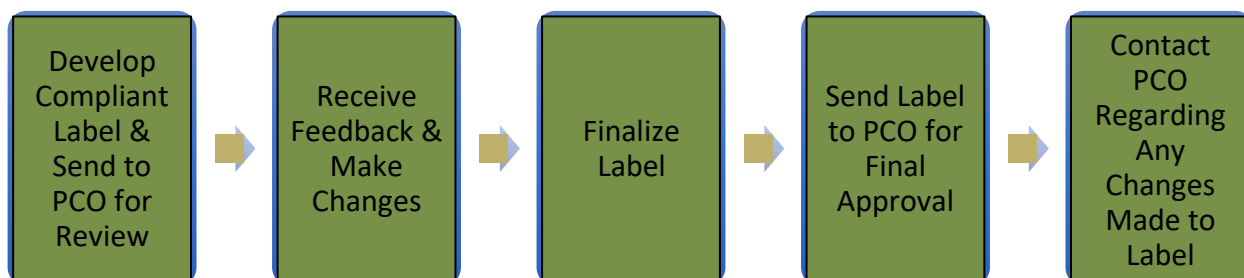




Organic Labeling Guide

The following guidelines may be used to help you develop labels compliant with USDA NOP organic standards and navigate the label approval process with PCO.

Submitting Labels to the PCO for Approval



ALL labels (including all sizes, non-retail packaging, inner packaging, tags, etc.) must be submitted to PCO for review and approval prior to printing or use. After reviewing this guidance document, submit your labels to PCO by emailing a copy (pdf is preferred) to your Certification Specialist (CS). PCO will review your labels for compliance with organic regulations. Your operation is responsible for verifying compliance with other regulatory programs. If changes are requested, you must re-submit a revised label. Once approved, PCO will provide stamped labels (either in your portal or upon request). It is a good practice to also retain a copy in your records.

Understanding Common Labeling Issues

The USDA NOP labeling standards (defined in 7 CFR Subpart D - Labels, Labeling, and Market Information) dictate how you may design your certified organic product labels. In situations where labels with serious or minor errors have entered the marketplace, PCO may issue a noncompliance with or without a use-up period depending on the scenario. To prevent unnecessary costs associated with labeling noncompliances, review the following guidelines and ensure your labels are approved by PCO prior to use.

Common labeling issues include:

- Incorrect color and/or transparency for USDA seal
- Missing ingredient statement
- Certifier name missing or in the wrong location
- Incorrect product claims
- Using labels before PCO has approved them

Pennsylvania Certified Organic (PCO)

pco@paorganic.org • www.paorganic.org • 106 School Street, Ste 201 • Spring Mills, PA 16875 • 814.422.0251 • fax 814.422.0255

Developing a Compliant Retail Label

Step 1: Determining Product Composition

The USDA has defined three categories of organic products: “100% Organic,” “Organic,” and “Made with Organic”. To determine the appropriate category for your products, you must [calculate the percentage of organically produced ingredients](#) in your product(s). This should be done prior to creating your labels to ensure the labeling claims align with the product composition. For processors of multi-ingredient products, this should be documented on the PCO Formulation Sheet ([food](#), [feed](#)).

Step 2: Identifying the Appropriate Labeling Category

Based on your product composition, your product may be eligible for one or more of the following labeling categories. Use the chart to determine which is appropriate.

Organic Labeling Category	Organic Ingredients
“100% Organic” <ul style="list-style-type: none">• Must contain 100% organic ingredients (excluding water and salt added as ingredients at formulation)• Must use certified organic processing aids	100%
“Organic” (>95% organic) <ul style="list-style-type: none">• Must be composed of at least 95% certified organic ingredients (excluding water and salt added as ingredients at formulation)• May use up to 5% of the formula for non-organic ingredients allowed per The National List:<ul style="list-style-type: none">○ Non Agricultural (listed at §205.605) or○ Agricultural (listed at §205.606) and not commercially available as organic• All processing aids must also be approved on The National List.	At least 95%
“Made with Organic” <ul style="list-style-type: none">• Must be composed of at least 70% certified organic ingredients (excluding water and salt added as ingredients at formulation)• May have 30% or less of non-organic ingredients, either:<ul style="list-style-type: none">○ Non Agricultural (listed at §205.605) or○ Agricultural (listed at 205.606)• All processing aids must also be approved on The National List.	At least 70%
Specific Organic Ingredients <ul style="list-style-type: none">• May list certified organic ingredients as organic in the ingredient list (See Additional Labeling Guidance section for more details).	Less than 70%

Pennsylvania Certified Organic (PCO)

pco@paorganic.org • www.paorganic.org • 106 School Street, Ste 201 • Spring Mills, PA 16875 • 814.422.0251 • fax 814.422.0255

Step 3: Designing Labels Based on the Labeling Category

Below is the summary of retail labeling requirements for each category. Refer to these and the additional steps referenced as you design your labels for compliance.

