



## OPT Grass-Fed Labeling Guidance

All labels and packaging must be submitted to PCO for review and approval. Labeling must be in general accord with the compositional percentages and labeling requirements of the NOP described in 7 C.F.R. §205, Subpart D, and the labeling guidance set forth in the OPT Grass-Fed Program Manual.

### Required Label Elements:

- Use of the OPT Program Seal is mandatory on all consumer-facing products making the OPT Grass-Fed claim.
- The OPT Program Seal is obtained by contacting OPT directly to obtain a licensing agreement. *(Operations making less than \$20,000 a year in gross sales of OPT Grass-Fed certified products are exempt from the licensing fee.)*
- All products that are OPT Grass-Fed certified shall contain the phrase: "OPT Grass-Fed Organic Certified by PCO" on the label (retail and non-retail).
- All labels must be submitted to PCO for review and approval.

### Percentage Labeling Claims:

1. 100% Term
  - a. The "100%" claim may only be used in accordance with NOP regulations.
  - b. Label text using the term "100%" may be used at an operation's own risk. The following phrases are allowed at operator risk and subject to approval by the certifying agent:
    - i. Certified 100% Grass-fed Farm (not a split operation)
    - ii. Certified Grass-fed Farm (not a split operation)
    - iii. Certified 100% Grass-fed (no modifier after this phrase and product must be in compliance with NOP 205.301(a) as a "100% organic" product)
    - iv. 100% Grass-fed (no modifier after phrase)
  - c. Prohibited:
    - i. 100% certified Grass-fed [generic products- dairy, milk, yogurt, etc].
    - ii. 100% Grass-fed [generic products- dairy, meat, milk, yogurt, etc]
    - iii. 100% certified grass-fed [animals- cows, sheep, etc]
2. Multi-Ingredient Products
  - a. Products composed of 95-99% OPT Grass-Fed Program ingredients may be labeled as "Certified Grass-Fed Organic (ingredient)".
  - b. Products composed of 70-94% OPT Grass-Fed Program ingredients may be labeled "Contains Certified Grass-Fed Organic (ingredient)" or "Made with Certified Grass-Fed Organic (ingredient)".
  - c. The remaining ingredients must comply with Organic requirements.
  - d. Use of OPT Grass-Fed Certified and non-OPT Grass-Fed Certified forms of the same ingredient is prohibited.

### **Pennsylvania Certified Organic (PCO)**

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