



# Labeling Your Organic Products: Staying Compliant, Building Trust

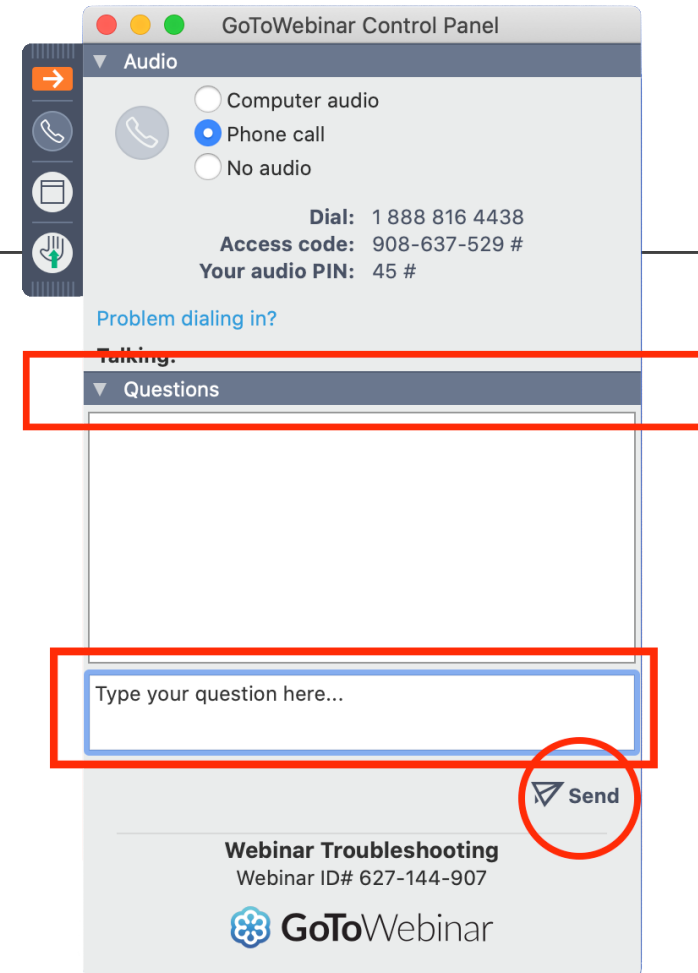
**Wednesday, May 14, 2025**

Presented by: Rachel Winter – PJRF SI Organic Program Manager



# Housekeeping

- All attendees are muted.
- Q&A after presentation – please use question tab.
- Slides and recording will be available at [www.pjrfsi.com](http://www.pjrfsi.com) after the presentation.
- Reach out to [pjrfsi@pjrfsi.com](mailto:pjrfsi@pjrfsi.com) with any additional inquiries.



# POLL #1

Additional Programs or Services?

# Today's Agenda Includes

- ✓ Understanding USDA organic labeling regulations
- ✓ Private label scenarios
- ✓ Tips for avoiding mislabeling





# Understanding USDA Organic labeling

01

## regulations? 300's Labeling Regulations

<https://www.ecfr.gov/current/title-7/subtitle-B/chapter-I/subchapter-M/part-205?toc=1>

▼ <b>Part 205</b> National Organic Program	205.1 – 205.699
▼ <b>Subpart A</b> Definitions	205.1 – 205.3
§ 205.1 Meaning of words.	
§ 205.2 Terms defined.	
§ 205.3 Incorporation by reference.	
▼ <b>Subpart B</b> Applicability	205.100 – 205.199
§ 205.100 What has to be certified.	
§ 205.101 Exemptions from certification.	
§ 205.102 Use of the term, “organic.”	
§ 205.103 Recordkeeping by certified operations.	
§ 205.104 [Reserved]	
§ 205.105 Allowed and prohibited substances, methods, and ingredients in organic production and handling.	
§§ 205.106-205.199 [Reserved]	
▶ <b>Subpart C</b> Organic Production and Handling Requirements	205.200 – 205.299
▶ <b>Subpart D</b> Labels, Labeling, and Market Information	205.300 – 205.399
▼ <b>Subpart E</b> Certification	205.400 – 205.499
§ 205.400 General requirements for certification.	
§ 205.401 Application for certification.	



▼ <b>Part 205</b> National Organic Program	205.1 – 205.699
▼ <b>Subpart D</b> Labels, Labeling, and Market Information	205.300 – 205.399
§ 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.	
§ 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 or processed by an exempt operation.	
§ 205.311 USDA Seal.	
§§ 205.312-205.399 [Reserved]	

01

# Understanding USDA Organic labeling regulations? 300's Labeling Regulations

▼ Part 205	National Organic Program	205.1 – 205.699
▼ Subpart D	Labels, Labeling, and Market Information	205.300 – 205.399
§ 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.	
§ 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 or processed by an exempt operation.	
§ 205.311	USDA Seal.	
§§ 205.312-205.399	[Reserved]	

## 205.300

- defines when the term organic can be used and not used.
- what product must comply.

