OF&G ORGANIC STANDARDS AND CERTIFICATION MANUAL

Section 4 Composition and Labelling of Products

4.0 Contents Page

This Section explains the rules for labelling organic products and the use of control body codes and logos. This legislation is specified in 834/2007, 889/2008 and Commission Regulation (EC) 271/2010.

Section 4.1 summarises the legislation, further details are given in each sub-section.

Where legislation has been included in the text, it has, in some cases, been paraphrased for clarity. However, references are given where the operator may prefer to check the original (links to relevant legislation are given on both the OF&G and Defra websites.

Important note:

The organic regulations are in addition to statutory legislation, they do not replace it.

Section	Contents	Page
4.1	Labelling of Organic Food Products - General Requirements	2
4.2	Labelling of Organic Food Products - Specific Requirements	3
4.3	Labelling of Organic Feed Products	7
4.4	Labelling of Farm Inputs	9
4.5	Labelling of Non-food Products	11
4.6	Organic production logo of the European Union – Specific Requirements	11
4.7	Approval of Labels	12

Publication and Revision Details

Published 01/04/2013

Rev No.	Revision date	Pages revised	Issued by	Authorised by

Labelling of Organic Food Products - General Requirements 4.1

4.1.01	A product label must clearly and accurately describe the product – it must <u>not</u> be misleading.	
4.1.02	Product labels must also comply with all relevant food and feed legislation.	
4.1.03	The operators shall ensure that products as referred to in this Section must be transported to other units, including wholesalers and retailers, only in appropriate packaging, containers or vehicles closed in such a manner that substitution of the content cannot be achieved without manipulation or damage of the seal and provided with a label stating, without prejudice to any other indications required by law:	
	(i) The name and address of the operator and, where different, of the owner or seller of the product;	
	(ii) The name of the product;	
	(iii) The name and/or the code number of the control body or authority to which the operator is subject; and	
	(iv) Where relevant, the lot identification mark according to a marking system either approved at national level and/or agreed with the inspection body or authority and which links the lot with the accounts referred to in Section 6.	
	The information referred to in points (i) to (iv) may also be presented on an accompanying document, if such a document can be undeniably linked with the packaging, container or vehicular transport of the product. This accompanying document shall include information on the supplier and/or the transporter.	
4.1.04	An operator who has the word 'Organic' in their trading name must ensure that this does not appear on any of the labelling, packaging, sales literature and any accompanying documentation relating to non-organic products.	
4.1.05	An operator who produces both organic and non-organic products must ensure that the labelling, packaging, sales literature and any accompanying documentation is sufficiently differentiated to avoid any confusion on the part of a customer or final consumer.	
4.1.06	Where organic and non-organic products of the same type are on retail display, the products must be adequately separated and labelled to prevent any mixing or confusion by customers or staff.	
4.1.07	The product must be produced without the use of genetically modified organisms and/or any products derived from such organisms.	
	Organic products shall not be labelled as non-GM in the context of these standards. Any reference to genetic engineering on the product labels, shall be limited to the production and processing methods themselves not having used GMOs, such as by use of the expression 'Produced and processed without the use of GMOs' or 'Produced from crops which have not been genetically modified'.	
4.1.08	The OF&G logo is owned by the Company and is registered as a Trade Mark. It may only be used by licensees holding a valid Certificate of Compliance. OF&G will deal with misuse of the logo by any party in the most appropriate manner, which may include legal action.	

