



Product Composition and Labeling: Made with Organic

Matt Boll, Senior Certification Officer
Darin Jones, Processing Program Manager
November 6, 2018

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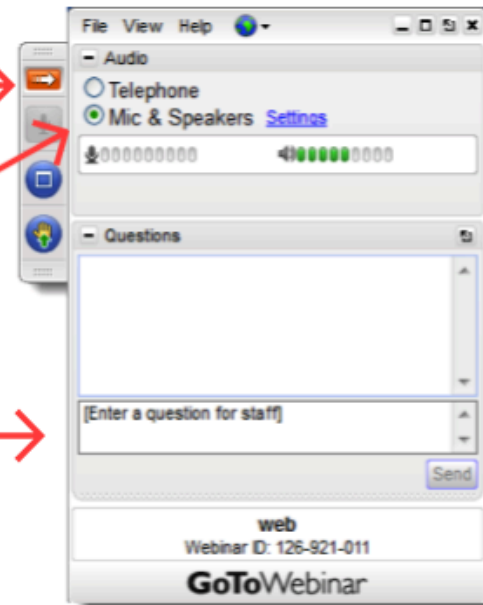


WEBINAR LOGISTICS

Collapse panel →

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Ask a question →





our **MISSION**

IS TO MAKE OUR FOOD SYSTEM
AND AGRICULTURE BIOLOGICALLY
SOUND AND SOCIALLY EQUITABLE

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My name is Matt Boll, I am a Senior Certification Officer at OTCO. I have been at Oregon Tilth for a little over 3 years now and am enjoying my time here. I work remotely from San Diego where I grew up. I went to school to become a Network Tech and started for another organic certifier. During that time I advanced through various positions and developed a love and respect for Organics, 10+ years later and here I am today.

During my free time, I enjoy spending time with friends and family. This usually consists of trips to Disneyland, Sea World, Legoland, the Zoo and local parks/beaches. I also enjoy hiking, camping, BBQ's, snorkeling and exploring the desert.



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
Labeling Guides

Resources

Overview of the
National Organic
Program
Composition and
Labeling
Requirements

Applying the
Standard to Real
Scenarios

Questions &
Answers



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!



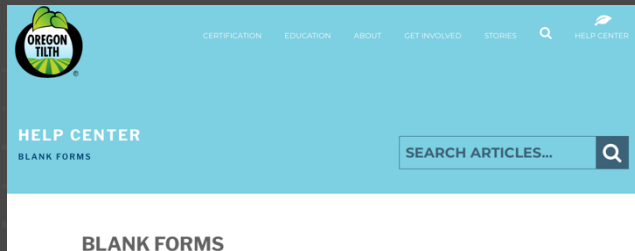
Overview of the Requirements

- **Where is the National Organic Program (NOP) Standard located?**
- **Subpart D**
 - Composition
 - §205.270(c)(1&2)
 - §205.301-§205.302
 - Labeling (Made with Organic)
 - §205.304, §205.307-308, §205.311
- **Subpart G**
 - Composition (National List)
 - §205.605
- **NOP Handbook**
 - 5032, 5033 and 4012



Made with Organic Composition and Labeling Resources

OTCO Blank Forms and Help Center



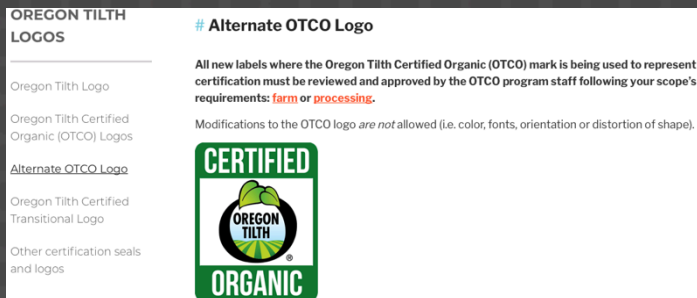
National Organic Program Website



OTCO Labeling Guide



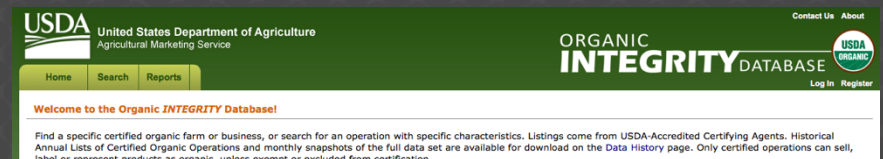
OTCO Logo Use



NOP Handbook



Organic Integrity Database



Subpart D - Composition (§205.301(c) & §205.304)

