

EU Organic Labeling and Regulations

- All labels must be Reviewed and approved by Oregon Tilth.
 The relevant sections of EU Regulations (excerpted from the OTCO ACB EU Equivalency Standard) are attached following this table.
- When not in compliance with NOP requirements (labeled for the EU), containers & shipping documents must be labeled "For Export Only" (NOP 205.307(c))

Label Category	European Union Regulation 834/2007 Requirements	Citations
"Organic" 95-	May be labeled "Organic",	9.1.3(a)
100% Organic	This is the only Front Label Organic Claim allowed in the EU.	
Ingredients	Use of the EU and/or the NOP Logo is optional.	9.2.1(b)
"100% Organic"	EU Regulations have no labeling category for 100% organic products. These products must be labeled "Organic."	
Below 95% Organic	EU Regulations have no labeling category for "Made With Organic" products. "Made With Organic (specified ingredients or food groups)" claims are prohibited.	
Ingredients	Identification of organic ingredients as organic is allowed only in the ingredient panel;	9.1.3(b)
	The total percentage of organic ingredients in proportion to the total quantity of ingredients of agricultural origin must appear in the ingredient panel.	9.1.3
	The reference to organic and the percentage statement must appear in the same color and identical size and style of lettering as the rest of the ingredient panel.	9.1.3
	Use of the NOP and/or the EU Logo is not allowed in this category.	9.3.1
Other EU Labeling Requirements	Details	Citations
Certifier Code Number	All labels, retail and nonretail, making an organic claim in the EU must include the Certifier Code (this is analogous to the "Certified Organic By" statement that is required by the NOP) -If the EU Logo is not used the Certifier Code must be in a conspicuous place in such a way as to be easily visible, clearly legible and indelibleIf the EU organic Logo is used, The Certifier Code must be placed immediately below it US-ORG-042 for NOP certified product exported under the US-EU EA - CA-ORG-011 for COR Certified products under the COR-EU EA - (AB)-BIO-116 for EU certified products in the following countries; Where AB in the Code	9.2.1 9.4.1 (d)



	Number is to be replaced by the ISO code of the country where the control takes place. (BO-Bolivia, CA-Canada, CL-Chile, CN-China, HN-Honduras, MX-Mexico, PA-Panama)	
Wholesale Cases and Non-retail Containers (Cases, of products labeled for retail)	Non-retail containers/boxes or documents accompanying Non-retail containers/boxes (e.g. invoices, BOLs) must include: a) Name and address of the certified operation b) Name of the product and its organic status c) OTCO's Name and Code # d) Traceability information, such as lot numbers, where applicable	7.5.2.1
Organic Seal/Logo EU Organic Seal:	Use of the EU Logo is optional for EU certified products imported from outside the EU. (The EU Logo is mandatory for products produced in the EU) According to the terms of the EU-US Equivalency Arrangement either or both the NOP and EU Logo are permitted. The EU organic Logo may only be used on products certified "Organic" (95%+) The EU Organic Seal/Logo can be downloaded from the OTCO EU Webpage:	9.3.1
Indication of Place of Farming (Country of Origin)	When the EU Organic Logo is used, one of the following statements must be placed immediately below the Certifier Code Number. • "EU Agriculture" if the agricultural raw material has been farmed in the EU, • "Non-EU Agriculture", if the agricultural raw material has been farmed outside the EU • "EU/non-EU Agriculture", if part of the agricultural raw materials has been farmed in the EU and part outside the EU.	9.4.2
	 -The name of a specific country may be used instead of the terms non-EU' where all agricultural raw materials have been farmed in the same country. - For the "EU" or "non-EU" indication, small quantities of ingredients are allowed provided that the total quantity of the allowed ingredients do not exceed 2 % of the total quantity by weight of raw materials of agricultural origin. -The "EU" or "non-EU" statement shall not appear in a color, size and style of lettering more prominent than the sales description of the product. 	9.2.1(c)



