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## Labeling Beef....What Does All This Mean?

### Organic

#### Part 3 of 3

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**O**rganic food is produced by farmers who emphasize the use of renewable resources and the conservation of soil and water to enhance environmental quality for future generations. Organic meat, poultry, eggs, and dairy products come from animals that are given no antibiotics or growth hormones. Organic food is produced without using most conventional pesticides, genetically modified organisms (GMOs); fertilizers made with synthetic ingredients or sewage sludge; bioengineering; or ionizing radiation. Before a product can be labeled "organic," a Government-approved certifier inspects the farm where the food is grown to make sure the farmer is following all the rules necessary to meet USDA organic standards. In addition to producers being certified, companies that handle or process organic food before it gets to your local supermarket or restaurant must also be certified.

#### **Certification**

Any operation, or partial operation, that produces or handles agricultural products that will be sold as "100% organic", "organic" or "made with organic ingredients" must be USDA certified. There are some cases that are exempt from certification. For example, farms and handling operations with less than \$5,000 in annual sales of organic products are exempt from certification. Certification exempt farms still must meet the national standards for organic production and labeling. Handlers and retailers who only handle products with less than 70 percent organic ingredients, is a retail food establishment that prepares organic products on the premises or only uses the word organic on the information panel are exempt from being certified. Essentially, handlers and retailers who do not process or repackage the product are certification exempt.

Certification includes an application process and on-site inspection process. The application to the certifying agent should include type of operation and an organic plan. The type of operation includes information such as the history of substances that have been applied to the land for the 3 previous years and organic products that are being grown, raised or processed. An organic plan consists of a description of practices and substances used in production. The plan must also describe monitoring practices that verify the plan is being effectively implemented, a record-keeping system and description of practices that will prevent commingling of organic and non-organic products. Farms that produce both organic and non-organic products are labeled as "split production."

Producers are required to keep accurate records of production, harvesting, and handling of organic products for at least 5 years, post-certification, documenting regulation compliance. The second part of certification is an on-site inspection by a qualified inspector. Inspections should be scheduled when the inspector can observe practices and procedures being implemented. Annual inspections will be conducted for each operation and the producer must provide an annual information update to the certifying agent before the annual inspection.

The farm and product must be inspected and certified through the National Organic Program (NOP), but producers must still file an animal raising labeling claim form (FSIS 7234-1) through the USDA Food Safety and Inspection Service (FSIS) in order to use the organic claim on the label of the product. FSIS will require documented proof of organic certification by the NOP.

USDA or the certifying agent may conduct unannounced inspections to effectively enforce rules and regulations. In addition, residue tests may be performed to help agents enforce regulations. Residue tests and unannounced inspections are usually performed when there is reason to believe products have been contaminated.

If any person knowingly handles, processes, or sells a product that is labeled organic that does not meet National Organic Program standards, a penalty of \$11,000 per offense can be applied.

### **Organic Livestock Production Standards**

These standards apply to animals used for meat, milk, eggs, and other animal products represented as organically produced.

The livestock standards state: Animals for slaughter must be raised under organic management from the last third of gestation. Producers are required to feed livestock agricultural feed products that are 100 percent organic, but may also provide approved vitamin and mineral supplements. Organically raised animals may not be given hormones to promote growth, or antibiotics for any reason. Producers are prohibited from withholding treatment from a sick or injured animal; however, animals treated with a prohibited medication may not be sold as organic. Preventive management practices, including the use of vaccines, will be used to keep animals healthy. All organically raised animals must have access to the outdoors, including access to pasture for ruminants. They may be temporarily confined only for reasons of health, safety, the animal's stage of production, or to protect soil or water quality.

### **Handling standards**

The handling standards state: All non-agricultural ingredients, synthetic or non-synthetic, must be included on the National List of Allowed Synthetic and Prohibited Non-Synthetic Substances. Handlers must prevent the commingling of organic with non-organic products and protect organic products from contact with prohibited substances. In a processed product labeled as "organic," all agricultural ingredients must be organically produced, unless the ingredient(s) is not commercially available in organic form.

## Labeling Requirements

Labeling requirements are based on the percentage of organic ingredients in the final product. Below are summary tables for labeling requirements of varying levels of organically produced ingredients.

**PDP:** Principal Display Panel

**IP:** Information Panel

**IS:** Ingredients Statement

**OP:** Any Other Panel

**Table 1: "100% Organic" Claim**

<b>If you want to claim:</b>	<b>"100 percent Organic"</b> (or similar statement)
<b>Your product:</b>	<b>Must</b> contain 100 percent organically produced ingredients, not counting added water and salt.
<b>Your label MUST:</b>	Show an ingredient statement when the product consists of more than one ingredient. Show below the name and address of the handler (bottler, distributor, importer, manufacturer, packer, processor, etc.) of the finished product, the statement: "Certified organic by ____" or similar phrase, followed by the name of the Certifying Agent. Certifying Agent seals may not be used to satisfy this requirement. (IP)
<b>Your label MAY show:</b>	The term "100 percent organic" to modify the product name. (PDP/IP/OP)  The term, "organic" to identify the organic ingredients <sup>1</sup> . Water and salt included as ingredients must not be identified as organic. (IS)  The USDA organic seal and/or certifying agent seal(s). (PDP/OP)  The certifying agent business/Internet address or telephone number. (IP)
<b>Your label MUST NOT show:</b>	Not applicable

<sup>1</sup> To identify an ingredient as organically produced, in the ingredients statement, use the word, "organic" in conjunction with the name of the ingredient, or an asterisk or other reference mark which is defined below the ingredient statement.