- Products sold, labeled or represented as “Made With Organic (specified ingredients or food groups) must contain a minimum of 70% Organic content.
- Any non-organic, non-agricultural substances used in the formulation need to appear on the National List (205.605).
- Any non-organic, agricultural ingredient may used in the formulation, but must not be produced with prohibited practices (GMO, ionizing radiation and sewage sludge). This is outlined in 205.105.
- The formulation may contain organic and non-organic forms of the same ingredient.

Subpart D - Labeling (§205.304, §205.307-308, §205.311)

The minimum labeling requirements (AKA, the must do):

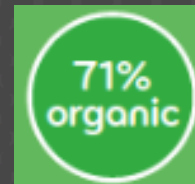
- The ingredient statement for each product must identify each organic ingredient with the word “organic” or with an asterisk or other reference mark that indicates the ingredient is organically produced.
- On the information panel, below the handler or distributor information the statement “certified organic by...” or similar phrase must appear.
- Products making a “Made with Organic” claim must not use the USDA seal.



Subpart D - Labeling (§205.304, §205.307-308, §205.311) Continued....

Optional Made with Organic labeling requirements (AKA, the may do):

- Labels may display on the principal display panel “Made With Organic (specified ingredients or food group)” as long as the statement does not list more than 3 ingredients or food groups. This statement needs to appear entirely in the same font size, style and color and cannot be more than one half of the largest font on that panel.
- Labels may display an organic percentage statement (X% organic or X% organic ingredients). Can only be used if a “Made With Organic” claim is used. The percentage statement must also appear entirely in the same font size, style and color.
- Product labels may display the OTCO logo (special rule for using the OTCO Certified Organic logo).



Subpart G and C - National List (§205.605) and Handling Requirements (§205.270)

Subpart G (National List)

- §205.605 - the only relevant part of list due to the language of §205.105(d) and §205.270(b)(2) This is a list of Non-Organic, Non-Agricultural Inputs.
- There is no list of Non-Organic, Agricultural Inputs for Made with Organic products. Instead, the possibilities are infinite for the type of Non-Organic Agricultural Inputs used.

Subpart C (§205.270)

- Non-Organic ingredients may sometimes be processed with synthetic solvents or processing aids. Further supported by disregard to §205.301(f)(4) and (f)(5) via §205.301(c)



Labeling Guides

Oregon Tilth Labeling Guides Cover:

- National Organic Program (Other international programs do not have an official “Made With Organic...” category)
- Labeling Guide goes over product content requirements, minimum label requirements, optional requirements and prohibited labeling statements and claims.



NOP Handbook

Guidance

Products in the “Made with Organic ***” Labeling Category

1. Purpose and Scope

This guidance describes the requirements for products in the “made with organic (specified ingredients or food grade agricultural products)” labeling category. The following aspects of the category are covered:

Guidance

Decision Tree for Classification of Agricultural and Nonagricultural Materials for Organic Livestock Production or Handling

Start with a substance

1. Is the substance a mineral or bacterial culture as included in the definition of nonagricultural substance at section 205.603 of the USDA organic regulations?

- Cover the relevant Handbook sections

- 5032 (MWO Labeling)
- 5033 (Ag/Non-Ag Decision Tree)
- 4012 (Organic in the Company Name)

Instruction

Use of Brand or Company Names Containing the Word “Organic”

1. Purpose and Scope

This instruction clarifies the requirements regarding the use of brand or company names that contain the word “organic” or its variants¹ on the labeling of agricultural products. This instruction affects accredited certifying agents (certifiers) that certify operations to the U.S. Department of Agriculture (USDA) organic regulations.

