

ACA Best Practices for Listing Products on Organic Handler Certificates

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Purpose

This ACA Best Practices document describes ways to list products on organic handler certificates. Members of the Accredited Certifiers Association have noted that many products within the Handling scope are not listed in a consistent manner on the Organic Certificates produced by various organic certification agencies. Increased consistency in ACA policies for certificate listings will ensure that organic integrity can be verified on a product level, enabling a higher level of traceability within the supply chain as a whole.

Background

[7 CFR 205.404 \(b\)\(1-4\)](#) describes information that must be included on an Organic Certificate issued by a certifying agent:

- (b) The certifying agent must issue a certificate of organic operation which specifies the:*
- (1) Name and address of the certified operation;*
 - (2) Effective date of certification;*
 - (3) Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation; and*
 - (4) Name, address, and telephone number of the certifying agent.*

[NOP Instruction document 2603 on Organic Certificates](#) provides additional details on how certifiers can comply with the requirements of §205.404 and related USDA Organic Regulations. Certifiers strive to balance thoroughness and transparency with efficiency and practicality. USDA Organic Integrity Database reporting taxonomy informs certificate listings in some but not all cases. Additional questions arise when activities, rather than products, are certified. A working group was assembled to address these topics. The working group also sought to delineate between when production ends and handling begins and to address questions related to confidentiality and transparency in private label arrangements. The working group has produced the following Best Practices. Please note these are specific to the Handling scope.

General Taxonomy and Organic Certificate Structure for Handled Products

To improve clarity and traceability, organic certificates must list the product names used to refer to a product at time of sale or for inventory purposes. The product name must be used

consistently on labels, signs, invoices, websites, and/or catalog descriptions. Organic Certificates vary in structure from one certifier to the next. Some certifiers use some type of addendum in addition to the Organic Certificate to provide greater detail regarding labels, acreage, brand names, size of packaging, etc. However, not all certifiers regard the addendum as a formal and public part of the Organic Certificate. Some non-public addenda include confidential supply chain information that cannot be disclosed to the public.

In general, certifiers should employ a three-tiered Organic Certificate Structure, which includes:

1. The Organic Certificate, which should list specific product names unless this level of detail is provided on a public addendum*
2. Certificate addendum (optional), which can be public or non-public; if public, must not disclose confidential information.
3. When appropriate: Confidential addendum** (non-public; certifiers provide this to buyers as appropriate)

*For example: If an Organic Certificate (including any public addendum) merely lists “fruit” or “tree fruit,” this is not sufficient to verify certification of apples. If apples are represented as “tree fruit” on the Organic Certificate, a public addendum should specifically list “apples.”

**Examples of confidential supply chain information:

1. Private label arrangements- disclosing the name of the brands and listing brand names on the certificate can be confidential.
2. Co-packing for companies A and B who are competitors- may have a generated custom certificate with a list of brands and label names.
3. Similar products sourced from competitors in a distributor’s inventory.

While the addendum may be considered confidential it needs to clearly associate the generic product with the brand names to allow for traceability in the supply chain.

Specificity of Product Names and Placement on Organic Certificate

In general, a product name must be included on some public part of the Organic Certificate, whether on the certificate itself or on a public addendum. This level of detail should also be reported to the Organic Integrity Database.

Examples:

- Apples marketed as Granny Smith Apples should be identified as “Granny Smith Apples” on the Organic Certificate or public addendum.
- Cabbage marketed as “cabbage” should be listed as “cabbage” on the Organic Certificate, whereas cabbage marketed as “red cabbage” should be described as “red cabbage” on the Organic Certificate or public addendum.

Certifiers who use non-public addenda should ensure that the Organic Certificate itself lists the product the way it is marketed. Certifiers using public addenda must ensure that confidential supply chain information is not disclosed.

Label/brand names should also be included on the Organic Certificate or public addendum to allow for transparency in the supply chain; however, some certifiers may have confidential addenda for private label arrangements.

For example:

- a product such as “Pizza Magic Pepperoni Pizza” can be listed directly on the Organic Certificate, or
- the Organic Certificate or public addendum can list “Pepperoni pizza” as long as the confidential addendum lists “Pizza Magic Pepperoni Pizza”

In either case, the addendum may include additional information such as size of packaging and anticipated sales/volume as needed for clarity or transparency regarding what is certified. Confidential details should only be included on a confidential addendum.

General/Categorical Product Listings on Certificates

Some operations request to have general categories, such as “bulk potatoes” or “wholesale corn” listed on their certificate. While these types of listings can be acceptable, the organic certificate should also specify “packaged” or “unpacked” whenever possible. For certificates listing “green coffee” the origin should also be listed to allow for traceability in the supply chain. Certifiers should consider having organic certificates with primarily general category listings as a risk factor on their risk assessments. Furthermore, certifiers may require additional records/information when certificates have general listings in order to verify traceability.

