Guidance on Documentation for Organic Ingredients In Processed Products

Records for Organic Ingredients:
The Rule (7 CFR, Part 205, the National Organic Program; Final Rule), §205.103 states that organic operations must maintain records that are sufficient to demonstrate compliance with the regulations.

The National Organic Program publishes the National Organic Program Handbook* which includes the “Guide for Organic Processors”. Page 29 of the Guide for Organic Processors contains the following:

Supplier certificates
If you purchase organic ingredients, you will need to obtain current organic certificates from each supplier to verify that the ingredient is indeed organic. When you purchase the ingredient, keep the invoice and verify that the item is marked “organic” on the invoice. If you purchase an item, such as organic sugar, from the grocery store, save the label and the receipt.

As stated organic handlers / processors sourcing organic ingredients must maintain documentation to verify the ingredients purchased are in fact certified organic ingredients.

The USDA has the INTEGRITY database system. If you are sourcing organic ingredients from an operation that is certified to the National Organic Program, that operation will be listed in the INTEGRITY database system. Organic certificates for such operations can be printed from INTEGRITY by finding the supplier’s entry on the list, then click on their name. When the page opens, click on the “Product Details” tab, then click on the “Export to PDF” option in the upper right to open a dated organic certificate that can be saved or printed. Ensure the organic ingredient you are sourcing is listed / provided for on the certificate.

Sourcing from Uncertified Distributors and Stores:
If the entity you are sourcing from is not the certified organic handler who packaged the organic ingredient, you must obtain the organic certificate of the last certified handler. Typically, the supplier will have that handy. It is important to keep in mind that only products that are already packaged and labeled, and remain packaged and labeled, can be handled by uncertified entities. If your supplier is handling organic product by combining loads, repackaging, or relabeling, they MUST be certified for that activity. If they are not, you should not source organic ingredients from that entity because the ingredients have lost their certified organic status and must not be considered as organic ingredients in your final processed product.

This is also true for uncertified retailers or stores. If you wish to source a packaged organic product in a non-certified retail location such as a supermarket, as stated in the excerpt from the guidebook you must save the label / packaging from that certified product and save the receipt. This will document who the certified final handler was, who the certification agent is, and confirm that you purchased that ingredient.

This precludes / prohibits the use of organic items not enclosed in packages or containers, such as loose organic apples in a bin, or granola in a bulk item tube. Such ingredients cannot be used as organic ingredients in processed products. §205.310(a)(2) states an agricultural product organically produced or handled on an exempt or excluded operation must not be identified or represented as organic in a processed products.

It may be possible to source bulk items from a certified retailer (there are stores who choose to become certified), but keep in mind that you must obtain documentation, such as organic certificates and receipts, gathered from the certified retailer. Be sure you can secure this level of documentation from the certified retailer prior to purchasing. If you have any questions about sourcing organic ingredients or what documents you must collect for those ingredients, please contact the NJDA Organic Certification Program.

* = (found on the NOP web site at https://www.ams.usda.gov/sites/default/files/media/Program%20Handbk_TOC.pdf)

NJDA DOI08.08.19