Applying the Standards: Scenarios

Steps to Compliance for Three Products

Step 1

Access the regulations and resources

Step 2

Gather information

Step 3

Match the requirements to your product

Step 4

Submit to Oregon Tilth for review



Applying the Standards: Pizza Bites Product

Step 1 – Access the regulations and resources

- 7 CFR 205 – National Organic Program Standards
 - 205.301, 302, and 304
- OTCO Organic Labeling + Composition Guide
- NOP Handbook 5032 (MWO Labeling)

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

2. Gather Information

- Label
 - Ingredient list
 - Identify Organic Ingredients
 - Certified Organic by Statement
 - NOP 5032, Section 3.3

INGREDIENTS: PIZZA CRUST: ORGANIC ENRICHED FLOUR (ORGANIC WHEAT FLOUR, NIACIN, IRON, THIAMINE MONONITRATE, RIBOFLAVIN, FOLIC ACID), WATER, ORGANIC CANOLA OIL, ORGANIC CANE SUGAR, ORGANIC WHOLE GRAIN FLOUR (ORGANIC WHOLE WHEAT FLOUR, ORGANIC WHOLE RYE FLOUR, ORGANIC WHOLE SPELT FLOUR, ORGANIC WHOLE BARLEY FLOUR, ORGANIC WHOLE RICE FLOUR, ORGANIC WHOLE QUINOA FLOUR, ORGANIC WHOLE AMARANTH FLOUR), YEAST, SEA SALT, ENZYMES. **TOPPING:** LOW MOISTURE PART SKIM MOZZARELLA CHEESE (PARTLY NONFAT MILK, BACTERIAL CULTURE, SALT, CALCIUM CHLORIDE, ENZYME), WATER, ORGANIC TOMATO PASTE, COOKED ITALIAN STYLE SAUSAGE CRUMBLE (PORK, WATER, NON-ORGANIC SPICES, SALT, NATURAL FLAVOR, SUGAR, ORGANIC CARROT, ORGANIC ONION, ORGANIC RED BELL PEPPER, ORGANIC SWEET POTATO, ORGANIC PARSLEY, CELEREST, SEA SALT, ORGANIC PAPRIKA, ORGANIC SPICES, ORGANIC GARLIC, FLAVOR (GARLIC OIL, NATURAL FLAVORING)).
CONTAINS: WHEAT, MILK.

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Compliance Practice

2. Gather Information

- Label
 - Percentage Claim
 - size, color consistent
 - accurate % statement
 - Identify only certified organic Ingredients in the “Made with Organic” claim
 - Guidance 5032, Section 3.4 states:

3.4 Ingredients or Food Groups in the “Made With Organic ***” Claim

The “made with organic ***” claim may include a combined total of three ingredients, food groups, or combination of ingredients and food groups. For example, a product could be labeled, “made with organic grains, pistachios, and cranberries.” Specific guidance on ingredients and food groups is provided below.

If an ingredient is identified in the “made with organic ***” statement, it must be a truthful claim. This means the product can only contain organic forms of that specific ingredient or any further processed form thereof.* For example, if the label states:

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Compliance Practice: Formulation

Product Name (as it should appear on certificate):				Pizza Bites Cheese and Sausage						
Process type:	Manufacture	X		Repack			Market Only			
This product is labeled as:	100% Organic			Organic			Made With (70%+)	X		Ingredient listing only (<70%)
This product is packaged and sold as:	Retail	X		Nonretail						
Label Brand Names:			Not Yet a Plum Grown						Certifier Ref. on Label	OTCO
Ingredient	% organic content ingredient	% in formulation			actual organic % of that ingredient/ product					
Organic Enriched Flour Blend	95.00%		73.00%		69.3500%					
Mozzarella Cheese	0.00%		13.00%		0.0000%			OTCO Office Use		
Pork Sausage	0.00%		12.00%		0.0000%					
Organic Vegetable Blend	100.00%		1.00%		1.0000%			Date Approved:		
Organic Seasoning Blend	100.00%		1.00%		1.0000%			Revision Dates:		
					0.0000%			Approval By:		
					0.0000%					
					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%			Mexico (LPO)		
					0.0000%					
Sub-total for non salt and water contents			100.00%		71.35%					
Salt Water										
List Processing Aids Used										
Totals			100.00%		71.35%					



