



Guidelines for Organic Certification of Processed Products

Vermont Organic Farmers, LLC (VOF)

Northeast Organic Farming Association of Vermont (NOFA-VT)

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The following guidelines are based on the USDA National Organic Program (NOP) Standards. Processors planning to become certified should consider all of the following areas required for compliance with the certification standards. In order to certify that food is organic at the retail level, processors, packagers, manufacturers and food handlers must adhere to the National Organic Program Standards to verify the continuity of organic integrity. These guidelines do not address any additional state regulations regarding commercial food preparation.

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

If producing both organic and non-organic products in the same plant, each applicant must develop a detailed plan, identifying critical points of potential co-mingling of organic and non-organic ingredients and potential contact with prohibited substances.

Distributors and retailers of organic products that handle products only in their final packaged form are exempt from certification. A retail food establishment is considered a restaurant; delicatessen; bakery; grocery store; or any retail outlet with an in-store restaurant, delicatessen, bakery, salad bar, or other eat-in or carry-out service of processed or prepared raw and ready-to-eat-food.

Organic Product Composition Categories

Organic products must fall into one of the following categories.

"100% Organic"

Products represented as 100% organic must contain (excluding salt and water) 100% organic ingredients and processing aids. For example maple syrup, generally filtered with diatomaceous earth could not be labeled as '100% organic' because the filtering agent is considered a non-organic processing aid. For a multi-ingredient product, all ingredients must be certified at the '100% organic' level. Please note that most processed products do not fall into this category.

"Organic"

Products represented as "organic" must contain (excluding salt and water) at least 95% organic ingredients. The remaining 5% must also be organic unless those ingredients are:

- 1) Allowed non-agricultural ingredients listed on the National List Section 205.605. These ingredients are non-agricultural, so organic forms do not exist. *Example: Baking soda.*
- 2) A non-organic agricultural ingredient listed on the National List Section 205.606. These agricultural ingredients have been determined not to be commercially available in organic form by the National Organic Program. *Example: Sausage casings.*

Producers using non-organic agricultural ingredients listed in Section 205.606 are still required to do a thorough search for these ingredients as organic before non-organic versions are used. This must be documented.

Any non-organic ingredients (on 205.605 or 205.606) must not be produced using genetic engineering or sewage sludge or be irradiated. *Example: Baking powder is on 205.605. The cornstarch in the baking powder must be verified as from a non-gmo source.*

"Made with organic (specified ingredients or food groups)"

Products sold as "Made with organic..." must contain at least 70% organic ingredients. The remaining non-agricultural ingredients must be on the National List Section 205.605. Non-organic agricultural ingredients may not be produced using genetic engineering or sewage sludge or be irradiated. In addition, non-organic agricultural ingredients are not subject to the same commercial availability requirements as the "organic" category.

Less than 70% organic ingredients

Products in this category are not eligible for certification and may not be sold labeled or represented as organic. However, producers may identify organic ingredients in these products in the following ways:

- Identifying organic ingredients in the ingredient statement with the word "organic", or an asterisk or other reference mark which is defined below the ingredient statement.
- Displaying the products percent of organic ingredients on the information panel (only allowed if organic ingredients are identified in the ingredients statement).

Raw Ingredient Verification & Tracking

Incoming organic ingredients must be accompanied by a certificate that verifies certification to USDA National Organic Program Standards. These should be kept on file and made available to the inspector. Incoming loads of raw ingredients should be accompanied by receipts/invoices that identify the ingredients as organic and can be tracked with a lot number.

For small scale operations not buying through a distributor, but who instead buy items from a retail operation (like a food co-op), a certificate is not required. However, a receipt identifying the ingredient as organic must be available at the time of inspection and when otherwise requested to verify organic status.

Processors may not include organic and non-organic forms of the same ingredient in their products.

