

## Retail and Wholesale Labeling for Farms

*In general, the labels of organic products can use the USDA organic seal and the seal of the certifying agent. They can make truthful organic claims, including the percentage of a product's organic content. This document addresses retail and wholesale labeling guidelines for organic farms only.*

There are three categories of labels that organic farms can use to label their certified products and each of them is regulated differently:

1. Retail packaged products labeling
2. Unpackaged retail labeling
3. Wholesale labeling

### Packaged organic products labeled for retail sale:

Packaged and labeled organic products need to comply with USDA organic regulation 7 CFR 205.303. This section has two main requirements:

- a. The organic certifier must be identified in the information panel, right below the information identifying the farm, manufacturer, or distributor. The required phrasing should be, "Certified organic by (name of certifier)", or some very similar language.

**Sample Label:** You might find this label on a bag of apples in a retail setting.



- b. If the packaged product has more than one ingredient, then an ingredient statement is required, and that ingredient statement must describe each organic ingredient as organic. The goal is to make sure the customer can clearly tell which ingredients are certified and which are not. In the case of limited space, the standards allow each organic ingredient to be followed by an asterisk, with the asterisk defined at the end of the ingredient statement as representing an organic ingredient.

For example, the ingredient statement for a jar of organic strawberry jam could be presented in either of these formats:

“Ingredients: organic sugar, organic strawberries, water, fruit pectin, calcium chloride.”

**OR, the ingredient statement could be written this way, with the asterisk marking the organic ingredients:**

“Ingredients: sugar\*, strawberries\*, water, fruit pectin, calcium chloride.  
\*organic.”

(Pectin and calcium chloride are allowed per the National List of Allowed and Prohibited Substances, and so can be allowed in organic products provided that they are <5% of the total ingredient weight.)

It should be noted that the Food and Drug Administration (FDA) also has food labeling requirements. Click [here](#) to learn more.

## **Unpackaged certified organic products for retail**

7 CFR 205.308

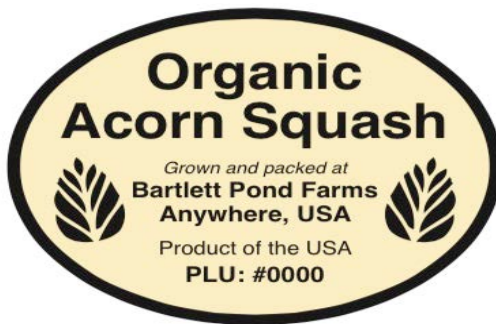
Unpackaged organic products on display at farmers’ markets or retail stores are not *required* to display any specific information, although the farmer or retailer can *choose* to display organic claims and can utilize the USDA organic seal or the certifier seal.

Unpackaged certified organic products include many fresh fruits and vegetables sold in a retail environment or farmer’s market. Examples include organic oranges sold individually, (not bagged), fresh parsley bunches, stacked green beans, fresh cucumbers, etc. These items are not typically packaged in a farmer’s market or in a fresh produce section of a retailer. This category of product can also include plant tags for seedlings.

**Sample Label 1:** This example shows a twist tie label that a hypothetical farmer might use to bunch unpackaged Swiss chard. Note the farm chose to display the USDA organic seal, and to display the certifier information, but not the official certifying seal. The farmer could have displayed all or none of these.



**Sample Label 2:** Note that this hypothetical farm chose not to display the USDA organic seal or the certifying seal. This sticker would be placed on unpackaged squash, ready for individual retail sale.



### Wholesale labeling

7 CFR 205.307

This section of the organic standards is concerned with the labeling of nonretail containers used specifically for shipping or storage of raw or processed agricultural products that are defined and labeled as "100 percent organic," "organic," or "made with organic (ingredients or food groups)".

Examples of non-retail containers include bulk totes of grain or master cases of wholesale packaged products. A master case is simply the box or container that the manufacturer or distributor may use to ship more than one packaged product.

Master cases and other non-retail containers are primarily used to store or ship large quantities of packaged or bulk products. The product may be headed directly to storage, to another handler, or to the retailer. Non-retail containers are never visible to the consumer in a retail setting.

Although only the production lot number is required on such labels (if the lot numbers exists), an organic handler may *choose* to display organic labeling information on the outside of the non-retail container. This may help ensure that the product receives special handling consistent with organic practices. The handler may choose to display:

- The USDA organic seal
- The certifier seal, name, and contact info
- Special handling instructions related to maintaining organic integrity of product
- Other accurate organic descriptions.

**Sample Wholesale Label 1:** You might see this type of label on the outside of a container used for shipping large quantities of packaged organic foods. This farmer chose to include the USDA organic seal and the certifying seal.



**Sample Wholesale Label 2:** Another example of a label you might find on a box or container used to ship organic foods. Note this one includes the lot #, which must be included on all wholesale labels **if there is one**.



## For Further Reading & Questions

The full text of the [USDA organic regulations](#) can be found online at the U.S. Government Publishing Office (GPO) website in the Electronic Code of Federal Regulations (e-CFR).

Specifically, these organic regulatory sections may be helpful to those with questions about retail and wholesale labeling for farmers:

- |                               |  |
|-------------------------------|--|
| <a href="#">7 CFR 205.303</a> | Packaged products labeled “100 percent organic” or “organic”   |
| <a href="#">7 CFR 205.307</a> | Labeling of nonretail containers used for only shipping or storage of raw or processed agricultural products labeled as “100 percent organic,” “organic,” or “made with organic ingredients” |
| <a href="#">7 CFR 205.308</a> | Agricultural products in other than packaged form at the point of retail sale that are sold, labeled, or represented as “100 percent organic” or “organic”                                   |
| <a href="#">7 CFR 205.311</a> | USDA Seal  |

For general information about the USDA’s National Organic Program (NOP), visit [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop).

Further questions may also be directed to your certifying agency.

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