



Client Broadcast FAX

Attention Organic Handlers

The NOSB has recently provided clarification regarding the calculation of organic products that contain processed ingredients. If your organic product is produced with ingredients that contain added water, the calculation must be based on the dry weight of that ingredient *unless there is a FDA standard of identity for that ingredient*. The following examples are presented to simplify this issue:

If your company is producing an organic beverage that includes organic brewed tea which is composed of 10% dry tea leaves and 90% water, your percentage calculation under 7 CFR Part 205.302(a)(1) must be made based on the dry weight of the tea added since there is no FDA standard of identity for brewed tea.

Correct Calculation		Incorrect Calculation	
Organic Dry Tea	47%	Organic Brewed Tea	90%
Organic Lemon Juice	37%	Organic Lemon Juice	7%
Citric Acid	16%	Citric Acid	3%
Total Percentage Organic	84%	Total Percentage Organic	97%

However, if your company is making an organic convenience meal that includes organic tomato juice, your calculation under 7 CFR Part 205.302(a)(3) may be based on the total weight of all organic ingredients including the tomato juice. Since tomato juice has a standard of identity with the FDA (21 CFR Part 156.145), the weight may be based on liquid form.

QAI will be reviewing your percentage calculations as part of your next annual monitoring. This new clarification will be considered during that evaluation.