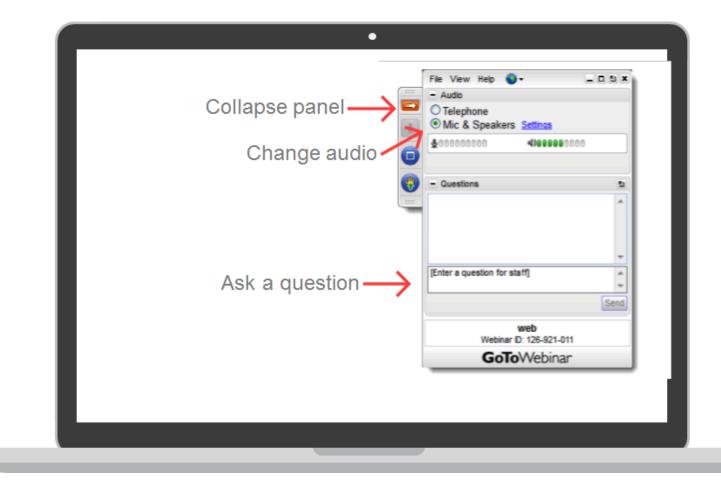


Product Composition and Labeling: Made with Organic

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



WEBINAR LOGISTICS





our MISSION

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





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.



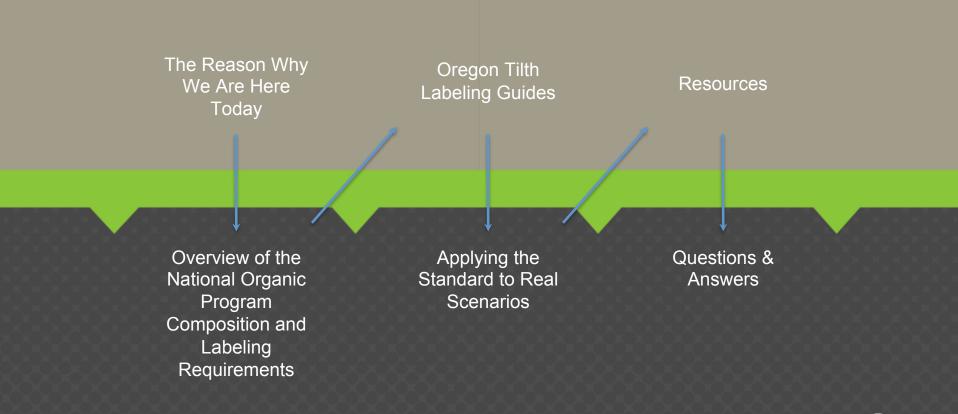
Darin is the Processing Program Manager at Oregon Tilth and has been with OTCO for 10 years.

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







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

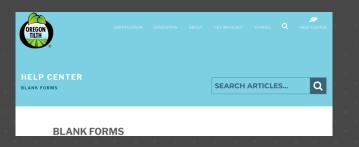
• Subpart G

- Composition (National List)
 §205.605
- NOP Handbook
 - 5032, 5033 and 4012



Made with Organic Composition and Labeling Resources

OTCO Blank Forms and Help Center



OTCO Labeling Guide

ORGANIC LABELING and COMPOSITION GUIDE

IF YOU WANT TO CLAIM MADE WITH ORGANIC OR SIMILAR STATEMEN

OTCO Logo Use

OREGON TILTH LOGOS

Organic (OTCO) Logos

Alternate OTCO Logo

Dregon Tilth Certified

Transitional Logo

Alternate OTCO Logo

All new labels where the Oregon Tilth Certified Organic (OTCO) mark is being used to represent certification must be reviewed and approved by the OTCO program staff following your scope's requirements: farm or processing.

Modifications to the OTCO logo are not allowed (i.e. color, fonts, orientation or distortion of shape).



National Organic Program Website

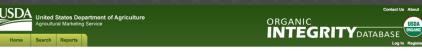


NOP Handbook

national standards for organically-produced



Organic Integrity Database



Welcome to the Organic INTEGRITY Database!

