



Who is Required to Be Certified as an Organic Handler?

The first step to getting certified is knowing whether you are required to be certified or whether it is optional in your circumstance. This article details when an operation that processes or handles organic products needs to be certified and when it qualifies for an exemption.



What You'll Learn

- What counts as handling and processing under the USDA organic regulations
- Which operations in an organic product's supply chain require certification and which do not
- When simple post-harvest handling requires an additional handler scope to your certification
- What a retail establishment is and when it is exempt from organic certification
- Which situations that are best clarified by speaking directly with a certifier

In order to maintain organic integrity, many of the entities involved in an organic product's supply chain must be certified organic. This is known as the Chain of Custody principle, and it ensures that the records verifying a product's compliance with organic standards are inspected throughout the manufacturing and distribution process. However, there are some cases where an entity in the supply chain may be exempt from needing their own organic certification. Knowing whether you, your suppliers, co-packers, and other manufacturing and distribution partners need to be certified is a crucial step in maintaining your compliance with USDA organic standards.

WHAT IS AN ORGANIC HANDLER?

The USDA organic regulations define four main types of operations, namely crop production (growing), livestock managing (raising), handling, and wild-crop harvesting. The majority of supply chain activities fall under the definition of handling.

Put simply, *handling* covers almost everything that happens to an organic ingredient or product after it leaves the farm. There are some narrow exemptions that are clearly defined in the organic rules.¹



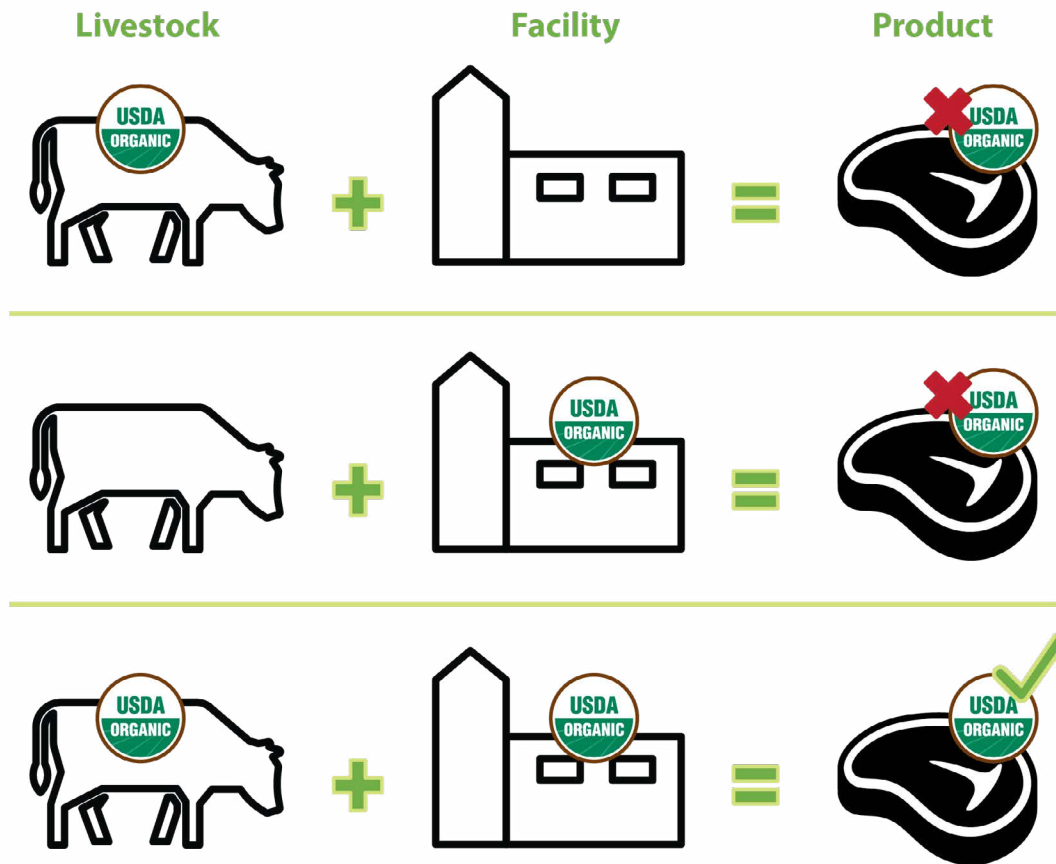
DEFINITION

Handling means to sell, process, or package agricultural products. This includes trading, facilitating sale or trade on behalf of a seller or oneself, importing to the United States, exporting for sale in the United States, combining, aggregating, culling, conditioning, treating, packing, containerizing, repackaging, labeling, storing, receiving, or loading.²

