



# Guidelines for Organic Certification of Processed Products

Vermont Organic Farmers, LLC (VOF)

Northeast Organic Farming Association of Vermont (NOFA-VT)

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The following guidelines are based on the USDA National Organic Program (NOP) Standards. Processors planning to become certified should consider all of the following areas required for compliance with the certification standards. In order to certify that food is organic at the retail level, processors, packagers, manufacturers and food handlers must adhere to the National Organic Program Standards to verify the continuity of organic integrity. These guidelines do not address any additional state regulations regarding commercial food preparation.

Processing and handling includes cooking, baking, curing, heating, drying, mixing, grinding, churning, separating, distilling, extracting, slaughtering, cutting, fermenting, eviscerating, preserving, dehydrating, freezing, chilling, or otherwise manufacturing and packaging, canning, jarring, or enclosing food in a container.

If producing an organic product both organically and non-organically in the same plant, each applicant must develop a detailed plan, identifying critical points of potential co-mingling of organic and non-organic ingredients. **Distributors of organic products that are handled only in their final packaged form and retailers are exempt from certification.**

## Organic Product Composition Categories

Organic products must fall into one of the following categories.

### "100% Organic"

Products represented as 100% organic must be comprised of 100% organic ingredients and processing aids. For multi-ingredient products, all ingredients must be certified in the 100% category. Please note that most ingredients do not qualify for the 100% category. For example, organic maple syrup filtered with diatomaceous earth (a non-organic processing aid) would not qualify as "100% organic" and therefore could not be used as an ingredient in a product labeled as "100% organic).

### "Organic"

Products represented as "organic" must contain at least 95% organic ingredients. The remaining 5% of the product must be comprised of organic ingredients unless those ingredients are:

- Allowed non-organic ingredients listed on the National List Section 205.606. These ingredients are defined as agricultural and are not commercially available in organic form (e.g. sausage casings). However, producers are still required to do a thorough search for these ingredients as organic before non-organic versions are used. This will be verified at the annual inspection.
- Allowed non-agricultural ingredients listed on the National List Section 205.605. These ingredients are non-agricultural, so organic forms do not exist (e.g. baking soda).

All non-organic ingredients must not be produced using genetic engineering or sewage sludge or be irradiated. This must be verified and documented on an annual basis. All processing aids must also be approved on the National List.

### "Made with organic (specified ingredients or food groups)"

Products represented as "Made with organic..." must contain at least 70% organic ingredients. The remaining ingredients must be on the National List Section 205.605 (non-agricultural) and 205.606 (non-organic agricultural). Non-organic agricultural ingredients may not be produced using genetic engineering or sewage

sludge or be irradiated. This must be verified and documented on an annual basis. It is not required that processors attempt to source organic forms of the non-organic agricultural ingredients in a “Made with organic...” product. All processing aids must also be approved on the National List.

#### Less than 70% organic ingredients

Products in this category are not eligible for certification and may not be sold, labeled or represented as organic. However, producers may identify organic ingredients in these products in the following ways:

- Identifying organic ingredients in the ingredient statement with the word “organic” or an asterisk or other reference mark which is defined below the ingredient statement to indicate the ingredient is “organic”.
- Displaying the products percent of organic ingredients on the information panel (only allowed if organic ingredients are identified in the ingredients statement).

#### **Raw Ingredient Verification & Tracking**

Incoming organic ingredients must be accompanied by documentation (e.g. organic certificates) verifying certification to the NOP Standards. Certificates and other documentation should be kept on file by the processor and made available to the inspector. In order to be considered current, certificates should not have a renewal date that is more than one year old. Incoming loads of raw ingredients should be accompanied by receipts/invoices that identify the ingredients as organic and can be tracked with a lot number.

For operations not buying through a distributor but who instead buy raw ingredients from a retail operation (e.g. food coop), a certificate is not required. However, a receipt identifying the ingredient as organic must be available at the time of inspection and when otherwise requested to verify the organic status of the ingredient.