4.2 Labelling of Organic Food Products - Specific Requirements

4.2.01 Products with 95-100% organic agricultural ingredients (Article 23(4) (834/2007)) A food product may be called 'organic' when at least 95% of the agricultural ingredients are organic; (ii) The remaining ingredients must come from the lists of Approved Ingredients, Additives or Processing Aids in Section 10 of this Manual. Note: Agricultural ingredients are ingredients of animal or vegetable origin. They include milk, meat, cereals etc. but exclude minerals, water etc. 4.2.02 Products with less than 95% organic agricultural ingredients (Article 23(4) (834/2007)) Where less than 95% of the agricultural ingredients are organic, only the ingredients list on the label of a food product or accompanying documentation may make reference to organic ingredients; The organic ingredients must be identified using the same colour, size and style of lettering as for the non-organic ingredients; In this case the ingredients list must also carry a declaration of the proportion of the (iii) agricultural ingredients that have been produced organically; Products with less than 95% organic agricultural ingredients cannot be labelled with the (iv) EU organic logo but must have the OF&G control body code 'GB-ORG-02'. Products with less than 95% organic agricultural ingredients are not required to comply with Section 11.1.05 (c). This means the non-organic ingredients used in products with less than 95% organic agricultural ingredients do not have to be from the permitted list (See Section 10 of this Manual) but would need to comply with all other parts of Section 11.1.05 of this Manual. 4.2.03 Products where the main ingredient is a product of hunting or fishing (Article 23(4) (834/2007)) Where the main ingredient is a product of hunting or fishing and all other agricultural ingredients are organic you may identify the organic ingredients in the same field of view as the product description; The reference to organic ingredients must not be more prominent than the product (ii) description; (iii) The organic ingredients must be identified in the ingredient panel using the same colour, size and style of lettering as for the non-organic ingredients; The total percentage of organic ingredients as a percentage of the agricultural ingredients must be included in the ingredient panel. Remaining non agricultural ingredients must comply with Section 10 of this Manual (v) An organic ingredient shall not be present together with the same ingredient in nonorganic form or an ingredient in-conversion.

4.2.04 In-Conversion Products of Plant Origin

(Article 62 (889/2008))

In-conversion products of plant origin can be labelled as 'product under conversion to organic farming' provided that:

- A conversion period of at least 12 months before the harvest has been complied with;
- The product contains only one crop ingredient of agricultural origin; (ii)
- The label does not mislead the customer that the product is organic: (iii)
- The phrase 'product under conversion to organic farming' must appear in a colour, size and style of lettering which is not more prominent than the sales description of the product:
- The words 'organic farming' shall not be more prominent than the words 'product under conversion to':
- (vi) The label must include the code number of the control body to which the operator who has carried out the most recent production or preparation operation is subject;
- (vii) Products in conversion are not allowed to use the EU logo;
- (viii) The OF&G logo is not permitted to be used on the label;
- The labelling of any animal product as in-conversion is prohibited.

4.2.05 **Animal Products**

- (i) Meat must be labelled in accordance with all relevant legislation;
- Additionally, each carcass, side, quarter and cut must be labelled giving the slaughter number (to provide an audit trail) and the date of slaughter;
- If the product is boxed the following information should be marked legibly on each outer package:
 - Name and address of supplier or supplier's mark; (a)
 - Contents of the package; (b)
 - Slaughter number and slaughter date (not required in the case of offals).
- Each carcass, side and quarter must be labelled as ORGANIC by means of an Organic Meat Stamp available from OF&G;
- Only colours for stamping meat in accordance with article 2(8) of directive 94/36/EC are permitted (Article 27(1) (889/2008));
- (vi) All birds/carcasses must be labelled in accordance with relevant legislation and the label must include the following particulars:
 - The name and address of the producer;
 - The address of the premises where the bird was slaughtered and prepared for sale. (b)

4.2.06 Control Body Codes

(Article 58 (889/2008))

- Labels must include the code of the control body who licenses the company that applies the labels:
- For Organic Farmers & Growers this is 'GB-ORG-02'; (ii)
- This must be placed in the same visual field as the EU logo, where this is used on labels. (iii)

4.2.06
cont.

UK control body codes:

GB-ORG-02	Organic Farmers & Growers (OF&G)
GB-ORG-03	Scottish Organic Producers Association (SOPA)
GB-ORG-04	Organic Food Federation (OFF)
GB-ORG-05	Soil Association Certification Ltd (SACL)
GB-ORG-06	Biodynamic Agriculture Association (BDAA)
GB-ORG-07	Irish Organic Farmers and Growers Association (IOFGA)
GB-ORG-09	Organic Trust Ltd
GB-ORG-13	Quality Welsh Food Certification (QWFC)

4.2.07 Place of Origin

(Article 24(1) (834/2007))

