



Good Organic Retail Practices

Guide

Best Practices for Handling, Storing, and
Selling Organic Products in the United States

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Welcome

Welcome to the new and revised Good Organic Retail Practices (GORP). Organic regulations are unique in that it was the organic industry that recognized the need for federal oversight in order to create a level playing field for producers and handlers of organic products. Made up of farmers, food manufacturers, as well as all segments of the food system including retailers, these early adopters of organic recognized that a common standard for growing and labeling organic products was essential to the success of the organic “brand.” The continued success of organic in the marketplace hinges on all of us safeguarding the integrity of these products and retaining the trust that consumers have shown in the USDA organic label since congress passed the Organic Foods Production Act in 1990. We hope that this guide helps you to be part of this success story.

The organic products industry has grown to over \$60 billion in annual sales. With over 82% of households in the country buying organic products, it’s clear that organic has become a part of mainstream shoppers' buying habits. Shoppers are the heroes – by investing in organic, they are driving positive change for farmers and the environment. As a retailer, your assortment of organic products should align with your shoppers’ values.

The USDA organic standard prevents over 700+ chemicals from being used in growing and processing organic products, and in turn helps keep these chemicals off our plates, out of our bodies and out of our environment. Organic farming is important to helping reverse climate change by pulling carbon out of the air and returning it to the soil. Speaking of soil, organic agriculture improves soil, water and air quality by using sustainable and regenerative practices. Organic farming also reduces nitrogen pollution from chemical fertilizers, which is another important piece to mitigating climate change as well as protecting our oceans. Organic has one unifying worldwide goal – to develop and promote products safer for people and the planet, made accessible to all!

This manual is an educational resource and introduction to handling, storing and selling organic products in the United States, and is designed to provide insight on how to protect the organic integrity of the products through retail channels. Organic products are certified to strict standards and regulated and enforced by the federal government. By adopting these practices and following basic good organic handling methods your retail operation will protect organic products from prohibited materials, maintaining the segregation between organic and non-organic products, and therefore doing your part **in maintaining consumer confidence and organic integrity.**

1 USDA Organic Standards for Retailers

Who must be certified?

Organic is one of the most heavily regulated and closely monitored food systems in the United States. The U.S. Department of Agriculture's (USDA) National Organic Program (NOP) is responsible for setting and enforcing strict regulations for organic agricultural products that are either produced in the U.S. or imported for sale in this country and they oversee the accreditation of 3rd party organic certifiers who do the actual work of monitoring compliance and inspections.

Generally speaking, any agricultural product labeled with an organic claim must be certified to the USDA organic standards. Further, everyone in the organic supply chain handling an organic product, from farm to retailer, must be certified. A few exceptions have been made for organic farms and businesses with less than \$5,000 gross annual organic sales, handling operations that only identify organic ingredients on the information panel **and some retail establishments (retailers)**. Under the organic regulations, retailer establishments include include restaurants, delicatessens, bakeries, grocery stores, or any retail business with a restaurant, delicatessen, bakery, salad bar, bulk food self-service station, or other eat-in, carry-out, mail-order, or delivery service of raw or processed agricultural products.

As a retail establishment, you may not need to be certified. However, there are a few important situations to be aware of that would require USDA organic certification.

In 2023, the NOP announced the Strengthening Organic Enforcement (SOE) rule which added new certification requirements for the organic supply change. Some of these changes have direct implications for retail establishments .

You must get certified if you:

1. Represent your store or retail outlet as "certified" organic.
2. Display or use the USDA organic seal in such a way that would lead a shopper to believe you are a certified organic retailer.
3. You do not have a physical location where you are selling to the end user/consumer. You may have online sales, but you must have a physical location.
4. Wish to label, sell or represent the products you **process* or repackage** as "**certified**" organic or display the USDA organic seal on processed or repackaged items, even if the products were previously certified organic.
5. You are selling organic product to another processor or retail establishment who then sells the product (processed or not) to the end user.
6. If you have a distribution center (DC) owned by the retail establishment that handles bulk, non-tamper-evident packaged goods, processes organic product (including, but not limited to, packing online orders using bulk, non-tamper-evident organic goods), and/or has ripening rooms, then the DC needs to be certified.

Although not all retail establishments are *required* to become certified, they may *voluntarily* seek certification. See Section 5 to learn more about the benefits of getting certified.

What are the requirements all retailers must follow?

Retail operations function not only as handlers of organic products, but also as purchasers, verifiers, and marketers. Unlike most businesses in the organic supply chain, retail operations may not be required to undergo the rigorous process of organic certification. However, independent of certifications, retailers are required to maintain the integrity of organic products from receiving until final sale and ensure accurate and truthful labeling of these products at all times. In addition to the handling requirements, most uncertified retailers will also need to maintain records for three years on organic sales and be able to complete a mass balance to verify the quantities of organic product match the amount sold.

The requirements for retailers, as explained in the organic regulations can be distilled down to the following.



As a retail establishment:

1. You must prevent commingling with non-organic products and contact with prohibited substances.
2. You may sell certified organic products with the USDA organic seal, as long as you do not process or repackage them.
3. You may process certified organic products on-site, provided you DO NOT use the USDA organic seal or refer to the processed products as “certified” organic. You may however label the products as “organic” or “made with organic (specified ingredients).”
4. In all cases, you must meet the USDA organic product composition and labeling requirements (see Section 2).
5. If you process any organic product, in any department of the retail establishment, then you are also subject to maintaining three years of records and be able to complete a mass balance verifying the amount of organic product received coincides with the amount sold.

The organic standards state the requirements all retail operations must follow, but they are not prescriptive, and therefore do not provide any further detail, explanation or guidance on how to meet each requirement. The National Organic Program recognizes that each retail operation is unique and must develop its own plan and practice to meet the outcome-based goals of the organic program. This guide will not only help you protect organic integrity and maintain consumer confidence, but fulfill those requirements using a “best practices” approach.

Finally, the organic regulations inevitably evolve over time. Most recently, the SOE rule requires additional certification and provides clarity on activities that require certification and oversight. In the future, we will continue to announce any updates needed to what we as retailers are expected and required to do.

2 Best Organic Retailing Practices

The fundamentals of handling organic products are essential knowledge for management and staff responsible for developing in-store organic handling plans and practices. All employees should develop critical thinking skills necessary to ensure that the integrity of organic product is maintained. It is the retailer's responsibility to ensure that the organic integrity of products in your operations are not jeopardized. Preventing **contamination and commingling** and ensuring **accurate labeling** are the key actions that assure **organic integrity**.

***What is Commingling?** Commingling refers to a situation where visually indistinguishable organic and non-organic foods or products could be mixed up resulting in the possibility of a non-organic item being sold as an organic item. Commingling can also occur inadvertently by customers or employees when organic and non-organic produce are displayed together. Sometimes product testing is the only way commingling can be traced.*

***What is Contamination?** Contamination occurs when an organic product is exposed to prohibited substances, often a sanitation material, cleanser or pesticide.*

Retail establishments must avoid commingling to ensure organic integrity by being aware of Organic Controls Points (OCPs). OCPs are points where effort needs to be made to ensure that contamination or commingling with organic and non-organic products does not occur.

Retail establishments avoid commingling by avoiding storing non-organic and organic products without labels, using the same equipment to process non-organic and organic products without proper cleaning procedures, and by avoiding the display of organic and non-organic products together.

Retail establishments avoid contamination by preventing organic products from being exposed to prohibited substances like cleaners, sanitizers, or pest control products that are prohibited in organic regulations.

Procedures for Assuring Organic Integrity

An Organic System Plan (OSP) is a written document that describes how your retail operation will meet the requirements of the National Organic Program. Developing an Organic System Plan at your operation is highly recommended and a great way to protect organic integrity. Retail staff that handle organic products, should all be educated, trained, and involved in protecting and maintaining organic integrity. Having a plan in place supports the training that must be done to protect organic products and helps you organize your best practices. It can also help you educate customers and thus, sell more organic products.

Filing the plan in a ring binder is an easy way to document departmental information that can be copied and used by individual

departments. Keep the Organic System Plan up-to-date with examples of protocols and record keeping forms used to document organic product handling in your operation. This Good Organic Retail Practices document can form the foundation of your Organic System Plan.

1. *Identify how products move through each department, and define where areas of potential contamination and commingling exist.* Walk through the department, visually looking for potential contamination and commingling risks. Organic Control Points are any points or procedures in an organic packaging or handling system where there is a high probability that improper control may cause or contribute to the loss of organic integrity. These are listed in each department section below and may be posted in department work areas as a reminder to staff. Store employees must be aware of the potential places in their departments where commingling and contamination could occur in order to be vigilant in preventing problems.

2. *Establish methods and procedures that prevent commingling or contamination.* Organic standards accept zero tolerance for commingling with non-organic products or contamination by prohibited substances.

3. *Post written protocols that prevent contamination and commingling.* These should be posted for all staff to read so all affected employees can easily review them.

4. *Take appropriate action.* If organic products are commingled or come in contact with prohibited substances, those products may no longer be labeled as organic. Employees must be trained and empowered to notice when commingling

or contamination occurs and to then segregate and relabel that product.

5. *Maintain records.* Retail establishments are expected to maintain records demonstrating the purchasing and receiving of organic foods in their systems, and in addition, keeping records of sales of those products so that they can be verified against quantities received. Usually this can be accomplished through storing invoices that list organic products as line items, as well as movement reports from POS systems. Many establishments will need to have accessible three years of data for use upon request.

Implement an effective record keeping system to document activities. Good record keeping will allow for transparency if organic claims are ever questioned as well as give the retailer the tools to self-monitor their systems. Sanitation logs help employees in prep areas use clean equipment and have clean surfaces before getting organic products out of the cooler or other storage areas and should be retained as part of organic handling records.