**Note that genetic engineering, ionizing radiation and use of sewage sludge are considered prohibited processes by the NOP Standards. Therefore ingredients produced using these processes may not be used in products labeled “100% organic”, “organic”, or “made with organic (ingredients or food groups)”.** Producers must have written documentation verifying that non-organic ingredients were not produced using excluded methods. **All non-agricultural ingredients and processing aids must appear on the National List, §205.605-§205.606.**

#### **Organic Product Composition**

A detailed product profile of each product requested for certification must be submitted to the VOF office with the annual certification application. The product profile must include a list of all ingredients used in the product (organic, non-organic, and non-agricultural ingredients); the supplier name; name of the corresponding certifying agent; the percent organic content in each ingredient; the percent of each ingredient (excluding water and salt) in the formulation; and the actual organic percent of each ingredient in the product (please see a description of how the product composition calculations must be calculated below) Note that if the ingredient is obtained from more than one supplier information for all suppliers should be provided. All processing aids must also be listed on the product profile form.

#### **Calculating Percentage of Organic Ingredients**

For the configuration of percentages of organic ingredients, processors should use weight or fluid volume, and exclude salt and water from all calculations. It is the responsibility of the processor who puts the label on the final retail package to determine the total percent of organic ingredients in the product.

- Non-liquid products must figure the percentage by dividing the weight of the organic ingredients by the weight of the total ingredients.
- Liquid products must use volume, and if using ingredients that have been reconstituted, the calculation should be made on the basis of single strength concentrations.
- If a product contains both solid and liquid ingredients, the calculation should be made using the combined weight of both the solid and liquid ingredients.

The total percentage of organically produced ingredients should be rounded down to the nearest whole number.

*Example: Biscuit Baking Mix- 16 oz*

Ingredient	Supplier	Certifying Agent	Weight	% of final product
Organic All-Purpose Flour	Midwest Mills	QAI	8 oz.	50%
Organic Whole Wheat Flour	Pacific Flour Co.	OTCO	4 oz.	25%
Baking Powder	Rumford	(non-agricultural)	0.5 oz.	3.1%
Organic Non-Fat Milk Powder	Dairy Brands	CCOF	3.5 oz.	21.8%
Sea Salt	Real Salt	(non-agricultural)	n/a	n/a
Total (rounded down)			16 oz.	99 %
% Organic (rounded down)				96%

In 1 lb (16 oz) of baking mix there is 8 oz all-purpose flour, 4 oz whole wheat flour, 3.5 oz of dry milk and ½ oz baking powder. The mix also includes salt but it is not included in the calculation. Eight ounces divided by 16 equals 0.5 or 50%. The same calculation is done for each ingredient.

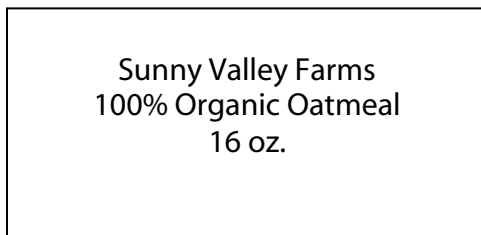
4 oz / 16 oz = .25 (25%), 3.5 oz / 16 oz = 0.218 (21.8%), 0.5 oz/ 16 oz = 0.031(3.1%)

### Labeling

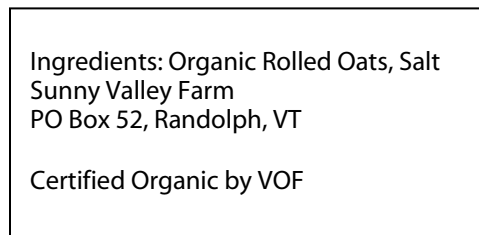
Producers must submit their labels to VOF for approval prior to sale.

#### 100% Organic

These products may be labeled anywhere on the package as “100% organic” or “organic” and may indicate ingredients individually as organic in the ingredient statement. Processors may use the USDA seal and the VOF Logo. However, if a processor chooses to use both logos, the VOF logo may not be more prominent than the USDA seal. On the information panel below information identifying the handler or distributor, the certifying agency of the handler must be identified with a phrase such as, “Certified Organic by Vermont Organic Farmers” or “Certified Organic by VOF”. The VOF logo is not an adequate substitute for this phrase.