Processing means cooking, baking, curing, heating, drying, mixing, grinding, churning, separating, extracting, slaughtering, cutting, fermenting, distilling, eviscerating, preserving, dehydrating, freezing, chilling, or otherwise manufacturing and includes the packaging, canning, jarring, or otherwise enclosing food in a container.³

CAN MULTIPLE HANDLERS BE COVERED BY A SINGLE CERTIFICATION?

Under the USDA organic regulations, two operations cannot share organic certificates.¹ This means that an uncertified operation may not process organic products on its own premises on behalf of a certified operation. For example, an uncertified independent slaughter facility cannot operate under a certified cattle ranch's organic certification or vice versa. Unless they are organized as a producer group, they must each hold their own independent certification.^{4,5,6}



Let's look at the main handling operations in a supply chain and clarify when they are and are not required to get certified. If your operation performs multiple roles or activities in the supply chain, make sure to read up on certification requirements for each.

HANDLERS THAT DO NOT REQUIRE CERTIFICATION

Certain handlers are exempt from certification based on the limited scope of their activities.

Operations Selling Less Than \$5,000

Small farms and businesses with a gross annual income of \$5,000 or less from sales of organic products are exempt from certification. At this size, you are still required to comply with all organic standards and maintain records that illustrate compliance. It is important to note that unless you seek certification, your organic products cannot be used as an organic ingredient by other operations. You also cannot use the USDA or certifier seals, nor can you use the word "certified."

Operations That Do Not Make Organic Label Claims or Organic Marketing Claims¹

Handlers who use organic ingredients in a product but make no organic claims on the packaging or in marketing are not required to be certified. For these products, the term "organic" may only appear in the ingredient statement to identify specific certified organic ingredients; no organic claims are permitted elsewhere on the packaging or marketing.

Customs Brokers

Licensed customs brokers whose sole activity is conducting customs business (facilitating entry and filing documentation) but who do not otherwise handle organic products are not required to be certified.

Transportation and Logistics

The physical transport of organic products does not always require certification. For **packaged** organic products, activities like combining, containerizing, or splitting shipments do not require organic certification, as long as the operation is doing limited handling activity, and the activity is contracted by a certified operation and described in their Organic System Plan. This exemption only applies if the product stays in the same packaging while it is under the transporter's control.

Operations that only arrange for the shipping, storing, transport, or movement of organic products but do not otherwise handle organic products are not required to be certified. However, both the operation where the product is loaded and the operation where the product is unloaded must be certified for the product to maintain its organic status in most circumstances.

HANDLERS THAT DO REQUIRE CERTIFICATION

Most handlers must be certified if they process, package, relabel, or otherwise handle organic products. The following scenarios outline when certification is always required.

Importers and Exporters

Any operation acting as the exporter or importer of record for organic products into the United States must be certified, regardless of what type of packaging it is in. These entities must use electronic NOP Import Certificates for all imported organic products regardless of country of origin.⁷

Processors, Co-Packers, and Contract Processors

Any facility that physically mixes, packages, or labels organic products must be certified. Even if co-packers or contract processors never take ownership of the organic product, they still need their own certification in order to handle it in these ways. Certification is based on who handles the product, regardless of who owns it.⁸



HANDLER TIP

NOP Import Certificates are official documents created when an accredited certifying agent verifies a specific shipment of organic goods. Because definitions of "organic" differ around the world, this process ensures that organic products coming into the United States meet USDA organic requirements (or approved equivalency standards). The certificate also provides shipment traceability by identifying the certifier, exporter, importer, and final handler. Without an NOP Import Certificate, a shipment can be denied organic status upon entry, requiring reexport, donation, or destruction of the product.

HANDLERS THAT SOMETIMES DO AND SOMETIMES DO NOT REQUIRE CERTIFICATION

Some handlers may or may not require certification depending on the specific activities they perform and how they handle organic products. For these operations, it's important to dive deeper and understand the specific cases when an exemption applies.