Citations from the OTCO ACB Equivalency Standard:

9	Labelling	EU Standards cross reference
9.1	Use of terms referring to organic production	
	1. For the purposes of this Standard a product shall be regarded as bearing terms referring to the organic production method where, in the labelling, advertising material or commercial documents, such a product, its ingredients or feed materials are described in terms suggesting to the purchaser that the product, its ingredients or feed materials have been obtained in accordance with the rules laid down in this Standard. In the labelling and advertising of live or unprocessed agricultural products, terms referring to the organic production method may be used only where, in addition, all the ingredients of that product have also been produced in accordance with the requirements laid down in this Standard. 2. Labelling as referred to in paragraph 1 shall not be used for a product for which it has to be indicated in the labelling or advertising that it contains GMOs, consists of GMOs, or is produced from GMOs. 3. As regards processed food, the labelling referred to in paragraph 1 may be used: (a) in the sales description, provided that: (i) the processed food complies with 7.1.1, 7.4.1a,b &d (ii) at least 95 % by weight, of its ingredients of agricultural origin are organic; (b) only in the list of ingredients and in the same visual field as the sales description, provided that: (i) it contains other ingredients and in the same visual field as the sales description, provided that: (i) it contains other ingredients of agricultural origin that are all organic; (ii) the food complies with 7.1.1, 7.4.1a,b &d. The list of ingredients shall indicate which ingredients are organic. In the case where points (b) and (c) of this paragraph apply, the references to the organic production method may only appear in relation to the organic ingredients and the list of ingredients shall include an indication of the total percentage of organic ingredients in proportion to the total quantity of ingredients of agricultural origin. The terms and the indication of percentage referred to in the previous subparagraph shall a	834-Article 23
9.2	Compulsory indications	004 4 1: 1 24
	 Where terms in line with 9.1 are used: (a) a code number of the control body to which the operator who has carried out the most recent production or preparation operation is subject, shall also appear in the labelling Note: contact your control body for the appropriate code number; (b) from July 2010 as regards pre-packaged food the Community logo may also appear on the packaging; (c) from July 2010 where the Community logo is used, an indication of the place where the agricultural raw materials of 	834-Article 24



	which the product is composed have been farmed, shall also appear in the same visual field as the logo and shall take one	
	of the following forms, as appropriate:	
	"EU Agriculture", where the agricultural raw material has been farmed in the EU;	
	"non-EU Agriculture", where the agricultural raw material has been farmed in third countries;	
	"EU/non-EU Agriculture", where part of the agricultural raw materials has been farmed in the Community and a part of it	
	has been farmed in a third country.	
	The above mentioned indication "EU" or "non-EU" may be replaced or supplemented by a country in the case where all	
	agricultural raw materials of which the product is composed have been farmed in that country.	
	For the above mentioned "EU" or "non-EU" indication, small quantities by weight of ingredients may be disregarded	
	provided that the total quantity of the disregarded ingredients does not exceed 2 % of the total quantity by weight of raw materials of agricultural origin.	
	The above mentioned "EU" or "non-EU" indication shall not appear in a colour, size and style of lettering more	
	prominent than the sales description of the product.	
	2. The indications referred to in paragraph 1 shall be marked in a conspicuous place in such a way as to be easily visible,	
	clearly legible and indelible.	
9.3	Organic production logos	
	1. From July 2010 the Community organic production logo may be used in the labelling, presentation and advertising of	
	products which satisfy the requirements set out under this Standard.	834-Article 25
	The Community logo shall not be used in the case of in-conversion products and food as referred to in 9.1.3 (b) and (c).	
	2. National and private logos may be used in the labelling, presentation and advertising of products which satisfy the	
	requirements set out under this Standard.	
9.4	Conditions for the use of the code number and place of origin	
	1. The indication of the code number of the control body shall:	889-Article
	(a) start with the acronym identifying the third country of origin1	58.
	(b) include a term which establishes a link with the organic production method2	
	(c) include a reference number to be decided by the competent authority;	
	(d) be placed immediately below the Community logo, where the Community logo is used in the labelling.	
	2. The indication of the place where the agricultural raw materials of which the products is composed have been farmed	
	shall be placed immediately below the code number referred to in paragraph 1.3	
9.5	Specific labelling requirements for feed	
9.5.1	Scope, use of trade marks and sales descriptions	
	1. This section shall not apply to pet food and feed for fur animals.	889-Article 59