Find a specific certified organic farm or business, or search for an operation with specific characteristics. Listings come from USDA-Accredited Certifying Agents. Historical Annual Lists of Certified Organic Operations and monthly snapshots of the full data set are available for download on the Data History page. Only certified operations can sell, bel or represent products as organic, unless exempt or excluded from certification

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, <u>below</u> the handler or distributor information the statement "certified organic by..." or similar phrase must appear.
- Products making a "Made with Organic" claim must <u>not</u> 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 perantage 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.

REANIC LABELING and COMPOSITION GUIDE





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 g following aspects of D for the formation of the second se

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

Start with a substance

1. Is the <u>substance</u> a mineral or bacterial culture as included in the definit <u>nonagricultural substance</u> at set the USDA organic regulations?

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.



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

Applying the Standards: Scenarios

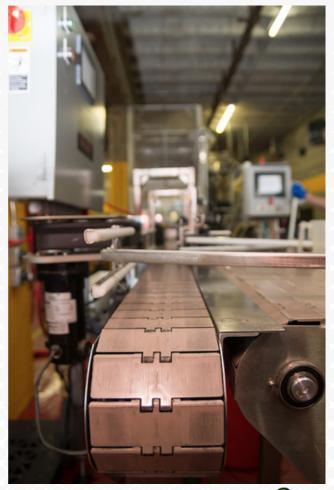
Steps to Compliance for Three Products

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





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 YEAST. SEA SALT I H FL ()UR) ENZYMES. TOPPING: LOW MOISTURE PART SKIM MOZZARELLA CHEESE (PARTLY NONFAT MILK. BACTERIAL CULTURE, SALT, CALCIUM CHLORIDE, ENZYME), WATER, ORGANIC TO COUKED, CRUMBLE (PORK. WA CR. NON-ORGANIC SPICES FLAVon, ONION, ORGANIC RED BELL PEPP SWEET POTATO, ORGANIC , VELLUE rs. Sea SALT, ORGANIC PAPRIK, ORGANIC SPICES. ORGANIC GARLIC, FLAVOR COMPLEXIES, ORGANIC SPICES. NATURAL FLAVORING). CONTAINS: WHEAT, MILK.

DISTRIBUTED BY: PLUM, PBC A PUBLIC BENEFIT CORPORATION EMERYVILLE, CA 94608 1-877-914-PLUM CERTIFIED ORGANIC BY OREGON TILTH.





Compliance Practice

2. Gather Information

Label

- Percentage Claim Ο
 - size, color consistent
 - accurate % statement
- Identify only certified 0 organic Ingredients in the "Made with Organic" claim
- Guidance 5032, Section 3.4 0 states:



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

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:

made with organic flour, tomatoes and carrots

Compliance Practice: Formulation

Product Name (as it should appear on certi			Pizza Bites	izza Bites Cheese and Sausage				
Process type: Manufacture			Repack	Market Only				
This product is labeled as:			Organic	Made With (70%+) X	Ingredient listing only (<70%)			
This product is packaged and sold as:	Retail	x	Nonretail					
Label Brand Names: No No organic Ingredient content ingredient		Not Yet a Plu	um Grown		Certifier Ref. on Label	отсо		
		% 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 O	ffice Use		
Pork Sausage	0.00%		12.00%	0.0000%				
Drganic 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%	International Ce	rt 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 wa	ater contents		100.00%	71.35%				
Salt Water								
List Processing Aids Used								
Totals			100.00%	71.35%				

OREGON

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
 - o 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





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.

WWW.TILTH.ORG

INGREDIENTS: ORGANIC UNBLEACHED WHEAT FLOUR, ORGANIC SUGAR, PALM FRUIT OIL, COCOA (PROCESSED WITH ALKALI), MATURAL 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

DIST BY: NEWMAN'S OWN, INC. P.O. BOX 2098, APTOS, CA 95001 ©2014 www.newmansownorganics.com *Certified Organic by Oregon Tiltb.*

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

WWW.TILTH.ORG

Electronic Code of Federal Regulations

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

Title 7 \rightarrow Subtitle B \rightarrow Chapter I \rightarrow Subchapter M \rightarrow 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%

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

Nonorganic Organic Ingredient Declaration

<u>Oregon Titth Client</u>: 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.

