



Labelling guidelines for product exported to the USA

These guidelines aim to provide an outline of the requirements for labelling products for export to and sale in the US under the UK/US organic equivalence agreement. Products exported under this agreement must be certified to the GB organic regulation.

You can find details of the agreement on the USDA website

<https://www.ams.usda.gov/services/organic-certification/international-trade/UK>

The full USDA labelling requirements are set out in subpart D of the regulatory text

<https://www.ecfr.gov/current/title-7/subtitle-B/chapter-I/subchapter-M/part-205/subpart-D>

Labelling

- **100% organic claims** – You may only refer to a product as 100% organic if it contains only organically produced ingredients. This excludes water and salt. The composition of the product must comply with the GB regulations.
- **Organic claims** – To label a product as 'organic', it must contain no less than 95% organically produced ingredients. This excludes water and salt. The composition of the product must comply with the GB regulations.
- **Declaring the certification body** – In addition to using SA Certification code, (GB-ORG-05 in GB and XI-ORG-05 in NI), the NOP requires the label to include the name of the certifier that certified the handler* of the finished product. '*Certified organic by Soil Association Certification*', or similar phrase, must appear on the information panel* below the information identifying the handler or distributor of the product.

*NOP uses the following definitions:

Information panel - '*That part of the label of a packaged product that is immediately contiguous to and to the right of the principal display panel as observed by an individual facing the principal display panel, unless another section of the label is designated as the information panel because of package size or other package attributes (e.g., irregular shape with one usable surface).*

Principle display panel – '*That part of a label that is most likely to be displayed, presented, shown, or examined under customary conditions of display for sale*'.

Handler - '*Any person that handles agricultural products, except final retailers of agricultural products that do not process agricultural products.*'

- **Identifying ingredients** – All ingredients of multi-ingredient products must be declared, and the organic ingredients differentiated from the non-organic ingredients. This can be done by preceding each ingredient with either the word 'organic', or an asterisk linking to an explanatory statement below the ingredients list. Salt and water must not be described as organic.

- **Statement of agricultural origin** – This is a requirement of the GB organic regulation for all product pre-packed in GB and also applies to product for export.
- **Use of the USDA symbol** – Application of the USDA symbol is optional for product exported to the USA. Product with the USDA symbol may also be sold on the GB market. Product may not be exported to other countries with the USDA symbol - the scope of the equivalence agreement is limited to trade between the USA and UK. It can be used in conjunction with the Soil Association logo. Our symbol cannot be displayed more prominently than the USDA logo. It is permitted on bulk labels. There are three versions of the USDA logo and these can be obtained from their website <https://www.ams.usda.gov/rules-regulations/organic/organic-seal>
- **Products with less than 95% organic ingredients** – The UK-US equivalence agreement only applies to product which are 95% or above organic content. Products with less than 95% organic content are outside the scope of the arrangement and so cannot be exported to the USA under the terms of the agreement.
- **Livestock feed labels**
Livestock feed product labels must declare the certification body as above, but no other information is required besides the standard legal requirements. For details of these, contact the FDA or visit their website <https://www.fda.gov/animal-veterinary/products/animal-food-feeds>

It is your responsibility to ensure your labelling complies with any other mandatory labelling requirements for the USA. This guide covers organic specific requirements only.

Please submit labels to food.drink@soilassociation.org for approval prior to printing to ensure they meet the requirements.