

A Newcomer's Guide to Organic Handling

Narrator (00:20):

As a new organic handler, stepping into the world of USDA organic regulations can feel like learning a new language, but memorizing the regulations from front to back isn't the only way to learn how to do your job effectively. Today, we're going to curate these regulations into a practical step-by-step journey. We will look at what it takes to get certified, how to build your facility's organic plan, how to handle ingredients on the floor, and how to prove your compliance. But first, we have to start with the why.

Jessica Jones (00:54):

The only claim that organic certification makes is how things were produced agriculturally. Being a handler means that I'm tying that forward to a finished product that's not an ingredient. And we are operating within these parameters to keep the integrity of the organic product going. That is the organic claim.

Johanna Phillips (01:14):

It's the only standard that gives producer-level insight for individuals who are purchasing product. You have clarity around how the product can and has been produced throughout the supply chain. It is a trusted label. It's the only federally backed third-party certification in the country.

Narrator (01:35):

As a handler new to organic certification, the idea of federal regulations might seem intimidating. Every certified organic handler in the United States must comply with the set of rules that govern the National Organic Program. But what are they? And where do you actually find these rules? The rules are published online in the Electronic Code of Federal Regulations, or eCFR, specifically under Title 7, Part 205. When you open Part 205, you'll see it's organized from largest to smallest segments, part, subpart, section, and subsection. You can think of the subparts like chapters in a book, each covering a major theme. For example, subpart B covers who needs to be certified, while subpart C outlines specific handling requirements. Within those chapters, individual rules are referred to by their specific citation. If you see a reference like 205.103, it's simply pointing you to Part 205, Section 103, subsection B, item 4. You don't need to memorize the whole book, but understanding this structure will help you confidently navigate the rules as you build your organic compliance plan.

Narrator (03:09):

Your journey begins with applicability, understanding who actually needs to be certified. The rule is simple. If you produce or handle agricultural products intended to be sold, labeled, or represented as organic, you must be certified. Handling includes processing, packaging, combining, containerizing, or simply storing unpacked goods. A major update to the USDA organic regulations called the Strengthening Organic Enforcement or SOE Rule was published in 2023. It closed many gaps in the



supply chain. Now, almost everyone in the middle of the supply chain must be certified, including brokers, traders, and importers. There are some narrow exceptions, but in general, nearly all operations that handle organic products must be certified.

Abel Sanchez-Valencia (04:05):

Before, brokers didn't need to be certified organic, so anybody really could buy organic products and sell organic products without being audited. But now with these changes, anybody that does handle those organic products needs to have that product verified to be able to maintain that consumer confidence.

Narrator (04:34):

Once you decide to become certified, you must tell your certifier exactly how you plan to follow the rules. You do this by writing your Organic System Plan, or OSP. This is the foundational document of your certification.

Aileen Mannion (04:50):

They need to make sure their OSP, Organic System Plan, is really well written, because that's your bible right there. The auditor is really going to review that OSP program.

Narrator (05:07):

Your OSP is a living document. It details every ingredient you use, every supplier you buy from, how you clean your equipment, and how you manage pests. If you ever want to change a recipe, use a new sanitizer, or buy from a different supplier, you must update your OSP and have it approved by your certifier before you make the change. With your blueprint approved, the journey moves to the facility floor. Here, your primary objective is to manage your Organic Control Points, or OCPs. These are the specific steps in your facility where organic integrity is at risk of two things, commingling and contamination.

Mike Dill (06:01):

It's just really important for businesses to develop practices that work for their type of production and handling system, and then assess those and look at where those Organic Control Points are, where you could potentially experience some commingling or some contamination events.

