



Product Composition and Labeling: 100% Organic and Organic

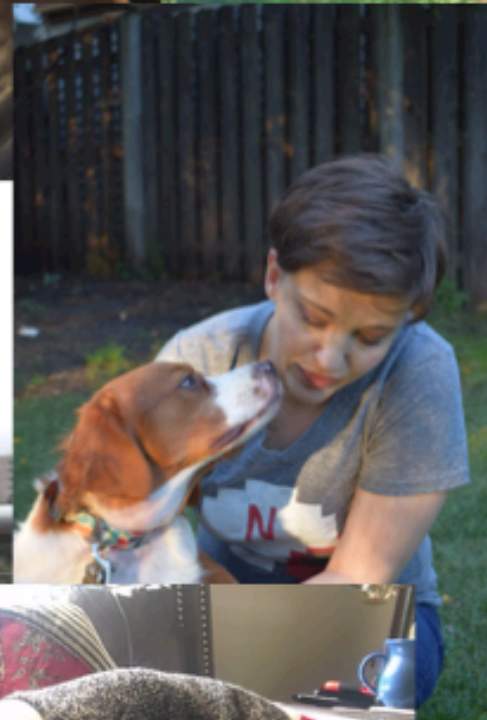
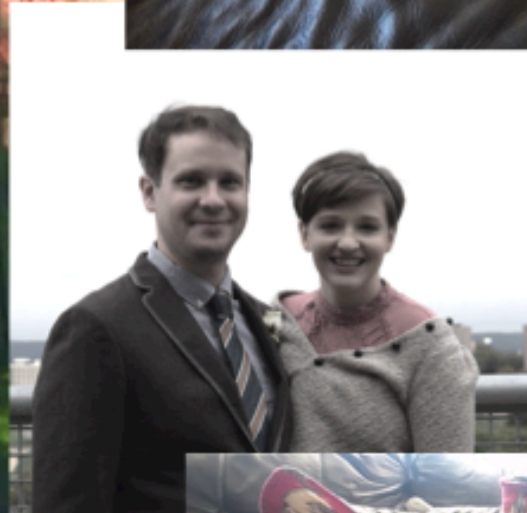
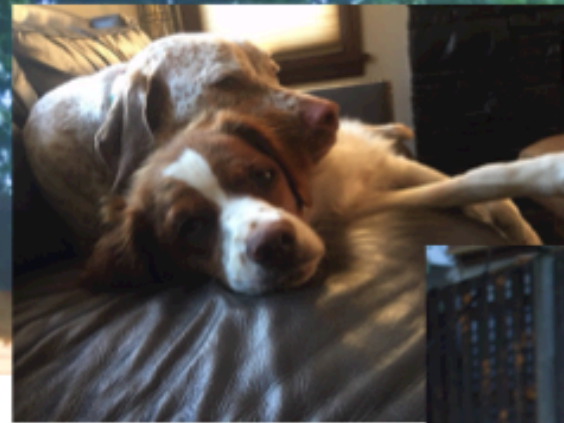
Colette Piper, Senior Certification Officer
Darin Jones, Processing Program Manager

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Colette Piper is a Senior Certification Officer working with Oregon Tilth for the past five years.

She holds a BS in Agricultural Economics and entered the certification industry after graduating from the University of Nebraska - Lincoln eight years ago.

The Piper People plus two Piper Puppies currently live in Omaha, NE. The ratio of photos in their album is 100:1 dogs to humans.





Darin is the Processing Program Manager at Oregon Tilth and has been with OTCO for 10 years.

Like most in the organic industry he took the educational path of studying Accounting with a minor in Food Technology.

During his time at Oregon State University he was able to explore his passion for the food sciences and met many classmates whom he would later work with in the organic industry.

When Darin is not serving the clients and staff of Oregon Tilth, he enjoys playing volleyball or celebrating with friends and raising his daughter.

What We Will Cover Today

The Reason Why
We Are Here
Today

Oregon Tilth
Composition and
Supplier Forms

Applying the
Standard to Real
Scenarios

Questions &
Answers

Overview of the
National Organic
Program
Composition and
Labeling
Requirements

Oregon Tilth
Labeling Guides

Resources





Why Are You Here?

- Learn the Importance of NOP Composition and Labeling Requirements
- Compliance Requirements
- A Tool for Training Staff
- Understand Consequences of Producing Organic Product/Printing Labels without Approval
- Learn to Navigate Resources
- Plan Ahead to Stay Compliant!




Overview of the Requirements

- **Where is the National Organic Program (NOP) Standard located?**
- **Subpart D**
 - Composition
 - §205.301-§205.302
 - Labeling (100% Organic and Organic)
 - §205.303, §205.306-308, §205.311
- **Subpart G**
 - Composition (National List)
 - §205.605 & §205.606
- **NOP Handbook**



NOP Standard

The standard is housed in the electronic Code of Federal Regulations under Title 7, Part 205



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Browse: Select a title from the list below, then press "Go".



NOP Standard

Subpart D contains the Composition and Labeling sections that are featured in our discussion

§205.271 Facility pest management practice standard.

§205.272 Commingling and contact with prohibited substance prevention practice standard.

§§205.273-205.289 [Reserved]

§205.290 Temporary variances.

§§205.291-205.299 [Reserved]

Subpart D—Labels, Labeling, and Market Information

§205.300 Use of the term, “organic.”

