



# OREGON TILTH PROCESSING FAQs

**Can I process organic products and non-organic products on the same equipment, or do I have to have a dedicated facility or production line?**

Yes, you can process non-organic on the same line as organic as long as there are sufficient measures and procedures in place to protect organic product from contamination or commingling of any non-organic material. You will want to implement a plan or an operating procedure to address cleaning and sanitation of equipment prior to organic production as well as product segregation and labeling procedures in storage areas.

**If I use an off-site storage facility to store and distribute my products does it have to be inspected and certified?**

No, independent off-site storage facilities and distribution centers are not required to be certified as long as the product is enclosed in packaging and they are not opening the containers and repacking. The storage facility is required to protect organic products from any sort of contamination or commingling while it is in their facility. Oregon Tilth provides an Independent Storage Information Sheet form for the facility to complete and sign and this is approved as part of your Organic System Plan.



**What processing aids or non-organic ingredients can I use in my organic products?**

Section 205.605 lists the non-agricultural items that can be used in organic products. Some items listed on the National List appear with restrictions or “annotations” that must be followed. Some further restrictions may apply to those ingredients with regard to excluded methods (GMO), irradiation and sewage sludge prohibitions. Furthermore 205.606 lists the agricultural items that can be used in an “organic” labeled product when deemed not commercially available in an organic form.

**Can I store organic and non-organic ingredients in the same storage area?**

Yes, as long as adequate measures are taken to distinguish the organic from the non-organic and that the storage practices do not pose a risk for commingling of the organic ingredients. You do not have to have a physical barrier in place, but adequate separation and labeling should be in place to protect the organic product.



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## **What sanitizing materials can I use to clean my production line prior to organic?**

There are a few sanitizing agents listed on 205.605 as allowed for cleaning of equipment and/or direct food contact. Chlorine, peroxy-acetic acid, hydrogen peroxide and ozone are a few with particular annotations. These materials used are allowed as no rinse sanitizers unless there is a special annotation. You may also use sanitizing materials that are not on the national list as long as there is an adequate rinse or intervening step to remove any residue of the material prior to organic production.

## **If I just want to identify the organic ingredients in my ingredient statement, does the product have to be certified?**

No, products that restrict organic claims to the ingredient listing only, are exempt from the requirements of certification. However, the manufacturer needs to maintain documentation that the organic ingredients identified are organic and certified according to the regulations. Manufacturers should request and maintain on file copies of the certificates certifying these ingredients.

## **Can I use ingredients that are not on the National List (205.605) if I am just planning to label my product as "Made With Organic X"?**

No, non-agricultural ingredients in a product labeled as "Made with..." need to be listed in section 205.605. Products labeled as "Made with..." can be produced without regard to 205.606 which lists agricultural products for "Organic" labeled products. Commercial availability for agricultural ingredients do not apply to made with products. Oregon Tilth has compiled a comprehensive labeling and composition guide which details each label category and the specific requirements for composition.



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