	2. The trade marks and sales descriptions bearing an indication referred to in 9.1 may be used only if at least 95 % of the	
	product's dry matter is comprised of feed material from the organic production method.	
9.5.2	Indications on processed feed	
	 Without prejudice to 9.5.3 and 9.5.1.2, the terms referred to in 9.1 may be used on processed feed provided that: (a) the processed feed complies all provisions of this Standard and in particular with 6.16.4, and 6.16.5, for livestock, with 11.7.1.d and 8.1 for aquaculture animals, and 8.1 for both. (b) the processed feed complies with the provisions of this Standard and in particular with 6.7.4.3 and 7.2; (c) at least 95 % of the product's dry matter is organic. Subject to the requirements laid down in points (a) and (b) of paragraph 1, the following statement is permitted in the case of products comprising variable quantities of feed materials from the organic production method and/or feed materials from products in conversion to organic farming and/or non-organic materials: 'may be used in organic 	889-Article 6 (see 710— Article 38.13
ĺ	production in accordance with Regulations (EC) 834/2007 and (EC) 889/2008'.	
953	Conditions for the use of indications on processed feed	
, ,,,,,	1. The indication provided for at 9.5.2 shall be:	889-Article 6
	(a) separate from the wording describing the product and the manufacturer4;	
	(b) presented in a colour, format or character font that does not draw more attention to it than to the description or name	
	of the animal feedingstuff referred to in (a) above;	
	(c) accompanied, in the same field of vision, by an indication by weight of dry matter referring:	
	(i) to the percentage of feed material(s) from the organic production method;	
	(ii) to the percentage of feed material(s) from products in conversion to organic farming;	
	(iii) to the percentage of feed material(s) not covered by points (i) and (ii);	
	(iv) to the total percentage of animal feed of agricultural origin;	
	(d) accompanied by a list of names of feed materials from the organic production method;	
	(e) accompanied by a list of names of feed materials from products in conversion to organic production.	
	2. The indication provided for in 9.6.2 may be also accompanied by a reference to the requirement to use the	
	feedingstuffs in accordance with the requirements for in-conversion feed (6.7.4.3) and non-organic feed (6.7.4.4).	
7	Production of Processed Food	
7.1	General rules	
	1. The preparation of processed organic food shall be kept separate in time or space from non-organic food. 2. Substances and techniques that reconstitute properties that are lost in the processing and storage of organic food, that correct the results of negligence in the processing of these products or that otherwise may be misleading as to the true nature of these products shall not be used.	834-Article 1
7 1 1	Use of cortain products and substances in processing of food	

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Use of certain products and substances in processing of food

⁴ As referred to in Article 5 of Council Directive 79/373/EEC (19) or in Article 51. of Council Directive 96/25/EC (20);