Listing Certified Handling Services on Certificates

Organic certificates may also include handling activities, sometimes called “process level” listings, in addition to specific certified products. Listing activities allow buyers, and their certifiers, to distinguish between a manufacturer or private label and a broker or distributor – between an operation that owns or produces product and one that merely provides a handling service. The list of handling activities should include all certified activities and complement the list of specific products. In some cases, certified handling activities may be listed on the Organic Certificate instead of certified organic products to which the activities pertain. This may be appropriate when a handler provides custom handling services for other certified organic operations, such as a seed cleaner which does not take ownership of seed but provides custom cleaning services for other organic operations.

Here are some examples of handling services language which can be used on the organic certificate in addition to specific certified products:

- Seed cleaning

- Bulk grain brokering, transport, storage, roasting, and drying
- Brokering dry fruits and nuts
- Grinding, mixing, bagging, and labeling poultry feed including custom mixes
- Grinding, milling, and blending flours
- Chopping, dicing, cutting, slicing, cubing, and coring produce for packaging, labeling and distribution
- Packaging, labeling, and distributing “Happy Cow” Calf Starter
- Wholesale pre-packaged produce labeling & distribution

If the custom processor also has their own certified organic products, those specific products need to be listed on the Organic Certificate or Addendum in addition to the services the handler provides.

If a custom handler mixes and blends certified products sold under more than one organic content category (e.g. organic and 100% organic), the organic certificate should reflect all of the claims. The buyer and certifier may need to request additional information, such as composition sheets, ingredient lists, and organic certificate listings, to verify the appropriate organic content claim is being used for any given product.

Scope Listing on the Organic Certificate - The Line Between Production and Handling

In some cases, it may be difficult to determine whether crops or other farm products should be listed under the Crop or Livestock Scope or under the Handling scope. Since some amount of post-harvest handling and/or storage exists on all farms, there is a sense in which all farm operations could be described as handlers. (See NOP 205.2 Definitions for *handle*, *handler*, and *handling operation*.) However, it does not seem logical or practical to view most farms as handlers or to assume that typical farm activities have the same types of complexities as operations on which handling of organic products is their sole or main activity. On the other hand, it is essential that producers maintain a Handling scope if, for example, they begin packing and selling their neighbor’s organic produce in addition to their own.

The working group recommends certifiers consider requiring certification as a handler when the processing/handling activities are more complex or of a larger scope than what is common on most other farms producing the same goods. Certifiers should also consider requiring certification as a handler when on-farm handling activities require additional licensing, involve use or sale of organic products from other operations, include the certification of multi-ingredient products, or when the product is substantially transformed from its original state such as when handling involves roasting, canning, fermenting or other processing beyond packaging, labeling, storing and selling.

In general, if the handling activities of the operation cannot be clearly and reasonably described within a Farm Organic System Plan, then a Handling Organic System Plan should be used to ensure a complete assessment of all activities, and the operation’s Organic Certificate should

list the Handler scope. For producers who are also certified to the Handling scope, handled products should be listed on the Organic Certificate as described above, including any brand names used to market the product. Any activities on the farm that require handling certifications should follow the norms set out in this document. A more detailed conversation on the line between production and handling, as it relates to forms and fees, is outside the scope of this document.

Conclusion:

In conclusion, these best practices stipulate that organic certificates list the product names used to refer to a product at time of sale or for inventory purposes whether on a public addendum or the certificate itself. Organic certificates with generalized listings should be considered a risk and may require additional records/information to verify traceability within the supply chain. Organic certificates may also include handling activities in addition to specific certified products. In rare cases, certified handling activities may be listed on the Organic Certificate instead of certified organic products to which the activities pertain. Finally, these best practices briefly describe what operations should be certified under the handling scope.

About ACA Best Practices:

ACA Best Practices describe actions certifiers should take to verify operator compliance, as well as producer activities that can easily be approved by certifiers. The ACA strives to ensure that all Best Practices are consistent with the Organic Foods Production Act (OFPA) and the USDA Organic Regulations. These Best Practices are not legally binding, but if a producer presents plans that fall outside of these Best Practices, then the Organic System Plan (OSP) should provide a rationale for alternative methods and an explanation for how their system fulfills the applicable portion(s) of the related regulations. Certifiers will evaluate whether the differences can be justified. Similarly, if certifiers take an approach that is different from what is presented here, they should be able to articulate how the differing approach is justified according to the OFPA and the USDA Organic Regulations. The ACA recommends all accredited certifiers adopt ACA Best Practices for consistent implementation of the USDA Organic Regulations. ACA Best Practices are reviewed periodically to ensure they are accurate and up to date. Concerns with this or any ACA Best Practice or guidance document should be submitted to the ACA Coordinator.

Resources

[NOP Instruction document 2603 on Organic Certificates](#)
[Organic Integrity Database Data Dictionary](#)
[Organic Integrity Database NOP Taxonomy](#)