**Table 2: "Organic" Claim**

<b>If you want to claim:</b>	<b>"Organic"</b> (or similar statement)
<b>Your product:</b>	<p><b>Must</b> contain at least 95% organic ingredients, not counting added water and salt.</p> <p><b>Must</b> not contain added sulfites.</p> <p><b>May</b> contain up to 5% of:</p> <ul style="list-style-type: none"> <li>a. Non-organically produced agricultural ingredients which are not commercially available in organic form; and/or</li> <li>b. other substances allowed by 7 CFR 205.605.</li> </ul>
<b>Your label MUST:</b>	<p>Show an ingredient statement.</p> <p>List the organic ingredients as "organic" when other organic labeling is shown.<sup>1</sup> Water and salt included as ingredients must not be identified as organic. (IS)</p> <p>Show below the name and address of the handler (bottler, distributor, importer, manufacturer, packer, processor, etc.) of the finished product, the statement:</p> <p>"Certified organic by ____" or similar phrase, followed by the name of the Certifying Agent. Certifying Agent seals may not be used to satisfy this requirement. (IP)</p>
<b>Your label MAY show:</b>	<p>The term "Organic" to modify the product name. (PDP/IP/OP)</p> <p>"X% organic" or "X% organic ingredients." (PDP/IP/OP)</p> <p>The USDA Organic seal and/or certifying agent seal(s). (PDP/OP)</p> <p>The certifying agent business/Internet address or telephone number. (IP)</p>
<b>Your label MUST NOT show:</b>	Not applicable

<sup>1</sup> To identify an ingredient as organically produced, in the ingredients statement, use the word, "organic" in conjunction with the name of the ingredient, or an asterisk or other reference mark which is defined below the ingredient statement.

**Table 3: “Made with Organic Ingredients” Claim**

<b>If you want to claim:</b>	<b>"Made with Organic Ingredients"</b> (or similar statement)
<b>Your product:</b>	<p><b>Must</b> contain at least 70% organic ingredients, not counting added water and salt.</p> <p><b>Must</b> not contain added sulfites; except that, wine may contain added sulfur dioxide in accordance with 7 CFR 205.605.</p> <p><b>May</b> contain up to 30% of:</p> <ul style="list-style-type: none"> <li>a. non-organically produced agricultural ingredients; and/or</li> <li>b. other substances, including yeast, allowed by 7 CFR 205.605.</li> </ul>
<b>Your label MUST:</b>	<p>Show an ingredient statement.</p> <p>List the organic ingredients as "organic" when other organic labeling is shown.<sup>1</sup> Water and salt included as ingredients must not be identified as organic. (IS)</p> <p>Show below the name and address of the handler (bottler, distributor, importer, manufacturer, packer, processor, etc.) of the finished product, the statement:</p> <p>"Certified organic by ____" or similar phrase, followed by the name of the Certifying Agent. Certifying Agent seals may not be used to satisfy this requirement. (IP)</p>
<b>Your label MAY show:</b>	<p>The term "Made with organic ____ (specified ingredients or food groups)." (PDP/IP/OP)</p> <p>"X% organic" or "X% organic ingredients." (PDP/IP/OP)</p> <p>The certifying agent seal(s). (PDP/OP)</p> <p>The certifying agent business/Internet address or telephone number. (IP)</p>
<b>Your label MUST NOT show:</b>	The USDA Organic seal

<sup>1</sup> To identify an ingredient as organically produced, in the ingredients statement, use the word, "organic" in conjunction with the name of the ingredient, or an asterisk or other reference mark which is defined below the ingredient statement.

**Table 4: Some Organic Ingredients Claim**

<b>If you want to claim:</b>	<i>That your product has some organic ingredients</i>
<b>Your product:</b>	<p><b>May</b> contain less than 70% organic ingredients, not counting added water and salt.</p> <p><b>May</b> contain over 30% of:</p> <ul style="list-style-type: none"> <li>a. non-organically produced agricultural ingredients; and/or</li> <li>b. other substances, without being limited to those in 7 CFR 205.605</li> </ul>
<b>Your label MUST:</b>	<p>Show an ingredient statement when the word organic is used.</p> <p>Identify organic ingredients as "organic" in the ingredients statement<sup>1</sup> when % organic is displayed. Water and salt included as ingredients must not be identified as organic. (IS)</p>
<b>Your label MAY show:</b>	<p>The organic status of ingredients in the ingredients statement.<sup>1</sup> Water and salt included as ingredients must not be identified as organic. (IS)</p> <p>"X% organic ingredients" when organically produced ingredients are identified in the ingredient statement. (IP)</p>
<b>Your label MUST NOT show:</b>	<p>Any other reference to organic contents.</p> <p>The USDA Organic seal.</p> <p>The certifying agent seal.</p>

<sup>1</sup> To identify an ingredient as organically produced, in the ingredients statement, use the word, "organic" in conjunction with the name of the ingredient, or an asterisk or other reference mark which is defined below the ingredient statement.<sup>i</sup>

*This information sheet has been submitted, but not reviewed by USDA Food Safety Inspection Service. All information is deemed correct and accurate to the best ability of the author and reviewers, based on information utilized at the time of their review.*

<sup>i</sup> All information included in this fact sheet was compiled from United States Department of Agriculture National Organic Program website.

<http://www.ams.usda.gov/NOP/indexIE.htm>