Note that genetic engineering, ionizing radiation and use of sewage sludge are considered prohibited processes by the NOP Rule. Therefore ingredients produced using these methods may not be used in products labeled “100% organic”, “organic”, or “made with organic (ingredients)”. Producers must have written documentation verifying that non-organic (agricultural and non-agricultural) ingredients were not produced using excluded methods. **All non-organic ingredients and processing aids must appear on the National List, Sections 205.605-205.606**

Product Composition

A detailed profile of each product submitted for certification must be submitted with the certification application. The product profile should include a list of all organic, non-organic, and non-agricultural ingredients. The supplier name and name of the corresponding certifying agent must also be listed. If the ingredient is obtained from more than one supplier information for both suppliers should be provided. Also included on the product profile is the percentage of each ingredient in the final product (please see a description of this calculation below). A list of any processing aids is also requested on the product profile form.

Calculating Percentage of Organic Ingredients

For the configuration of percentages of organic ingredients, processors should use weight or fluid volume, and exclude salt and water from all calculations. It is the responsibility of the processor who puts the label on the final retail package to figure the total percent organic ingredients.

- Non-liquid products must figure the percentage by dividing the weight of the organic ingredients by the weight of the total ingredients.
- Liquid products must use volume, and if using ingredients that have been reconstituted, the calculation should be made on the basis of single strength concentrations.
- If a product contains both solid and liquid ingredients, the calculation should be made using the combined weight of both the solid and liquid ingredients.

The total percentage of organically produced ingredients should be rounded down to the nearest whole number.

Example: Biscuit Baking Mix- 16 oz

Ingredient	Supplier	Certifying Agent	Weight	% of final product
Organic All-Purpose Flour	Midwest Mills	QAI	8 oz.	50%
Organic Whole Wheat Flour	Pacific Flour Co.	OTCO	4 oz.	25%
Baking Powder	Rumford	(non-agricultural)	0.5 oz.	3.1%
Organic Non-Fat Milk Powder	Dairy Brands	CCOF	3.5 oz.	21.8%
Sea Salt	Real Salt	(non-agricultural)	n/a	n/a
Total (rounded down)			16 oz.	99 %
% Organic (rounded down)				96%

In 1 lb (16 oz) of baking mix there is 8 oz all-purpose flour, 4 oz whole wheat flour, 3.5 oz of dry milk and ½ oz baking powder. The mix also includes salt but it is not included in the calculation. Eight ounces divided by 16 equals 0.5 or 50%. The same calculation is done for each ingredient.

$4 \text{ oz} / 16 \text{ oz} = .25$ (25%), $3.5 \text{ oz} / 16 \text{ oz} = 0.218$ (21.8%), $0.5 \text{ oz} / 16 \text{ oz} = 0.031$ (3.1%)

Labeling

Producers must submit their labels to VOF for approval prior to sale.

100% Organic

These products may be labeled anywhere on the package as "100% organic" or "organic" and may indicate ingredients individually as organic in the ingredient statement. Processors may use the USDA seal and the VOF Processor Logo. However, if a processor chooses to use both logos, the VOF logo may not be more prominent than the USDA seal. On the information panel below information identifying the handler or distributor, the certifying agency of the handler must be identified with a phrase such as, "Certified Organic by Vermont Organic Farmers" or "Certified Organic by VOF".

Sunny Valley Farms 100% Organic Oatmeal 16 oz.	Ingredients: Organic Rolled Oats, Salt Sunny Valley Farm PO Box 52, Randolph, VT 05478 Certified Organic by VOF
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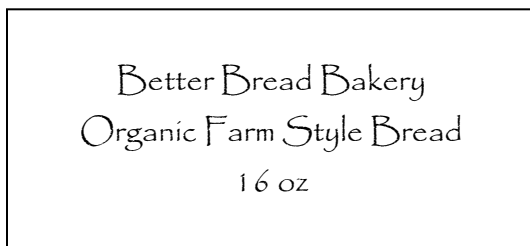
Front Panel

