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## **Reminder: June 9, 2007 is Approaching!!!**

There is less than a month to go before the June 9<sup>th</sup>, 2007 deadline. Have you asked yourself the following questions?

### **June 9<sup>th</sup>, 2007 FAQ's**

Q: What is the June 9<sup>th</sup> deadline?

A: When minor agricultural ingredients and agricultural processing aids in products making an "Organic" claim must either be sourced in organic form or must be listed on 205.606 and proven to be commercially unavailable in organic form.

Q: What products will be affected?

A: Any products making an "Organic" claim that contain non-organic agricultural ingredients or are processed with processing aids that are/contain non-organic agricultural materials (eg, pan release agents, equipment lubricants, defoamers). All non-organic agricultural ingredients/processing aids used to produce a product making an "organic" claim must be listed on 205.606 of the NOP's National List and proven to be commercially unavailable in organic form.

Q: What if my processing aids cannot become certified organic because they contain a large amount of approved non-agricultural materials in addition to the small amount of organic agricultural ingredients?

A: For some processing aids that contain an organic agricultural ingredient, you need only obtain proof of current organic certification for that ingredient; the product as a whole does not need to be certified.

Q: When do I need to start producing product that meets these new requirements?

A: Your first product run after midnight on June 8<sup>th</sup>, 2007

Q: What do I do with organic product produced up until midnight of June 8<sup>th</sup>, 2007?

A: So long as organic product is produced, packaged and labelled prior to June 9, 2007, it may enter the stream of commerce and be sold as NOP Organic.

Q: What do I do with product labels after June 9, 2007?

A: **For products that will continue to make an "Organic" claim:** If you have changed the formulation of your product to comply with the new requirements for agricultural ingredients/processing aids, QAI will allow a specified timeframe for you to use up old labels. For example, if you have replaced a non-organic ingredient with an organic ingredient, but the label still lists the non-organic ingredient, we will evaluate the number of labels that you have left in stock to use up and will allow you to exhaust these in a timely manner (e.g., 6 months).

A: **For products that will have to make a "Made with Organic" claim:** If you are unable to change your formulation and choose to drop your product down to the "made



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with organic" category, your labels will need to be changed to reflect the new claim and to comply with the "made with" labelling requirements by June 9, 2007.

Q: When will I know which agricultural items will be included on 205.606?

A: The proposed Rule for amending 205.606 is expected to be published on Tuesday, May 15, 2007. However, you can visit the NOP Website link today. Refer to pages 48–50 for the complete list.

<http://www.ams.usda.gov/NOP/ProposedRuleNoticeTodaysNews051107.pdf>

At this time, the next scheduled review of materials to be included on 205.606 is the NOSB meeting in October 2007.