“100% Organic” or “Organic”

- **Must** include a certified organic by statement (see step 4)
- **Must** identify all ingredients as organic (see step 5)
- May make a percentage statement (see step 6)
- May use USDA Seal (see step 7)
- May display certifier logo (see step 4)

“Made with Organic”

- **Must** contain certified organic by statement (see step 4)
- **Must not** be labeled as Organic (see step 6)
- **Must not** include organic and non-organic forms of the same ingredient. When these ingredients and/or food groups are listed within the “made with” statement.
- **Must not** use the USDA Organic Seal (see step 7)
- May list up to 3 organic ingredients or food groups (see step 6)
- May make a percentage statement (see step 6)

Step 4: Identifying the Organic Certification Agency

For retail labels on [packaged products labeled “100% organic” or “organic”](#), [packaged products labeled “made with organic”](#) and [livestock feed](#), the NOP regulations require a “Certified organic by...” (COB) statement, which identifies the name of the certification agency of the product's final handler or distributor. This statement should be placed **directly below** the information (e.g. name, address, website) identifying the product's final handler or distributor.

There must not be any intervening words or pictures in between the COB statement and the information identifying the handler or distributor of the product. Addresses, company websites and social media information are considered part of the handler or distributor's identifying information, and may be displayed above the COB statement. Other text that is unrelated to info identifying the handler or distributor, such as "Product of the USA" or "Keep Frozen" must not be displayed above the COB statement.

Some variation is allowed in the language of the COB statement. PCO encourages the use of the phrase “**Certified Organic by PCO**”. Examples of additional compliant phrases include:

- Certified Organic by PA Certified Organic
- Certified Organic by Pennsylvania Certified Organic
- Certified by PA Certified Organic
- Certified by Pennsylvania Certified Organic

Pennsylvania Certified Organic (PCO)

pco@paorganic.org • www.paorganic.org • 106 School Street, Ste 201 • Spring Mills, PA 16875 • 814.422.0251 • fax 814.422.0255

If using the PCO logo, it must not be more prominent than the USDA seal. If using the PCO logo with the term “Certified Organic”, the phrase certified organic by is not required. PCO logos may be downloaded from the [PCO website](#).

In general, all companies using the Pennsylvania Certified Organic (PCO) name or logo must be PCO-certified; however, in certain limited situations PCO may authorize a PCO-certified operation to provide a private label service to a non-PCO certified operation. See “Additional Labeling Guidance” below for further details on Private Labels.

Step 5: Formatting the Ingredient Statement

Based on the definition of “Ingredients statement” ([§205.2 Terms defined](#)), PCO must verify that ingredient statements on your labels list the ingredients contained in your product(s) by their common and usual names and in descending order of predominance.

Single ingredient products that are certified to the “100% organic” category and make a “100% organic” claim on the label are not required to have ingredients statements.

Multi-ingredient products that are >95% organic, must identify each organic ingredient in the finished product in an ingredient statement on the ingredient panel. This may be done by using the word “organic” in front of the organic ingredients, or by using an asterisk next to the organic ingredient with a key beneath; examples below:

Example 1: Ingredients: organic wheat flour, organic pumpkin, organic sugar, salt.

Example 2: Ingredients: wheat flour*, pumpkin*, sugar*, salt.
*organic

Section 6: Correctly Configuring Percentage Statements and Claims

Note: this step is only applicable to certain compositions. Read carefully and skip if it doesn’t apply to your product(s).

You may include a percentage statement of organic ingredients on the label. It must not be more than the actual organic content in the content. Graphic design elements such as banners or starbursts may be used, but you must adhere to the following requirements:

- Font size must not exceed 1/2 the size of the largest type size on the panel (e.g. if logo typeface is 24 pt. then the percent statement font must be 12 pt. or less.)
- Font must be uniform size, style, and color within the claim.

Pennsylvania Certified Organic (PCO)

pco@paorganic.org • www.paorganic.org • 106 School Street, Ste 201 • Spring Mills, PA 16875 • 814.422.0251 • fax 814.422.0255



- If you are using a percentage statement on the front panel of a “Made with Organic ...” product, the “Made with Organic ...” claim must appear on the same panel.
- The statement “Made with Organic ...” can be anywhere on the label, but the graphics must not exceed 1/2 the size of the largest type size on the panel and must be uniform size, style, and color within the claim.
- The statement “Made with Organic” can be followed by: up to 3 ingredient/food groups.
- In the statement “Made with Organic”, the named ingredients or all ingredients in the food groups must be organic.