Back Panel

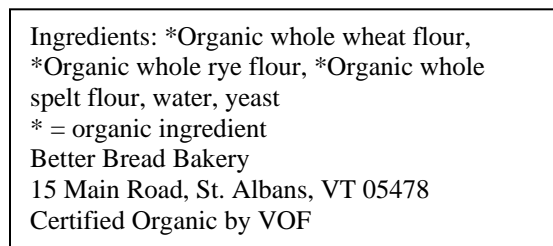
"Organic" Category

Products in this category may be labeled anywhere on the package as "organic" and may use the USDA seal and the VOF Processor Logo. However, if a processor chooses to use both logos, the VOF logo may not be more prominent than the USDA seal. Processors must indicate each organic ingredient in the ingredient statement. On the information panel below information identifying the handler or distributor, with no intervening language, the certifying agency of the handler must be identified with a phrase such as "Certified Organic by Vermont Organic Farmers" or "Certified Organic by VOF".

If you list the percentage of organic ingredients in the product, the size of the percentage statement must not exceed ½ the size of the largest type size on the panel on which the statement is displayed and must appear in its entirety in the same type size, style, and color without highlighting.



Front Panel



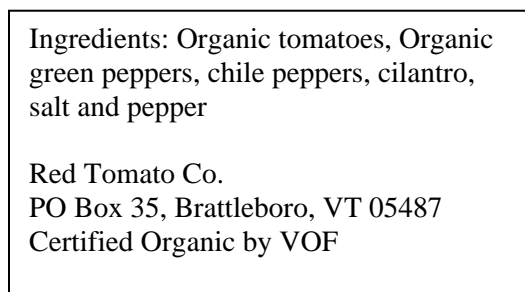
Back Panel

Made with organic "(specified ingredients or food groups)"

Products in this category may be labeled anywhere on the package as "Made with organic..." listing no more than three individual organic ingredients or food groups (for details see §205.304(a)(1)). The type size of the made with organic statement may not exceed ½ the size of the largest type size on the panel and must appear in its entirety in the same type size, style, and color without highlighting. Processors must indicate each organic ingredient in the ingredient statement. Processors of products in this category are not allowed to use the USDA seal or the VOF logos. On the information panel below information identifying the handler or distributor, the certifying agency of the handler must be identified with a phrase such as "Certified Organic by Vermont Organic Farmers" or "Certified Organic by VOF".



Front Panel



Back Panel

VOF Logo Guidelines

VOF has two logos: the round 'farmer logo' and the rectangular 'processor logo'. For producers who choose to use the VOF logos, the following qualifications must be met:

- Producers who use at least 95% organic ingredients raised or grown in Vermont in their product may use either the farmer logo or the processor logo.
- Producers who use less than 95% of organic ingredients raised or grown in Vermont in their product must use the processor logo.

There are special considerations for livestock feed processing and labeling. For details, please refer to Sections 205.237, 205.301(e), and 205.306 of the NOP Standards. There are also special considerations for point of retail sales labeling. Please refer to §205.308-309.

Maintaining Organic Integrity & Production of Organic and Non-organic products in the same facility.

The processor must implement measures necessary to prevent the commingling of organic and non-organic products and protect organic products from contact from prohibited substances. If producing an organic product both organically and non-organically in the same plant, each applicant must develop a detailed plan, identifying critical points of potential co-mingling of organic and non-organic ingredients. If any prohibited products are used in the facility, care must be taken to ensure that they do not contaminate the organic product. VOF recommends that all food contact surfaces are food-grade, including utensils and containers.

Cleansers and Sanitizers

VOF does not recommend the use of specific cleansers. Processors may use any cleanser, disinfectant, and sanitizer provided that they do not contaminate the organic product. VOF recommends thorough rinsing after the use of all cleaning products. If these products are likely to leave a chemical residue, testing may be required. If products are used that are highly persistent and leave a residue (such as quaternary ammonia), it is the producer's responsibility to verify that the organic product is not being contaminated.

Packaging

- All packaging material must be free of fungicides, preservatives, fumigants, insecticides, or other prohibited contaminants.
- All materials used for packaging must be food grade and of suitable design to protect the organic integrity of the product.
- VOF recommends non-essential packaging should be avoided where possible and considerations should be given to how the end product packaging may be recycled or returned.