§205.301 Product composition.

§205.302 Calculating the percentage of organically produced ingredients.

§205.303 Packaged products labeled “100 percent organic” or “organic.”

§205.304 Packaged products labeled “made with organic (specified ingredients or food group(s)).”

§205.305 Multi-ingredient packaged products with less than 70 percent organically produced ingredients.

§205.306 Labeling of livestock feed.

§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)).”

§205.308 Agricultural products in other than packaged form at the point of retail sale that are sold, labeled, or represented as “100 percent organic” or “organic.”

§205.309 Agricultural products in other than packaged form at the point of retail sale that are sold, labeled, or represented as “made with organic (specified ingredients or food group(s)).”

§205.310 Agricultural products produced on an exempt or excluded operation.

§205.311 USDA Seal.

§§205.312-205.399 [Reserved]

Subpart E—Certification

§205.400 General requirements for certification.

NOP Standard

Subpart D -- Labels , Labeling, and Marketing Information

- §205.300 Use of the Term, “organic”
- §205.301 Product composition
- §205.302 Calculating organic ingredients
- §205.303 Packaged and labeled “100 organic” and “organic”
- ...
- §205.306 Labeling of livestock feed
- §205.307 Labeling non-retail Containers
- §205.308 Labeling “100% organic” and “organic” point of retail sale
- ...
- §205.311 USDA Seal

§205.301 & §205.302
Helps you locate organic category for your product

§205.303 - §205.308
Helps you locate labeling requirements for specific products



NOP Standard

Subpart G contains the National List of Allowed and Prohibited Substances featured in our discussion

§205.509 Peer review panel.

§205.510 Annual report, recordkeeping, and renewal of accreditation.

§§205.511-205.599 [Reserved]

Subpart G—Administrative

THE NATIONAL LIST OF ALLOWED AND PROHIBITED SUBSTANCES

§205.600 Evaluation criteria for allowed and prohibited substances, methods, and ingredients.

§205.601 Synthetic substances allowed for use in organic crop production.

§205.602 Nonsynthetic substances prohibited for use in organic crop production.

§205.603 Synthetic substances allowed for use in organic livestock production.

§205.604 Nonsynthetic substances prohibited for use in organic livestock production.

§205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food group(s))."

§205.606 Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as "organic."

§205.607 Amending the National List.

§§205.608-205.619 [Reserved]

STATE ORGANIC PROGRAMS

§205.620 Requirements of State organic programs.

§205.621 Submission and determination of proposed State organic programs and amendments to approved State

NOP Standard

The NOP Handbook has guidance and instruction in areas where clarification has been found necessary and/or helpful for the industry.

Section I. Other	Document	Date
<u>Guide for Organic Processors</u>	N/A	12/10/2012
<u>Guide to Organic Certification</u>	N/A	12/10/2012
<u>CAP 138 Resource Inventory Supplement – Crop Production</u>	N/A	4/16/2015
<u>CAP 138 Resource Inventory Supplement – Livestock Production</u>	N/A	4/16/2015
<u>CAP 138 Resource Inventory Supplement – Organic Production</u>		
<u>Noncompliance and Adverse Actions Flow Chart</u>		

National Organic Program Handbook: Guidance and Instructions for Accredited Certifying Agents and Certified Operations

Title	Document	Date
<u>Introduction</u>		3/9/2011
<u>NOP Organization Chart and Stakeholder Map</u>	NOP 1001	12/7/2016
Section A. Standards		
<u>Processed Animal Manure in Organic Crop Production</u>	NOP 5006	7/22/2011
<u>Reassessed Inert Ingredients Notice to Petitioners</u>	NOP 5008	7/22/2011
<u>tion</u>	NOP 5012	7/22/2011
	NOP 5014	7/22/2011

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By Pamela Coleman
National Center for Appropriate
Technology (NCAT)
Agriculture Specialist
November 2012

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Guide for Organic Processors

CHAPTER 1 INTRODUCTION

This publication is intended primarily as a guide for farmers who wish to add value to their organic crops through processing. It does not include the farm practices that are required to grow organic crops, raise organic livestock, or obtain organic certification for a farm. Information on those topics can be found in other ATTRA publications, which are listed in the Resources section.



Oregon Tilth Tools and Resources

[Composition
Template
Form](#)

[Supplier
Template
Forms](#)

[Labeling
Guide](#)

Supplier Template Forms

Master Ingredient List

- Completed by Organic Certified Operation
- Used for Sourced Ingredients and Processing Aids

- Provides Column for Certificate Issue Date Monitoring
- Allows for Capturing Uncertified Brokers/Distributors
- Check and Balance Against Product Formulation Sheet

Master Ingredient List (Form MIL-03) Use this form for all ingredients and products sourced that are used in products to be certified. Please use one spreadsheet to cover **ALL** products requested for certification. This first sheet is used to list organic ingredients only. Please click on the tab at the bottom to list non-organic ingredients and processing aids. Certificate issue date cell will highlight red when the certificate is past its monitoring date.

Organic Ingredients												
Revision Date												
Organic Ingredient Name	Certified Organic Supplier	Uncertified Broker/Trader/Distributor (if applicable)	Location of Certified Organic Supplier	Organic Content Percentage of Ingredient	Certifying agent of Ingredient	Certificate Issue Date	Certificate Attached (mark with X)	Additional Compliance (Mark with X)				
								EU	Canada (COR)	US-Canada Equiv	Mexico (LPO)	NSF/ANSI 305

Master Ingredient List (Form MIL-04) Use this form for all ingredients and products sourced that are used in products to be certified. Please use one spreadsheet to cover **ALL** products requested for certification. Ingredient declaration column will automatically highlight red when the item is past its monitoring date for the item.