- There must be an indication of the origin of the agricultural raw materials, taking one of the following three forms:
 - Where ingredients originate from within the EU the product must be labelled as 'EU Agriculture';
 - Where ingredients originate from outside the EU the product must be labelled as (b) 'Non-EU Agriculture';
 - Where ingredients originate from both inside and outside the EU the product must (c) be labelled as 'EU/Non-EU Agriculture'.
- For the 'EU' or 'non-EU' indication, small quantities by weight of ingredients may be disregarded provided that the total quantity of the disregarded ingredients does not exceed 2% of the total quantity of agricultural ingredients;
- The indication 'EU' or 'non-EU' may be replaced or supplemented by the country of origin in the case where all agricultural raw materials of which the product is composed have been farmed in that country;
- (iv) The indication of the place where the agricultural raw materials have been farmed shall be placed immediately below the control body code number;
- The 'EU' or 'non-EU' indication shall not appear in a colour, size and style of lettering more prominent than the sales description of the product.

4.2.08 EU Organic Logo

(Article 24(1) (834/2007)) (Article 25 (834/2007))

- This logo will be mandatory where packed product has at least 95% organic agricultural ingredients. If less than 95% of the content of agricultural ingredients of a product has been produced organically the logo cannot be used;
- The control body code must be placed in the same visual field as the EU logo followed by a declaration of where the ingredients have been farmed (See Section 4.2.07);
- (iii) Products in conversion are not allowed to use the EU logo;
- Non pre-packaged organic products can use the EU logo on a voluntary basis; (iv)
- It is possible to use the EU logo on a voluntary basis in the case of any organic products imported from Third Countries.

4.2.09 Calculation of Percentages of Ingredients

(Article 19 (834/2007))

- As a general guide, the proportions of ingredients are calculated as they are weighed into the 'mixing bowl';
- When calculating the percentages for an 'Organic' product only the agricultural ingredients (ii)
- (iii) Water must be excluded from the calculations;
- (iv) Dehydrated ingredients which are to be rehydrated prior to mixing, must be weighed after rehydration;
- (v) Other non-agricultural ingredients, including salt, additives, micro-organisms and other materials listed in Section 10.3 and processing aids listed in Section 10.3 must be excluded from the calculations:
- (vi) Products making an organic claim, may not include the same agricultural ingredient in both non-organic and organic, or in-conversion, forms;
- (vii) All ingredients, including additives, of a multi-ingredient product must be listed on the product label in decreasing order by weight. It must be apparent which ingredients are of certified organic origin and which are not.

Subcontracted Products

- 4.2.10 Where the producer of a product certified by OF&G contracts out a processing operation to a company certified by another control body and wishes to identify the production standards and/or logo of OF&G
 - A written agreement is required, dated and signed, between the producer and the subcontractor that commits both parties to reveal if either of their organic certification is altered, suspended, terminated, withdrawn or lapses for the product involved;
 - Both operators must gain approval for the label from their own certifier and show proof of (ii) this to the other operator;
 - (iii) The OF&G logo, if used, must not include the term 'GB-ORG-02' but must be prefixed by the phrase 'Produced under':
 - (iv) The logo of the sub-contractor's organic control body may not appear;
- 4.2.11 As an example this could apply to a farmer having his OF&G certified meat processed, packed and labelled by a butcher certified by another control body, for sale in the farm shop. The UK code number of that body must appear on the labels but under the above arrangement, the OF&G logo could appear in place of the other control body's name or logo.

Imported Products

4.2.12	Where a product has been imported from an EU Member State or Third Country for processing or re-labelling by a registered processor, the use of the OF&G logo shall only be permitted where the production standards are in accordance with production standards specified in Sections 7 and 8 of this Manual.
4.2.13	The logo and/or name of a UK certifier may be used to show the certifier of the UK importer on organic produce labelled in the exporting country.
4.2.14	Such labelling should only appear where the conditions stated in Section 4.2.12 are in place and OF&G has approved the label.
4.2.15	The code number of the certifier in the exporting country must still appear on the labelling.

