

Labeling Requirements

Narrator (00:20):

When consumers walk down a grocery aisle, they face countless choices. But for millions of shoppers, the decision comes down to one thing: the organic label. Organic labels are more than just marketing tools. They are regulated claims that communicate compliance with the USDA organic standards and help consumers make informed purchasing decisions. As an organic handler, the label is the final step in proving your organic integrity. Understanding labeling requirements is a critical part of maintaining your certification, avoiding costly printing mistakes, and ensuring your products are represented accurately throughout the supply chain.

Nate Powell-Palm (01:04):

On labeling, the biggest thing I could say is that you have such a partner in your organic certifier, and you should really rely on them. The second you get an idea for a label you want to use, send it to them. It's an amazing part of the entire business of certification, is that they have the staff and the resources and the expertise to make sure that a label is compliant before you send it into the marketplace.

Narrator (01:30):

Whether you are developing a brand new product, updating your packaging, or inspecting incoming ingredients, this video will help you navigate the rules with confidence. We will explore the requirements for the product label's principal display panel and information panel, the strict design rules for the USDA organic seal, the particulars of livestock feed labels, and why securing certifier approval before you print is the most important step of all. Let's get started.

Narrator (02:08):

The USDA organic regulations dictate certain important details about what information is required and what information is prohibited on organic product labels. The labeling categories parallel the product composition categories that are determined by the percentage of organic ingredients in the product. Which category your product falls into determines exactly what you can claim on your label's principal display panel, which is the regulatory term for the front of your package.

Tracey Vanfield (02:40):

Working with these organic certifier to get your label approved is not a complex process. You want to make sure that you have your checks and balances to ensure you're providing the most up-to-date label information. Here at Scratch & Peck, we have a very thorough checklist process that allows us to ensure that the information that we are providing to any certifier is our most recent version. Version control is probably one of the biggest aspects to your certifier.

Narrator (03:08):



The highest tier is "100% organic." For this category, you may use the phrase "100% organic", and you are allowed to display the USDA organic seal on the front panel. Second is the "organic" category. To qualify here, at least 95% of the ingredients must be certified organic. This category is also eligible to use the USDA organic seal on the front panel. Third is the "made with organic" category. These products contain at least 70% organic ingredients. You can state "made with organic," followed by a list of up to three ingredients or food groups on the front panel, like oats, honey, and raisins. But there are several catches. You are strictly prohibited from using the USDA organic seal anywhere on the package. You are also prohibited from using the generic phrase "made with organic ingredients." You must name the specific ingredients or food groups, and you cannot use the word "organic" to modify your product's name. Finally, products with less than 70% organic ingredients cannot make any organic claims on the principal display panel at all.

Narrator (04:36):

The USDA organic regulations dictate specific rules for the information panel. This panel is defined as located immediately contiguous to and to the right of the principal display panel. For irregularly shaped packages, it may be positioned at the back or side of your package where your nutrition facts live. For products in the "organic" or "made with organic" composition categories, your ingredient statement on the information panel must clearly identify every single organic ingredient. You can do this by using the word "organic" before the ingredient name or by using an asterisk that is clearly defined below the list. Remember, salt and water cannot be identified as organic.

Aileen Mannion (05:26):

For example, the ingredients here are all, says has an organic. So each ingredient has an asterisk that says it's organic, and it's certified organic by CCOM. For organic compliance, this has to be submitted to our certifying body before we can actually print the label and use it on our product.

Narrator (05:51):

For "100% organic" products, identifying individual organic ingredients is best practice, but it's not strictly required since every ingredient is 100% organic. Products with less than 70% organic ingredients cannot use the organic seal and may only make organic claims on the information panel. The word "organic" can only be used in the ingredient list on the back of the package to identify specific organic items. But products in this category may display the percentage of organic content on the information panel. You are also required to identify your organic certifier on the information panel. The phrase "certified organic by," followed by your certifier's name, must be placed directly below the information identifying your company. And consistent with FDA and NOP guidance, there can be no intervening text, barcodes, or graphics between your company address and this statement.

Tracey Vanfield (06:58):

The information as to where your certification lies, the address, the certifier, all of the information has to be specifically placed on your label and/or your packaging.

Narrator (07:10):



If you make a "made with organic" claim or use a percentage statement on your label, like "made with organic oats and honey," "80% organic ingredients," the font size cannot exceed one half the size of the largest text on the panel. Furthermore, it must appear in the same type size, style, and color without any highlighting. You cannot make the word "organic" bolder than the rest of the sentence.