Non-organic Ingredients and Processing Aids					
Revision Date					
Non-Organic Ingredient or Processing Aid Name	Sources/Vendor	Non-organic Ingredient Declaration, Questionnaire on file, date signed	Ingredient Declaration, Questionnaire meets the requirements of applicable standard (Y/N)	Commercial Availability documentation on file for any agricultural ingredients (Y/N)	Documentation Attached (mark with X)



Supplier Template Forms

Non-Organic Ingredient Declaration

- Supplier Completed Form
- Must be Accompanied by Composition Sheet
- Relevant for most National List materials (§205.605 and 6205.606)

	Non-organic Ingredient Declaration (NOID)	Page 1 of 1
Electronic version available at www.tilth.org .		

Nonorganic Organic Ingredient Declaration

Oregon Tilth Client: Use this Affidavit for any nonorganic material you would like to use in your certified products. Forward this Affidavit to your material manufacturer. They must fill out and sign this form.

Material Manufacturer: Fill out this form so OTCO may review this material for the Oregon Tilth certified client's use. Attach either a copy of the label disclosing all material ingredients, a copy of the SDS (if all ingredients are disclosed), or a current statement which discloses all ingredients. Ingredient Documentation Attached

A. Nonorganic processing aid or ingredient ("material") _____

Function: _____

Manufacturer Business Name: _____

B. The processing aid or ingredient listed above conforms to the following criteria:

	True	False	N/A
1. The material / ingredient was NOT genetically modified and/or genetically modified organisms were NOT used in the production of this material.	<input type="checkbox"/>	<input type="checkbox"/>	
2. Irradiation was NOT used in the production of this material.	<input type="checkbox"/>	<input type="checkbox"/>	
3. Sewage sludge was NOT used in the production of this material.	<input type="checkbox"/>	<input type="checkbox"/>	
4. For livestock feed additives ONLY , the material was NOT produced with any mammalian, or poultry by-products (for mammal, or poultry feed).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

* Explain: _____

C. If the material listed above is, or contains one of the following, **also** attest to the applicable criteria below. If the material above is a livestock product then skip this section as it is not applicable. (ANY BOX CHECKED "FALSE" IMPLIES THIS MATERIAL IS NOT COMPLIANT)

	True	False	NOT USED
<input type="checkbox"/> Activated Charcoal – Is derived from a vegetative source - List source:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Cellulose – Is non-chlorine bleached	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Citric Acid – Is produced by microbial fermentation of carbohydrate substance - List carbohydrate substance:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Enzymes – Are from edible, nontoxic plants, nonpathogenic fungi, or non-pathogenic bacteria	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Glucono delta-lactone – Is not produced by oxidation of D-glucose with bromine water	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Glycerin – Is produced by the hydrolysis of fats and oils	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Gums (Arabic; Guar; Locust Bean; Carob Bean) – Are water extracted.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Lecithin – Is dried, or de-oiled.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Microorganisms – Are food grade bacteria, fungi, or other microorganisms.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Pectin – Is non-amidated.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Tocopherols – Is derived from vegetable oil	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Waxes – Are non-synthetic* (carnauba wax, or wood resin)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Yeast – Is non-synthetic* and no petrochemical substrate, or sulfite waste liquor was used	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

D. The statements regarding the material produced by my company are true to the best of my knowledge. **NOTE: NON ORGANIC INGREDIENT DECLARATIONS THAT ARE NOT ACCOMPANIED BY DOCUMENTATION DISCLOSING ALL INGREDIENTS IN THE PRODUCT ARE SUBJECT TO BEING DENIED.**

Manufacturer Representative's Name & Title (please print) _____ Phone # & E-mail _____

Manufacturer Representative's Authorized Signature _____ Date _____

*Non-synthetic (natural). A substance that is derived from mineral, plant, or animal matter; does not undergo a synthetic process as defined in section 6502(2) of the Act (7 U.S.C. 6502(2)). Non-synthetic is used as a synonym for natural.

*Synthetic. A substance that is from a plant or animal or is manufactured by a chemical process or by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral sources; ...shall not apply to substances created by naturally occurring biological processes.

rev. 11/30/2017



Supplier Template Forms

Natural Flavor Questionnaire

- Supplier Completed Form
- Must be Accompanied by Composition Sheet
- Relevant for §205.605 Natural Flavors

Natural Flavor Product Questionnaire

OREGON TILTH CERTIFIED ORGANIC (OTCO)

NATURAL FLAVOR PRODUCT QUESTIONNAIRE

The **USDA National Organic Program (NOP)** and the **Canadian Organic Regime (COR)** allow the use of certain natural (non-synthetic) substances, including flavors, in products labeled as "Organic" or "Made with Organic"/70-95% Organic providing they comply with provisions established in the **USDA NOP (7 CFR Part 205)** or **CANACGSB 32.311-2015 (Section 6.2)**, as applicable.