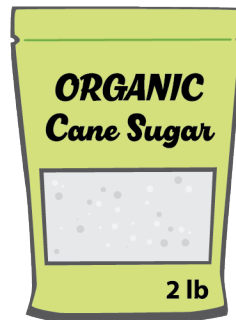
In multiple cases below you'll see the mention of an exemption when the product being handled is in tamper-evident **retail** packaging. What counts as retail packaging? The regulations do not have a specific definition, but the term is generally understood as packaging intended for sale directly to an end customer. **The distinction is important because products in bulk or nonretail formats do not receive this exemption.**



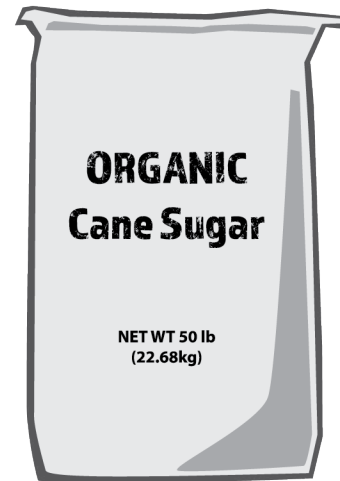
LEARN MORE

This [Organic Certification Self-Assessment](#) flowchart put together by CCOF can help you identify whether or not your operation requires certification, especially when your operation is more complicated.

Which type of packaging do you handle?



Retail Packaging



Nonretail Packaging

Even if a handler qualifies for an exemption, that does not mean they are free from all requirements. Exempt handlers must still follow the core organic standards relevant to their activities. This includes preventing commingling with nonorganic products and maintaining clear records that demonstrate compliance and product traceability. While certification may not be required, accountability still is, and these operations play an important role in maintaining the overall integrity of the organic supply chain.

Private Label Brands

Brands can sell certified organic products without getting certified themselves if they hire a certified co-packer and strictly receive, store, and sell the products in sealed, tamper-evident retail packaging. However, if they relabel, repackage, or process the product in any way, they must be certified. Certification is also required in most cases when a private label brand directly buys ingredients for their co-packer or stores ingredients that they then send to their co-packer. They may qualify for an exemption if the ingredients purchased are in sealed, tamper-evident retail packages or if they use a certified broker to manage the exchange.

Brokers, Traders, and Wholesalers

The regulations define these entities as “operations that buy, sell, or facilitate the trade of organic products.” These are businesses that act as middlemen, helping move organic ingredients or finished products without necessarily growing or making the product themselves. One example is an ingredient supplier purchasing organic sugar from a mill and selling it to a manufacturer who uses it to produce organic jams. Brokers, traders, and wholesalers are required to get certified unless the organic product in question is in sealed, tamper-evident **retail** packaging the entire time. If, in our example, the sugar supplier was trading organic sugar in a one-pound tamper-evident **retail** pouch, they could qualify for this exemption.

“Even if a handler qualifies for an exemption, that does not mean they are free from all requirements.”



HANDLER TIP

If your supply chain includes an exempt operation, make sure you have a clear understanding of what records you will need from them in order to demonstrate your own compliance with organic standards. Being proactive about documentation helps avoid gaps that could jeopardize your certification.



WATCH OUT

Notice that the exemption from certification only applies to entities buying, selling, or facilitating the trade of organic products in tamper-evident **retail** packaging. If the organic product you buy, sell, or trade is in wholesale packaging, you are required to get certified.

Warehouses and Storage Facilities

A warehouse or storage facility is a location where organic products are received and stored. Sometimes these facilities also have a transportation and logistics component (see Transportation and Logistics below). Warehouse and storage facilities may be handling organic ingredients, organic work in progress, and/or organic finished goods. When these facilities store bulk or unpackaged organic products they must be certified. They do not need certification when they receive and store products in sealed, tamper-evident packages and do not otherwise handle or alter them.

WATCH OUT

Notice that the exemption from certification only applies if you do not “handle” or “alter” sealed, tamper-evident packages of organic goods. If your warehouse performs bundling, packaging, or labeling, you may need to get certified. Speak to a certifier to find out.

Retail Establishments

Most retail establishments do not require certification. Retailers that handle, but do not process organic products are generally exempt. Some examples include removing produce from shipping boxes, washing produce, and transferring products to bulk bins for sale.

When a retail establishment processes organic products (cooks, bakes, heats, or otherwise manufactures), certification depends on where that processing takes place. If processing occurs at a secondary, off-site location, that facility must be certified. If processing takes place on-site at the retail location where products are sold directly to customers, certification is not required.