205.302- Provides a deep dive of the organic calculation.

01

# Understanding USDA Organic labeling regulations? 300's Labeling Regulations

▼ Part 205 National Organic Program	205.1 – 205.699
▼ Subpart D Labels, Labeling, and Market Information	205.300 – 205.399
§ 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.	
§ 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 or processed by an exempt operation.	
§ 205.311 USDA Seal.	
§§ 205.312-205.399 [Reserved]	

205.301 provides the percentage of organic products must contain for specific labeling claims.

## Label Claim

By weight and volume excluded salt and water

**100% Organic-** One hundred percentage organic product

**Organic-** 95% and above

**Made with Organic-** 70% and Above



# 01 Understanding USDA Organic labeling regulations?

Using your formula and the ingredients' organic categories from the organic certificate your Organic Product Profile (provided by PJRFSI) will calculate the finished product's organic category

- ❖ 100% Organic
- ❖ Organic (95%-and above)
- ❖ Made with Organic (70% and above)

		INGREDIENTS
<b>100% ORGANIC</b> All ingredients and processing aids must be certified organic. These foods may use the USDA organic seal as well as 100% organic claim.		<b>100%</b>
<b>ORGANIC</b> All agricultural ingredients must be certified organic, but product can contain up to 5% non-organic content. These foods may use the USDA organic seal.		<b>AT LEAST 95%</b>
<b>MADE WITH ORGANIC INGREDIENTS</b> Contains at least 70% certified organic ingredients; remaining 30% not required to be certified organic, but may not be produced using excluded methods. These foods may not use the USDA organic seal.		<b>AT LEAST 70%</b>
<b>SPECIFIC ORGANIC INGREDIENTS</b> Contains less than 70% certified organic ingredients. May list certified organic ingredients as organic in the ingredient list. These foods may not use the USDA organic seal.		<b>LESS THAN 70%</b>



# 01 Understanding USDA Organic labeling regulations?

205.303- “100% organic” and “organic” label **must** and **may** statements

205.304- “Made With Organic” (MWO) **must**, **may**, and **may not** statements

205.305 - Multi-ingredient packaged products with less than 70 % organically produced ingredients- **may** and **must not** statements

			INGREDIENTS
<b>100% ORGANIC</b>	All ingredients and processing aids must be certified organic. These foods may use the USDA organic seal as well as 100% organic claim.		<b>100%</b>
<b>ORGANIC</b>	All agricultural ingredients must be certified organic, but product can contain up to 5% non-organic content. These foods may use the USDA organic seal.		<b>AT LEAST 95%</b>
<b>MADE WITH ORGANIC INGREDIENTS</b>	Contains at least 70% certified organic ingredients; remaining 30% not required to be certified organic, but may not be produced using excluded methods. These foods may not use the USDA organic seal.		<b>AT LEAST 70%</b>
<b>SPECIFIC ORGANIC INGREDIENTS</b>	Contains less than 70% certified organic ingredients. May list certified organic ingredients as organic in the ingredient list. These foods may not use the USDA organic seal.		<b>LESS THAN 70%</b>

# 01 Understanding USDA Organic labeling regulations?

205.307- Labeling of nonretail containers-  
**must** and **may**

Examples included in processing mixing tanks and bulk finished product packaging

205.308 and 309- Agricultural in other packaging form at point of retail/ retail display with label claims (100%, organic, MWO)

			INGREDIENTS
<b>100% ORGANIC</b>	All ingredients and processing aids must be certified organic. These foods may use the USDA organic seal as well as 100% organic claim.		<b>100%</b>
<b>ORGANIC</b>	All agricultural ingredients must be certified organic, but product can contain up to 5% non-organic content. These foods may use the USDA organic seal.		<b>AT LEAST 95%</b>
<b>MADE WITH ORGANIC INGREDIENTS</b>	Contains at least 70% certified organic ingredients; remaining 30% not required to be certified organic, but may not be produced using excluded methods. These foods may not use the USDA organic seal.		<b>AT LEAST 70%</b>
<b>SPECIFIC ORGANIC INGREDIENTS</b>	Contains less than 70% certified organic ingredients. May list certified organic ingredients as organic in the ingredient list. These foods may not use the USDA organic seal.		<b>LESS THAN 70%</b>

# 01 Understanding USDA Organic labeling regulations?

205.311 USDA Seal- requirements

Can find downloads and pantone colors :

<https://www.ams.usda.gov/rules-regulations/organic/organic-seal>



01

# Understanding USDA Organic labeling regulations? **205.303 Organic**

## **Must:**

- Underneath the final handler/distribution centers information state “Organic by PJRFSI” or Certified Organic by Perry Johnson Registrars Food Safety, Inc.”
- Specify organic ingredients in the ingredient statements
- Contain 95% organic ingredients excluding salt and water
- Contain less than 5% non-organic ingredients and process aids. See 205.605 and 205.606 of the regulations.