<u>Material Manufacturer</u>: 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. X

Α.	Nono	rganic p	rocessing aid or ingredie	nt ("material"):	Brocco-Green #313			
	Funct	tion:	Ingredient					
	Manu	rfacturer	Business Name:	Broccoli Dudes, Inc.				
В.	The p	rocessi	ng aid or ingredient listed	above conforms to the follo	wing criteria:			
	1. The material / ingredient was NOT organisms were NOT used in the					True	False	N/A
						\boxtimes	□*	
	2.	Irradiat	tion was NOT used in the	production of this material.		\times	*	
	3.	Sewag	e sludge was NOT used i	in the production of this mate	erial.	×	□*	
	4.			LY, the material was NOT pricts (for mammal, or poultry			□*	
		* Expla	ain:		-			
C.		is a live	I listed above is, or conta stock product then skip th IAL IS NOT COMPLIANT	is section as it is not applica	attest to the applicable criteria be ble. (ANY BOX CHECKED "FALS	low. If the E" IMPLIE	material abov S THIS	e
						True	False	NOT
		Activate	d Charcoal – Is derived fi	rom a vegetative source			П	USED ⊠
			st source:	on a regenate source		-		
		Cellulos	e – Is non-chlorine blead	hed				\boxtimes
	•		cid – Is produced by micro ist carbohydrate substand	obial fermentation of carbohy e:	ydrate substance			⊠
	•	Enzym	es – Are from edible, non	toxic plants, nonpathogenic	fungi, or non-pathogenic bacteria			\boxtimes
	•			roduced by oxidation of D-gl	ucose with bromine water			\boxtimes
	•		n – Is produced by the hy					⊠
	•			an; Carob Bean) – Are water	extracted.			
			n – Is dried, or de-oiled.					×
	•		rganisms – Are food grad – Is non-amidated.	e bacteria, fungi, or other mi	croorganisms.			×
			– Is non-amidated. nerols – Is derived from w					×
	:							×
				mauba wax, or wood resin)	sulfite waste liquor was used			×
	•	reast-	- is non-synulletic and no	perounemical substrate, or	sume waste injulit was used			

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

Date

 Tom Jones
 123-456-7890

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

 Trade
 10/25/18

Manufacturer Representative's Authorized Signature



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 disgualify it from being agricultural.



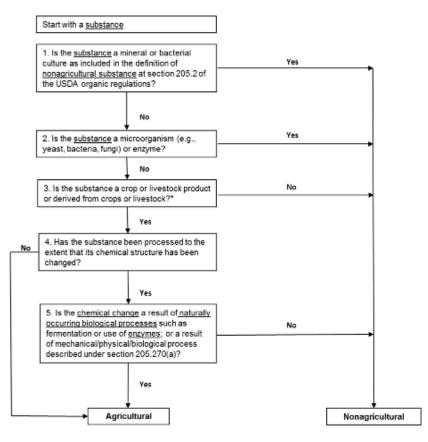


United States Department of Agriculture 1400 Independence Avenue SW. Agricultural Marketing Service National Organic Program

Room 2646-South Building Washington, DC 20250

NOP 5053-2 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 multiingredient 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.