Notes - This font - EU Regulation/OF&G Standards **Certification Manual - Section 4** 01/04/2013 This font – OF&G Guidance Notes This font - 'Partnership Programme'

4.2.16	There is no requirement for imported produce to be labelled with a UK code number. Any such requirement would be acting in restraint of trade and would not be acceptable.		
4.2.17	Terms Used To Define Organic Products in EU Member States		
	(Article 23 (6) (834/200	07))	
	These terms may be found on products imported from EU member states and confirm that the product has been organically produced. The terms only apply to products from agricultural production systems and must not be confused with the use of these terms in connection with other scientific fields such as organic chemistry.		
	Bulgarian:	Биологично Земеделие	
	Czech:	Ekologické Zemedelství	
	Danish:	Økologisk Jordbrug	
	Dutch:	Biologische Landbouw	
	Estonian:	Mahepõllumajandus or Ökoloogiline Põllumajandus	
	English:	Organic Farming	
	Finnish:	Luonnonmukainen Maataloustuotanto	
	French:	Agriculture Biologique	
	German:	Biologische Landwirtschaft or Ökologischer Landbau	
	Greek:	Bioatikh Teωptia	
	Hungarian:	Ökológiai Gazdálkodás	
	Italian:	Agricoltura Biologica	
	Lithuanian:	Ekologinis Žemės	
	Maltese:	Agrikultura Organika	
	Polish:	Rolnictwo Ekologiczne	
	Portuguese:	Agricultura Biológica	
	Romanian:	Agricultură Ecologică	
	Slovakian:	Ekologické Poľnohospodárstvo	
	Slovenian:	Ekolosko Kmetijstvo	
	Spanish:	Agricultura Ecológica	

Partnership Programme

Swedish:

4.2.18

The labelling of a product may only refer to the Partnership Programme or use the Partnership Programme logo where the product in question is certified to that programme and the operator has been issued with the Partnership Programme Certificate and Schedule to the Certificate which specify the products in question.

4.3 Labelling of Organic Feed Products

Feeds for Animals Intended for Human Consumption

Ekologiskt Jordbruk

4.3.01 (Article 59 (889/2008))

The labelling, advertising and commercial documentation relating to organic and in-conversion products may refer to organic production methods only where:

- (i) The products have been produced, prepared or imported by an operator who is subject to the inspection measures laid down in Section 5 of this Manual;
- (ii) At least 95% of the product's dry matter is organic;

Certification Manual - Section 4 Notes - This font – EU Regulation/OF&G Standards **01/04/2013** This font – OF&G Guidance Notes

Page 7 of 12 This font – 'Partnership Programme'

The products and the materials of which they are composed and any other substance 4.3.01 used in the preparation of those products have not been subjected to treatments involving cont. the use of ionising radiation; (iv) Non-organic feed materials from plant origin, feed materials from animal and mineral origin, feed additives, certain products used in animal nutrition and processing aids shall be used only if they have been authorised for use in organic production under Article 16 of EC 834/2007; (v) Growth promoters and synthetic amino-acids shall not be used; (vi) The processed feed complies with the provisions of this Manual and in particular with Sections 8.4 and 11.15.10; (vii) The processed feed complies with Section 11.1.04 of this Manual; (viii) Feed materials from the organic production method do not enter simultaneously with the same feed materials produced by non-organic means into the composition of the product; (ix) Feed materials from products in-conversion to organic farming do not enter simultaneously with the same feed materials produced by non-organic means into the composition of the product. 4.3.02 (Article 59 (889/2008)) If the above requirements are met, the following statement is permitted in the case of products comprising variable quantities of feed materials from the organic production method and/or feed materials from products in conversion to organic farming and/or non-organic materials: 'may be used in organic production in accordance with Regulations (EC) 834/2007 and (EC) 889/2008'. 4.3.03 (Article 19 (834/2007)) A compounded product may contain a raw material, which is both organic and in-conversion. Where a non-organic ingredient is used, the same ingredient cannot be present as either organic or in-conversion. 4.3.04 (Article 61 (889/2008)) The indication referred to in Section 4.3.02: Must be separate from the wording referred to in Article 5 of Directive 79/373/EEC or in Article 5(1) of Directive 96/25/EC; Must not be presented in a colour, format or character font that draws more attention to it than to the description or name of the animal feedingstuff referred to in Article 5(1)(a) of Directive 79/373/EEC or Article 5(1)(b) of Directive 96/25/EC respectively; (iii) Must be accompanied, in the same field of vision, by an indication by weight of dry matter referring: (a) To the percentage of feed material(s) from the organic production method: To the percentage of feed material(s) from products in conversion to organic (b) farming; (c) To the percentage of feed material(s) not covered by points (a) and (b); (d) To the total percentage of animal feed of agricultural origin. (iv) Must be accompanied by the name and/or the code number of the control body or authority to which the operator who carried out the final preparation is subject: Must be accompanied by a list of names of feed materials from the organic production method: (vi) Must be accompanied by a list of names of feed materials from products in conversion to organic farming;