## **May:**

- Use USDA Organic Seal
- State the claim Organic
- Use the PJRFSI Logo
- Include the percentage or organic on the principal display panel





01

# Understanding USDA Organic labeling regulations? **205.303 100% Organic**

## **Must:**

- Contain 100% organic ingredients and organic processing aids
- Underneath the final handler/distribution centers information state “Certified Organic by PJRFSI” or Certified Organic by Perry Johnson Registrars Food Safety, Inc.”

## **May:**

- State the claim, 100% organic on the principal display panel
- Use USDA Organic Seal
- Use PJRFSI Organic Logo



01

# Understanding USDA Organic labeling regulations? 205.304 MWO

## Must:

- Contain 70% organic ingredients excluding water and salt
- Contain no more than 30% allowed non-organic ingredients. Refer to 205.605
- Specify organic ingredients in the ingredient statements
- Underneath the final handler/distribution centers information state “Certified Organic by PJRFSI” or Certified Organic by Perry Johnson Registrars Food Safety, Inc.”

## May:

- State “Made with Organic” claiming up to three individual organic ingredients or food groups
- State the “Made with (percentage of organic ingredients)”
- Use PJRFSI Organic Logo a “ Made with Claim (Induvial with Organic Ingredients or food groups)



01

# Understanding USDA Organic labeling regulations? 205.304 MWO

## Must Not:

- Use the USDA Organic Seal
- Use the term organic in the brand name on the principal display panel
- Use organic or 100% organic claims
- Use ingredients that are produced with GMO's, irradiated, or sewage sludge
- Use a "made with" claim that is more than half the size of the largest font on the panel
- Use a "made with" claim where parts of the statement are emphasized in different sizes, styles, or colors



01

# Understanding USDA Organic labeling regulations? 205.307 Nonretail

## Must:

- Include the lot number if using a shipping container or storage
- Identify the product as organic, 100% organic, or "Made with Organic" as rules stated above. If nonretail container holds retail labeled product and retail organic identification is visible, the nonretail container is not required to identify product as organic.

## May:

- Use the USDA Organic Seal for organic and 100% organic products if applicable to the label rules stated above
- Use PJRFSI Organic Logo for organic and 100% organic products located if applicable to the label rules
- Use “Certified Organic by PJRFSI” or Certified Organic by Perry Johnson Registrars Food Safety, Inc.” anywhere on the label – if applicable to the label rules stated above



02

# Private label Scenarios

A Private Label Agreement must be in place between the companies for Contract Manufactures and Brand/Label Owners.

In an organic private label agreement, the companies agree upon who is purchasing ingredients, labels, what labels are to be produced, and that the products are producing to the organic regulations, and possible trade secrets.

## Examples:

Brand Owner purchases ingredients for the co- manufacture. The brand owner is also required to be certified.

Brand Owner purchases non-retail ingredients for the co- manufacture and does not handle. The brand owner is not required to be certified.

03

# Guidance for avoiding mislabeling

- Review PJRFSI Organic Guidance Document before designing labels
- Review the Organic Regulations before designing labels
- Review your organic certificate product list for Organic Category/ Claim before designing labels
- Calculate your organic percentage during R&D development
- Am I allowed to use the USDA Seal ??
- Check does the label have a “Certified Organic By” statement? Is this below the address?
- Are my ingredient labeled as organic?

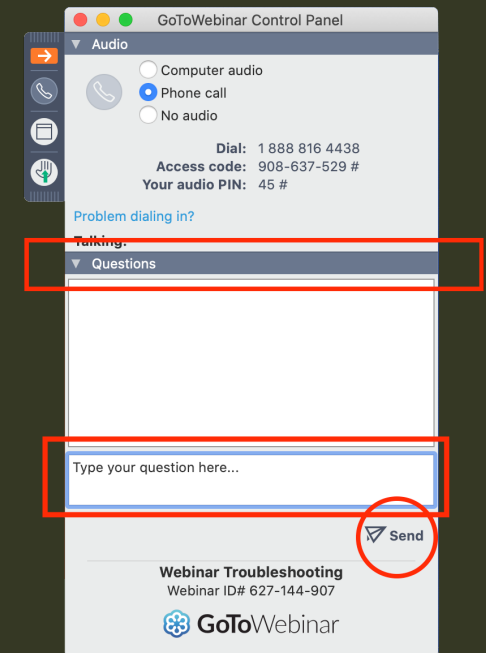
# THANK YOU FOR WATCHING!

---



**CONTACT US**  
(248) 519-2523  
pjrf si@pjrf si.com

## Q&A





Rachel Winter hails from Mansfield, Ohio, and graduated in 2016 with a Food Science & Technology Degree from The Ohio State University. She started her career in Product Development before transitioning to a Quality Manager role, where she first was introduced to Organic programs. Rachel is married with two dogs and two cats, and enjoys hiking, baking, and traveling.

# OUR PRESENTER

Rachel Winter – PJRFSI Organic Program Manager

[rwinter@pjrfsi.com](mailto:rwinter@pjrfsi.com)