6. *Monitor the systems.* Management should check that employees are following these protocols. The checklists in each department section were developed as the basis for this monitoring.



How to Protect Organic Integrity at Organic Control Points

Here's an example of protecting organic integrity in the organic produce section:

Organic Control Point #1: The produce department displays organic apples and non-organic apples side by side. The customer can easily pick up a non-organic apple and put it back down in the organic apple display. This presents a commingling problem which is prohibited. Because both types of apples are in direct contact with each other, there is a second area of non-compliance, i.e., the potential for surface residue of prohibited materials from the non-organic apples contacting organic apples.



Step 1: Assemble the organic control point team: Produce manager and employees.

Step 2: Identify organic control point: Organic and non-organic apples touching each other in a display shelf.

Step 3: Critical limit for organic control point is zero. No commingling or contact is allowed.

Step 4: Establish protective action: Develop protocols that ensure organic and non-organic produce do not touch. Incorporate protocols into employee

training. Post protocols in the produce department and keep a copy in the Organic System Plan binder.

Step 5: Establish corrective action: Separate apples and re-display properly. Never set organic produce below non-organic, especially where water and misters are in use. If organic apples cannot be clearly identified by the employee when separating the display, any suspect apples should be displayed with the non-organic apples and sold as non-organic.

Step 6: Implement records to document organic control points: Use a written checklist to verify periodic visual walk through of produce department to ensure that organic apples are displayed properly. A document may be needed to record problems and solutions.

Step 7: Monitor effectiveness: A monthly visual inspection of the department for each organic control point is conducted by the manager. The Produce Department organic control point Checklist may be used to verify this inspection.

Protocol options depend on how the retail store wants to handle the problem. The protective action, in part, depends on the amount of organic produce handling versus the amount of conventional produce, spatial needs in the produce department, type of display shelving, and the type of organic and conventional produce sold.

Here's an example of protocols in the produce department to maintain organic integrity using organic control points:

1.a. The retail store has completely different

display areas for organic and non-organic produce. Organic produce is always displayed in Sections A and B. Non-organic produce is always displayed in Sections C and D. Consider creating signage that clearly distinguishes organic from non-organic, such as a color-coding system that is consistently used throughout the store.

1.b. The retail store does not have totally separate display areas for organic and non-organic. Similar commodities, such as tree fruits or citrus, are stored in proximity but not side by side on the same display shelf. Always display organic produce in completely separate areas on the display shelf. Because apples are loose items, organic apples and non-organic apples should not be displayed in the same area of the display shelf.

2. Retailers need to incorporate this information into the store's existing employee training program.

Here are some key examples of organic control points where contamination can occur:

- Receiving
- Cleaning and Sanitizing
- Pest control
- Storage
- Packaging
- Labeling

Clearly written and posted protocols will help ensure all prevention measures are maintained.

Receiving

Retail establishments purchase from a variety of sources such as local farmers or distributors. Organic farmers and handlers

with more than \$5000 gross annual organic sales must be USDA certified organic. It's recommended to have non-certified farmers and handlers who sell less than \$5,000 sign an in-store statement that their organic products comply with the USDA organic regulations. When purchasing through a distributor, it is the distributor's responsibility to hold documentation and certification on the products they sell. As a retail establishment, you must ensure that the organic products sold in your store are produced and handled in accordance with the USDA organic standards, even if you are an exempt operation from formal certification. The methods below can help to maintain organic integrity.

Inspect all Incoming Product:

- Verify items ordered match the packing list / bill of sale and that the items on the pallet match the bill of lading or invoice.
- Inspect incoming packaging, to verify the organic certification status of incoming product.
- Organic products should be labeled with the name of the product, manufacturer or grower, weight or volume, and ingredients. Organic products should clearly identify that the product is organic as well as list the certifying body. This is especially important if the product will be repackaged or sold in bulk.
- Ensure clear procedures are in place to receive organic products and transfer them to designated organic storage areas that are clearly marked and labeled.
- Clear procedures should be in place to quarantine products while organic integrity questions are being answered.
- If there is a question about the source and certification of a product, the supplier should be notified, and the organic status of the product verified before it is displayed and sold as organic.

- Empower employees to return products due to contamination concerns, to request credits from the supplier, or to sell questionable items as non-organic.

What do I do if I suspect fraud?

As retailers you are in a unique position to see and detect fraud or misrepresentation of organic products. Are those nuts just too inexpensive to be true or is the labeling of an organic product obviously faulty? The first place to check out the legitimacy of a product is to look on the [USDA Organic Integrity Database](#). Here you can reference any company or farm and quickly check their certification status and the kinds of products under their certification, as well as who does their certification. If your supplier isn't listed in the database, the best practice is to follow up with them to confirm their certification status.

Anyone who suspects fraud can and should report it, as it is important to safeguard the integrity of organic products in the marketplace. The National Organic Program welcomes complaints and is committed to following up on them to ensure the integrity of the organic system. If fraud is suspected, reports can be made [here](#).

When you report fraud, provide as much information as possible to help ensure a thorough investigation. The Organic Trade Association has developed a helpful [template](#) that provides guidance on what to do if you suspect or detect fraud. It will also help you collect and organize the necessary information to be shared in order to submit an actionable complaint. You can access the template at <https://ota.com/advocacy/>

[how-file-complaint](#).

To learn more about what you can do help mitigate and prevent the occurrence of organic fraud, check out the Organic Trade Association's [Organic Fraud Prevention Solutions](#) at: <https://ota.com/OrganicFraudPrevention>

Cleaning and Sanitizing

Retail establishments must assure that organic products do not come into contact with prohibited substances, such as prohibited pest control products or most cleaning and sanitizing chemicals. Before handling or preparing organic foods, employees should ensure that a cleaner or sanitizer has been evaluated for appropriate use with your organic handling and preparation needs.

All cleaners and sanitizers are allowed to be used on food contact surfaces to ensure food safety requirements. The organic requirement is simply to prevent contact with organic products. **All materials used for disinfecting and sanitizing should be thoroughly rinsed before organic products come into contact with those surfaces.** Avoid the use of **cleaning agents and sanitizers that have strong residual characteristics and are difficult to rinse off.** Quaternary ammonia products fit into this category and should not be used. Talk to your distributor as most carry environmentally safe and effective cleansers and sanitizers made specifically for use in food preparation areas.

In general, most cleaners and sanitizers require an intervening step, such as a thorough rinse step, to ensure the substance never comes into contact with the organic food/product. Because of the need to

ensure a safe food system, the USDA organic regulations allow the use of some sanitizers for direct food contact. The [National List of Allowed Materials](#) in the organic regulations explicitly lists these allowed cleaners and sanitizers by their generic names:

- Citric Acid
- Chlorine Materials (see notes below*)
- L-Malic acid
- Hydrogen peroxide
- Ozone
- Peracetic acid/ peroxyacetic acid - for use in wash and/or rinse water according to FDA limitations. For use as a sanitizer on food contact surfaces.
- Phosphoric acid- —cleaning of food-contact surfaces and equipment only.

*Chlorine: For organic systems, chlorine is allowed for disinfecting and sanitizing food contact surfaces, equipment and facilities and may be used up to maximum labeled rates. Chlorine materials in water used in direct crop or food contact are permitted at levels approved by the FDA or EPA for such purpose, provided the use is followed by a rinse with potable water at or below the maximum residual disinfectant limit for the chlorine material under the Safe Drinking Water Act. Chlorine in water used as an ingredient in organic food handling must not exceed the maximum residual disinfectant limit for the chlorine material under the Safe Drinking Water Act.

Specific brand names of approved sanitizers can be found on a list maintained by the [Organic Materials Review Institute \(OMRI\)](#), although other products also may comply with the USDA Organic Regulations.

Cleaning Documentation

A cleaning schedule should be in place to document that cleaning is taking place with clear, written protocols available to all employees detailing the products they are supposed to use and in which areas of the department. Here's what we recommend including:

- List of current cleaning tasks
- List all cleaning equipment and areas cleaned, as well as how often they are cleaned
- List should reflect the cleaning products you choose to use, and the measures taken to protect organic products from contamination.

Post the above protocol in a prominent spot in the preparation areas where all employees can view.

A clearly written and posted protocol describing the cleaning and rinsing activities that should be performed before any organic products can come in contact with the food contact surface is extremely important. A checklist with date and employee initials can verify the action.



Do not store cleaning and sanitizing products where they pose a risk to organic products, like storing open bottles of cleansers above the counters where you repackage organic products.

Pest Control

Retail establishments will always have to contend with pests in their environment, however a well-designed preventative pest management plan geared to the types of insects and/or rodent problems that exist can eliminate the use of toxic chemicals. Managers and employees should be aware of potential problems as well as measures being taken to prevent problems. Pest management and sanitation program components should be included in the employee training program. Developing the retail store's pest management plan includes the following:

1. Identification of pest problems and locations of problems.
2. Development of methods and strategies to prevent, minimize or eliminate pest problems
3. Monitor for signs of insect or rodent problems.
4. Use approved pest control treatments, as needed.
5. Document use of pest control treatments.

Once these issues have been identified, opportunities to target those pests and situations can be tailored to specific locations.

Removal of Pest Habitat and Food Sources

Pest management and sanitation go hand in hand. Good sanitation practices can prevent insect and rodent problems, reducing the need for toxic pest control

products that can contaminate not only organic products but non-organic products as well. Eliminating habitat and preventing pests from entering into the retail store are important when developing a pest management plan.