If a retail establishment also operates as a private brand owner or distributor, they may or may not require certification based on the considerations explained in other sections of this article.

DEFINITION

Operations considered to be a **retail establishment** include “restaurants, delicatessens, bakeries, grocery stores, or any retail business with a restaurant, delicatessen, bakery, salad bar, bulk food self-service station, or other eat-in, carry-out, mail-order, or delivery service of raw or processed agricultural products.”⁹

Producers Doing Post-Harvest Handling

As we explained earlier in this article, the organic regulations define four types of organic operations. In practice, a single business may fall into more than one of these categories. One common combination that warrants a more fine-tuned explanation is a grower who performs post-harvest processing. For example, a farmer who grows grapes and ferments and bottles them into wine would need certification as both a grower and a handler.

In these cases, the parts of their organic certification are referred to as different **scopes**. The farm above would have a crop **scope** (grower) and a handler **scope** (processor).

However, not all growers who sell organic products are considered handlers. Some post-harvest activities can still fall under a grower’s crop scope certification. So where is the line?

WHEN DOES POST-HARVEST HANDLING FALL UNDER A GROWER CERTIFICATION?

Most farms perform some amount of post-harvest handling and storage. Whether that activity requires an additional handler scope depends on the complexity, scale, and nature of the post-harvest activities.

Activities that do not require an additional handler scope are often referred to as simple *post-harvest handling*. These are activities that involve minimal modification. Some very basic examples include washing, filtering, cleaning, trimming, bagging, boxing, labeling, storing, and selling produce.¹⁰ Other minimal handling activities, such as drying whole chile peppers or herbs, are also often considered simple post-harvest handling and can be covered under a crop scope certification.

WHEN DOES POST-HARVEST HANDLING REQUIRE HANDLER CERTIFICATION?

Post-harvest handling requires handler certification when those activities go beyond *typical on-farm handling*. Each certifier ultimately determines exactly when a handler scope is required for the farms they certify.

That said, there are several situations where post-harvest handling clearly requires a handler certification.¹¹

Handling Other Operations' Products

If you handle organic products from outside your farm, you will need handler certification. For example, if you purchase organic peppers to supplement your own crop, you may be required to be certified as a handler, even if you do not perform any additional processing on those peppers.

Multi-Ingredient Products

Producing and selling organic products with multiple ingredients requires a handler scope. For instance, adding sugar to your organic dried apple slices moves the activity from one that might fit under a crop scope to one that requires handler certification.

There are also two, less clearly defined factors that may trigger handler certification, described below.

Substantial Transformation

When a product is substantially transformed from its original state through “complex” processing methods, this requires a handler certification. This includes activities such as roasting, canning, fermenting, and other processing methods. Examples include fruit growers who produce and sell organic jams and livestock operations that slaughter livestock on-farm.

Increased Complexity and Scope

Handler certification may also be required when post-harvest activities become more complex or operate at a larger scale than is typical for similar farms. This threshold is not strictly defined and depends on certifier interpretation.

If you are unsure where your operation falls, it's best to check with a certifier before moving forward.

CONCLUSION

Ensuring that every operation in an organic supply chain is certified, unless it qualifies for an exemption, helps protect the organic industry and reduces the risk of fraud, which can quickly erode consumer trust in the organic label. The USDA organic regulations provide narrow exemptions to strengthen the integrity of the industry, and organic rules make clear that processing partners cannot piggyback on another operation's certification. If you are unsure whether your operation, or one within your supply chain, needs certification it's best to contact a certification agency for clarification.

ACTION ITEMS

- Use the resources provided to determine whether your operation is required to be certified organic or may qualify for an exemption.
- List out all the handlers involved in your product's supply chain.
- Use the [USDA Organic Integrity Database](#) or direct conversations to determine whether those handlers are currently certified organic.
- For handlers that are not certified organic, use the resources provided in this article to determine whether they are required to become certified or may qualify for an exemption.
- If you are unsure whether an exemption applies, contact an organic certifier for clarification.
- Take the necessary steps to ensure that all handlers in your supply chain that are required to be certified are certified. This may include changing supply chain partners or waiting for a handler to obtain certification.

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DIG DEEPER

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United States Department of Agriculture
Agricultural Marketing Service
National Organic Program