Non-synthetic (natural) is currently defined in 7 CFR 205.2 and CAN/CGSB 32.310-2015, 3.39 as: a substance that is derived from mineral, plant or animal matter and does not undergo a synthetic process. Under the terms of the Act (7 U.S.C. 6502(21)) and CAN/CGSB 32.310-2015, "**synthetic**" means a substance that is formulated or manufactured by a chemical process or by a process that chemically changes a substance extracted from naturally occurring plant, animal or mineral sources, except that such term shall not apply to substances created by naturally occurring biological processes.

Non-synthetic Flavors authorized under the NOP, Section 205.605 (a)(9) and under CAN/CGSB 32.311-2015, Section 6.2 must be from non-synthetic sources only and must not be produced using synthetic solvents, carrier systems or any artificial preservative. In addition, **Sections 205.105 (e)(f) of the NOP and 1.4.1(a)-(f) of CAN/CGSB 32.310-2015** respectively prohibit so-called "excluded" methods (GMOs) and ionizing radiation from being used to produce, or during the handling of any, ingredients or products.

The US FDA Definition of Natural Flavors *FDA 21 CFR Part 101.22(a)(3)* "... **natural flavor or natural flavoring** means the essential oil, oleoresin, essence or extractive, protein hydrolysate, distillate, or any product of roasting, heating or enzymolysis, which contains the flavoring constituents derived from a spice, fruit or fruit juice, vegetable or vegetable juice, edible yeast, herb, bark, bud, root, leaf or similar plant material, meat, seafood, poultry, eggs, dairy products, or fermentation products thereof, whose significant function in food is flavoring rather than nutritional. Natural flavors include [but not exclusive to] the natural essences or extractives obtained from plants listed in §§182.10, 182.20, 182.40, and 182.50 and part 184 of this chapter, and the substances listed in §172.510 of this chapter."

The Canadian Food Inspection Agency (CFIA) Definition of Natural Flavours and Flavour Descriptors *CFIA Guide to Food Labelling and Advertising, Chapter 4: "... Flavour descriptors:* Substances which impart flavours which have been derived from a plant or animal source, may be claimed to be "natural". As well, any additive, such as preservatives and solvents added to a flavour preparation to have a technological effect solely on the flavour, does not **modify** the "natural" status of the flavouring material itself.

In order to approve the use of a natural flavor used in an "organic" or "made with" (70-95%) product, OTCO requests the information below in order to determine compliance under the terms of NOP or COR, as applicable. **Oregon Tilth may request additional information as needed.**

Identification of Natural Flavor Product (code/Name):

Supplier Name, Address:

Type of flavor (*Please attach specification sheet or similar listing all ingredients contained in the flavor*):

<input type="checkbox"/> Compound ed flavor	<input type="checkbox"/> Extracts	<input type="checkbox"/> Isolate
<input type="checkbox"/> Compound ed WONF	<input type="checkbox"/> Essential oil	<input type="checkbox"/> Oleoresin
<input type="checkbox"/> Distillate	<input type="checkbox"/> Essential oil Isolate	<input type="checkbox"/> Other (please specify):

Natural Flavor Product

A. Flavor constituents

- Do all of the flavor constituents in the natural flavor product named above meet the definition of a natural flavor (see above)?
 Yes No
- Natural flavors** authorized for use in "organic" or "made with organic" products, in addition, must not be produced using **synthetic extraction solvents**. Extraction may only use **nonsynthetic, non-petroleum based solvents (see below)**.
 0. Is/are the natural flavor constituent(s) made using NOP-suitable extraction solvents*?
 Yes No N/A. **No solvents used**
- If the solvent used to extract the natural flavors is not listed as an example of one of the NOP-suitable extraction solvents* please disclose: _____

*Allowed natural extraction solvents include water, natural ethanol, super-critical carbon dioxide, authentic essential oil, and natural vegetable oils. No hydrocarbon solvents, or chlorinated, or halogenated solvents may be used. Propane, hexane, and freon are examples of solvents that are prohibited.



Supplier Template Forms

Commercial Availability Form

- Completed by Organic Certified Operation
- Relevant for some §205.605 materials and all §205.606 materials

	COMMERCIAL AVAILABILITY FORM	CAF
Electronic versions available at www.tilth.org		Page 1 of 1

Operation Name: _____ Date: _____

► Complete one form for EACH non-organic agricultural product (ingredient or manufactured seed blends) or non-organic non-agricultural ingredient (7CFR205.605) with annotations for sourcing organic, used in products labeled "organic." All commercial availability documentation must be current within 12 months. This form may be used for farm operations that are obtaining non-organic seed as a production input.

Commercially available refers to the ability to obtain a production input in an appropriate form, quality, or quantity to fulfill an essential function in a system of organic production or handling, as determined by the certifying agent in the course of reviewing the organic plan. Organic ingredients must be used for production of product labeled "organic," but non-organic ingredients are allowed when organic forms are not commercially available and the ingredient appears on the National List §205.605 (with annotations to source organic) & §205.606. Non-organic seed is allowed as a farm input if that variety in organic form is not commercially available. A commercial availability search must be conducted each time that non-organic seed is planted.