The following list provides examples of good sanitation, the least expensive method of pest control for any retailer:

- Implement and maintain a daily cleaning and sanitization schedule.
- Clean up spills when they occur.
- Inspect incoming product for signs of insect infestation or rodent problems. Remove any problem products immediately.
- Have effective equipment, such as vacuums, readily available for use.
- Locate the dumpster far away from the exterior door.
- Keep areas around the outside of the building free from pest habitat such as junk and other debris.
- Repair torn screens in windows or doors.
- Periodically check that employees are performing these practices.

Prevention of access and environmental management

The store building should be periodically inspected for cracks, holes, loose fitting doors and other areas where insects and pests may be able to enter the store.

Environmental management encompasses the following types of activities and devices:

- Sound and light devices as repellents
- Freezing, heating and vacuum treatments

- Mechanical and physical methods (traps), lures and repellents.

There are a variety of methods available for pest control including:

- Mechanical traps (wind-up and snap)
- Adhesive traps (glue boards, sticky ribbons and glue strips)
- Electrical traps (bug zappers or fluorescent light traps at exterior doorways) work well near exterior doorways to control flying insects (these also provide an indicator of activity for monitoring a developing problem)
- Pheromone traps act as both a monitoring tool and a trap to control grain-eating flying insects
- Carbon dioxide fumigants
- Natural insecticides such as boric acid and diatomaceous earth

If a pest control contractor is used, the retail store contract with the company should indicate that some pest control products that are allowed elsewhere are not allowed for use in proximity to organic foods. Any and all treatments should be approved by store personnel before use.

Synthetic crack and crevice sprays, rodent baits and fumigants are prohibited when organic products are present. It is recommended that if any prohibited pest control products must be used where organic products are stored and handled, organic products must be removed from the area during treatment and for a prescribed period after treatment and only reintroduced after a thorough washing of the area has taken place.

Whether pest monitoring is done by employees or a contractor, the retail store should keep a written record of each time monitoring activities are performed or products are used. The outside contractor should provide documentation of all of their visits and activities. Monitoring documents should illustrate if any problems were noted, traps reset, glue boards replaced, etc. A good pest control service will make note of structural improvements that will help prevent pests. If an employee is inspecting traps or insect monitoring devices, the retail store should keep a written log. Traps or monitors may be numbered for ease in record keeping. If numbered, the trap or monitor station should also be numbered to correspond with the log. A map of the retail store should be included in the handling plan that shows the location of each mechanical trap, pheromone trap, electrical bug control unit, or other monitoring/control devices. There is a sample pest control monitor log in the appendix.

Storage (including Distribution Centers)

Products in storage need to be continuously and clearly identified as organic and stored in a manner that prohibits commingling or contamination. The following is recommended:

- Have separate storage areas for organic and non-organic products.
- Label organic and non-organic cold and dry storage areas clearly.
- Do not stack non-organic storage items over organic storage items to prevent moisture or dripping which could contaminate organic foods.
- Any bags of open products must be

closed tightly, taped or twist-tied, and clearly marked. Have these supplies readily available to all employees in the storage areas.

- Organic products must be stored only in areas that have been and are free of any prohibited pesticides or sanitizers.
- If contamination does occur, the product must be sold as non-organic.

Packaging and Labeling

As a retailer, you are expected to ensure your customers know which products or ingredients are organic and which are not. All organic claims on packaging, labeling and signage must be truthful and not misleading to shoppers about the status of whether or not a product is organic. Additionally, you are expected to ensure that no commingling or contamination of organic products has occurred within your operation.

Packaging and Repackaging

Packaging, repackaging (or re-bagging) at a retail establishment is a point where organic integrity could be compromised. It is also an area where special attention to labeling is needed. Tubs, counters, scoops and other items used to transfer or repackage products must be thoroughly cleaned and rinsed between organic and non-organic. Organic products may be cut and packaged on cutting boards and with equipment previously used for non-organic products, as long as all boards, knives and other equipment have been cleaned prior. Some stores may choose to have separate (designated), clearly labeled, counters and scoops to differentiate their conventional and organic products. Another idea is to only repackage

organic products at the beginning of the day.

Only new or recycled from organic product materials can be used when packaging organic products. Unless thoroughly cleaned and rinsed, no packaging that previously held conventional products should be used. All packaging materials must be free of dyes and fumigants. You can ask your supplier to verify that no fumigants are used in your packaging.



Labels, Labeling and use of the USDA Organic Seal

Any prepackaged organic product sold by a retailer in the same package that it was received in may maintain whatever labeling it arrived in. If the product displays the USDA organic seal or makes an organic claim on the front label panel of the product (including "made with organic ingredients...," then it must be certified under the USDA National Organic Program regulations and display on the information panel, under the name of the handler or distributor, the name of the certification agency that certified the product.

If you are handling certified organic product, **but not processing**, you may provide the same information as provided on the original container. For example, if

you are transferring bulk certified organic flour to a bulk bin, the retail display, labeling and display containers may use the USDA organic seal. The same would apply to certified organic apples that are transferred from a case box the apples arrived in, to the organic produce display case.

IMPORTANT! *Keep in mind that packaging and/or repackaging certified organic product into a retail container that is closed, sealed and labeled by the retailer for sale to the consumer as an individual unit, is considered processing. In this situation, and if you are not certified, you must not represent, label or sell the product as “certified” organic or display the USDA organic seal. You may however label the product as “organic.” or “organically grown”*

Other common retail activities (especially for restaurants, bakeries, delicatessens, meat departments, prep areas in general and in-store kitchens) that fall under “processing” include cooking, baking, heating, dehydrating, mixing, cutting, extracting, canning, and jarring.

Remember the following when designing labels or signage for your store:

- If you process organic products, you must not use the USDA organic seal or refer to the product(s) as “certified organic” unless you are a certified retailer.
- If you are uncertain whether your activity is considered “processing,” simply use the term “organic” or the phrase “made with organic.” There is no size restriction, or any limitation, on how you display the “term” organic as long as it is accurate and truthful.

- Articulation of grower practices, farm location, or farmer-retailer relationships is welcome as long as the word “organic” is not used in the description of a non-certified product.

With respect to foods labeled by a retail establishment and sold on-site, the following tables clarify the product composition requirements and allowed label claim. The same rules apply to display labels used near or around the products.



Labeling and relabeling organic products can be divided into four general areas:

1. 100% Organic - If all ingredients, including processing aids, are organic, the product can be labeled as “100% organic” or simply “Organic”.

2. At least 95% Organic - At least 95% of the product, by weight or fluid volume, is comprised of organic ingredients. This type of product may use the term “organic.” Water and salt are excluded from the calculation. The 5% non-organic ingredients in this category are strictly controlled and must appear on the [National Organic Program’s List](#) of allowed substances and no ingredient (organic or non-organic) may be genetically engineered, grown using sewage sludge, or irradiated.

3. 70% or More Organic Ingredients – At least 70% of the product, by weight or fluid volume, is comprised of organic ingredients. This type of product may use the phrase “made with organic (specified ingredients or food groups).” Again, water and salt are excluded from the calculation. The 30% non-organic ingredients in this category are strictly controlled. Non-agricultural ingredients, such as sodium bicarbonate and tocopherols, must appear on the National Organic Program’s List of allowed substances. No ingredient (organic or non-organic) may be genetically engineered, grown using sewage sludge, or irradiated.

4. Less than 70% Organic Ingredients - The term “organic” may not be used anywhere on the packaging (front) display panel; the label may only list the organic ingredients in the ingredient list on the information (back) panel. Water and salt are excluded from the calculation. Other ingredients do not have any restrictions, such as genetically engineered or irradiated.

Labeling Rules for Organic Repackaged or Prepared Foods

Label Parameters	100% Organic Ingredients	At least 95% Organic Ingredients	70-95% Organic Ingredients ¹	Less than 70% Organic Ingredients
Product name designation	"100% Organic" or "Organic"	"Organic"	"Made with Organic (specified ingredients or food groups)" on front label but not with product name	List organic ingredients in ingredient list only
List organic ingredients	Yes	Yes	Yes	Yes
Use of USDA Seal	No	No	No	No
Use of certifier name	No	No	No	No
Use of certifier seal	No	No	No	No
Use term "100% organic"	Yes	No	No	No
Use term "organic" in the product name	Yes	Yes	No	No
Use term "Made with organic ingredients"	Yes	Yes	Yes	No
Non-organic ingredient rules²	No non-organic ingredients	Yes	Yes	No
Must use allowed processing aids	Only organic processing aids	Yes	Yes	No
Must use organic ingredients if commercially available	Yes - no non-organic ingredients	Yes	No	No
Must not use the same non-organic & organic ingredient	Yes	Yes	No	No
Can use sulfites, nitrates, and nitrites	No	No	Yes ³	Yes

¹ When this term is used, the actual organic ingredients or food groups must be named, "Made with Organic Flours." Up to 3 ingredients or food groups can be listed on the principal display panel.

² The non-organic ingredients must not be genetically engineered, produced from sewage sludge, have been irradiated. See USDA organic standard § 205.310 and § 205.301(f)(1) through (7).

³ The exception is only for use in wine labeled "made with organic grapes" provided total sulfites do not exceed 100 ppm..

Record Keeping

Good record keeping for the movement and processing of organic products allows for more transparency into the purchase and sale of organic products, helping retailers to maintain solid internal systems by effectively managing this process. Retail establishments are required to have documentation in place to demonstrate that they are receiving, storing, preparing, packaging, displaying and selling organic foods in a way that is not compromising organic integrity. The goal is for the retailer to demonstrate that the organic products are being managed effectively through their systems. Records provide a complete written picture of the organic handling that has occurred in the past. You are encouraged to document the methods used to prevent commingling of organic and non-organic as well as the methods used to prevent contamination of organic products by prohibited substances. Documents detailing these activities should be maintained along with the purchase and sales information allowing for verification that the amount sold/purchased are in alignment.