Pest Management

Pest management in processing facilities must be described in the application and must include exclusion/prevention of pests, good sanitation, and restriction of habitats for pests. Pest logs describing where and when pesticides are used are required for processors who use synthetic controls. These logs must be available for review during the annual on-site inspection. Ongoing monitoring and inspection should be performed in the facility to

determine the presence and degree of activity of any insect or rodent pests. If a processor does use a synthetic or non-synthetic substance to control pests, this must be listed in their application, including all measures taken to prevent contact of the substance with organic products or ingredients.

Approved

- Management practices to prevent pests
- Mechanical, electrical, pheromone/scent and adhesive traps, physical barriers, sound and light devices as repellents, lures and repellents using non-synthetic or synthetic substances from the National List.

In the case that the above approved methods are not effective, processors may use a non-synthetic or synthetic substance from the National List. If substances from the National List are also not able to prevent or control pests, a synthetic substance not on the National List may be used provided that the producer and VOF agree on the substance, method of application and measures being taken to prevent contact with the organic product.

In the case of fogging and broad surface treatments, organic product must not be contaminated. All food preparation surfaces must be covered or otherwise protected from contamination.

Storage

Processors must protect organic products from contamination and commingling while in storage. Storage of organic and non-organic ingredients in the same room or cooler is permissible with documentation that organic ingredients can be kept separate from non-organic ingredients and that repackaging of organic food containers can be tracked to assure no mixing of organic and non-organic ingredients occur. All bins or storage facilities that organic ingredients are being stored in must be numbered or identifiable.

Approved

- Storage areas should be ventilated, but sealed to the encroachment of birds, rodents, or other pests
- Controlled atmosphere storage, see the National List for individual gases

Prohibited

- Bags or other containers used for any substances that could compromise the organic quality of the product through the introduction of contaminants.

Transportation

For each load of incoming organic product shipped in a way that could expose the product to prohibited substances, affidavits must be signed by the transporter and kept on file by the processor, attesting to the fact that no prohibited fumigants or pesticides were used prior to or during the shipment of organic foods, and that the carrier was cleaned sufficiently to avoid the contamination of organic foods by previous loads. (This refers to agricultural products shipped in bulk in trailers such as grain, not applicable to products shipped in packages).

Organic Handling System Plan, Record Keeping and Audit Trail

All processors must submit an organic handling system plan in the form of the VOF Processing Production Plan on a yearly basis. The plan must show compliance with the requirements in the NOP Standards. The VOF Plan will ask the processor for the following:

- A description of processing practices.
- A facility map and process flow diagram with a description of any organic control points.
- A comprehensive list and description of organic product(s) including ingredients, processing aids, additives, including source.
- Current label proofs for each new product
- Description of all monitoring practices for pests, etc.
- A list of all cleaners and pest control products planned on being used.
- Description of the record keeping system used.
- Additional information as deemed necessary by the VOF Review Committee.

Audit trail and inventory control procedures must be detailed enough to trace all raw materials from the supplier, through the entire plant process, and on through the distribution system to the retailer, using lot numbers, or serial numbers. Company records (including purchase orders, bills, invoices, and inventory records) must be made available to the inspector.

Example of an audit trail for a corn bread mix.

To track cornmeal in a baking mix back to the purchase date, start with the lot number on the finished product. Lot number on the finished product is 010410 (date of production). Production log for January 4, 2010 shows lot number of cornmeal purchased as #1905. This number matches the invoice number on the cornmeal purchased from the supplier on December 10, 2009

Record keeping

VOF **may** require the following information from processors as part of the inspection process:

- current certificates for all organic raw materials
- a complete list of ingredients by weight or volume as appropriate
- current facility map
- detailed flow chart of processing steps
- facility pest control map
- storage conditions
- sample of the audit trail
- facility sanitation, and cleaning methods
- MSDS and labels for all products used in cleaning final product
- how and by whom materials are transported to and from the plant