Summary: Pizza Bites Product

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: Alphabet Cookies

Step 1 – Access the regulations and resources

- 7 CFR 205 – National Organic Program Standards
 - 205.301-302, 304
- OTCO Organic Labeling + Composition Guide
- NOP Handbook 4012

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

2. Gather Information

- Label
 - Identify Organic Ingredients
 - “Certified Organic by...” statement
 - Made with Organic claim on PDP
 - NOP 4012, Section 3(b):
- b. Agricultural products certified as “made with organic (specified ingredients or food groups)”
 - i. Brand or company names containing the term “organic” should not be used on the principal display panel (PDP) of these products.
 - ii. Company names containing the term “organic” may be displayed as the name of the manufacturer, packer, or distributor and listed on the information panel as required by Food and Drug Administration (FDA) regulations.² Nevertheless, the display of such company names should be reviewed in consideration of its potential to mislead consumers about the composition and organic certification of the product. Although this information is required by the FDA, it should not be displayed in a manner that falsely implies an agricultural product meets certification requirements that it does not.
 - iii. Brand or company names containing the term “organic” should not be used elsewhere on the labeling of these products.

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INGREDIENTS: ORGANIC UNBLEACHED WHEAT FLOUR, ORGANIC SUGAR, PALM FRUIT OIL, COCOA (PROCESSED WITH ~~ALKALI~~), ~~NATURAL FLAVOR~~, SODIUM BICARBONATE (LEAVENING), SALT, UNSWEETENED CHOCOLATE.

CONTAINS WHEAT.

MANUFACTURED ON EQUIPMENT THAT PROCESSES PRODUCTS CONTAINING PEANUTS, TREE NUTS AND DAIRY.

Newman's Own Foundation continues Paul Newman's commitment to donate all royalties and after tax profits from this product for charitable purposes.

Paul Newman and Newman's Own Foundation have given over \$400 Million to thousands of charities since 1982. Learn more at newmansownfoundation.org

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P.O. BOX 2098, APTOS, CA 95001
©2014**

**www.newmansownorganics.com
Certified Organic by Oregon Tilth.**

Compliance Practice - How to determine if an ingredient is Agricultural

What information is needed:

1. Compliance documentation

- Non-organic Ingredient Declaration (NOID).
- Ingredient specification and/or composition sheet

2. Review Information and Resources

- National Organic Program e-CFR
- NOP Handbook (5033-2)

3. Determine compliance

- What to look for
- When additional information may be necessary.

4. Submit Documentation to OTCO for Review

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Electronic Code of Federal Regulations

e-CFR data is current as of **October 23, 2018**

[Title 7](#) → [Subtitle B](#) → [Chapter I](#) → [Subchapter M](#) → [Part 205](#)

[Browse Previous](#) | [Browse Next](#)

Title 7: Agriculture

PART 205—NATIONAL ORGANIC PROGRAM

Contents

[Subpart A—Definitions](#)

[§205.1](#) Meaning of words.

[§205.2](#) Terms defined.

[§205.3](#) Incorporation by reference.

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

Title	Document	Date
Introduction		3/9/2011
NOP Organization Chart and Stakeholder Map	NOP 1001	1/10/2018



Compliance Practice: Compliance documentation

What to look for:

- Ensure the NOID is fully completed and the correct boxes are checked.
- The NOID must have a physical or digital signature.
- Verify that appropriate supporting documentation is provided. Composition sheets are needed to verify the ingredients of the material in review.