1.1 ORGANIC INGREDIENT SEARCH

- 1) Nonorganic agricultural ingredient/input: _____
- 2) Used in the following product(s) or for the following purpose:

- 3) Describe your search (potential suppliers, dates, search methods). *To demonstrate that organic ingredients are not commercially available, you are expected to contact at a minimum three potential sources or explain why this type of search is not possible:*

- 4) Which criterion makes this product unavailable organically? Check all that apply: Form Quality Quantity
Please explain your answer using specific details and attach correspondence (e.g. emails, phone logs). Attached

1.2 ANNUAL PLAN TO FIND ORGANIC FORM

- 1) Describe your annual plan to find an organic form of ingredients/inputs listed in #1 above. Records or documents of continued efforts to locate an organic source will be examined at your annual inspections.

- 2) Describe the record(s) to be used for documenting your search each year, or attach a copy. Attached

2525 SE 3rd Street, Corvallis, OR 97333, 503-378-0690 | 1-877-378-0690 | organic@tilth.org

Commercial Availability Form rev. 5/1/14



Labeling Guides

Oregon Tilth Labeling Guides Cover:

- National Organic Program (below)
- NSF/ANSI 305
- Canada Organic Regime
- EU Organic (EEC 834/2007, EEC 889/2008)
- Mexico Organic (Lineamientos de Productos Organicos)



ORGANIC LABELING *and* COMPOSITION GUIDE

IF YOU WANT TO CLAIM:
100% ORGANIC
(OR SIMILAR STATEMENT)



Applying the Standards: Scenarios

Steps to Compliance

Step 1

Access the regulations and resources

Step 2

Gather Information about the product

Step 3

Match the requirements to your product

Step 4

Submit to Oregon Tilth for Review



Applying the Standards: Kimchi Scenario

Step 1 – Access the regulations and resources

- 7 CFR 205 – National Organic Program Standards
 - 205.301-303, and 311
- OTCO Organic Labeling + Composition Guide

Step 2 – Gather Information

- Product Documentation:
 - Product Formulation Sheet, Label, Master Product List
- Ingredient documentation
 - Organic Certificates, Non-Organic Compliance Documents, Master Ingredient List

Step 3 – Match the requirements to your product

- Calculate Organic Content
- Organic Label Category

Step 4 - Submit to Oregon Tilth for Review

- Formulation, Label, Master Lists, Ingredient Documentation

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Compliance Practice

Label

- Ingredient list
- Identify Organic Ingredients
- Certified Organic by Statement

Grateful Harvest Farm

Extra Spicy
KIMCHI

100% **CERTIFIED ORGANIC - LIVE FOOD**

Keep Refrigerated

Enjoy it with salad, soup, grains,
sandwiches, chips, greens or
straight from the jar.

Net Wt. 16oz (453g)

Ingredients: Organic napa
cabbage, organic carrot, organic
onion, sea salt, organic ginger,
organic garlic, organic sweet
pepper, organic cayenne pepper.

Junction City, Oregon 97448
www.gratefulharvestfarm.com
Certified Organic by Oregon Tilth

Compliance Practice: Formulation

Product Name (as it should appear on certificate):		Organic Kimchi						
Process type:	Manufacture	X		Repack		Market Only		
This product is labeled as:	100% Organic	X		Organic		Made With (70%+)	Ingredient listing only (<70%)	
This product is packaged and sold as:	Retail	X		Nonretail				
Label Brand Names:		Fierce and Formidable Foods					Certifier Ref. on Label	
Ingredient	% organic content ingredient	% in formulation		actual organic % of that ingredient/product				
Organic Carrots	100.00%		33.00%		33.0000%			
Organic Cabbage	100.00%		33.00%		33.0000%		OTCO Office Use	
Organic Ginger	100.00%		33.00%		33.0000%			
					0.0000%		Date Approved:	
					0.0000%		Revision Dates:	
					0.0000%		Approval By:	
					0.0000%			
					0.0000%			
					0.0000%		International Cert Requested	
					0.0000%		Mark with X if Requested	
					0.0000%		EU	
					0.0000%		Canada (COR)	
					0.0000%		Canada Equiv.	
					0.0000%			
					0.0000%			
Sub-total for non salt and water contents			99.00%		99.00%			
	Salt Water		1.00%					
List Processing Aids Used								
Totals			100.00%		100.00%			



Master Ingredient List (Form MIL-03) Use this form for all ingredients and products sourced that are used in products to be certified. Please use one spreadsheet requested for certification. This first sheet is used to list organic ingredients only. Please click on the tab at the bottom to list non-organic ingredients and Certificate issue date cell will highlight red when the certificate is past its monitoring date.

Organic Ingredients

Revision Date 4/1/18							
Organic Ingredient Name	Certified Organic Supplier	Uncertified Broker/Trader/Distributor (if applicable)	Location of Certified Organic Supplier	Organic Content Percentage of Ingredient	Certifying agent of Ingredient	Certificate Issue Date	Certificate Attached (mark with X)
Organic Carrot	Ersatz Produce		Prufrock, ND	100.00%	V.F.D. Organics	1/1/18	X
Organic Cabbage	Ersatz Produce		Prufrock, ND	100.00%	V.F.D. Organics	1/1/18	X
Organic Ginger	Ersatz Produce		Prufrock, ND	100.00%	V.F.D. Organics	1/1/18	X

Master Ingredient List (Form MIL-04) Use this form for all ingredients and products sourced that are used in products to be certified. Please use one spreadsheet to cover ALL products requested for certification. Ingredient declaration column will automatically highlight red when the item is past its monitoring date for the item.

