

August 22, 2014

TO: National Organic Program Accredited Certifying Agents
FROM: Miles McEvoy, Deputy Administrator
**RE: Instruction: Use of Brand or Company Names
Containing the Word “Organic”**



On August 14, 2014, the National Organic Program (NOP) issued an instruction clarifying the requirements for use of brand or company names containing the word “organic” on the labeling of agricultural products. The instruction will ensure consistency by certifiers when reviewing product labeling, and it reflects the NOP’s principles for review of the use of company or brand names containing the word “organic” on product labeling.

Certifiers should consider the following aspects of the instruction during its implementation:

- The “made with organic (specified ingredients or food groups)” is an “organic” labeling category under the USDA organic regulations at 7 CFR § 205.304. The “made with organic (specified ingredients or food groups)” labeling category has specific labeling provisions for which the NOP has provided guidance. As with products in the “100 percent organic” and “organic” labeling categories, “made with organic (specified ingredients or food groups)” products must be certified by accredited certifiers, must list the certifier on the label, and must comply with relevant regulatory labeling requirements. Reference: [“Guidance: Products in the “Made with Organic ***” Labeling Category”](#)
- Labels that were previously approved by accredited certifiers are in good standing. Moving forward, we expect certifiers to review labels as part of the annual review process, and work with companies to ensure their labels align with the new instruction. We expect certifiers to use a sound and sensible approach and take into account the time and effort needed for certified operations to make label changes.