Brocco-Green #313 Product Composition Sheet

Brocco-Green is composed of the following:

- Broccoli Seed Powder: 75-80%
- Broccoli Powder: 10-15%
- Broccoli Sprouts: 5-10%

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	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"): Brocco-Green #313

Function: Ingredient

Manufacturer Business Name: Broccoli Dudes, Inc.

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 checked="" type="checkbox"/>	<input type="checkbox"/>	*
2. Irradiation was NOT used in the production of this material.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	*
3. Sewage sludge was NOT used in the production of this material.	<input checked="" 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"/>	*

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

Tom Jones 123-456-7890

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

 10/25/18

Manufacturer Representative's Authorized Signature Date



Compliance Practice: Resources

What to look for (continued)

1. Flowcharts

- In some cases a manufacturing flow chart may be needed to determine if the processing of the ingredient goes through any chemical changes that could disqualify it from being agricultural.



No solvents or chemicals used in processing

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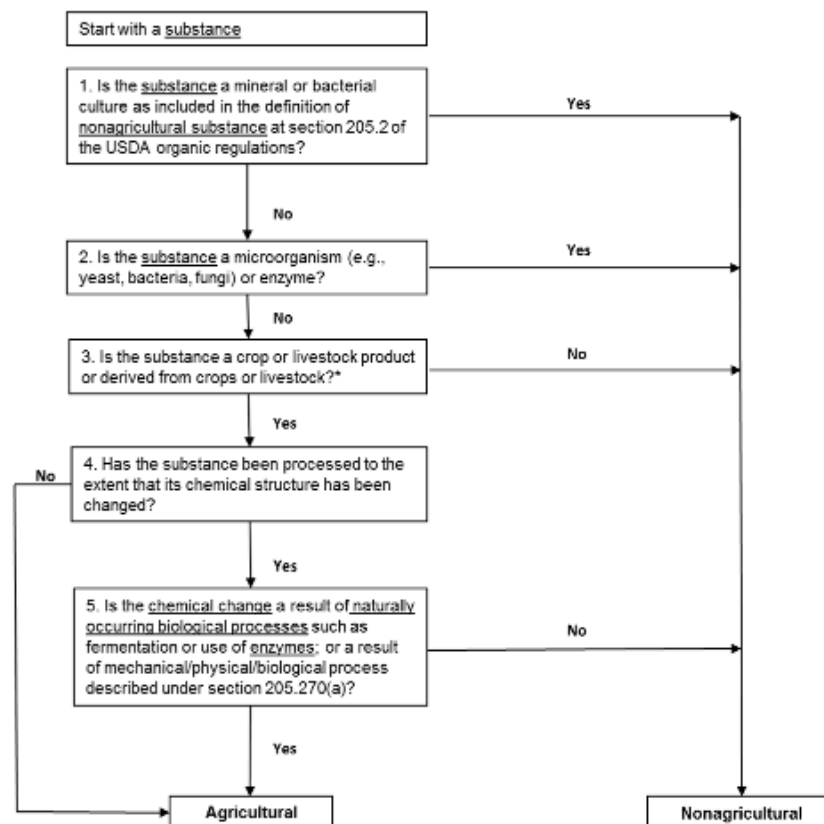
United States Department of Agriculture
Agricultural Marketing Service
National Organic Program

1499 Independence Avenue SW,
Room 2616-South Building
Washington, DC 20250

NOP 5033-2
Effective Date: December 2, 2016
Page 1 of 4

Guidance

Decision Tree for Classification of Agricultural and Nonagricultural Materials for Organic Livestock Production or Handling



Summary: How to determining if a ingredient is Agricultural

Composition Compliance Steps

- Access the requirements
- Gather Information
- Review inputs to Ag/Non-Ag Decision Tree
- Submit documents to Oregon Tilth



Compliance Practice: Non-Agricultural Ingredient and the decision tree for synthetic and non-synthetic materials

Complex non-organic multi-ingredient materials:

- What to look for.
- What documentation is needed.
- How to verify the information.
- What sections of the NOP apply.