Non-organic Ingredients and Processing Aids

Revision Date					
Non-Organic Ingredient or Processing Aid Name	Sources/Vendor	Non-organic Ingredient Declaration, Questionnaire on file, date signed	Ingredient Declaration, Questionnaire meets the requirements of applicable standard (Y/N)	Commercial Availability documentation on file for any agricultural ingredients (Y/N)	Documentation Attached (mark with X)
Salt	Figuratively and Literally The Salt Of The Earth Company	1/1/18	Y	N/A	X

Master Products List (Form MFL-01) Use this form for all organic finished products to be sold by your company. An accompanying Product Formulation product which you either manufacture or own the formulation for. If you are distributing product, please use this form to identify each product you are seeking cert processing).

Revision Date						
Name of Product as it will be sold (Include varieties)	Brand Name	Name of Copacker/ Supplier of Product or Brand Owner (if you are the copacker)	Uncertified Broker/Trader/Distributor (if applicable)	Location of Certified Organic Supplier	Certifier of Copacker or Supplier	Item is certified and sold under which label category? (mark with X)
						100% Organic (NOP Only)
Organic Kimchi	Fierce and Formidable Foods	N/A, not copacked	N/A	N/A, not copacked	N/A, not copacked	X



Non-Organic Composition Sheet

Description

Morton® Select Sea Salt is food grade salt harvested from ocean water using solar evaporation. The brine is concentrated in open shallow ponds and then crystallized into pure salt through slow evaporation via solar heat and wind. The harvested salt is washed, dried, crushed, and screened to optimum size. It contains no additives.

This product tends to crystallize in pyramidal aggregates which are broken up in milling to irregular, rectangular particles. Appearance is crystalline to white.

Product of the Bahamas or Mexico. Processed and packaged in U.S.A.

Chemical Properties

This product complies with Food Chemicals Codex and federal CGMP standards. It is annually certified as kosher for Passover.

	Typical
¹ Sodium Chloride (%)	99.78
Calcium Sulfate (%)	0.16
² Other Salts (%)	0.04
Ca/Mg as Ca (ppm)	601
Moisture (Surface) (%)	0.03
Water Insolubles (ppm)	153
Arsenic (ppm)	<1.0
Heavy Metals as Lead (ppm)	<2.0

¹ By difference of impurities, moisture-free basis (ASTM).

² One or more of the following—calcium chloride, magnesium sulfate, magnesium chloride, sodium sulfate.

Product Ingredient Statement

Salt

Physical Properties

Pour (loose) bulk density is about 1.06 g/ml (66 lbs/ft³).

Sieve Analysis

USS Mesh	Openings Microns**	Typical Percent Retained*
30	600	3
40	425	33
50	300	47
70	212	16
Pan	--	1

* On individual screens

**10,000 Microns (micrometers, μm) per centimeter
25,400 millimeters (mm) per inch

Codes

	Material Code	UPC
50 lb. Paper Bag	F112100000	0 24600 01210 9
Totes	F1123000xx	-

Plant

Port Canaveral, FL

This is an interim product data sheet. The chemical and physical properties shown on this product data sheet are based on limited data and may vary. The prospective user should determine the suitability of this product for their use before adopting it for use on a commercial scale.

Organic Supplier Certificate



Certification Acknowledgement

This is to certify that

Nacho Tigre
DBA Tiggie Boy
2525 SE 3rd Street
Corvallis, OR 97333
United States

is Certified Organic by Oregon Tilth under the
 US National Organic Program 7 CFR Part 205

Scope: NOP-Crop, NOP-Handling

Client Identification Number: OT-007032

Certified Organic Products: Per attached System Plan Summary

Certified by OTCO since: 01/01/2008

NOP effective date: 01/01/2008

NOP ID: 8150001632

Anniversary Date: 01/01/2017

Once certified, a production or handling operation's organic certification
 continues in effect until surrendered, suspended or revoked.

Certificate Issue Date: 10/19/2017

Authorized by:

Connie Karr, Certification Director

Certificate Number: Z-30475-2008

Doc - Certificate | Rev. 4/24/2017

Oregon Tilth, Inc.

2525 SE 3rd Street, Corvallis, OR 97333, USA • PH: 1-503-378-0690 • FX: 1-541-753-4924 • www.tilth.org • organic@tilth.org



System Plan Summary

Nacho Tigre
DBA Tiggie Boy
2525 SE 3rd Street
Corvallis, OR 97333
United States

Client Identification Number: OT-007032

NOP ID: 8150001632

Certificate Issue Date: 10/19/2017

Certified by OTCO since: 1/1/2008

100% Certified Organic Land, fields and crops:

Parcels	Crops	Compliance
Field 2: 1214 So Street, Corvallis, Oregon	Basil (Aroma), Corn, Transplants (See Farm Products for list), Wine grape	NOP-Crop

Certified Product (100% Organic)

Brands	Compliance
Farm Products:	
Seed > Flower Seeds	NOP-Crop
Seed > Seed Acmella oleracea (Spilanthes official)	NOP-Crop
Seed > Seed Acmella oleracea (Spilanthes official)	NOP-Crop
Health Products:	
Nacho Tigre	NOP-Handling

Certified Product (Organic)

Brands	Compliance
Alcohol Products:	
Beer > Ale The Best Beer Ever	NOP-Handling, US/Canada Equivalence-Handling
Health Products:	
Misc > Honey	Nacho Tigre US/Canada Equivalence-Handling