Narrator (07:46):

What about the seal itself? If you choose to use the USDA organic seal in color, it must perfectly match specific Pantone colors, PMS 348 green and PMS 175 brown on a white background, or you can use an approved black and white version on a white or transparent background. You cannot alter the seal's colors to match your brand's aesthetic. Vector files for the USDA organic seal are available for download on the NOP website. Two elements in the official seal files are optional, the trademark symbol and the horizontal crop field lines in the lower semicircle. You can use the seal with or without these.

Jill Brockman-Cummings (08:33):

You have to actually show them every single label of every single product and show the USDA seal and then in our case, OCIA seal on every label or bag, depending on how you package your products. This label had to be approved by our organic certifier prior to ever putting a label on a bag and selling it. On the three pound bags, the USDA sticker is found on the actual label, as is the OCIA. So the artisan blend, the USDA sticker is on the bag, but on the back is the OCIA seal. In this case, the bag was the most important thing to be approved by the organic certifier. And every single product you create in every single size has to be approved by your organic certifier. So yeah, you can't just throw any old organic seal on there. It has to be the real one, and they will approve it.

Aileen Mannion (09:29):

As you can see, there's a USDA logo, and then at the back, again, there's the claims in here, and then it goes to this point of purchase pack. And again, even though this is just a box, we still have to get approval to use the USDA logo on this. The main label for the mastercase, again, they have USDA logo, they have the CCOF logo, and other certification like Fairtrade and Kosher.

Narrator (10:02):

You may also use your certifier's logo, but the Prominence Rule applies. The certifier's logo cannot be displayed more prominently than the USDA organic seal on the package, meaning it cannot be larger or more visually striking than the USDA organic seal. Keep in mind, if your product is not in the "100% organic" or "organic" categories, you cannot use the USDA seal at all, but you may still display your certifier's logo with no restriction on where or how prominent. And before you go to print, you must submit your product label to your certifier for review and approval. Failing to get approval before printing can be a costly error.

Jessica Jones (10:52):

There was one instance where we accidentally sent to the printer one of our labels and had it printed and realized after the fact that it didn't say certified organic by MOSA because that little line just like



got cut somewhere in the digital editing, and so we printed 1200 little stickers and placed them on by hand in the little like six millimeter section where it fits because we don't want to sticker 1200 bottles in the walk-in cooler again. That was very cold work.

Narrator (11:23):

One more labeling requirement to be aware of: USDA organic regulations also have requirements for labeling any nonretail containers used to ship or store organic products like boxes, totes, bins, and trailers. These containers must contain a display or label that identifies the product as organic and contains information such as a production lot number, shipping identification, or other unique ID that links the container to your audit trail documentation. One exception though, if you are shipping retail packaged products and the organic identification on the individual retail package is already visible through the outer container, that outer container does not need a separate organic identification label.

Narrator (12:17):

If your facility processes livestock feed, it is important to know that feed can only be labeled as "100% organic" or "organic." But like human food, livestock feed products require a "certified organic by" statement on the information panel placed directly below the handler or distributor information. Organic ingredients may be identified as organic in the ingredient statement by the word "organic" before each ingredient's name or by an asterisk system defined on the package. Water and salt cannot be identified as organic. And because feed labeling is heavily regulated by state commercial feed laws, AAFCO and the FDA, your organic feed tags must accommodate both organic identifiers and standard commercial feed naming conventions simultaneously. In practice, this means your feed tag may need to use AAFCO-defined ingredient names alongside your organic identifiers. So you might see organic wheat middlings where you'd otherwise simply write organic wheat. Your certifier will review your feed tags to ensure they meet organic standards while respecting those commercial feed laws.

Narrator (13:33):

Labeling is where the organic promise becomes visible to your customer. You've done the meticulous work to build a product profile, calculate the composition percentage, select a labeling category, and design a beautiful product label. That label design must follow the USDA's strict formatting rules perfectly.

Nate Powell-Palm (13:54):

So if you are going to be having product formulation changes and you're going to be using one of five different labels, make sure you just get them all approved. I see a lot of folks get into incredible pickles, very expensive pickles when they need to change a label and there's usually like at least a week, if not more delay on the certifier side to be able to approve that label, and that could cascade into a big problem with your customer.

Narrator (14:21):

Never send a label to the printer before your organic certifier has formally approved it in writing. By understanding your exact label category and always securing pre-approval, you will avoid costly misprints and confidently bring your organic products to the global market.



United States Department of Agriculture
Agricultural Marketing Service
National Organic Program



**ORGANIC
TRADE
ASSOCIATION**