Electronic version available at www.tilth.org. Nonorganic Organic Ingredient Declaration Gregon TWh Citer; Use this Attidawt for any nonorganic material you would like to use in your certified products. Forward this Attiduated to your material manufacturer: They must fit out and sign this form. Material Manufacture: Fit out this form so OTCO may review this material for the Oregon Tith certified citer's use. Attach either a copy of the laber discissing at material ingredients, a copy of the SDS (if al' Ingredients are discissed), or a current statement which discisses al' ingredients. Manufacture: Flux the state of t			Page 1 of	F1
Orecon TBN Cilent: Use this Attidant for any nonaganic material you would like to use in your certified products. Forward this Attidant to your material manufacturer: They must fill out and sign this form. Material Manufacture: They must fill out and sign this form. Material Manufacture: They must fill out and sign this form. Material Manufacture: They must fill out and sign this form. Material Manufacture: They must fill out and sign this form. Material Manufacture: They must fill out and sign this form. Anonorganic processing ald or ingredient ("material"): Chill Line Seasoning #1608 Function: Ingredient Manufacture: Flag Matt's Super Flavors Impredient Seasoning #1608 Impredient Seasoning #1608 Function: Ingredient listed above conforms to the following criteria: 1. The material / ingredient listed above conforms to the following criteria: 2. Imade and or genetically modified and/or genetically modified in a seasoning #1608 3. Gewage studge was NOT used in the production of this material. Image in the material ingredient was NOT genetically modified and/or genetically modified in any manufacture substance is a breator, they double the moduction of this material. Image in the material above is a nearchick the additives ONLY, the material was NOT produced with any image and any or poultry by-products (for manufacture). Image in they following at a seasoning #10000 <	Electronic version available at www.tilth.org.			
Affidiant to your material manufacturer. They must thi out and sign this form. Material Adamyticiturer. Fill out this form so OTGO may review this material for the Oregon Tith certified client's use. Attach either a copy of the label disclosing all material ingredients, a copy of the label disclosed), or a current statement which discloses all ingredient to the SDS (if all ingredients are disclosed), or a current statement which discloses all ingredient ("material"): Chill Lime Seasoning #1608 Function: Ingredient ("material"): Chill Lime Seasoning #1608 Function: Ingredient (state in the production of this material. In material ingredient listed above conforms to the following criteria: 1. The material ingredient listed above conforms to the following criteria: 2. The material ingredient was NOT genetically modified and/or genetically modified D 1. organisms were NOT used in the production of this material. D 2. irradiation was NOT used in the production of this material. D 3. Sewage studge was NOT used in the production of this material. D 4. Feptial:	Nonorganic Organic Ingredient Declaration			
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Function: Ingredient Manufacturer Business Name: Matt's Buper Flavors In The processing aid or ingredient listed above conforms to the following criterito: True Failed True Processing aid or ingredient was NOT genetically modified and/or genetically modified and/or genetically modified and/or genetically modified and/or genetically modified Intervention 2. Irradiation was NOT used in the production of this material. Image: Processing aid or product addition of this material. Image: Processing aid or product addition of this material. Image: Processing aid or product addition of this material. Image: Processing Processing Product addition of this material. Image: Processing Product addition of this material. Image: Processing Product addition of this material. Image: Processing Product addition of Product addition addition addition addition addition addition addition addition ad	either a copy of the label disclosing all material ingredients, a copy of the SDS (if all ingredients a			
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True False F	Manufacturer Business Name: Matt's Super Flavors			
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arganisms were NOT used in the production of his material. Imaginating were NOT used in the production of his material. Sewage studge was NOT used in the production of his material. For livestock feed additives ONLY, the material was NOT produced with any mammalian, or poultry by-products for mammal, or poultry feed). * Explain:	1. The material / ingredient was NOT genetically modified and/or genetically modified			1910
3. Sewage studge was NOT used in the production of this material. Image: Control of the products of the product of the material was NOT produced with any mammalian, or poultry by-products (for mammal, or poultry feed). * Explain: Image: Control of the product of the product of the material was NOT produced with any mammalian, or poultry by-products (for mammal, or poultry feed). * Explain: Image: Control of the product of the pr	organisms were NOT used in the production of this material.	_	_	
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mammalian, or poulity by-products (for mammal, or poulity feed). "Explain:				_
If the material listed above is, or contains one of the following, also attest to the applicable oriteria 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.) Activated Charcoal – is derived from a vegetable source List source: Cellulose – is non-chiorine bleached Citric Acid – is produced by microbial fermentation of carbohydrate substance List counce: Cellulose – is non-chiorine bleached Citric Acid – is produced by microbial fermentation of carbohydrate substance List counce of the material produced by addition of D-glucose with bromine water Giucono della-factone – is not produced by addition of D-glucose with bromine water Giucono della-factone of the material source is not applicable. Gums (Arabic; Guar, Locust Bean; Carob Bean) – Are water extracted. Lectifin – is produced by the rdydroysis of rists and oils Gums (Arabic; Guar, Locust Bean; Carob Bean) – Are water extracted. Microorgantums – Are food grade bacteria, fungi, or other microorganisms. Pectin – is non-aynithetic* (carnauba wax, or wood resin) Yeast – is non-synthetic* (carnauba wax, or wood resin) Yeast – is non-synthetic* (carnauba wax, or wood resin) The statements regarding the material produced by microorgany are fue to the best of my knowledge, NOTE: NON ORGANIC INGREDIENT DECLARATIONS THAT ARE NOT ACCOMPANIED BY DOCUMENTATION DISCLOSING ALL			D *	0
is a livesdock product then skip this section as it is not applicable. (ANY BOX CHECKED *FALSE* IMPLIES THIS MATERIAL IS NOT COMPLIANT.) Activated Charcoal – is derived from a vegetative source	" Explain:			
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Will Dayton 123-468-7890 Manufacturer Representative's Name & Title (please print) Phone # & E-mail CALLPD Age to the second	 Cliric Acid – is produced by microbial fermentation of carbohydrate substance - List carbohydrate substance: Wheat Staroh Enzymes – Are from edible, nontaxic plants, nonpathogenic tangl, or non-pathogenic backe Glucono delta-lactone – is not produced by oxidation of D-glucose with bromine water Gycerin – is produced by the hydrolysis of fals and oils Gunc Arabit; Gluars, Locust Bean; Carob Bean) – Are water extracted. Lecliftin – is dried, or de-oiled. Microorganisms – Are food grade bacteria, fungl, or oilter microorganisms. Pecfin – is non-amidated. 			
10/28/18	Citric Acid – is produced by microbial fermentation of carbohydrate substance - List carbohydrate substance:	edge. NOTE		



