

Organic Labeling

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MOFGA certified producers need to be careful with the rectangular banner that spans the center of the MOFGA seal, seen below. This banner exceeds the diameter of the circle in the background making the entire seal larger than it appears at first glance. The USDA seal is only a circle, so you need to make sure that the diameter of the USDA seal is greater than or equal to the length of the rectangular banner on the MOFGA seal. If the USDA seal diameter is less than the length of the banner, then producers will have to modify their labels accordingly. This could be a costly mistake if labels are printed before confirming new labels with MCS. Always send your label proofs to MCS for review prior to printing so we can catch any devils in the details.



CO-PACKING ARRANGEMENTS AND CONSIDERATIONS

by John Welton, Certification and Quality Specialist

Contract packaging, or co-packing, is a commercial arrangement where a company manufactures and packages another company's product line. An example of this might be a certified organic vegetable farm that doesn't have the time or resources to turn its produce into value-added products, but contracts with a certified organic manufacturer to make salsas, relish, or the like, to be sold under the vegetable farm's label. It's important to keep in mind that, for any co-packing arrangement, there is a manufacturer and a label owner who need to coordinate their activities to ensure organic integrity throughout the production process. Co-packers must be certified organic for the final product to be labeled as certified organic. This article will look at several possible co-packing scenarios and what certified organic producers need to keep in mind when exploring this option for their business.

Scenario 1: MCS-certified co-packer and an uncertified label owner

Label owners do not have to be certified organic to sell certified organic products. For example, an uncertified coffee roaster who wishes to expand their product line to include organic coffee may contract with a certified organic coffee roaster to co-pack a line of organic coffees to sell under the uncertified roaster's label.

In this case, the label will list MOFGA as the certifier and may, or may not, include the manufacturer's information. The co-packer will be expected to maintain all certification paperwork, including final product label copies, whether or not their business is mentioned on the label. If the co-packer sources ingredients from the uncertified label owner, the co-packer must maintain organic certificates for the last certified handler of the ingredients.

Scenario 2: MCS-certified co-packer and label owner certified by a different certifier

Since both producers are certified organic, the final product label may list either MOFGA or the label owner's certifier, depending on which business is listed on the label. Regardless, the MCS certified co-packer needs to maintain all

documentation related to organic production, including copies of the final product labels.

The co-packer should have a copy of the label owner's organic certificate that lists the products made by the co-packer. The label owner's certificate should also list all ingredients they provide to the co-packer. In this scenario, the co-packer needs to certify the finished products before they can be added to the label owner's certificate.

Scenario 3: MCS-certified co-packer and MCS-certified label owner

Final products can be approved for both operations simultaneously. If the co-packer and label owner are different businesses, then any update for one operation may affect the other operation's organic system plan. All involved in this type of scenario benefit from clear and consistent communication between the co-packer, the label owner and the certifier.

Scenario 4: Co-packer certified by a different certifier and MCS-certified label owner

The final product label may list either MOFGA or the co-packer's certifier, depending on which business is listed on the label. Label owners should have the co-packer's organic certificate on file for review at inspection. Records documenting all incoming co-packed products and sales of the co-packed products should be available for review by MCS.

Label owners in this scenario do not need to have the product recipes, ingredient source information, or information related to nonorganic ingredients or processing aids used. MCS will not review production records of the process products, as those should be reviewed by the co-packer's certifier.

Scenario 5: Uncertified co-packer and MCS-certified label owner

Final product cannot be certified organic! Co-packers must be certified organic for final products to be certified organic.

