

Sourcing Ingredients

Narrator (00:19):

In conventional food processing, you often formulate a recipe, source your ingredients, and send your product to market without anybody actually verifying your ingredient supply chain. But when you step into the world of organic handling, that paradigm shifts completely. A certified organic product is backed by a promise that every single ingredient inside that package has been scrutinized and verified to comply with USDA organic regulations. To earn the right to use the word "organic," you must become an expert in sourcing, verifying, and documenting your ingredients. Before using new ingredients or processing aids, they must be listed and approved in your Organic System Plan, the written document that describes every input, practice, and procedure in your operation. Your certifier must review and approve every ingredient and processing aid before you can use it. Changing an ingredient, swapping a supplier, or reformulating a product all require certifier approval in advance.

Narrator (01:34):

Before we talk about how ingredients and processing aids are sourced on organic operations, we need to define what your certifier is looking for from you. Your organic certifier must review and approve everything used to manufacture your product. To do this, we break them down into two categories, ingredients and processing aids. Ingredients are substances added during processing that remain in the final product. These are the items printed on your product's final retail ingredient statement. For example, the organic wheat and organic sugar used in a cookie. Processing aids are substances used during processing that are, one, removed before packaging, two, convert to normal food constituents, or three, are present in insignificant amounts and have no technical or functional effect in the finished food. For example, the non-stick oil sprayed on a baking pan. Whether or not a substance ends up on your retail label, your certifier must still verify that it is compliant.

Narrator (02:52):

In organic processing, the general rule is simple: all ingredients and processing aids must be organic. But there are exceptions, if you are producing an organic product and you need an ingredient like sodium bicarbonate, a.k.a. baking soda, or salt, which are not agricultural products and therefore cannot be certified organic, you must turn to the National List of Allowed and Prohibited Substances. The National List is the narrow set of exceptions, nonorganic substances that may be used under specific conditions. The National List outlines the specific nonorganic materials that are allowed in or on organic products. It is broken into sections. Section 205.605 lists nonagricultural substances that are allowed for use in organic products, like natural enzymes or synthetic ascorbic acid. Section 205.606 lists specific nonorganic agricultural products, like certain animal casings or food colors that are allowed under strict conditions.

Jessica Jones (04:01):



I wish when I was going into being a certified organic that I knew how much I would need to know about my salts. I didn't realize that I would have to be able to prove that it was just salt. It is pretty difficult to find a salt that is just salt because there's often some sort of anti-caking or anti-moisture agent.

Narrator (04:21):

Just because a substance is on the National List doesn't mean that any version of it is allowed. Many items have annotations or restrictions. For example, animal enzymes must be derived from approved sources. To make sourcing these easier, many handlers rely on determinations made by material review organizations, MROs, such as OMRI, the Organic Materials Review Institute. As a recognized material review organization, OMRI, who is an independent nonprofit, pre-reviews certain inputs and processing aids to ensure that they meet USDA organic standards. While your certifier always has the final say, finding a substance on the OMRI product list or seeing the OMRI logo on a spec sheet saves you immense amounts of documentation and legwork. There are also other material review organizations that you can turn to. WSDA, the Washington State Department of Agriculture, maintains a list of allowed and prohibited substances as well.

Lynne Haynor (05:28):

If a handler wants to change an ingredient or product formulation, it is best to contact your certifier ahead of time and see what type of documentation you might need. These changes would need to be reviewed and approved by your certifier before you began to sell or represent any new products as organic. So the most important thing is to realize that this takes time and if you're considering a change, start the communication process with your certifier with, you know, enough time for some conversation about it so that it doesn't bump up against your deadlines.

Narrator (06:10):

Now, what if you want to use a nonorganic agricultural ingredient listed on Section 205.606 or a specific item from 205.605 like natural flavors or yeast? You cannot simply buy a nonorganic version just because it's on the National List. You must first prove that the ingredient is not commercially available in organic form.

Katie Nix (06:35):

So in an ideal world, there would be an organic option for every piece of the puzzle, but sometimes we are limited in what we are able to use due to shortages or ingredient availability. So we have to get creative with what we can use in that place, and that would be going to the drawing board and determining what other possibilities there are out there that can fit our needs for that specific role.

Narrator (06:59):

The USDA defines commercially available as the ability to obtain a production input in an appropriate form, quality, or quantity. Let's be very clear, price cannot be used as a justification. You cannot use a nonorganic ingredient simply because the organic version is more expensive. To use the nonorganic version, you must conduct and document a search for the organic material.



Kaylee Pickering (07:26):

We do use nonorganic ingredients in our processes, and that's due to the fact that either one, they're not available or two, they're only available for part of the year. And if you can't order them consistently for production, if you find an ingredient that is nonorganic, you have to have three suppliers that you have reached out to in the year, proving that they are not able to supply that product in organic form. You have to keep that on record and you have to do that yearly to make sure that nothing new has come into the market. If it has, you have to look at reformulating your products.

Narrator (08:10):

Your certifier may accept fewer suppliers or could require additional sourcing efforts, on a case-by-case basis, depending on the ingredient and the circumstances. The goal of this rule is to expand the organic marketplace. If an organic version of your ingredient becomes available in the future, you may no longer be able to use the nonorganic version.

Narrator (08:41):

You are the gatekeeper for your facility. Don't just trust that your supplier is sending you the correct compliant materials. You must verify it, and your certifier will require the paper trail. If you are buying a certified organic ingredient, you must obtain the supplier's current organic certificate. If it is an allowed nonorganic ingredient, contact your certifier to learn what documentation they will require in order to review that ingredient. You may need a spec sheet detailing all sub-ingredients, information about the manufacturing process, and signed declarations proving the material was produced without genetic engineering, ionizing radiation, or sewage sludge. To verify your supplier's organic certificates, you will turn to the USDA's Organic Integrity Database, or OID. This public website allows you to look up any currently certified operation and see exactly what products they are certified to handle or produce.

Jessica Jones (09:42):

Finding who is certified organic has also gotten very easy because there is now the Organic Integrity Database that allows you to look up companies and see if they really are certified organic, download their organic certificate, see the scope of what their organic products are. All you see is certified organic things. It's the greatest. Finding, vetting, and establishing relationships with organic suppliers has gotten streamlined and easy.

Narrator (10:11):

Establishing a formal receiving protocol will allow your staff to effectively crosscheck incoming shipping documents and labels against your approved supplier's organic certificate. If a supplier's paperwork doesn't disclose if it is organic, or if a material isn't pre-approved in your Organic System Plan, it should not be used in your organic product. Sourcing ingredients for organic processing can feel like a rigorous puzzle, but remember the why behind the paperwork. Every organic certificate you verify, every commercial availability search you conduct, and every spec sheet you review ensures that the consumer is getting exactly what they paid for.

Abel Sanchez-Valencia (10:52):

Something that I appreciate about products that are certified organic is that they are verified. When I started working in the industry, I was surprised to find out that this does not happen very often with conventional products. A lot of companies just formulate and they send it out to market without anybody actually verifying that information. With products that are certified organic, we do have an extra set of eyes. We do have somebody that looks into and makes sure that it complies with regulations, even though it is additional work, even though there is more documentation, as a consumer, you know, I appreciate that with organic products, they are verified and there's just more scrutiny that goes into them versus their conventional counterparts.

Narrator (11:41):

By mastering your ingredient sourcing, understanding the National List, and partnering with transparent suppliers, you are doing more than just passing an inspection. You are actively defending the integrity of the organic supply chain.



United States Department of Agriculture
Agricultural Marketing Service
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