Additional information on the “Made with organic” claim can be found in [NOP Guidance 5032](#).

Section 7: Use of the USDA Seal

The USDA seal is optional and only allowed on products that are certified to the “100% Organic” or/and “Organic” labeling category. The USDA Seal can be displayed anywhere on the package. Approved USDA seals can be found on the [USDA’s website](#). If the certifier seal is also used, the USDA seal must be more prominent.



The USDA four color seal must be on a white (not transparent) background.
Brown = PMS 175, Green = PMS 348



The USDA black seal can be on a white or transparent background.

Guidance for Nonretail Container Labeling

Nonretail containers are any container used for shipping or storage of an agricultural product that is not used in the retail display or sale of the product. These may include:

1. Produce boxes, totes, bulk containers, bulk bags, harvest crates and bins;
2. Boxes, crates, cartons, and master cases of wholesale packaged products; and
3. Trailers, tanks, railcars, shipping containers, vessels, cargo holds, freighters, barges, grain elevators, silos, grain bins, or other methods of bulk transport or storage.

[Nonretail container labeling](#) is regulated under § 205.307. Labels of nonretail containers must include:

1. Identification of the product as organic (clear abbreviations e.g. “org” are allowed);
2. The production lot number, shipping identification, or other unique information that links the container to audit trail documentation.

Additional identification of the container as “organic” (see 1. above) is not required if

1. non-retail containers are used to ship or store agricultural products packaged for retail sale with organic identification visible on the retail label OR

Pennsylvania Certified Organic (PCO)

pco@paorganic.org • www.paorganic.org • 106 School Street, Ste 201 • Spring Mills, PA 16875 • 814.422.0251 • fax 814.422.0255

2. if the label includes the USDA Seal and/or a “Certified Organic by...” statement. Certifier information may also be included on the label.
 - If the USDA seal is used it must be compliant with 205.311.

Examples of compliant information display might include:

- Stamp on a produce box or master case
- Pallet tag
- Seal, tag or magnet on a railcar
- Truck/trailer number with “organic” direct on truck or some other signage
- Plastic document holder on the outside of a shipping container with audit trail documents

Nonretail container labeling (Low-risk): PCO has determined the following nonretail containers may be low-risk, and do not need to comply with the labeling requirements at §205.307 . These include but are not limited to:

- Work in process containers that do not leave the operation (e.g. harvest bins)
- Produce boxes that remain in the operation’s control the entire time (e.g. produce box that is packed into and taken to market but remains in the vehicle)
- Transportation that is operated by the certified operation and returns to the certified operation (e.g. truck driven by PCO certified farmer picks up hay at neighboring farm and returns to the certified operation)
- Nonretail container containing a retail labeled product where the organic identification is visible while in the nonretail container (e.g. pallet of wrapped clamshells)

These nonretail containers must comply with identification requirements to prevent commingling and contamination as required at §205.272. Additionally the use of temporary signage or labeling is permitted. This may include a magnet, seal, tag, etc.

Nonretail containers labeling “For Export Only”: If shipping containers of domestically produced product(s) are to be exported, the shipping containers may be labeled in accordance with any shipping container labeling requirements of the foreign country of destination or the container labeling specifications of a foreign contract buyer provided that 1. The shipping containers and shipping documents accompanying such organic products are clearly marked “For Export Only” and 2. Proof of such container marking and export are maintained by the handler in accordance with recordkeeping requirements for exempt and excluded operations under §205.101.

Additional Labeling Guidance

- A. **Alcoholic Beverages:** Alcoholic beverages do not require ingredient statements. There are specific alcohol labeling guides on the NOP website ([wine](#), [malt beverages](#), [distilled spirits](#)).
- B. **Body care or cosmetic products:** Certified organic cosmetics, personal care products, and body care products are eligible for the same 4 organic labeling categories as all other agricultural products, based on their organic content and other factors.