Certificate Number: Z-30475-2008 | Page 1 of 2

Doc - Certificate | Rev. 4/24/2017

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Formulation

Product Name (as it should appear on certificate):		Organic Kimchi						
Process type:	Manufacture	X		Repack		Market Only		
This product is labeled as:	100% Organic			Organic	X	Made With (70%+)	Ingredient listing only (<70%)	
This product is packaged and sold as:	Retail	X		Nonretail				
Label Brand Names:		Fierce and Formidable Foods					Certifier Ref. on Label	
Ingredient	% organic content ingredient	% in formulation		actual organic % of that ingredient/product				
Organic Carrots	100.00%		33.00%		33.0000%			
Organic Cabbage	100.00%		33.00%		33.0000%	OTCO Office Use		
Organic Candied Ginger	95.00%		33.00%		31.3500%	Date Approved:		
					0.0000%	Revision Dates:		
					0.0000%	Approval By:		
					0.0000%			
					0.0000%			
					0.0000%	International Cert Requested		
					0.0000%	Mark with X if Requested		
					0.0000%	EU		
					0.0000%	Canada (COR)		
					0.0000%	Canada Equiv.		
					0.0000%			
					0.0000%			
Sub-total for non salt and water contents			99.00%		97.35%			
	Salt		1.00%					
	Water							
List Processing Aids Used								
Totals			100.00%		98.33%			



Summary: Kimchi Scenario

Basic Composition and Label Compliance Steps

- Access the requirements
- Gather Information
- Match your product to the correct NOP Composition and Labeling requirements
- Submit documents to Oregon Tilth

Next

- More considerations to match your product to the right requirement
- More examples of using resources



Applying the Standards: Livestock Feed Scenario

Steps toward Compliance

1. Access Requirements & Resources

- Subpart D – Labels, Labeling, and Market Information
- Program Handbook

2. Gather Information

- Master Ingredient List
- Ingredient Documentation
- Label or Tag

3. Match Content and Category

- Type of product – Packaged, other than packaged, etc.
- Check composition requirements

4. Submit Documentation for Review

- Label

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Org Pullet #2 Complete feed for poultry

Guaranteed Analysis	
Crude protein, not less than	19.00%
Methionine, not less than	0.30%
Crude fat, not less than	4.00%
Crude fiber, not more than	6.00%
Calcium, not less than	2.15%
Calcium, not more than	3.20%
Phosphorus, not less than	1.00%
Salt, not less than	0.50%
Salt, not more than	0.95%

Ingredients:

Organic corn, Organic soybean meal, Calcium carbonate, Monocalcium phosphate, Dicalcium phosphate, Salt, Ferrous sulfate, Zinc sulfate, Vitamin A supplement, Vitamin D3 supplement, Vitamin E supplement, Vitamin B12 supplement, Biotin, Niacin, Calcium pantothenate, Choline chloride, Riboflavin, Folic acid, and Sodium selenite.

FEEDING DIRECTIONS

Feed free choice to pullets from 4 to 16 weeks of age. Always provide plenty of fresh water.

Manufactured for
Good Times Grange
Carhenge City, NE
Certified organic by Oregon Tilth

Version 1.1

Net weight 25# (11.34 kg)

.....



Compliance Practice: Resources

Steps toward Compliance

Access Requirements & Resources

- Use the table of contents to check rules for composition and labeling such as §205.301 and §205.306
- Rule points to §205.237 which is written for livestock producers

Summary of §205.237 for Feed Mills

- No animal drugs including hormones to promote growth.
- No plastic pellets for roughage
- No mammalian or poultry slaughter by-product (to be fed to mammals or poultry)
- No antibiotics including ionophores

§205.301 Product Composition

(e) Livestock feed. (1) A raw or processed livestock feed product sold, labeled, or represented as “100 percent organic” must contain (by weight or fluid volume, excluding water and salt) not less than 100 percent organically produced raw or processed agricultural product.

(2) A raw or processed livestock feed product sold, labeled, or represented as “organic” must be produced in conformance with §205.237.



Compliance Practice: Resources

Steps toward Compliance

Access Requirements & Resources

- NOP Handbook - Use the table of contents to locate topics related to your product
 - NOP Handbook 5027
 - NOP Handbook 5030
- NOP Standard
 - National List §205.603
 - Vitamins and Minerals are allowed if approved by FDA and Association of American Feed Control Officials

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Section A. Standards

[The Use of Kelp in Organic Livestock Feed](#) | [Response to Comments](#)

[Seeds, Annual Seedlings, and Planting Stock in Organic Crop Production](#) | [Response to Comments](#)

[Evaluating Allowed Ingredients and Sources of Vitamins and Minerals For Organic Livestock Feed](#) | [Response to Comments](#)



Compliance Practice: Gather Information

Steps toward Compliance

Gather Information

- Prepare Content - Product Formulation Sheet or alternative document and update Master Ingredient List
- Supporting documentation such as a specification sheet for organic ingredients and non-agricultural ingredients (methionine and vitamin & mineral mix)

Ration Formula
Good Times Grange

CONFIDENTIAL
Product: Pullet #2

Ingredient Code	Name	Amount
O12	Corn (ORG)	1068.00#
O24	Soy meal (ORG)	830.00#
N42	Methionine DL	2.00#
P02	Pullet V&M Premix	100.00#

