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Attention:
Handlers and Livestock Operators Using Non-Certified Multi-ingredient Products as
Ingredients or Processing Aids in Organic and Made With Organic Products or in
Livestock Feed

This notification affects any client currently using a **non-certified** multi-ingredient ingredient or processing aid in a final certified “organic” or “made with organic” product that:

- a) Contains an agricultural ingredient that is represented as “organic” on the certified client’s finished product labels/ingredient panel (*Example: a certified client uses a non-certified fruit preparation that contains organic sugar; the sugar is represented as “organic” on the ingredient panel of the finished product that is produced by the certified client*), or
- b) Is allowed for use in a product making an “organic” claim because it contains organic agricultural ingredients, even if those agricultural ingredients may or may not be represented as “organic” on the certified finished product label/specification sheet (*Example #1: an organic product is produced using a multi-ingredient processing aid that contains organic oil, but the processing aid is not certified/verified in its own right. Example #2: a vitamin premix contains an organic agricultural carrier but the vitamin premix is not certified/verified in its own right.*)

Please be advised that any multi-ingredient product, which contains organic agricultural ingredients, that are intended to be used as an ingredient or processing aid in a final certified product processed by a certified operation, must be certified and/or “verified” by an accredited certifier, including defoamers, feed vitamin premixes, antioxidant blends, fruit coatings, dough conditioners, etc.

Most of the defoamers, dough conditioners, vitamin premixes in livestock feed, antioxidant blends, and other agricultural multi-ingredient ingredients used in or on “Organic” and “Made with Organic” products, such as fruit preparations, contain less than 70% organic ingredients and therefore, do not meet requirements to be certified under the NOP:

NOP 205.305(b)

“Agricultural products with less than 70 percent organically produced ingredients must not display: (1) The USDA seal; and (2) Any certifying agent seal, logo, or other identifying mark which represents organic certification of a product or product ingredients.”

NOP 205.310 (b)

“An agricultural product organically produced or handled on an exempt or excluded operation may be identified as an organic product or organic ingredient in a multi-ingredient product produced by the exempt or excluded operation. Such product or ingredient must not be identified or represented as “organic” in a product processed by others.”

The good news is that most certifiers have “verification” programs that allow for organic certification of facilities producing these multi-ingredient “Less than 70% organic ingredient” products, with formal verification granted for the organic status of the organic ingredients. When organic certification/verification has been granted for the multi-ingredient product, those organic agricultural ingredients may be used and identified as “organic” on the certified finished product label/ingredient declarations.

Please note, when the manufacturer of the non-certified multi-ingredient product is sourcing organic agricultural ingredients, those ingredients lose their organic status once that non-certified facility takes possession of and processes them. Therefore it is not sufficient verification for your non-certified supplier to provide you with an organic certificate for the agricultural ingredient they used.

In summary, when a multi-ingredient product, which is used in or on a certified "Organic" or "Made with Organic" product contains organic ingredients, and where those organic ingredients are either:

- 1) identified as organic on the product labels of the final certified "organic" or "made with organic" product; or
- 2) are approved for use either as an ingredient or processing aid for the certified "organic" or "made with organic" product because the ingredients are certified organic (eg, organic oil in non-certified defoamer, antioxidant blend, or carriers in a vitamin premix)

then the multi-ingredient product must be either certified or "verified" by an accredited certifier.

QAI is allowing clients who are using such multi-ingredient products that contain organic ingredients a six-month time line to obtain multi-ingredient products that are certified/verified or to stop using the product.

QAI will be verifying compliance during the annual renewal. Please note that the use of any non-compliant ingredients or processing aids will be cited as a major non-compliance.

Please contact your certification project manager with any questions.