Product Specification Sheet

Chili Lime Seasoning #1508 composition:

Maltodextrin, Paprika, Salt, Citric Acid,
Natural Flavors and Silicon Dioxide.

	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"): Chili Lime Seasoning #1508

Function: Ingredient

Manufacturer Business Name: Malt's Super Flavors

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 checked="" type="checkbox"/>	<input type="checkbox"/>	
2. Irradiation was NOT used in the production of this material.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Sewage sludge was NOT used in the production of this material.	<input checked="" 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 checked="" 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
• Activated Charcoal – Is derived from a vegetative source	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
– List source:			
• Cellulose – Is non-chlorine bleached	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Citric Acid – Is produced by microbial fermentation of carbohydrate substance	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
– List carbohydrate substance: <u>Wheat Starch</u>			
• Enzymes – Are from edible, nontoxic plants, nonpathogenic fungi, or non-pathogenic bacteria	<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"/>
• Glycerin – Is produced by the hydrolysis of fats and oils	<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"/>
• Lecithin – Is dried, or de-oiled.	<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"/>
• Pectin – Is non-aminated.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Tocopherols – Is derived from vegetable oil	<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"/>
• 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.

Will Dayton 123-456-7890
Manufacturer Representative's Name & Title (please print) Phone # & E-mail

Will Dayton

10/28/18



Compliance Practice: Evaluating the Flavor portion

Where to start:

- Flavors are listed on 205.605(a) and must be nonsynthetic,
- Verify any non flavoring ingredients (carriers, preservatives, etc).
- Ensure documentation is completed correctly.

Identification of Natural Flavor Product (code/Name): Lime Flavor

Supplier Name, Address: Matt's Super Flavors

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

<input type="checkbox"/>	Compounded flavor	<input type="checkbox"/>	Extracts	<input type="checkbox"/>	Isolate
<input checked="" type="checkbox"/>	Compounded 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

1. Do all of the flavor constituents in the natural flavor product named above meet the definition of a natural flavor (see above)?
☒ Yes ☐ No
2. 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)*.
➤ 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.

B. Non-flavor constituents and other ingredients

1. Natural flavors authorized for use in "organic" or "made with organic" products must not contain any synthetic carrier systems or any artificial preservatives. This extends to synthetic processing aids, emulsifiers or antioxidants, i.e. prohibited substances include but are not limited to, e.g., propylene glycol, polyglycerol esters of fatty acids, mono- and di-glycerides, benzoic acid, polysorbate 80, medium chain triglycerides, BHT, BHA, tocopherol, etc. Acceptable carriers, preservatives or other additives or foodstuffs **MUST BE** either organic, nonsynthetic, or permitted for use in the standard

➤ Please list any carrier system(s) used in this Natural Flavor Product: ☐ N/A None used

Carrier: Maltodextrin Source Material: corn starch

➤ Please list any preservative(s), or other additives or foodstuff ingredients used in this Natural Flavor Product: ☒ N/A None used

Preservative/Additive/Foodstuff: _____ Source Material: _____

2. If glycerin is used, was it produced by the hydrolysis of fats and oils? ☐ Yes ☐ No ☒ N/A None used
3. If maltodextrin was used was hydrolysis primarily by enzymes? ☒ Yes ☐ No ☐ N/A None used
4. If citric acid was used was it produced by the fermentation of a carbohydrate substrate? ☒ Yes ☐ No ☐ N/A None used

C. Genetically Modified Organism (GMO) products may not be used at any stage in the process of making natural flavor products. Excluded methods (= GMO use) – a variety of methods used to genetically modify organisms or influence their growth and development by means that are not possible under natural conditions or processes and are not considered compatible with organic production. Such methods include but are not limited to recombinant DNA technology (including gene deletion, gene doubling, introduction of a foreign gene, and changing the positions of genes when achieved by recombinant DNA technology); therefore, GMO-plant extracts may not be used nor may natural flavors be the product of GMO-yeast fermentation, for example.