2000#

Pullet Vitamin & Mineral Premix

Calcium carbonate.....	78.0#
Monocalcium phosphate.....	8.00#
Dicalcium phosphate.....	5.00#
Salt.....	3.0#
Ferrous sulfate.....	0.68#
Zinc sulfate.....	0.53#
Vitamin A.....	0.51#
Vitamin D3.....	0.48#
Vitamin E.....	0.45#
Vitamin B12.....	0.41#
Biotin.....	0.40#
Niacin.....	0.37#
Calcium pantothenate.....	0.32#
Choline chloride.....	0.29#
Riboflavin.....	0.22#
Folic acid.....	0.08#
Sodium selenite.....	0.01#



Compliance Practice: Matching

Steps toward Compliance

Match Content and Category

- **Check composition requirements**
 - §205.301(e) Product Composition
 - §205.237 Livestock Feed requires organic ingredients and lists what is allowed / prohibited
- **Labeling Requirements / Options**
 - Livestock feed, §205.306 Labeling of Livestock Feed
 - May identify organic category and may include the USDA or Oregon Tilth seal
 - Must include the statement “Certified Organic by Oregon Tilth”
 - Must comply with Federal or State feed labeling requirements

Org Pullet #2 Complete feed for poultry

Guaranteed Analysis	
Crude protein, not less than	19.00%
Methionine, not less than	0.30%
Crude fat, not less than	4.00%
Crude fiber, not more than	6.00%
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Ingredients:

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Net weight 25# (11.34 kg)

.....



Summary: Livestock Feed Scenario

Composition and Label Compliance Steps

- Access the requirements
- Gather Information
- Match your product to the requirements
- Submit documents to Oregon Tilth

Next

- More considerations to match your product to the right requirement
- More examples of using resources



Summary: Any Product Request Scenario

Composition and Label Compliance Steps

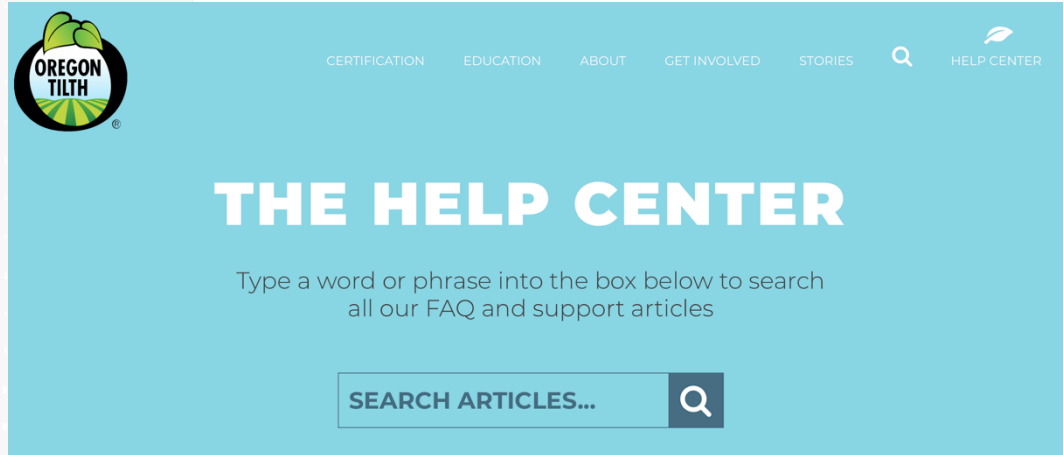
- **Access the requirements**
 - Can be beyond the pages of the NOP
- **Gather Information**
 - Address each input
 - Connect the dots to ensure information for one ingredient connects to the next document (i.e. Organic Certificate matches the listing on the Master Ingredient List)
- **Match your product to the correct NOP Composition and Labeling requirements**
 - Contact our staff with any questions. Use resources and tools to ask the best questions
- **Prior to Submitting to OTCO ensure that Documentation:**
 - Conveys compliance to the regulation
 - Is signed as necessary



Resources

Oregon Tilth Website

- [The Help Center](#)
- [Blank Forms & Documents](#)
- [Logos](#)
- [OTCO Staff Contact Info](#)
- [OTCO Hotline Number](#)
- [OTCO Producer Search](#)



National Organic Program

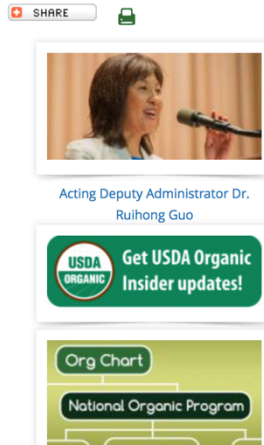
The National Organic Program (NOP) is a regulatory program housed within the USDA Agricultural Marketing Service. We are responsible for developing national standards for organically-produced agricultural products. These standards assure consumers that products with the USDA organic seal meet consistent, uniform standards. Our regulations do not address food safety or nutrition.

What's New

- New [Short Video](#) for Certified Organic Handlers: Organic Integrity in the Supply Chain

Key Activities

- Maintain the [list of certified organic operations](#) and help new farmers and business learn how to get [certified](#)



National Organic Program & E-CFR

- [NOP Standard](#)
- [NOP Handbook](#)
- [Organic Integrity Database](#)
- [Logos](#)
- [Petitioned Material Database](#)
- [Sign Up for NOP Insider](#)
- [Electronic Code of Federal Regulations - NOP](#)

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Thank You

Questions?

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