

## CLIENT BROADCAST FAX



QAI is proud to announce its transition into alignment and compliance with the National Organic Program (NOP). Effective today, QAI is adopting the NOP/7 CFR Part 205 as it's official Standard for U.S. certification. Although the recently promulgated Final Rule will not be in full enforcement until October 21<sup>st</sup>, 2002, we feel it is important to immediately begin addressing those areas where our clients appear to be noncompliant with the NOP. QAI is taking this direction in order to provide our clients with a smooth transition into compliance prior to October 21<sup>st</sup> 2002.

The most noticeable change you will see, will be the "Notification of Noncompliance" letters that will be sent along with your renewal certificates. These letters will identify those areas where it appears as if your operation is noncompliant with the NOP. The goal of the notification is to allow your operation ample time for preparation and, ultimately, compliance with the NOP. A copy of the Rule can be downloaded from [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop) for reference.

QAI clients will be notified of the following major areas of NOP noncompliance (The NOP section(s) will be listed at the end of the specific noncompliance per QAI's required adherence with the Final Rule):

- ***Notification to those clients whose operation fall outside of the jurisdiction of the rule. Their products will not be allowed to make "certified organic" claims.***
- ***The requirement that 100% organic claim must be 100% organic and will be enforced [205.301(a), 205.302(a), and 205.303].***
- ***"Made with organic..." claims must now contain a minimum of 70% organic content [205.301 (c) and 205.305].***
- ***Seed and seedlings used in organic farming must comply with NOP sourcing requirements [205.204].***
- ***Feed claims are limited to "100% organic" or "organic" [205.237].***
- ***Wines may use sulfites with the claim "made with organic grapes" as long as the sulfite concentration does not exceed 100 PPM [205.605(b) 34].***
- ***Livestock operations must have adequate access to natural light and outdoors for animals at the appropriate stage of life [205.309].***
- ***ALL materials (including processing aids, boiler chemicals, defoaming agents, etc.) used in processing and production must be published on the National List in order to be used on or in a product making an organic claim. The NOP allows no exceptions. [205.600, 205.601, 205.602, 205.603, 205.604, 205.605, and 205.606].***

If you have any questions, please contact QAI at (858) 792-3531 and ask for your client representative.