, take appropriate measures to avoid contamination of the organic



products, and adapt the OSP accordingly.

V. Commingling and Contamination (§ 205.272)

- In the operation, measures must be implemented to prevent commingling of organic and nonorganic products (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.
- Also the integrity of incoming ingredients and products must be checked by verifying proper packaging, labeling, certificates, etc.

VI. Categories for Certification (§ 205.301)

- Under NOP, the following categories are differentiated:
 - "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)

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

- Water and salt are excluded from the calculation
- The same applies for fluid volumes if products and ingredients are liquid.
- The percentage must be rounded down to the nearest whole number.

* 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.







IX. Labeling of Organic Products according to the NOP (§§ 205.303 – 205.306)

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





If your client in the U.S., certified by another certifying agency, does not want that Ecocert appear on his labels, then the label approval shall be done by this certifying agency and before issuing the NOP certificate by Ecocert (a written approval is expected).

Any new or revised labels must be sent to Ecocert for approval before being used on products.

Please find below the requirements about NOP labeling according to the products category.

Product Composition	Labeling	Seals
Indication: 100% Organic §205.303 Must contain 100% organically produced ingredients (excluding water and salt). Note: No substances as mentioned in § 205.605 may be used.	<u>Compulsory information:</u> "Certified organic by ECOCERT SA" or similar phrase <u>must be indicated just below</u> the information identifying the handler or distributor of the product <i>Sample: "100% Organic Olive Oil"</i>	 
Indication: 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.	<u>Compulsory information:</u> - identification of each organic ingredient in the ingredient statement with the word " <u>organic</u> " or with asterisk or other reference mark "Certified organic by ECOCERT SA" or similar phrase <u>must be indicated just below</u> the information identifying the handler or distributor of the product <u>Optional information:</u> - The percentage of organic ingredients in the product - The name of the distributor of the finished product <i>Sample: "Organic Lemon Soda" - Ingredients: Water, Organic Sugar, Organic Lemon Juice, Citric Acid</i>	 



<p>Indication:</p> <p>Made with organic (specified ingredients or food group(s)) §205.304</p> <p>Must contain at least 70% organically produced ingredients</p> <p>All remaining agricultural ingredients may be conventionally produced but no ingredient may be produced using ionizing radiation, sewage sludge, or genetic engineering.</p>	<p>Compulsory 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. <p>"Certified organic by ECOCERT SA" or similar phrase <u>must be indicated just below</u> the information identifying the handler or distributor of the product</p> <p>Optional information:</p> <ul style="list-style-type: none"> - The statement may not list more than three organically produced ingredients. - The letters "made with..." may not exceed one-half size of the largest type size on the panel. - The percentage of organic ingredients in the product may be displayed on the panel. - The name of the distributor of the finished product <p><i>Sample: "Pizza made with organic flour and tomatoes" - Ingredients: Organic flour, Water, Organic tomatoes, Cheese, Olive oil, Yeast, Mushrooms, Pepper</i></p>	 
<p>Product containing less than 70% organically produced ingredients.</p> <p>(no indication in the sales description) §205.305/§205.310</p>	<p>Optional information:</p> <ul style="list-style-type: none"> - The product's percentage of organic contents must be identified on the information panel. - The organic content of the product may only be identified in the ingredient statement with the word "organic" or with asterisk or similar reference mark. <p><i>Sample: "Milk Chocolate" - Ingredients: Sugar, Organic Cocoa, Butter, Organic Milk, Soy Lecithin</i></p>	 

You will find all information about the NOP on the USDA-NOP homepage:
<http://www.ams.usda.gov/AMSV1.0/nop>

You will find more information on **ECOCERT** homepage: www.ecocert.com (certification, certified inputs, other activities)

If you need further information, we are at your disposal for technical question.

Bearing social and ecological values