➤ This natural flavor product, including any solvents, carriers, preservatives or other or processing aids used or contained therein, was NOT produced or handled using excluded (GMO) methods.
☒ True ☐ False

D. Ionizing Radiation is prohibited for all uses involving food preservation, pest control and pathogen control. Other radiation uses, including food inspection, are permitted providing such use meets applicable federal regulations, which establish limitations applicable to all (organic and non-organic) food products.

➤ Ionizing radiation was NOT used in the processing of this natural flavor product.
☒ True ☐ False

E. Sewage Sludge (as a crop fertilizer) is solid, semisolid, or liquid residue generated during the treatment of domestic sewage in a treatment works. Sewage sludge includes but is not limited to: domestic septage, scum or solids removed in primary, secondary, or advanced wastewater treatment processes; and a material derived from sewage sludge. It is not permitted in the manufacture of any ingredients used in NOP products.

➤ This natural flavor product was NOT derived from products using sewage sludge in their agricultural production:
☒ True ☐ False

This questionnaire is only to be signed by a qualified technical person:*

Pursuant to the applicable regulations, I, on behalf of the supplier, hereby attest that the information provided in this form is accurate and truthful to the best of my knowledge.

Identification of Natural Flavor Product (code/Name): Lime Flavor

Company Name: Matt's Super Flavors Phone/e-mail: 123-456-7890

Printed Name: Will Dayton Title: Sr. Flavor Chemist

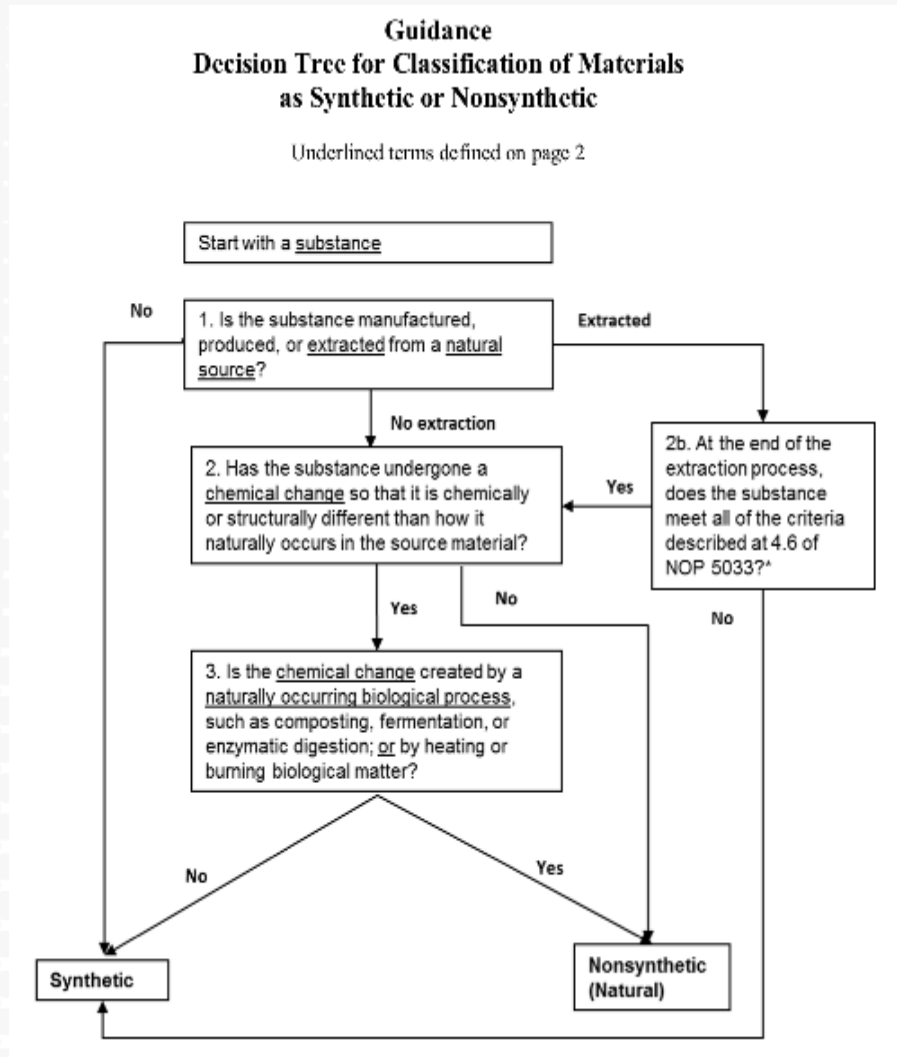