4.3.04 cont.	(vii) May be accompanied by a reference to the requirement to use in accordance with Sections 8.4.06 to 8.4.08 and 8.4.14 to 8.4.17.
4.3.05	The labels of all animal feed products must list all the ingredients in descending order by weight. Any ingredients that are organic or in-conversion must be clearly identified. In-conversion ingredients must not be identified as organic.
4.3.06	The labels of all animal feeds must contain the 'GB-ORG-02' code to identify OF&G as the responsible control body.
4.3.07	Detailed guidance for the labelling of animal feeds are provided in OF&G Technical Leaflet 206 - Guidance Notes for Feed Mills on the Manufacture, Labelling and use of Feeds for Organic Farming.

Pet Foods

4.3.08	Pending the inclusion of detailed processing rules for pet food in the EU Organic Regulations, national rules or, in the absence thereof, private standards accepted or recognised by the Member States shall apply.
4.3.09	Pet food products complying with the requirements of Section 8.4 of this Manual will be considered on a case-by-case basis. Where accepted for certification, they may be labelled in accordance with Section 4.3.04 above and carry the OF&G logo but without the statement 'GB-ORG-02' because this is restricted to products in the human food chain.
4.3.10	The labels of all pet food products must list all the ingredients, with the organic status of the agricultural ingredients identified where appropriate.

4.4 Labelling of Farm Inputs

Pot Plants, Transplants and Reproductive Vegetative Materials

4.4.01	Plants grown in pots and trays, such as potted herbs and wheatgrass, intended for sale to the final consumer and labelled as 'organic' must be grown in substrates mainly composed of materials (more than 51%) derived from organic farming but not including soil or peat. A minimum of 75% of the substrate must originate from organic sources, yielding 51% of the nutrient content expressed as nitrogen. The balance must be composed of materials listed in Sections 7.14 and 7.16 of this Manual. The labels of these products may carry the OF&G logo.
4.4.02	Propagating materials such as pot plants and transplants raised in substrates solely composed of permitted materials for soil fertilising and conditioning listed in Sections 7.14 and 7.16 of this Manual must not carry any indications of organic production on the labels or advertising materials other than the term 'Transplants Approved for use in Organic Farming'. The word 'organic' in this statement, elsewhere on the label and/or on the advertising, shall not be more prominent than the other words of the statement. The labels of these products must NOT carry the OF&G logo.
4.4.03	Vegetative propagating materials such as strawberry plants, which are grown on a short term or annual cycle can be considered to be annuals. The runners can only be labelled as organically produced strawberry plants if the mother plants are grown on registered organic units for a minimum of 6 weeks. The labels of these products may carry the OF&G logo.
4.4.04	Where the mother plants are brought in from non-registered sources, cane and bush fruits and fruit trees can only be labelled as organically produced where the mother plants have undergone a minimum of 2 years organic management on a registered unit. The labels of these products may carry the OF&G logo.

4.4.05	During the 2-year 'conversion', products from these mother plants shall be labelled, in the labelling and advertising material, as 'Fruit Stock Grown on an Organic Unit'. The word 'organic' in this statement, elsewhere on the label and/or on the advertising, shall not be more prominent than the other words of the statement. The labels of these products must not carry the OF&G logo.
4.4.06	The labels and accompanying documentation for all products indicated in Sections 4.4.01 to 4.4.05 above must contain the code 'GB-ORG-02' to identify OF&G as the responsible control body.

Seeds

4.4.07	Mixes labelled as containing part organic or fully organic seeds, must be certified products mixed at a certified mill. The non-organic seed in the mix must be untreated and come from a non-GM source.
4.4.08	The labelling of a part organic mix should state for example:
	'X% Organic Grass Seed Mix' plus the statement – X% of the seeds have been produced in accordance with the EU organic regulation.
	The organic status of the individual components of the mix must be indicated.

