



9191 Towne Centre Drive, Suite 510
San Diego, CA 92122 • USA
858-792-3531 • Fax: 858-792-8665
www.qai-inc.com

QAI has received a number of questions following the broadcast email that was released on May 20, 2008, entitled *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*. To clarify and expand upon the 5/20/08 broadcast, here is a synopsis of the requirements for organic agricultural ingredients in a multi-ingredient ingredient, processing aid, or vitamin premix in livestock feed:

1. Multi-ingredient **ingredients** that do contain an agricultural ingredient that is represented as “Organic” on the certified client’s finished product labels/ingredient panel will still need to be certified by an accredited certifier. Examples are organic oils in antioxidant blends, organic gums in a stabilizer, organic cornstarch in a baking powder, organic sugar in a fruit bases.
2. Multi-ingredient **ingredients** that contain organic agricultural sub-ingredients that are not required to be listed out on the certified client’s finished product labels need to be EITHER certified by an accredited certifier, or approved by a recognized organization such as Organic Materials Review Institute (OMRI) and the Washington State Department of Agriculture (WSDA). Examples include fruit waxes containing organic wax, confectionary coatings containing organic alcohol.
3. Multi-ingredient **processing aids** that contain an agricultural ingredient that is “Organic” need to be EITHER certified by an accredited certifier, or approved by a recognized organization such as Organic Materials Review Institute (OMRI) or the Washington State Department of Agriculture (WSDA). Note, this only applies to products making an “Organic” claim¹. Examples include, defoaming materials containing organic oils, pan release agents containing organic oils.
4. Vitamin premixes do not need to be certified but an organic certificate needs to be submitted for any agricultural carriers in vitamin premixes for livestock feed.

Ultimately, it comes down to how the sub-ingredient in the multi-ingredient product is represented on the certified client’s finished product label AND the organic claim that the finished product is making.

¹ Products making a “Made with Organic” claim (eg, 70% - 95% organic ingredients) need not be produced using organic processing aids and products making a “100% Organic” claim may ONLY be produced with **processing aids** that are certified “Organic” or certified “100% Organic”.