Signature: Will Dayton Date: 10/28/2018



Compliance Practice: Determining if a material is synthetic

Where to start:

- The NOP handbook (5033) provides a resource to help determine if a material would be considered synthetic under the NOP
- Some materials can be produced synthetically or non-synthetically.
- Gather necessary information.



Summary: Any Product Request Scenario

Composition and Label Compliance Steps

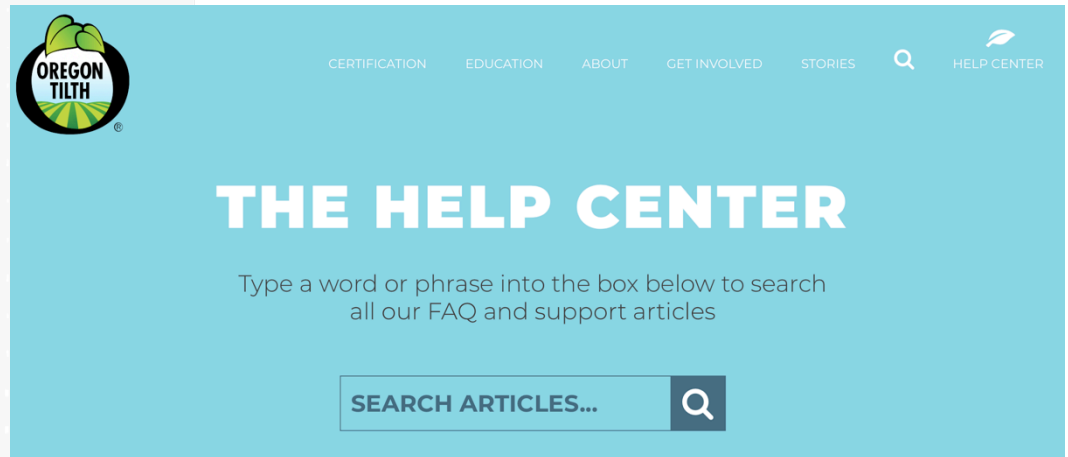
- **Access the requirements**
 - Can be beyond the pages of the NOP
- **Gather Information**
 - Address each input
 - Connect the dots to ensure information for one ingredient connects to the next document (i.e. Organic Certificate matches the listing on the Master Ingredient List)
- **Match your product 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
- OTCO Logos
- OTCO Staff Contact Info
- OTCO Hotline Number
- OTCO Client List



National Organic Program

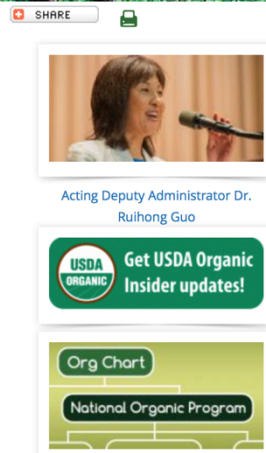
The National Organic Program (NOP) is a regulatory program housed within the USDA Agricultural Marketing Service. We are responsible for developing national standards for organically-produced agricultural products. These standards assure consumers that products with the USDA organic seal meet consistent, 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 Website

- NOP Standard
- NOP Handbook
- Organic Integrity Database
- NOP Logos
- Petitioned Material Database
- Sign Up for NOP Insider

WWW.TILTH.ORG





Thank You

Questions?

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Darin Jones, darin@tilth.org

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