Maintaining invoices showing line-item designation of organic products as proof of purchase, as well as records of POS velocities identifying unique UPCs/PLUs for organic products. Purchases vs. sales are important to measure for internal accuracy checks.

Retail establishments are encouraged to maintain the following records:

a. Complete auditable records for three years of all organic products, including date of purchase, source, and quantities. (Invoices clearly identifying organic items.)

b. Documentation of methods used for prevention of contamination and commingling of organic products; including pest control methods and storage and cleaning procedures.

Documentation will be important if the organic status of a product sold by the store is ever questioned. Record keeping for production items that have multi-ingredients should be in place when you repack and relabel multi-ingredient processed foods. This could be as simple as saving recipes, which indicate the organic status of ingredients.

If you are a retail establishment that does not process, you are exempt from the three-year record keeping requirement. However, all handling requirements as described above are still required.

Purchase from exempt non-certified producers. As a retail store you may purchase and sell organic products directly from non-certified producers who have less than \$5,000 annual gross organic sales. However, these products may not be represented as certified organic, nor as ingredients in organic products prepared in the retail store.

3 Best Retailing Practices by Department or Operation

Organic integrity in all areas can be protected by setting up clear written protocols for employees. This section details how to prevent commingling and contamination in each department or area but does not replace overall guidelines; managers are encouraged to read the whole of section 1 and 2.

Bulk Department Best Practices and System Plan

Bulk Cleaning and Sanitizing

- Store cleaning materials away from food products and preparation areas.
 - Always clean and thoroughly rinse all tubs, preparation areas and utensils before using these areas for organic products.
- Use only department approved cleaning materials.
- Complete any written documentation of your cleaning activities when needed.
- Clean up spills when they occur.

Bulk Receiving

- Always verify bulk products ordered matches what is delivered and what is written on the invoice/bill of lading.
- Always look for clear organic labeling and the certifying agent seal or name on incoming bulk containers.
- Place any bulk item in a quarantine area if it does not meet USDA labeling rules. Get any missing information from supplier.

Bulk Storage at the retail establishment level (i.e. store level)

Products from broken or open bags/containers can be accidentally mixed with non-organic products. Proper labeling is key to prevent non-organic products from being used to fill organic bulk bins. If this occurs, employees should understand that they have management's full support to relabel the entire bin and sell it as non-organic.

- Have separate storage areas for organic and non-organic products.
- Label organic and non-organic cold and dry storage areas.
- Do not stack non-organic items over organic storage items to prevent contaminating organic foods.
- All open bags must be closed tightly, taped or twist-tied, and clearly marked. Have these supplies readily available to all employees in the storage areas.
- If contamination does occur, the product must be sold as non-organic.
- Clear signage is paramount to ensure no commingling or contamination. Have "Organic" stickers readily available in the storage area for employees to easily affix on open bags or products if the label may be difficult to see.
- All organic back stock should be clearly marked organic, especially when the same non-organic product is being offered.
- Any issues should be brought to the buyer's attention.
- Place bulk bags and boxes on storage

shelves in a way that the organic label is easy to see.

- Tubs, counters, scoops and other items used to repackage bulk foods must be thoroughly cleaned and rinsed between organic and non-organic products.

Labeling Bulk Products

Bulk labels and signage must meet the labeling criteria in **Section 2 (Labeling)**.

Bulk Display Guidelines

- Always use clean bins for organic products. Bins must be washed and thoroughly dried.
- Use distinctive labels to differentiate organic and non-organic products. Different color backgrounds make it easy for the consumer to pick out the organic product.
- Scoops for bulk product bins should be designated separately for organic and non-organic.
- If bulk bin design allows product to fall onto other bins, do not stack non-organic product above organic products.
- If contamination does occur, the product must not be sold as organic.

Resources Recommended for Bulk Foods Department

- Sources of “Organic” tapes, twist ties, and stickers
- Sources of organic promotional materials
- Sources of “Organic” signage

Produce Department Best Practices and System Plan

Produce Cleaning and Sanitizing

- Always use clean bins for organic products. Bins must be washed and thoroughly dried.
- Use distinctive labels to differentiate organic and non-organic products. Different color backgrounds make it easy for the consumer to pick out the organic product.
- Scoops for bulk product bins should be designated separately for organic and non-organic.
- If bulk bin design allows product to fall onto other bins, do not stack non-organic product above organic products.
- If contamination does occur, the product must not be sold as organic.

Produce Cleaning and Sanitizing

Receiving organic produce is similar to receiving any other organic products. Follow the guidelines in **Section 2 (Receiving)** for receiving best practices to prevent commingling and contamination when receiving produce items.

- Always verify bulk products ordered match what is delivered and what is written on the invoice/bill of lading
- Always look for clear organic labeling and certifying agent seal or name
- Place any bulk item in quarantine area that does not meet USDA labeling rules. Get missing information from supplier.

Produce Storage at the retail establishment level (i.e. store level)

Non-organic and organic produce can be accidentally mixed. Proper labeling is key to prevent non-organic products from being mislabeled and sold as organic.

- Have separate storage areas for organic and non-organic products.
- Label organic and non-organic cold and dry storage areas.
- Non-organic produce boxes that have been crushed or damaged should be reviewed to make sure they do not pose a contamination risk to organic produce stored nearby.
- Organic product should never be stored below non-organic wet produce. There is a risk that pesticides or fumigants would be washed off the non-organic produce by the melting ice or water, and drip onto the organic product.
- Stacks of wet product must not have non-organic and organic product mixed.
- When storing large volumes of wet product on pallets, separate non-organic and organic produce with clear labeling.
- Always remove fumigant/sulfite slips from conventional produce when these are stored in the same cooler as organic produce.
- When stacking dry product, separation of product by non-organic and organic must be clear.

Produce Preparation

- Tubs, counters, scoops and other items used to repackage or prep bulk produce must be thoroughly cleaned and rinsed between organic and non-organic products.

- Tubs, counters, cutting boards, knives and other items used to prep produce must be thoroughly cleaned and rinsed between organic and non-organic products.
- When prepping product in soaking or crisping water, organic product should not be processed in water used to process non-organic product. The tub or sink must be thoroughly cleaned, rinsed and filled with fresh potable water before washing or cooling organic produce. Non-organic produce may have residues that are washed off into the water and may remain on the sides and bottom of the sink or on the work area unless the area is scrubbed clean.
- Trays, buckets and other equipment used in displaying non-organic product should be washed before being used to display organic product.
- Packaging materials used to pre-pack non-organic product must not be recycled to pre-pack organic product.



Labeling Individual Organic Produce

- Whenever possible, the organic produce should be individually stickered, twist-tied, taped, sleeved or packaged clearly with “organic” if similar items are sold that are not organic. By doing this, both the consumer knows what they are buying and the cashier knows what is being sold. This also helps prevent customer commingling of organic and non-organic produce.
- Organic produce stickers may be used and are available from a wide variety of sources.

Labeling in the Produce Department

- Keep display labels current when racking new produce. Verifying that all display labels are correct is important to instill consumer confidence in the organic products they are purchasing.
- Consumer confidence in organic production is enhanced when they are made aware of the organic certification system.
- If the store only sells certified organic produce, a large placard in the department may be used to declare that whenever the consumer sees the word “organic” this signifies the product has been inspected and approved by a recognized independent third-party organic certifying agent.
- “Organic” twist ties, stickers and tape should also be available to help the consumer locate the organic products.
- Wet and dry displays should be as consistent as possible in their presentation, to avoid confusion by customers and employees stocking the shelves. Aiding consumers who are looking for the

organic produce can help the retailer in their marketing of the organic fruits and vegetables.

Packaging Materials

- Only new or materials recycled from organic product can be used when packaging organic produce.
- Unless thoroughly cleaned and rinsed, no packaging that previously held conventional products should be used. Plastic totes may be used if cleaned. Cardboard boxes should never be reused.
- All packaging materials must be food grade, assuring that dyes and fumigants do not pose a risk. You can ask your supplier to verify that no fumigants are used in your packaging.

Packaging Display Guidelines

- Always use clean bins and shelves for organic products. All display areas must be washed and thoroughly dried, especially when non-organic produce has been previously displayed.
- Use distinctive labels to differentiate organic and non-organic products.
- In display areas, organic produce should not touch non-organic produce. Organic produce should not be placed below wet or dripping non-organic produce. Retailers should work to prevent customer commingling of organic and non-organic produce.
- If contamination does occur, the product must be sold as non-organic.

Resources Recommended for Produce Departments

- Sources of “Organic” tapes, twist ties, and stickers
- Sources of organic promotional materials
- Sources of “Organic” signage

Meat Department Best Practices and System Plan

Developing good organic handling practices in the meat department starts with an understanding of all of the areas where organic meat is present, beginning with receiving and continuing through storage, preparation, display, labeling and cashier sales. Protection of organic integrity includes keeping organic meats clearly separate from conventional meats to prevent possible contamination.

Meat Cleaning and Sanitizing

Cleaning and sanitizing the meat department is similar to other departments. Follow the guidelines in **Section 2 (Cleaning and Sanitizing)** to prevent contamination.

- Store cleaning materials away from food products and preparation areas. Never store these materials above a sink or preparation area.
- Always clean and thoroughly rinse all sinks, tubs, preparation areas and utensils before using these areas for organic meat products.
- Use only department approved cleaning materials.
- Complete any written documentation of your cleaning activities when needed.

- Clean up spills when they occur.