Approved Farm Inputs

4.4.09	Product from non-organic sources, such as approved pest and disease control materials, propagating composts, manures and soil conditioning materials and fertilisers, listed in Sections 7.12, 7.14 and 7.16 of this Manual, must not be labelled as organic products.
4.4.10	Approved products which do not require prior approval before use (identified in Sections 7.12, 7.14 and 7.16 of this Manual) shall carry, in the labelling and accompanying documents, the statements:
	(i) 'Approved (Product name) (X% nutrient)' where the percentage X of the plant nutrient is required, and;
	(ii) 'Approved for use in Organic Farming'.

Restricted Farm Inputs

4.4.11	Products which require written approval before use (identified in Sections 7.12, 7.14 and 7.16 of this Manual as – 'Must be approved before use'), shall carry, in the labelling and advertising materials the statements:
	(i) 'Approved Restricted (Product name) (X% nutrient)' where the percentage X of the plant nutrient is required, and;
	(ii) 'Registered for Restricted Use in Organic Farming - Must be Approved before use'.
4.4.12	Where a product is labelled as indicated in Section 4.4.11, only the Restricted Product logo may be used on the product.
4.4.13	Where a product is labelled as indicated in Sections 4.4.10 and 4.4.11, the code 'GB-ORG-02' must not be used on the product.

4.5 **Labelling of Non-food Products**

Agricultural Products

4.5.01 Where products, such as wool, veterinary products, essential oils and creams are composed of agricultural products which have been organically produced but are not covered by 834/2007:

- The product may be labelled as an 'Organic Product':
- (ii) The product may carry the OF&G logo (to be determined on a case by case basis);
- (iii) The product must not carry the 'GB-ORG-02' code as this is restricted to products in the human food chain;
- (iv) The product may not carry the EU logo.

Products of Non-agricultural Origin

4.5.02 Non-agricultural products, such as water or sea salt, are not covered by the EC Regulation 834/2007 but can be labelled as follows:

- The product must not be labelled as an 'Organic Product';
- (ii) The product can carry the label 'Water Bottled on an Organic Farm' or 'Organically Approved Sea Salt' and 'Certified by (name of control body)';
- (iii) The product must not carry the OF&G logo, the EU logo or the 'GB-ORG-02' code.

4.6 Organic production logo of the European Union - Specific Requirements

Organic logo of the EU

(Annex XI (EC) 271/2010 (1), (3), (5)) 4.6.01

The Organic logo of the EU shall comply with the model shown.



The reference colour in Pantone is Light Green 376

CMYK: 50 / 0 / 100 / 0 RGB: 169 / 201 / 56

If a symbol is used in colour on a coloured background, which makes it difficult to see, a delimiting outer line around the symbol can be used to improve contrast with the background colours.

(Annex XI (EC) 271/2010 (3), (4)) 4.6.02

> The Organic logo of the EU can also be used in black and white as shown, only where it is not practicable to apply it in colour.



If the background colour of the packaging or label is dark, the symbols may be used in negative format, using the background colour of the packaging or label.

(Annex XI (EC) 271/2010 (6)) 4.6.03

> In certain specific situations where there are indications in a single colour on the packaging, the Organic logo of the EU may be used in the same colour.

(Annex XI (EC) 271/2010 (7)) 4.6.04

> The Organic logo of the EU must have a height of at least 9mm and a width of at least 13.5mm; the proportion ratio height / width shall always be 1:1.5. Exceptionally the minimum size may be reduced to a height of 6mm for very small packages (for example a small packet of chewing gum or a single sugar sachet).

4.6.05	(Annex XI (EC) 271/2010 (8))
	The Organic logo of the EU may be associated with graphical or textual elements referring to organic farming, under the condition that they do not modify or change the nature of the Organic logo of the EU, nor any of the indications mentioned in this section. When associated to national or private logos using a green colour different from the reference colour mentioned in Section 4.6.01 above, the Organic logo of the EU may be used in that non-reference colour.
4.6.06	Organic Farmers & Growers are not requiring the mandatory use of the OF&G logo. However, should you wish to use our logo, please refer to Technical leaflet TL212 Labelling of Organic Food Products for guidance.

4.7 Approval of Labels

4.7.01	All labels and packaging materials referred to in Section 4.1 to 4.6 must be submitted to OF&G
	for approval prior to printing and use.