



# NON-GMO VERIFICATION & LABELING IN ORGANIC PRODUCTION & HANDLING

## Guidance

The use of genetic engineering, or GMO's (genetically modified organisms), is explicitly prohibited in the production and handling of certified organic products. No matter where it was grown, if a product is certified organic, it wasn't produced with GMO's!

### DEFINITIONS

- GMO (Genetically Modified Organism)- are organisms whose genome has been altered by generic engineering techniques not possible under natural conditions.

### NOP REGULATIONS AND PCO POLICY

There are several key non-GMO verification points under the USDA organic regulations:

- Never use GMO seed to produce organic crops
- Never use GMO feed to feed organic livestock
- Never use GMO ingredients or processing aids, including minor ingredients such as flavors, yeast, and corn starch, in any organic products
- Preventative practices to avoid GMO drift contamination
- Physical barriers to prevent contact with GMO's
- Segregation, identification, and traceability throughout production, processing, storage, and transportation of organic products
- On-site inspections at least once per year to verify effectiveness of GMO prevention methods
- Periodic residue testing to ensure compliance; any detection of GMO's leads to investigation
- Inadequate prevention measures or intentional use of GMO's can lead to adverse actions, loss of certification, and/or financial penalties.

In addition to the prohibition of GMO's, there are many other environmental sustainability and animal welfare requirements under the organic regulations.

- Protect natural resources and biodiversity
- Maintain or improve soil and water quality
- Livestock grazing requirements and organic feed
- Never use toxic pesticides or fertilizers
- Never use livestock antibiotics or growth hormones
- Never use artificial preservatives or flavorings

**WATCH OUT!** Products that are labeled non-GMO but aren't certified organic could have been produced with toxic fertilizers, pesticides, and herbicides!

### ADDITIONAL INFORMATION

#### LABELING ORGANIC PRODUCTS AS NON-GMO

Organic certification under the USDA National Organic Program as "100% organic", "organic", or "made with organic (specified ingredients or food group(s))" is sufficient to substantiate a claim that a product is non-GMO. However, in cases where manufacturers choose to voluntarily add a non-GMO claim to their product labels, the

following guidelines should be followed.

- “Non-GMO” or “Non-GE” (Non-Genetically Engineered) or other similar phrases may be used on certified organic product. These claims are accurate statements that attest to the product being produced in accordance with the USDA National Organic Program regulations, which prohibit the use of GMO’s or genetic engineering.
- “GMO-free” or “GE-free” or “Zero GMOs” claims should not be used because they are potentially inaccurate due to limitations of testing methodology and the realities of inadvertent contamination risk. Organic certification is process based, meaning that organic products must be produced and handled without the use of GMO’s, but does not claim that the product is 100% free of GMO’s. Non-GMO verification by other third-party certification agencies typically provide for small tolerance levels of GMO presence, and therefore would also not qualify as being free of GMO’s. For example, the Non-GMO Project and the EU standards both use .09% GMO content as the action threshold.

## MEAT AND POULTRY

*Meat and Poultry Products are subject to specific labeling requirements under the USDA Food Safety and Inspection Service (FSIS). FSIS will only allow specific "non-genetically engineered" label claims on organic meat and poultry products. The statement must reference the fact that the USDA organic regulations do not permit the use of genetically engineered ingredients or meat from animals that were fed genetically engineered ingredients to bear an organic claim.*

- An example of a claim that FSIS may permit is: *“The beef used in this product is fed a diet that contains non-genetically engineered ingredients. The USDA organic regulations prohibit the use of Genetically Engineered Feed Ingredients.”*

## RESOURCES

- Non-GMO Requirements under the National Organic Program:  
[https://ota.com/sites/default/files/indexed\\_files/OTA\\_Non-GMOVerification\\_FactSheet.pdf](https://ota.com/sites/default/files/indexed_files/OTA_Non-GMOVerification_FactSheet.pdf)
- FSIS Label Approval <http://www.fsis.usda.gov/wps/portal/fsis/topics/regulatory-compliance/labeling>