Meat Receiving

- Always verify meat ordered matches what is delivered and what is written on the invoice/bill of lading.
- Always look for clear organic labeling and certifying agent seal or name on incoming containers.
- Place any meat product in a quarantine area if it does not meet USDA labeling rules. Get missing information from supplier.

Meat Storage

Proper back stock labeling is key to prevent non-organic products from being used to fill organic displays or being labeled organic on signage. If any mix-up occurs, employees should understand that they have management’s full support to relabel the entire lot and sell it as non-organic.

- Have separate storage areas for organic and non-organic meat.
- Label organic and non-organic storage areas clearly.
- Non-organic product boxes that have been crushed or damaged should be reviewed to make sure they do not pose a contamination risk to organic meat stored nearby.
- Organic meat should never be stored below non-organic meat. There is a risk of dripping onto the organic product.
- Never store organic meat in boxes, trays or tubs that have been used for conventional meat products unless after a thorough washing.

Meat Packaging

- Tubs, counters, scoops and other items used to repackage or prep bulk meat must be thoroughly cleaned and rinsed between organic and non-organic products.
- When prepping or thawing product in sitting water, organic product should not be processed in water used to process non-organic product.
- Trays, buckets and other equipment used in processing non-organic meat should be washed before being used to process organic meat.
- Only new packaging materials may be used to pack organic meat.
- All packaging materials must be food grade, with special care taken to purchase and use items that do not pose a risk from dyes or fumigants. Ask your supplier to verify that no fumigants are present in the materials that you are using, including the drip pads placed on the bottom of Styrofoam trays.

Labeling Individual Meat

- Fresh meat cuts fall in the “100% organic” product labeling category. The term, “100% organic” or “organic” can be used on the printed meat label.
- Whenever possible, the organic meat should be individually labeled, stickered, taped, sleeved or packaged clearly with “Organic.” By doing this, both the consumer knows what they are buying, and the cashier knows what is being sold.
- Any labels used in prepared or “oven ready” foods cannot use the word, “Certified,” or the USDA seal unless the retail store is certified by a USDA accredited certifying agent.

Display Case Labeling of Meat Department

- The display case label must state the product as “organic”. [The Food Safety Inspection Service \(FSIS\)](#) requires the label bearing the claim to include the certifying entity’s name, website address, and logo, when the organization has a logo. An asterisk or other symbol may connect the claim to this information. Consumer confidence in organic production is enhanced when they are made aware of the organic certification system.
- Prevent Commingling and Contamination: Organic meat must not touch non-organic meat. Organic meats should not be displayed below non-organic meat. Segregating organic from non-organic greatly reduces the risk of commingling or contamination.
- Meat dividers should be thoroughly washed with soap prior to use.

Resources Recommended for Meat Departments

- Sources of “Organic” tapes, twist ties, and stickers
- Sources of organic promotional materials
- Sources of “Organic” signage

Fish and Seafood

A small amount of imported organic fish is sold in the U.S. each year. However, organic seafood sales remain small as USDA organic regulations still do not include standards for either wild-caught or farm-raised fish ([aquaculture](#)).

Deli, Prepared Foods and Restaurant Best Practices and System Plan

Cleaning and Sanitizing

Cleaning and sanitizing the deli and prepared foods department or restaurant kitchen is similar to other departments. Follow the guidelines in Section 2 (Cleaning and Sanitizing) to prevent contamination.

- Store cleaning materials away from food products and preparation areas. Never store these materials above a sink or preparation area.
- Always clean and thoroughly rinse all sinks, tubs, preparation areas and utensils before using these areas for organic food preparation.
- Use only department approved cleaning materials.
- Complete any written documentation of your cleaning activities when needed.
- Clean up spills when they occur.

Receiving

Receiving organic ingredients for prepared foods, deli and restaurants is similar to receiving organic products in any facility. Follow the guidelines in Section 2 (Receiving) for receiving best practices to prevent commingling and contamination when receiving bulk products.

- Always verify product ordered matches what is delivered and what is written on the invoice/bill of lading.
- Always look for clear organic labeling and

certifying agent seal or name on incoming containers.

- Place any item in a quarantine area that does not meet USDA labeling rules. Get missing information from supplier.
- When a store purchases organic product through a distributor, it's the distributor's responsibility to maintain the documentation on the products they sell. Cases of new products or the product itself should be reviewed at receiving to verify use of the word "organic" and identification of the certifying agent name on the case or product label.
- Document any transfer of product from in-store departments to Prepared Food Department

Deli, Prepared Foods, and Restaurant Storage

Products from broken or open bags/containers can be accidentally mixed with non-organic products or ingredients. Proper labeling is key to prevent non-organic products from being used to fill organic recipes. If a mix-up occurs, employees should understand that they have management's full support to relabel the entire container and sell it as non-organic.

- Have separate storage areas for organic and non-organic products and ingredients.
- Clearly label organic and non-organic cold and dry storage areas.
- Always place organic bags or boxes in a separate clearly labeled area from conventional products.
- Never place organic product below conventional product, where falling items may cause contamination.
- Never store organic product in boxes or

bags that have been used for conventional products.

Deli and Prepared Foods Processing and Packaging

- Trays, drying racks, cutting and work area surfaces, as well as knives, spoons, spatulas and other utensils, must be thoroughly cleaned and rinsed between organic and non-organic products and ingredients.
- Wash hands prior to direct contact with organic food products and between preparing conventional and organic recipes.
- When prepping product in sitting water, organic product should not be processed in water that was used to process non-organic product.
- Clearly label and identify all organic products at the production area.
- Group organic ingredients clearly separated from non-organic ingredients.
- When multi-ingredient items are produced in store it is recommended that ingredients purchased for such products be exclusively Organic. This is because it is too difficult to segregate in a production environment.

Example: Two kinds of chicken, organic and not organic can be produced for rotisserie because it is a single ingredient. If olive oil is an ingredient listed as organic in any product, then all the olive oil in the kitchen should be organic.

- Tape open bags of ingredients shut before returning them to organic storage area. Be sure the organic label is visible.
- Clearly label and highlight all organic foods on the recipe cards.

- All preparation procedures should be closely monitored by a manager.
- Store finished organic products on separate trays from non-organic prepared food items.

Labeling Individual Deli, Prepared Foods, and Restaurant Recipes

All labeling of prepared foods needs to adhere to USDA's Organic Labeling guidelines as outlined in **Labels, Labeling and use of the USDA Organic Seal above**

- When preparing a product sold as 100% organic, "Organic" or "made with organic ingredients" the recipe card or instructions for the employee preparing this item should clearly state which ingredients are organic. The use of a highlighter, or bold letters could differentiate the organic from the conventional on the recipe.
- All organic ingredients need to be certified. Employees should look for word "Organic" or the USDA Organic seal as well as the name of the certifying agent on bulk incoming ingredient containers before use.
- Highlight organic ingredients on recipe card. Determine which labeling category the recipe fits and mark this (100%, at least 95%, 70-95%, less than 70%) on the recipe card. Find more about determining the % of organic ingredients for proper labeling in **Section 2 (Labeling)**.
- Any labels used in prepared foods cannot use the word, "Certified," show a certifying agent name or logo, or the USDA seal unless the retail store is certified by a USDA accredited certifying agent.



Labeling Deli and Prepared Foods Case

- All organic ingredients or items in service or self-service cases should be clearly identified with signage or other labels.
- Any organic ingredients or items used should be emphasized and highly visible to the customer.

Packaging Materials

- Only new or recycled from organic product materials can be used when packaging organic products. Bowls, trays, plastic wrap or bags that have previously held conventional product may be used only if they are thoroughly cleaned and rinsed.
- All packaging materials must be food grade, assuring that dyes and fumigants do not pose a risk. You can ask your supplier to verify that no fumigants are used in your packaging.

Display Case Labeling of Deli and Prepared Foods Departments

- The display case label may state the

product as “organic”.

- Prevent Commingling and Contamination: Organic prepared foods must not touch non-organic prepared foods when unwrapped. Organic unwrapped prepared foods should not be displayed below non-organic prepared foods. Segregating organic from non-organic greatly reduces the risk of commingling or contamination.

Restaurant Menu, Sign Boards and Verbal Identification of Organic Items

- In a restaurant, the menu or sign board is the customer signage and therefore must adhere to the USDA labeling guidelines.
- A menu selection may only be called organic if over 95% of the dish is organic and any non-organic ingredients must be allowed as permitted ingredients.
- Menus can also use the same criteria as product labels in stores with an Asterix next to organic ingredients on the menu and then also noting this at the bottom or top of the menu.
- Online sales from restaurants follow the same guidelines as online retail, which is listed below.
- Oral descriptions of products in a restaurant atmosphere are important and therefore wait staff need to adhere to descriptions of dishes that adhere to USDA guidelines. This means, for instance, dishes cannot be called organic unless over 95% of the dish is in fact organic. If over 70% of a dish is Organic then a “made with . . .” claim can be made.
- Use of the word organic must leave the customer a clear understanding of which ingredients are organic and which are not.

Grocery and Prepackaged Foods Best Practices and System Plan

Cleaning and Sanitizing

Cleaning and sanitizing the grocery and prepackaged foods department is similar to other departments. Follow the guidelines in **Section 2 (Cleaning and Sanitizing)** to prevent contamination.

- Store cleaning materials away from food products and preparation areas. Never store these materials above a sink or preparation area.
- Use only department approved cleaning materials.
- Complete any written documentation of your cleaning activities when needed.
- Clean up spills when they occur.

Grocery and Prepackaged Foods Receiving

Receiving for grocery and prepackaged foods are similar to receiving any other organic products. Follow the guidelines in **Section 2 (Receiving)** for receiving best practices to prevent commingling and contamination when receiving prepackaged food products.