Front Panel



Back Panel

#### “Organic” Category

Products in this category may be labeled anywhere on the package as “organic” and may use the USDA seal and the VOF Logo. However, if a processor chooses to use both logos, the VOF logo may not be more prominent than the USDA seal. Processors **must** indicate each organic ingredient in the ingredient statement. On the information panel below information identifying the handler or distributor, the certifying agency of the handler must be identified with a phrase such as “Certified Organic by Vermont Organic Farmers” or “Certified Organic by VOF”. The VOF logo is not an adequate substitute for this phrase.

If you list the percentage of organic ingredients in the product, the size of the percentage statement must not

exceed ½ the size of the largest type size on the panel on which the statement is displayed and must appear in its entirety in the same type size, style, and color without highlighting.

Better Bread Bakery  
Organic Farm Style Bread  
16 oz.

Front Panel

Ingredients: \*Organic whole wheat flour, \*Organic whole rye flour, \*Organic whole spelt flour, water, yeast  
\* = organic ingredient  
Better Bread Bakery  
15 Main Road, St. Albans, VT  
Certified Organic by VOF

Back Panel

Made with organic “(specified ingredients or food groups)”

Products in this category may be labeled anywhere on the package as “Made with organic...” listing no more than three individual organic ingredients or food groups (for details see §205.304(a)(1)). The type size of the made with organic statement may not exceed ½ the size of the largest type size on the panel and must appear in its entirety in the same type size, style, and color without highlighting. Processors **must** indicate each organic ingredient in the ingredient statement. **Processors of products in this category are not allowed to use the USDA seal or the VOF logos.** On the information panel below information identifying the handler or distributor, the certifying agency of the handler must be identified with a phrase such as “Certified Organic by Vermont Organic Farmers” or “Certified Organic by VOF”. The VOF logo is not an adequate substitute for this phrase.

Red Tomato Co.  
Salsa  
Made with Organic Tomatoes  
8 oz.

Front Panel

Ingredients: Organic tomatoes, Organic green peppers, chili peppers, cilantro, salt and pepper  
Red Tomato Co.  
PO Box 35, Brattleboro, VT  
Certified Organic by VOF

Back Panel

There are special considerations for livestock feed processing and labeling. For details, please refer to §205.237, §205.301(e), and §205.306. There are also special considerations for point of retail sales labeling. Please refer to §205.308-309.

### Cleansers and Sanitizers

VOF does not recommend the use of specific cleansers for washing food contact surfaces. Processors may use any cleanser, disinfectant, and sanitizer provided that they do not contaminate the organic product. VOF recommends thorough rinsing after the use of all cleaning products. If these products are likely to leave a chemical residue, testing may be required. If products are used that are highly persistent and leave a residue (such as quaternary ammonia), it is the producer’s responsibility to verify that the organic product is not being contaminated. Documentation of this verification will be required. Chlorine materials may be used up to maximum-labeled rates for disinfecting and sanitizing food contact surfaces. Rinsing of chlorine materials is not required unless mandated by the label use directions.

Cleansers and sanitizers used to wash organic ingredients are considered food additives and must be on the National List of allowed non-agricultural substances (205.605). Water used in direct contact for ingredient washing is permitted to contain chlorine materials at levels approved by the Food and Drug Administration or the Environmental Protection Agency for such purpose. However, rinsing with potable water that does not exceed the maximum residual disinfectant limit for the chlorine material under the Safe Drinking Water Act (4ppm) must immediately follow this permitted use.

The following active ingredients are allowed for use in direct food contact:

- Chlorine (rinse required [see above])

- Hydrogen Peroxide
- Potassium Carbonate
- Sodium Carbonate (soda ash)
- Sodium Bicarbonate
- Sodium Hydroxide
- Ozone
- Peracetic Acid

### **Packaging**

- All packaging material must be free of fungicides, preservatives, fumigants, insecticides, or other prohibited contaminants.
- All materials used for packaging must be food grade and of suitable design to protect the organic integrity of the product.
- VOF recommends non-essential packaging should be avoided where possible and considerations should be given to how the end product packaging may be recycled or returned.

