



Product Composition - 100% Organic, Organic, and Made with Organic

Getting certified organic is just the beginning. Many organic products have consumer-facing labels, and the language on those labels must follow specific regulations; there is no one-size-fits-all approach. Understanding the different label categories will help you choose the one that best fits your product, company, and customers.



What You'll Learn

- Recognize the various organic labeling categories
- Understand the differences between these labeling categories
- Identify which nonorganic ingredients may be allowed in these label categories
- Determine which label is right for your products

The National Organic Standards specifies different labeling categories depending on the type of product and the percentage of organic ingredients in the product. One of the most important decisions in the certification process is choosing which organic labeling claim to use. The label claim depends on the percentage of organic ingredients in your product at formulation, so you may need to adjust your formulation to qualify for the category you want to use.

PRODUCT COMPOSITION

The USDA organic regulations set labeling categories for organic processed products. This article focuses on the categories available for products intended for human use (food, body care, etc.). Livestock feed products have specific requirements, which can be found in [Livestock Feed Composition and Product Formulation](#). They are based on the percentage of the ingredients that are organic.¹ The labeling categories are:

- "100% Organic"
- "Organic" or "certified organic"
- "Made with Organic"

For each label, there are specific rules about the percentage of organic ingredients, whether - and which - nonorganic ingredients and processing aids may be used, and labeling requirements.²

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Products with less than 70% organically produced ingredients cannot be certified organic. Livestock feed is another labeling category, but it is not covered in this article. See [Livestock Feed Composition and Product Formulation](#) for more information.

COMPARING THE 3 CATEGORIES OF ORGANIC LABELS^{1,2,3,4,5,6}

	"100% Organic"	"Organic"	"Made with Organic..."
Organic Ingredient Requirements	100% organic ingredients Including organic agricultural products and/or processed products that are "100% organic"	At least 95% organic ingredients	At least 70% organic ingredients
Nonorganic Ingredient Requirements	No nonorganic ingredients are allowed (except for water and salt)	Up to 5% of the ingredients can be nonorganic - only those included on The National List, in 205.605 or 205.606 Cannot contain organic and nonorganic forms of the same ingredient Nonorganic agricultural ingredients can only be used if an organic form is not commercially available	Up to 30% of ingredients can be nonorganic Agricultural ingredients must not be genetically engineered, irradiated, or produced using sewage sludge Nonagricultural ingredients must be on The National List May contain organic and nonorganic forms of the same ingredient, which must be identified separately on the label
Processing Aids	Must be certified organic	Must be organic or on the National List, in 205.605 or 205.606	Must be on the National List, in 205.605
Label Graphics /Claims	May say "100 percent organic" And/or "organic . . ." (i.e. "organic yogurt") May include the USDA organic logo	May say "organic" May include the USDA organic logo	May say "Made with organic . . ." Must specify which ingredients or food groups are organic (up to 3 can be listed) May not include the USDA organic logo

*For additional detailed label requirements by category, see [Labeling Requirements for Products Intended for Human Use](#).

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If you would like to learn more about the topics referenced in this table, here are the related articles:

- [Commercial Availability Requirement for Nonorganic Ingredients and Processing/Packaging Aids](#)
- [Labeling Requirements for Products Intended for Human Use](#)
- [Navigating the National List for Allowed Ingredients and Processing Aids](#)
- [Verifying Compliant Ingredients and Processing Aids](#)

If Your Product Has Less Than 70% Organic Ingredients

Products meant for human use that have less than 70% organic ingredients cannot make any organic claim on their label. For example, you cannot use the USDA seal or identify your certifier on the label. All you can do is identify each organically produced ingredient in the ingredient statement as organic.

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How do you calculate organic percentages in your products? This can be complicated, so we put together a dedicated article on it. Learn how to calculate your product's organic ingredients in [Product Formulation and Calculating Organic Content](#).

WHICH CLAIM IS RIGHT FOR YOU? SOME CONSIDERATIONS...

Choosing a label claim is a significant decision that reflects your company and your customers. There are many values and goals that come into play.

- What type of product are you producing?
- What ingredients are required?
- Do you have flexibility with them?
- Which is the highest label claim you can achieve given your product constraints?
- What opportunities are there for reformulation?
- Who is your customer and what are they looking for?

A top consideration is that the USDA organic seal is trusted by over 70% of consumers.⁷ This seal can only be used on products certified to the “100% Organic” or “Organic” categories.

The “100% Organic” label has the strictest requirements. If you pursue this label, your certifier may ask for additional verification of your suppliers’ organic certificates, particularly if you source any ingredients from abroad. This label can also be difficult to maintain if your product type, ingredients, or suppliers change frequently. Finally, keep in mind that the “100% Organic” claim is not recognized in all countries, which may create challenges if you plan to export your products.

The “organic” label claim is the most commonly used. Achieving this label requires valid organic certificates for all organic ingredients, but may not require any additional verification of organic ingredient percentages. This allows for more flexibility if your suppliers change frequently or you want more flexibility.

The “Made with Organic” label may be the highest labeling claim achievable for some types of products. You could have 99.9% organic ingredient content, but if you plan to use a nonorganic ingredient that is not on the National List, you cannot use the “organic” labeling category. This label can make an organic claim on the package, but it must specify which ingredients or food groups are organic, and it can identify no more than three. For example, “Made with organic sugar, raisins, and cinnamon” or “Made with organic beans, grains, and herbs.”

ACTION ITEMS

- Analyze which label claim is right for your products:
 - Reflect on your company's values
 - Understand your customers' values
 - Consider your ingredients and processing aids
 - Be realistic about your manufacturing process, how your product will be used, possible ingredient substitutions, and your desire to export

SOURCES CITED

1. USDA National Organic Program, [7 CFR §205.301](#).
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6. USDA National Organic Program, [7 CFR §205.301\(f\)\(4\)](#).
7. Organic Trade Association. (2024, April 5). Survey Says: Most Familiar, High Trust — Organic. Retrieved from <https://ota.com/about-ota/press-releases/survey-says-most-familiar-high-trust-organic>

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1. [Commercial Availability Requirement for Nonorganic Ingredients and Processing/Packaging Aids](#)
2. [Labeling Requirements for Products Intended for Human Use](#)
3. [Navigating the National List for Allowed Ingredients and Processing Aids](#)
4. [Verifying Compliant Ingredients and Processing Aids](#)
5. U.S. Department of Agriculture, Agricultural Marketing Service. "What Ingredients Can Be Utilized in the 5% of Non-Organic Ingredients Allowed in a Processed Product Labeled as "Organic"?" Retrieved from <https://www.ams.usda.gov/sites/default/files/media/3%20Nonorganic%20Ingredients%20-%205%25%20Rule%20FINAL%20RGK%20V2.pdf>



United States Department of Agriculture
Agricultural Marketing Service
National Organic Program