- Always verify product ordered matches what is delivered and what is written on the invoice/bill of lading.
- Always look for clear organic labeling and “certified organic by...” statement.
- Place any item in a quarantine area that does not meet USDA labeling rules. Get missing information from supplier.
- When a store purchases organic

product through a distributor, it’s the distributor’s responsibility to maintain the documentation on the products they sell. Cases of new products or the product itself should be reviewed at receiving to verify use of the word “organic” and identification of the certifying agent name on the case or product label.



Grocery and Prepackaged Foods Storage

If products are packaged or otherwise enclosed in a sealed container prior to being received, and remain unopened, in the same package or container until the final sale to the consumer, then no special precautions exist to maintain organic integrity. Fumigation agents are never allowed within the same air space as organic foods.

Good Organic Practices for Private Labeling and System Plan

Retail establishments that sell private label organic products do not have to be a certified retailer, but the contract

organization that manufactures or packages the products must be certified by an USDA accredited certifying agent. These products must be packaged prior to being received by the retailer, and remain in the same package or container and not be further processed by the retailer.

Retailers which process and sell off-site to other retail stores must be certified as well. For instance, an in-store bakery that bakes organic bread products and sells to other retail stores must have the bakery department certified in order to label the bread as “100% organic,” “organic,” or “made with (organic ingredients or food groups).”

Retail establishments that process and sell their own private label organic products on-site do not have to be a certified retailer, but cannot represent the product as “certified organic” or use the USDA organic seal on their products. The USDA labeling rules listed in **Section 2 (Labeling)** must be followed.

Cleaning and Sanitizing

- Store cleaning materials away from food products and preparation areas. Never store these materials above a sink or preparation area.
- Always clean and thoroughly rinse all sinks, tubs, preparation areas and utensils before using these for organic products.
- Use only department approved cleaning materials.
- Complete any written documentation of your cleaning activities when needed.
- Clean up spills when they occur.

In Store Private Label Receiving

- Always verify products ordered matches what is delivered and what is written on the invoice/bill of lading
- Always look for clear organic labeling and certifying agent seal on incoming bulk containers
- Place any bulk item in a quarantine area that does not meet USDA labeling rules. Get any missing information from supplier.

In Store Private Label Storage

Products from broken or open bags/containers can be accidentally mixed with non-organic products. Proper labeling is key to prevent non-organic products from being used to fill containers that will be labeled “Organic.”

- Have separate storage areas for organic and non-organic products.
- Label organic and non-organic storage areas.
- All open bags must be closed tightly, taped or twist-tied, and clearly marked. Have these supplies readily available to all employees in the storage areas.
- All packaging materials must be free of dyes and fumigants which pose a risk. You can ask your supplier to verify that no fumigants are used in your packaging.
- If contamination does occur, the product must be sold as non-organic.
- Clear signage is paramount to ensure no commingling or contamination. Have “Organic” stickers readily available in the storage area for employees to easily affix on storage containers if the label may be difficult to see.

- All organic back stock should be clearly marked organic, especially when the same non-organic product is being offered.
- Any issues should be brought to the buyer's attention.
- Place bulk bags and boxes on storage shelves in a way that the organic label is easy to see.
- Tubs, counters, scoops and other items used to repackage foods must be thoroughly cleaned and rinsed between organic and non-organic products.

Labeling In Store Private Label Products

In Store Private Label labels and signage must meet the labeling criteria in Section 2 (Labeling).

- Always use clean containers for organic products
- Use distinctive labels to differentiate organic and non-organic products. Different color backgrounds make it easy for the consumer to pick out the organic product.
- Scoops for packaging product should be designated separately for organic and non-organic items or washed thoroughly before use for organic items.
- If contamination does occur, the product must be sold as non-organic.

Best Practices for Online Retail and System Plan

Under SOE, all solely online retail establishments must be certified. Similar to brick-and-mortar retail operations, all organic claims on a website, social media and all forms of marketing must be truthful and not misleading to

shoppers about the status of whether a product is organic or not. Pay attention to the word "organic" as well as the USDA organic seal, on webpages and other marketing, especially webpages where product can be ordered, including the "shopping cart." Ensure that all products are labeled correctly.

Each individual product must have accurate, specific claims at the point of sale. A consumer must be able to determine whether a specific product is organic or not before they purchase.

- Noncompliant examples: "Organic ingredients" when not all ingredients sold are organic or "We strive to use organic ingredients," is a general claim that does not specifically disclose to consumers what is certified.

Percentage statements are discouraged as they are potentially misleading and difficult to prove.

- Compliant example: "70% of the total number of products we purchase are organic. Actual quantity of organic ingredients in your delivery may be less than 70%."
- Noncompliant example: "We strive for at least 70% organic ingredients." This is unclear to the consumer what percentage of ingredients they receive are organic.

Use of the USDA Organic Seal for Online Retailers

The USDA seal may only be used to identify products on a website that are prepackaged and also bear the USDA logo on their product label.

- Pop-outs and hover-overs are not sufficient to explain the claim.

If you offer organic and nonorganic products, the organic status of each product must be clear.

Nonorganic products must be represented so that shoppers will not assume that a nonorganic product is organic.

Examples of compliant use:

- USDA seal in page header next to statement “Products below are all organic,” all products on the page are certified organic. Use a separate page for nonorganic products that does not have the USDA seal or the word organic in the page header.
- When organic and nonorganic products are displayed on the same page, the USDA seal or the word organic can be next to individual organic products but not next to the conventional products, and no USDA seal or organic claim should be used in header.

When used in relation to specific products, including ordering pages or shopping carts, the USDA seal may only be used on “Organic” and “100% Organic” products and only when the product label also carries the USDA seal.

When the USDA seal or certifying agent, logo appears in an image or photo, all products or ingredients in that image must be eligible to display the seal/logo. If all products or ingredients in the image are not certified, neither USDA seal nor certifying agent logo can be used unless there is a clear and conspicuous explanation of what is certified organic.

Best Practices for Non-Food Products and System Plan

Shoppers have come to trust and understand that organic products are 3rd party certified to strict standards and regulated and enforced by the federal government. However, organic claims made on non-food products such as processed fiber and textiles, personal care products and dietary supplements fall outside of USDA National Organic Program’s (NOP) scope of enforcement. These types of products may be certified to the NOP, but are not required to by law. As a result, non-food products are currently unregulated and organic claims go unenforced, unless they use the USDA organic seal or otherwise imply or lead the consumer to believe that the final product is certified under the USDA organic regulations.

Retailers play a critical role in monitoring and reporting misleading and fraudulent organic claims on non-food products and are instrumental in educating staff and shoppers on which products have 3rd party organic certification and are accurately and truthfully labeled.

To promote and optimize compliant and truthful labeling and encourage leadership by companies committed to consumer trust, the following purchasing and labeling guidelines are recommended:

1. First and foremost, look for USDA organic certified products. Even though non-food products are outside of NOP’s scope of enforcement, companies making these products may opt into certification if they can meet the organic food standard. Make sure and look for the certifier

statement on the information panel of the product to verify organic certification status. If you do not find a certifier statement, then there is likely a problem!

2. If a product is not USDA certified organic, look for products that are certified to a transparent private standard by a 3rd party reputable certifying agency.

→ For textiles, look for products that are certified to the [Global Organic Textile Standard \(GOTS\)](#)

→ For personal care products, look for products certified to the [NSF/ANSI 305](#) standard, or to the [COSMOS-standard](#)

3. If the product is not certified, the product should not be labeled as “Organic.” The claim should be limited to the organic content (ingredients) of the product and communicated using the ingredient statement only.

→ Listing out the organic ingredients in the ingredient statement is perfectly acceptable as long as they are certified organic.

→ For textiles, look for products that are certified to the [Textile Exchange Organic Content Standard \(OCS\)](#).

4. Organic content (ingredient) claims may only apply to USDA certified organic ingredients.

5. Finally, for additional support, look to the Environmental Working Group (EWG) ([ewg.org](#)) to help inform your choices. EWG provides several consumer guides and databases that can be used to see if certain ingredients and products are safe for people and the planet.

4 Marketing Organic Products

Getting to Know Organic Shoppers

Organic shoppers make up about 89 million people! While 10% of the overall population are leaders of purchasing organic products, another 25% purchase some organic products, but not necessarily across all categories. There is a huge opportunity to extend this 25% of shoppers to purchase organic products in other categories. As you probably know by now, trust in the organic label is paramount in swaying these shoppers.

Organic shoppers tend to be younger than the general population; 45% are under 40. Organic shoppers' household incomes are about 8% higher than the general population. They are also 11% more likely than the general population to have a college degree, and 15% more likely to have children living with them.

Here are some of the top motivations of organic shoppers:

- Organic shoppers care about the environment and want to protect themselves, their families and the planet.
- Organic shoppers do not want the 700+ pesticides and processing chemicals that are prohibited by the USDA organic seal in the products they are buying.
- Organic shoppers want to avoid genetically modified ingredients.

Now that we know some of the highest priorities of organic shoppers, here are

some messages that appeal to these shoppers about the organic standards:

- USDA organic has countless scientists developing better, more efficient means of organic agriculture so we can feed the planet.
- USDA organic has tireless advocates and passionate experts helping shape the organic certification process to keep the standards resilient and relevant.
- The USDA organic standards team monitors organic regulations and makes balanced recommendations for progress.

As a retailer you can help preserve shoppers' trust in organic by maintaining organic integrity throughout your retail **establishment**. Clear labeling and signage are key to take a close look at in order to help shoppers best understand what they are buying.

Signage & Marketing Materials

Signage should relate to what you are selling! As a best practice, signage should refer to what products are in proximity to the sign. For example, a large sign that says "Organic" should only be placed adjacent to organic products otherwise this may confuse shoppers and unintentionally cause them to believe non-organic products are organic.