- 1. Only the following substances can be used in the processing of organic food, with the exception of wine:
- (a) substances listed in Annex VIII to this Standard;
- (b) preparations of micro-organisms and enzymes normally used in food processing;
- (c) substances, and products babelled as natural flavouring substances or natural flavouring preparations; (d) colours for stamping meat and eggshells 6;
- (d) colours for stamping meat and eggshells7
- (e) drinking water and salt (with sodium chloride or potassium chloride as basic components) generally used in food processing;
- (f) minerals (trace elements included), vitamins, amino acids, and micronutrients, only authorised as far their use is legally required in the foodstuffs in which they are incorporated.
- 2. For the purpose of the calculation referred to at 9.1,
- (a) food additives listed in Annex VIII and marked with an asterisk in the column of the additive code number, shall be calculated as ingredients of agricultural origin;
- (b) preparations and substances referred to in paragraph 1.(b),(c),(d),(e), and (f) of this Article and substances not marked with an asterisk in the column of the additive code number shall not be calculated as ingredients of agricultural origin.
- 3. The use of the following substances listed in Annex VIII is expected to be re-examined before 31 December 2010:
- (a) Sodium nitrite and potassium nitrate in Section A with a view to withdrawing these additives;
- (b) Sulphur dioxide and potassium metabisulphite in Section A;
- (c) Hydrochloric acid in Section B for the processing of Gouda, Edam and Maasdammer cheeses, Boerenkaas, Friese, and Leidse Nagelkaas.

889-Article 27



1. Operators shall ensure that organic products are transported to other units, including wholesalers and retailers, only in appropriate packaging, containers or vehicles closed in such a manner that substitution of the content cannot be achieved without manipulation or damage of the seal and provided with a label stating, without prejudice to any other indications required by law:	products to other operators or units	7.5.2
(a) the name and address of the operator and, where different, of the owner or seller of the product; (b) the name of the product or a description of the compound feedingstuff accompanied by a reference to the organic production method; (c) the name and/or the code number of the control body to which the operator is subject; and (d) where relevant, the lot identification mark according to a marking system either approved at national level or agreed with the control body and which permits to link the lot with the accounts referred to in Section 10. The information referred to in points (a) to (d) of the first subparagraph may also be presented on an accompanying document, if such a document can be undeniably linked with the packaging, container or vehicular transport of the product. This accompanying document shall include information on the supplier and/or the transporter. 2. The closing of packaging, containers or vehicles shall not be required where: (a) transportation is direct between an operator and another operator who are both subject to the organic control system, and (b) the products are accompanied by a document giving the information required under paragraph 1, and (c) both the expediting and the receiving operators shall keep documentary records of such transport	organic products are transported to other units, including wholesalers and packaging, containers or vehicles closed in such a manner that substitution of d without manipulation or damage of the seal and provided with a label stating, ir indications required by law: The operator and, where different, of the owner or seller of the product; The a description of the compound feedingstuff accompanied by a reference to the number of the control body to which the operator is subject; and entification mark according to a marking system either approved at national ol body and which permits to link the lot with the accounts referred to in Section a points (a) to (d) of the first subparagraph may also be presented on an uuch a document can be undeniably linked with the packaging, container or duct. This accompanying document shall include information on the supplier containers or vehicles shall not be required where: The operator and another operator who are both subject to the organic where the operator and another operator who are both subject to the organic mied by a document giving the information required under paragraph 1, and	

§ 205.307

Labeling of nonretail containers used for only shipping or storage of raw or processed agricultural products labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."

- (a) Nonretail containers used only to ship or store raw or processed agricultural product labeled as containing organic ingredients may display the following terms or marks:
- (1) The name and contact information of the certifying agent which certified the handler which assembled the final product;
- (2) Identification of the product as organic;
- (3) Special handling instructions needed to maintain the organic integrity of the product;
- (4) The USDA seal;
- (5) The seal, logo, or other identifying mark of the certifying agent that certified the organic production or handling operation that produced or handled the finished product.



- (b) Nonretail containers used to ship or store raw or processed agricultural product labeled as containing organic ingredients must display the production lot number of the product if applicable.
- (c) Shipping containers of domestically produced product labeled as organic intended for export to international markets 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, the shipping containers and shipping documents accompanying such organic products are clearly marked "For Export Only" and: *Provided further,* That, proof of such container marking and export must be maintained by the handler in accordance with recordkeeping requirements for exempt and excluded operations under § 205.101.