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*):

		Compounded flavor	Extracts	Isolate
Þ	2	Compounded WONF	Essential oil	Oleoresin
		Distillate	Essential oil Isolate	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)? XYes 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

 Natural flavors authorized for use in "organic" or "made with organic" products must not contain any synthetic carrier systems or any artificial preservatives. This outends to synthetic processing aids, sumhifters 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, bennoic acid, polysorbate 80, media chain trighycarides, BHT, BHA, triacetin, 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 u	sed		
	Carrier: <u>Maltodestrin</u> So	urce Material: corn sta	rch.		
	Please list any preservative(s), or other additives or foodstuff ingredie	nts used in this Natural N/A None u		uct:	
	Preservative/Additive/Foodstuff: Source Mate	cial:			
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 carbo	abydrate substrate?	X Yes	ΠNo	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 GMOyeast 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.

D. Ionizing Radistion 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. Fontaing radiation was NOT used in the processing of this natural flavor product. True False

E. Sewage Sludge (as a crop factilizar) 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 sowage 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 person¹:

Pursuant to the applicable regulations, L 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): Lino Flavor

Company Name:Matt's Super Flavors

Printed Name: Will Dayton

call Ayta

Title¹:Sr. Flavor Chen

Date:10/28/418

Phone/e-mail:123-456-7890



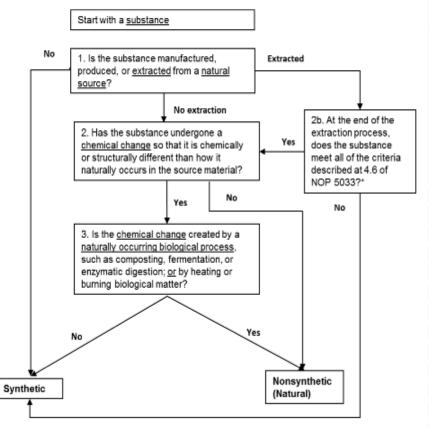
Compliance Practice: Determining if a material is synthetic

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.

Guidance Decision Tree for Classification of Materials as Synthetic or Nonsynthetic

Underlined terms defined on page 2





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

WWW.TILTH.ORG



Acting Deputy Administrator Dr. Ruihong Guo **FILTH**





CERTIFICATION EDUCATION ABOUT GET INVOLV

GET INVOLVED STORIES

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THE HELP CENTER

Type a word or phrase into the box below to search all our FAQ and support articles

SEARCH ARTICLES...



Q

National Organic Program Website

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





Thank You

Questions?

Matt Boll, matt@tilth.org Darin Jones, darin@tilth.org USD/