5 Organic Certification for Retail Operations

Required vs. Voluntary Certification

Retail establishments are not always required to become certified, and it depends on activities performed on-site, systems by which items are sold, to whom products are sold (end-user vs. processing site or another retail unit). Certification is required if a retail establishment would like to use the USDA Organic seal to represent processed products as certified organic or to generally represent the entire retail establishment as a certified organic operation. Although retail establishments may not always be required to become certified, those that are excluded may go the extra mile and voluntarily seek certification.

Here are the most recent exceptions from certification: [CURRENT NOP REGULATION](#)

Requirements & Benefits of Certification

Consumers rely on retail stores to properly handle and label organic products and protect organic integrity of the product from the moment it arrives to the store to the moment it lands in the shopping cart. Organic certification can not only provide a heightened level of verification to retail stores that are committed to protecting organic integrity, but it can also increase marketing, messaging and education opportunities by expanding the retailer's use of the USDA organic seal. At the end of the day, retailers that choose to get certified are inviting in a 3rd party inspector to verify all of their organic claims and practices. This is an important step that many consumers care about.

The process of organic certification can help you identify areas in your store where commingling or contamination of organic products could occur and where labeling could be improved or corrected. It is the organic inspector's job to identify non-compliances and areas of improvement. By receiving a copy of the inspection report and the findings of the certifying agent, you gain a comprehensive evaluation of your store's compliance with the USDA organic standard. Certification is an annual process. At this time, the entire store may be certified or you can request certification for specific departments.

When the organic certificate is received, the retailer can advertise itself as a certified organic store if all departments are certified, or it can advertise the specific department(s) that are certified. The main benefit of certification is the guidance and education that comes with the certification process, and being able to let your customers know that every organic claim in the store is verified through a 3rd party annual on-site inspection. It also allows you to comfortably use the USDA seal on products that are processed in the produce, meat, bulk or prepared food departments of your operation and/or prominently display the USDA organic seal to let your customers know that your operation is certified.

There are also additional marketing and sales opportunities that come with certification. Retailers which process or package certified organic products and sell off-site to other retail stores must be certified.

For instance, an in-store bakery that bakes organic bread products and sells to other retail stores or locations must have the bakery department certified. In this situation, it is not a matter of using the USDA organic seal or not, it is a requirement to be wholly certified since sales are not to the end-user/consumer. Retail establishments are only exempt from certification if they process and sell products on the premises of the retail location to the end-user. Off-site processing or any sales that take place off-site require certification to make an organic claim.

Organic certification offers a suite of benefits from 3rd party verification, to education to increased marketing and market access opportunities. Is certification easy? No, definitely not, but it may be worth it.

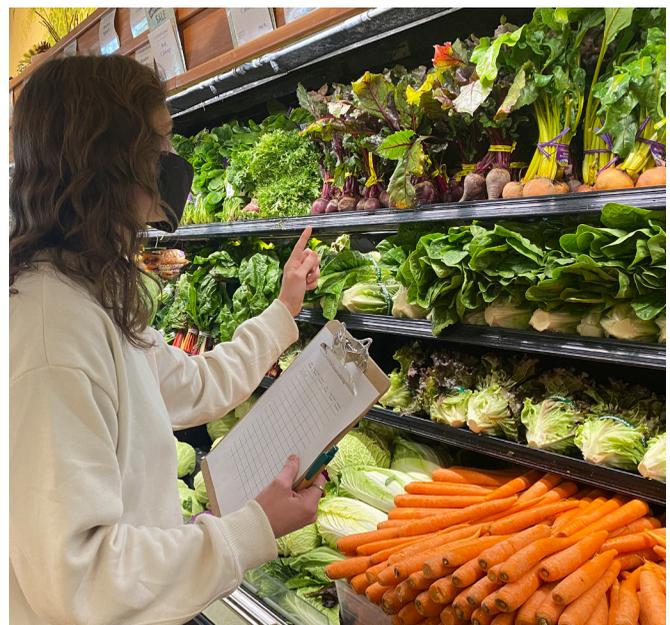
In order to comply with the USDA organic standard for certified retailers, certified retail stores must:

- Apply for certification with a USDA accredited 3rd party certifying agent
- Implement and follow a written Organic System Plan.
- Verify organic suppliers and sources.
- Ensure that all organic products comply with composition and labeling requirements.
- Inspect all areas of the retail store to identify where organic products have the potential to be commingled or contaminated by non-organic products and prohibited substances.
- Implement protocols to prevent commingling or contamination problems.

- Properly label fresh produce, bulk, meat and prepared organic products.
- Train employees to properly handle organic products.
- Keep appropriate records for 5 years.
- Undergo a yearly inspection from a USDA accredited certification organization.

The organic certification process begins when the retail store requests certification information and an application from a certifying agent. An important factor in choosing a certifying agent is whether it performs inspection for your type of organization. Other factors include cost, level of service provided, and customer recognition.

The entire process of organic certification can take as long as 8-12 weeks initially. At the very least, you should expect the process, from when you submit a complete application, to take 2 months. When you are getting information from a certifying agent about their timeline and procedures, make sure and ask about their certification and inspection fees which can vary.



6 OTA - We're Here to Help!

The Organic Trade Association (OTA) is a membership-based organization for the organic industry. OTA ensures that all parts along the organic value chain have a strong voice with government and the public. Bringing farmers, processors, distributors, retail establishments and others together to promote and protect the growing organic sector is essential to what we do. OTA represents its members to the government on sector needs, market development and promotion, and strong organic standards and regulations. Members also receive the latest information and quick answers on organic regulations and standards in the U.S. and around the world.

The single most effective way you can address the range of critical issues facing your organic business is by joining the OTA. OTA membership offers an investment with high returns. OTA has promoted and protected the organic business community for thirty years. The OTA has the strategic know-how to effectively address issues, both large and small, that impact your bottom line.

Benefits of an OTA membership:

- Expert guidance and one-on-one advice on organic regulatory issues relating to your business
- Timely and vital information on U.S. Organic Standards, NOSB and the National List
- Opportunities to directly influence elected officials and advocate for organic priorities on Capitol Hill

- Access the latest OTA market research to develop your business strategy
- Access to OTA's key media relationships, proactive outreach strategies and fast and effective crisis communications
- Exclusive marketing tools and directory listings to increase your visibility with current and potential customers and suppliers
- Access international distribution channels through OTA's global market programs and trade missions
- Educational resources to inform your customers with OTA's "Organic. It's Worth It." Materials
- Access to compelling evidence and talking points about the value of organic
- Exclusive discounts on products and services through OTA member partnership arrangements



7 GORP Employee Training Program

Training for the proper handling of organic products should be a part of the in-store training that all employees receive when hired or starting to work in a specific department that handles organic products. It is very difficult if not impossible for the retail store to properly handle organic products without the cooperation of all employees.

Training of employees about what organic food is and how certification works will also help them answer questions from customers. When consumers understand what organic food is, more organic food is likely to be sold. The checklists and exercises developed in this manual can help effective training of retail store employees in the proper handling of organic products. Management is responsible for employees understanding of how to handle organic products.

Organic Food Handling Quiz

Employee Name _____ Date _____

Circle the letter of the correct answer.

1. Which of the following practices or products are allowed in organic production?
 - a. Toxic synthetic pesticides (herbicides, insecticides and rodenticides).
 - b. Genetically engineered seeds
 - c. Solid, semi-solid, or liquid residue generated during the treatment of domestic sewage.
 - d. The rotation of crops grown in a planned pattern so crops of the same species or family are not grown repeatedly on the same field without interruption.
2. Prior to obtaining organic certification, crops must be grown without the use of prohibited materials, such as toxic chemical fertilizers and synthetic pesticides, for at least
 - a. Two years
 - b. Five years
 - c. Three years
 - d. One year
3. Organic dates were ordered. When they arrive, they are in boxes labeled as "organic" but they do not have a lot number. The invoice says they are organic.
 - a. The employee should assume they are certified organic and immediately put them out in the display.
 - b. The employee should assume they are conventional and return them to the distributor.
 - c. The supplier should be contacted and told that their label does not meet USDA labeling requirements for organic. A lot number is necessary on the label.
 - d. The employee should tell the distributor that the dates were of poor quality and give the dates to a food bank as a contribution.
4. There is only one counter in the preparation area, used for both conventional and organic bulk food re-packing.
 - a. Employees should never re-pack organic products on this counter.
 - b. Employees should always re-pack the conventional products first.
 - c. Employees should re-pack different types of conventional and organic at the same time, so they don't get mixed up, such as conventional raisins and organic dried apples.
 - d. Employees should re-pack the organic products first if possible. In all cases, employees should scrub clean and rinse the counters and tools between conventional and organic product re-pack.

5. Whose responsibility is it to verify an organic product is labeled correctly in a retail store?
 - a. the retailer who sells the product
 - b. the consumer
 - c. the state food inspector
 - d. the Environmental Protection Agency

6. Which of the following is not an option for a bulk oil self-serve display to help prevent contamination of organic oil by conventional oil in the funnels:
 - a. Provide only one-use disposable funnels.
 - b. Provide one funnel for all customers to use.
 - c. Clearly distinguishing organic and conventional funnels by color or label.
 - d. Separate conventional oil and organic oil self-serve counter areas with clear labels.