Narrator (06:24):

Commingling is the physical mixing of organic and nonorganic products. If you run a split operation handling both conventional and organic goods, you must prevent commingling. This can be achieved through things like physical barriers, distinct signage, and color-coded labels, so staff always keep them separated. Contamination occurs when your organic product touches a prohibited substance, like an unapproved sanitizer or pesticide. To prevent this on shared equipment, you must take steps to stop contact between those substances and the organic product. This can be achieved through selecting an allowed sanitizer for organic production or having an adequate intervening event, like thorough rinsing with water before an organic run. Contamination risks also dictate your pest control.



You cannot simply spray pesticides in an organic facility. The regulations require a preventative tiered approach. You must start with sanitation and physical barriers, escalate to mechanical traps, and only use synthetic pesticides if absolutely necessary, and pre-approved in your OSP by your certifier. Before approving the use of a synthetic pesticide, your certifier will review how and why you would need to use it, and how you will prevent contamination of organic products when using the pesticide.

Narrator (07:56):

When creating your product, the rules dictate exactly what ingredients you can use and what claims you can put on your packaging. Crucially, your certifier must review and approve your product formulation, your specific ingredients, and your final labels before you print them or sell the product. The rules differ a bit between products for human consumption versus livestock consumption, but we're going to focus on human food in this explanation.

Narrator (08:26):

Organic product composition generally falls into three main labeling categories. The first two, 100% organic and organic, allow you to display the USDA Organic Seal. The organic category means the product contains at least 95% certified organic ingredients. The third category made with organic is for products containing at least 70% organic ingredients. These products can list up to three organic ingredients or food groups on the front panel, but they are absolutely not allowed to use the USDA Organic Seal.

Narrator (09:06):

But what about the remaining nonorganic percentages in organic products? Any nonorganic ingredients or processing aids must be specifically allowed on the National List of Allowed and Prohibited Substances. It's helpful to think about these exceptions in two distinct categories. First are allowed nonagricultural substances. This includes specific nonsynthetics like natural enzymes and allowed synthetics like ascorbic acid. Second are specific nonorganic agricultural ingredients, like certain colors or animal casings. However, there is a catch. You can only use these nonorganic agricultural ingredients if you can prove to your certifier that an organic version is not commercially available in the appropriate form, quality, or quantity that you need.

Narrator (10:12):

The final stop on your journey is the paperwork and inspection. The organic seal is backed by traceability, and federal regulations require you to keep detailed records of all activities for five years. If it isn't documented, as far as your inspector is concerned, it didn't happen.

Laura Anne Sweitzer (10:32):

So one of the biggest benefits of organic, in addition to all of the benefits we think of, is the 100% traceability. If you are working in a company, and you don't know who all your suppliers are, and you want to know, you can ask your suppliers to provide you with the farmer list. By nature of being organic certified, that supporting documentation must exist. So you can use your organic certification as a vehicle to gain other insights into your supply chain. And honestly, the benefits of that are so numerous and so many, it's a great exercise for any company to do.

Narrator (11:11):

There are two main tests your records will face during your annual inspection. First is the traceability audit, where you must prove you can track a finished product from the point of sale all the way back to the documentation for incoming organic raw ingredients. The second is the mass-balance audit. This is a math test. The inspector will verify that the volume of organic products you sold matches the volume of organic ingredients you purchased. This ensures that conventional ingredients aren't being secretly swapped in, and that's it. Those are the general areas that you must comply with to achieve organic certification as a handler. There are more details and nuances to learn along the journey, but if you put into place the principles that we just described, you are off to a great start.

Mike Dill (12:01):

If you believe in the movement, you believe in organic practices, you want to support farmers that are doing the right thing, then don't let the little bit of additional recordkeeping hold you back. Most organic records are records that you want to keep anyways.

Narrator (12:19):

The organic regulations exist to protect the consumer, the farmer, and your business from fraud. By understanding your scope, maintaining your Organic System Plan, guarding your control points, and keeping impeccable records, you become a defender of organic integrity. You are ready to start your journey.



United States Department of Agriculture
Agricultural Marketing Service
National Organic Program