Pennsylvania Certified Organic (PCO)

pco@paorganic.org • www.paorganic.org • 106 School Street, Ste 201 • Spring Mills, PA 16875 • 814.422.0251 • fax 814.422.0255

PCO Organic Labeling Guide V3, 4/24/24

- C. Livestock Feed sold, labeled, or represented as: “100% organic” must contain 100% organic raw or processed ingredients; Livestock Feed sold, labeled, or represented as: “Organic” must be produced in conformance with § 205.237. Both categories:
- May use the USDA seal and/or PCO logo (per Step 6 above)
 - May use the word “organic,” or an asterisk or other reference mark
 - Must include a certified organic by statement on the information panel, below the information identifying the handler/distributor of the product (per Step 3 above).
 - Must comply with other Federal agency or State feed labeling requirements
- D. Market Information: This includes any written, printed, audiovisual, or graphic information, including advertising, pamphlets, flyers, catalogs, posters, and signs, distributed, broadcast, or made available outside of retail outlets that are used to assist in the sale or promotion of a product. You may submit marketing information to PCO for review but are not required to. Unless your operation is dedicated organic, PCO does not approve the use of the USDA seal on marketing materials. If your retailers or creative partners are responsible for producing these, be sure they know the requirements.
- E. Private Labels: Private label products or services are typically those manufactured or provided by one company for sale under another company’s brand. If you are co-packing for a private label / brand owner, please observe the following:
- Labels must be submitted to PCO for review. If a label submitted by a private label/brand owner is not compliant it will not be approved.
 - Label information for private label products must contribute to traceability and transparency.
 - If the private label company is identified on the label, it must be accompanied by a qualifying phrase which states the company’s relation to the product (e.g., “manufactured for” or “distributed by”). “Manufactured by” may not be used.
 - A PCO private label agreement should be used when the handler/distributor statement lists an entity not certified by PCO but identifies PCO as the certifier.
 - In private label scenarios where another certifier is identified on the label, PCO requires written or stamped approval from that certifier that the specific labels have been approved.
- F. Products in other than packaged form at the point of retail sale (100% organic/organic, made with organic), including: PLU stickers, twist ties, display cases, etc.
- [For products with >95% organic content](#), the terms “100% organic” and “organic” may be used to modify the name of the product, as applicable. In any such display of the product's ingredient statement, the organic ingredients are identified as “organic.”
 - For these products (if prepared in a certified facility), the retail display, labeling, and display containers may use the certifier logo (step 3) or USDA seal (step 6).
 - [For products with >70% organic content](#), the phrase “made with organic” may be used to modify the product, but must not list more than three organic ingredients or food groups. In any display of the product's ingredient statement the organic ingredients must be identified as “organic.”

Pennsylvania Certified Organic (PCO)

pco@paorganic.org • www.paorganic.org • 106 School Street, Ste 201 • Spring Mills, PA 16875 • 814.422.0251 • fax 814.422.0255

PCO Organic Labeling Guide V3, 4/24/24

- For these products (if prepared in a certified facility), the retail display, labeling, and display containers may use the certifier logo (step 3).
- G. Products with less than 70% organic content
- May not use the term “organic” on the primary display panel.
 - Organic ingredients may be identified in the ingredient statement on the information panel, but organic ingredients may not be referred to as “certified”
 - May not use the USDA or certifier seals.
- H. Romance language: In addition to the labeling requirements specified in the organic regulations, operations sometimes include additional language on the label (sometimes referred to as “romance language”) often pertaining to farming and livestock production practices. If the statement is a truthful claim about the product it is allowed. However, if the claim refers to the NOP organic regulations overall, then the claim must be accurate and cannot overstate what the NOP regulations entail (i.e. must not be misleading). Please reach out to your Certification Specialist if you have questions about the use of romance language on your labels.
- I. Textiles Textile products that are labeled as “organic”, may: 1. Use label claims that identify specific types of organic fibers and 2. Use statements identifying the percentage of organic fibers; but must not: 1. Use the USDA organic seal unless they are certified in accordance with the NOP regulations, 2. Imply or lead the consumer to believe that the final product is certified under the NOP regulations unless they are certified in accordance with the NOP regulations, or 3. Use a combination of both organic and non-organic sources for a single fiber that is identified as “organic” in the final product.
- J. Uncertified products: There may be limited situations where certified organic operations that organically produce or process uncertified products that are not part of their OSP or included on their organic certificate (e.g. products containing less than 70% organic content, product contains non-organic ingredients not on §205.606, operations only certified for crops that produce value added product but does not want to obtain handling scope). These products:
- Must not:
 - make any organic claim on the principal display panel, including any phrasing that could be misleading to a consumer
 - display the USDA seal nor any certifying agent seal, logo, or other identifying mark (which may be the name of the certifier) which represents organic certification of the product or ingredient
 - May:
 - only identify the certified organic ingredients as organic and the percentage of organic ingredients on the information panel of the label

Pennsylvania Certified Organic (PCO)

pco@paorganic.org • www.paorganic.org • 106 School Street, Ste 201 • Spring Mills, PA 16875 • 814.422.0251 • fax 814.422.0255