7. Which of the following must be used in organic beef production to sell the slaughter animal as organic?
 - a. Antibiotics
 - b. rBst or other genetically engineered products.
 - c. Pasture
 - d. Meat and bone meal by-products

8. Organic meat should be packaged using materials
 - a. that are free of dyes, fumigants or other possible contaminants
 - b. that have previously held conventional meats
 - c. of any type, with no review or oversight
 - d. only of paper origin

9. The meat department is making a sausage from certified organic pork. Conventional onions, garlic, spices and sausage casing are 5% of the recipe. The label should read: (Select all answers that apply.)
 - a. 100% organic pork sausage
 - b. Organic pork sausage
 - c. Pork Sausage- made with organic pork
 - d. Pork Sausage (no product claim, list the organic ingredients)

10. There is only one cutting board in the preparation area, used for both non-organic and organic food.
 - a. Employees should scrub clean and rinse the cutting boards, counters and tools between non-organic and organic meat preparation.
 - b. Employees should cut the organic meat on top of a piece of cardboard.
 - c. Employees should only cut organic meat on Mondays.
 - d. Employees should never cut organic meat on this cutting board.

11. The meat department has a small display cooler for both their organic and non-organic meats. The steaks are stacked so that the organic and non-organic are touching.
 - a. The employee should put a divider, such as butcher paper or a plastic display divider to separate the organic and conventional steaks.
 - b. The store should not sell organic steaks until they have a larger display cooler.
 - c. The employee should individually bag each organic steak in a new plastic bag.
 - d. The employee should replace the organic steaks with organic chicken, to help the consumer distinguish between the organic and conventional meats.

12. Organic cabbage arrives at a store. The case is severely damaged and the cabbage is dripping wet from the melting of conventional broccoli that had been stacked above it on the pallet.
 - a. The employee should immediately transfer the cabbage to the produce department for display under an "organic cabbage" sign.
 - b. The employee should set the cabbage aside in a quarantine area, and either return the product to the distributor or sell it as not-organic.
 - c. The employee should pull a few leaves off each cabbage head and re-case it for storage in a box formerly holding conventional cabbage.
 - d. The employee should make coleslaw and label it as "Transitional".

13. Organic spices used regularly in making prepared foods labeled as "organic" should be stored:
 - a. on the preparation counter intermingled with conventional spices
 - b. in a separate area from conventional spices, such as a separate cabinet or labeled separate area on a shelf
 - c. in the cooler
 - d. on the same shelf with the cleaning and sanitizing products

14. A display case label states the product is "Organic Pasta Salad." Which of the following labeling categories does this type of label signify?
 - a. 100% organic ingredients
 - b. At least 95 % organic ingredients
 - c. 70-95% organic ingredients
 - d. Less than 70% organic ingredients

15. When you arrive on your shift, you see organic spinach is placed on a shelf in the cooler, below dripping iced conventional broccoli. The employee should:
 - a. Identify the spinach as "Not to be sold as Organic" and work on storage procedures with the department manager.
 - b. Switch the broccoli and spinach, so the spinach is on the upper shelf. Talk to the manager about having an "organic only" storage area.
 - c. Wait until the manager comes in the next day to ask what they should do.
 - d. Wash the ice from the broccoli and put the case back where it was.

16. There is only one sink in the preparation area, used for both conventional and organic product.
 - a. Employees should never wash organic produce in this sink.
 - b. Employees should wash only the organic produce in a 200ppm chlorine solution.
 - c. Employees should only wash different types of conventional and organic at the same time, so they don't get mixed up, such as conventional lettuce and organic spinach.
 - d. Employees should scrub clean and rinse the sinks, counters and tools between conventional and organic product preparation.

17. Chlorine is used as a sanitizer on cutting boards in the prepared foods department. This should be stored:
 - a. Above the cutting area, making it within easy reach of all personnel.
 - b. On the countertop, adjoining the cutting board
 - c. Away from all cutting surfaces, where it could not spill or splash, such as under a sink or in a separate cleanser/sanitizer cupboard.
 - d. In the cooler.

18. The store makes both organic and conventional potato salads. Select all answers that apply.
 - a. The organic potato salad should be clearly labeled using the correct organic labeling statement and color coding when sold.
 - b. The conventional potato salad should be placed as far away from the organic as possible.
 - c. The organic potato salad should be displayed on a shelf underneath the conventional potato salad.
 - d. A sign should be displayed stating the potato salad without the egg is the organic salad.

19. The store has a self-service salad bar, with both organic and conventional items.
 - a. Salad bar should have a large sign stating "Organic Salad Bar"
 - b. Salad bar should have individual signs on each item, color coding organic and conventional or have the organic items on a clearly labeled separate side of the salad bar from the conventional items.
 - c. No organic items can be labeled since they are mingled with conventional items, according to USDA labeling rules.
 - d. All salad dressings must be certified organic.

20. Which of the following practices or products is not allowed for organic livestock production?
 - a. Antibiotics
 - b. 100% organic feed
 - c. State or federally mandated vaccinations

- d. Access to the outdoors, shade, shelter, exercise areas, fresh air and direct sunlight
21. Which of the following practices or products is required in the processing of organic products?
- a. Mixing organic and conventional raw ingredients in the same bulk bin storage.
 - b. Irradiation
 - c. Removal of pest habitat and food sources for insects and rodents at the processing facility.
 - d. Genetically engineered ingredients
22. Certified organic signifies:
- a. the product is produced in the United States.
 - b. the producer or handler has been reviewed annually by an USDA accredited certifying agent and is in compliance with the USDA organic standard for the product.
 - c. the product is free of all chemical residues.
 - d. the product was produced on a small farm.
23. When a retailer sees an incorrectly labeled organic product they should
- a. call the Attorney General and have the manufacturer fined.
 - b. quarantine the product and contact the supplier.
 - c. hand write the correct labeling on a sign, but not on every container.
 - d. donate the product to the food pantry, without notifying the supplier.
24. A product that states “Made with Organic Grains” on the front display panel of the retail package is in the following labeling category:
- a. 100% organic ingredients
 - b. at least 95% organic ingredients
 - c. at least 70% organic ingredients
 - d. less than 70% organic

Answer Key:

1. d
2. c
3. c
4. d
5. a
6. b
7. c
8. a
9. c&d
10. a
11. a
12. b
13. b
14. b
15. a
16. d
17. c
18. a&b
19. b
20. a
21. c
22. b
23. b
24. c

Retail Store Verification for Exempt Non-Certified Organic Producers

Name of Retail Store: _____

Name of Non-Certified Organic Producer: _____

Address: _____

Phone No. _____ Fax No: _____

I, _____ (name of producer), sell the following organic products.

My production and record keeping practices are in compliance with the Organic Foods Production Act of 1990 and the USDA organic regulations. My annual gross organic sales are less than \$5,000. I understand that I am subject to up to \$10,000 in civil penalties per violation of the Act and Rule.

Signature of Producer

Date

Signature of Department Manager

Date

NOTE: These products cannot be used as ingredients in the prepared food department.

Glossary

Certified Retailers are retailer establishments that have undergone a certification process allowing them to use the USDA organic seal to represent processed products as certified organic or to generally represent the entire retail establishment as a certified organic operation.

Commingling refers to a situation where organic products come in physical contact with non-organic products, or, they are mixed up due to inadequate labeling or identification resulting in the possibility of a non-organic item being sold as an organic item.

Contamination occurs when an organic product is exposed to prohibited substances, often a sanitation material, cleanser or pesticide.

Exempt Producer is a non-certified producer with less than \$5,000 annual gross organic sales. These products must not use the USDA organic seal or be represented as “certified organic.” They also must not be identified as organic in products prepared in the retail store.

Fumigants are chemical sprays, aerosols or the drip pads placed on the bottom of Styrofoam trays that are not allowed in organic food production or handling.

Handling Organic Product is when an item is transferred into a bulk bin or to a retail display, cooler or store shelf.

National List is the list of substances allowed or prohibited in organic production and handling.

National Organic Program (NOP) is responsible for setting and enforcing strict regulations for organic agricultural products that are either produced in the U.S. or imported for sale in this country, and they oversee the accreditation of 3rd party organic certifiers.

Organic Certification is a certification process for producers and handlers of organic food and other organic agricultural products that is carried out by a certifying agent. Any business involved in the production and handling of agricultural products can be certified, including seed suppliers, farmers, food processors, distributors, traders/brokers, retailers and restaurants.

Organic Control Points are any points or procedures in an organic packaging or handling system where there is a high probability that improper control may cause or contribute to the loss of organic integrity.

Organic Integrity is the quality of an organic product, obtained through the organic standards, which must be maintained throughout all retail in order for the final product to be labelled and/or marketed as organic.

Organic System Plan (OSP) is a written document that describes how your retail operation will meet the requirements of the National Organic Program.

Organic Trade Association (OTA) is a membership-based organization for the organic industry, ensuring that all parts along the organic value chain have a strong voice with government and to the public.

Pesticide Residues are leftover chemical, powder, wetness, film or scum on produce and on foodstuffs from an application or applications of pesticide. Pesticide residues are often considered toxic.

Prepackaged Product is a product that remains in the same package that it was received in.

Processing Product is considered cooking, baking, curing, heating, drying, mixing, grinding, churning, separating, extracting, slaughtering, cutting, fermenting, distilling, eviscerating, preserving, dehydrating, freezing, chilling, or otherwise manufacturing and includes the packaging, canning, jarring, or otherwise enclosing food in a container.

Prohibited Substances are substances that are prohibited by the USDA Organic Standard. This includes certain types of cleaning chemicals and pest control products.

USDA Organic Seal is a seal designed by the USDA that can be used only on products labeled as “100% Organic” or “Organic.”

USDA Organic Standards are regulations that require cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity. Products labeled as organic must be grown and processed without the use of toxic and synthetic pesticides and fertilizers, genetic engineering, antibiotics, synthetic growth hormones, artificial flavors, colors, preservatives, sewage sludge and irradiation.