

Made With Organic Panel Copy

principal display panel and information panel copy for a packaged food, checked against the certifier's composition record | Marked-up specimen

<https://www.editfast.com/editing-services/organic-farming>

Package copy at 82 percent organic content, read against the labeling section that governs that band rather than the one above it.

ORIGINAL, WITH EDITS MARKED

SPECIMEN, PREPARED BY EDITFAST FOR ILLUSTRATION. NOT A REAL PACKAGE.

Prepared for Kettle Row Foods (fictitious), retail carton copy

EXTRACT FROM THE CERTIFIER'S RECORD (reproduced unchanged in both panels)

CR-1 Composition confirmed by the operation and its certifying agent: 82 percent organically produced ingredients by weight, excluding water and salt.

CR-2 Organically produced ingredients: oats, sunflower oil, honey.

CR-3 Ingredients not organically produced: sea salt, natural flavor.

CR-4 Certifying agent that certified the handler of the finished product: Midland Organic Certifiers.

CR-5 Largest type size on the principal display panel: 36 point.

CR-6 The operation is certified, and it is not exempt under 7 CFR 205.101.

CR-7 The handler and distributor identification appears on the information panel.

PRINCIPAL DISPLAY PANEL

ORGANIC OAT CLUSTERS (36 point)¹

MADE WITH ORGANIC OATS, SUNFLOWER OIL, HONEY, AND SEA SALT (36 point)²

[USDA organic seal reproduced here]³

Certified organic by Midland Organic Certifiers⁴

INFORMATION PANEL

INGREDIENTS: Oats, sunflower oil, honey, sea salt, natural flavor.⁵

Distributed by Kettle Row Foods, Portland, Oregon

WHAT CHANGED, AND WHY

#	Was	Now	Reason
1	ORGANIC OAT CLUSTERS (36 point)	OAT CLUSTERS (36 point)	CR-1 places this product in 7 CFR 205.301(c). The permission to use "organic" to modify the name of the product sits at 205.303(a)(1), and 205.303 reads on packages described in 205.301(a) and (b). Section 205.304 is the section that reads on packages described in 205.301(c), and it carries no equivalent permission.
2	MADE WITH ORGANIC OATS, SUNFLOWER OIL, HONEY, AND SEA SALT (36 point)	MADE WITH ORGANIC OATS, SUNFLOWER OIL, AND HONEY (18 point or smaller)	Paragraph 205.304(a)(1)(i) allows the statement provided it "does not list more than three organically produced ingredients," and four are listed. CR-3 records sea salt as not organically produced, and CR-2 gives the three that are. Paragraph (a)(1)(iii) requires the statement to appear "in letters that do not exceed one-half the size of the largest type size on the panel," and CR-5 gives 36 point as the largest.
3	[USDA organic seal reproduced here]	(removed from the panel)	Section 205.304(c) provides that agricultural products in packages described in 205.301(c) "must not display the USDA seal." CR-1 places the product in that band, and CR-6 records that the question is not one of certification status.
4	Certified organic by Midland Organic Certifiers	(moved to the information panel, below the distributor line)	Paragraph 205.304(b)(2) requires the certifying agent to be identified "On the information panel, below the information identifying the handler or distributor of the product," preceded by that statement or a similar phrase. CR-7 records where the distributor line sits.
5	INGREDIENTS: Oats, sunflower oil, honey, sea salt, natural flavor.	INGREDIENTS: Organic oats, organic sunflower oil, organic honey, sea salt, natural flavor.	Paragraph 205.304(b)(1) requires each organic ingredient to be identified in the ingredient statement with the word "organic," or with a reference mark defined below the statement. It adds that water or salt included as ingredients cannot be identified as organic, so the sea salt entry stays unmarked.
6	(nothing states the percentage)	[Query to the operation: 7 CFR 205.304(a)(2) allows the percentage of organic ingredients on the panel, at the same one-half ceiling. CR-1 records 82 percent. The figure has not been printed, because the section permits it rather than requiring it.]	The percentage is permitted rather than required, and whether to print it is a decision for the operation. The figure is not written in on our own initiative.