### **Pest Management**

Pest management in processing facilities must be described in the application and must include exclusion/prevention of pests, good sanitation, and restriction of habitats for pests. Pest logs describing where and when pesticides are used are required for processors who use synthetic controls. Ongoing monitoring and inspection should be performed in the facility to determine the presence and degree of activity of any insect or rodent pests. If a processor does use a synthetic or non-synthetic substance to control pests, this must be listed in their application, including all measures taken to prevent contact of the substance with organic products or ingredients.

#### Approved

- Management practices to prevent pests
- Mechanical, electrical, pheromone/scent and adhesive traps, physical barriers, sound and light devices as repellents, lures and repellents using non-synthetic or synthetic substances from the National List.

In the case that the above approved methods are not effective, processors may use a non-synthetic or synthetic substance from the National List. If substances from the National List are also not able to prevent or control pests, a synthetic substance not on the National List may be used provided that the producer and VOF agree on the substance, method of application and measures being taken to prevent contact with the organic product.

In the case of fogging and broad surface treatments, organic product must not be contaminated. All food preparation surfaces must be covered or otherwise protected from contamination.

### **Storage (§205.272)**

Storage of organic products must be such to maintain the organic integrity of the product. Storage of organic and non-organic ingredients in the same room or cooler is permissible with documentation that organic ingredients can be kept separate from non-organic ingredients and that repackaging of organic food containers can be tracked to assure no mixing of organic and non-organic ingredients occur. All bins, tankers or storage facilities that organic ingredients are being stored in must be numbered or identifiable. Mists or other methods of freshening and maintaining humidity can not contaminate organic foods.

#### Approved

- Storage areas should be ventilated, but sealed to the encroachment of birds, rodents, or other pests
- Controlled atmosphere storage, see the National List for individual gases

#### Prohibited

- Bags or other containers used for any substances that could compromise the organic quality of the product through the introduction of contaminants.

## **Transportation**

For each load of incoming organic product shipped in a way that could expose the product or retail packages to prohibited substances, affidavits must be signed by the transporter and kept on file by the processor, attesting to the fact that no prohibited fumigants or pesticides were used prior to or during the shipment of organic foods, and that the carrier cleaned sufficiently to avoid the contamination of organic foods by previous loads. (This refers to agricultural products shipped in bulk in trailers such as grain and is not applicable to products shipped in protective packages).

## **Organic Handling System Plan, Record Keeping and Audit Trail**

All processors must submit an organic handling system plan in the form of the VOF Application on a yearly basis. The plan must show compliance with the requirements in the NOP Standards. The processor must:

- Describe processing practices.
- Provide a facility map and description of any organic control points.
- Description of organic product including ingredients, processing aids, additives, including source, where it will be used and why.
- Describe all monitoring practices for pests, etc.
- List all cleaners and pest control products planned on being used.
- Describe the record keeping system used.
- Provide additional information as deemed necessary by the VOF Review Committee.

Audit trail and inventory control procedures must be detailed enough to trace all raw materials from the supplier, through the entire plant process, and on through the distribution system to the retailer, using lot numbers, or serial numbers. Company records (including purchase orders, bills, invoices, and inventory records) must be made available to the inspector.

VOF **may** require the following information from processors as part of the inspection process:

- current certificates for all organic raw materials
- a complete list of ingredients by weight or volume as appropriate
- current facility map
- detailed flow chart of processing steps
- facility pest control map
- storage conditions
- sample of the audit trail
- facility sanitation, and cleaning methods
- MSDS and labels for all products used in cleaning final product
- how materials are transported to and from the facility

**Please refer to the VOF Certification Guidelines book for a more detailed explanation of the National Organic Program Standards. If you have any questions regarding the standards or the application process, please call the office.**