Packaging Requirements for Organic Products

After all the planning and production, handlers are ready to package and sell their organic product. Exciting! But as you can imagine, there are clear USDA organic regulations around packaging organic products. Whereas you may find great packaging options that work well with similar conventional products, packaging for organic products must be compliant with the organic regulations, including no prohibited substances. Even if a package seems compliant, there can be hidden hazards like antimicrobials and ethylene scavengers that could get an organic handler into certification trouble. This article will walk you through the packaging details you'll want to know.

What You'll Learn

- **Common conversations with your certifier around packaging**
- **Hidden hazards in packaging**
- **Requirements for reusing containers in your facility during processing or transhipment**
- **Uses of tamper-evident packaging**

After all your work producing an organic product, the package is a crucial final step, connecting your product to your customer while maintaining its quality. It is also one of your last steps in the production of your organic product.

DEFINITION OF "PACKAGING"

Like some other terms, there is no explicit definition of what packaging is in the USDA organic regulations. However, the regulations do say that "packaging, canning, jarring, or otherwise enclosing food in a container may be used to process an organically produced agricultural product for the purpose of retarding spoilage or otherwise preparing the agricultural product for market."[1]

So, as you would already imagine from common sense, you can think of packaging as anything that prepares your organic product for market, encloses food in a container, or helps keep it from spoiling. In food processing, it is common for food packaging to contain substances to prevent the spoilage of food, but many of these substances are not permitted for use under the USDA organic regulations. Follow this article closely and you'll understand what is and is not allowed for packaging organic food products.

CERTIFIER REVIEW OF PACKAGING MATERIALS

The last thing a handler wants is to contaminate their organic product and put its organic status at risk. With this in mind, every piece of packaging that touches organic food should be evaluated to ensure it doesn't introduce prohibited substances.[2] Unlike the substances that go into your product formulation, packaging is not considered an ingredient or processing aid. Therefore, it is not reviewed with the same specificity and detail by your certifier. It is uncommon for certifiers to require that every piece of packaging is submitted for review prior to use.

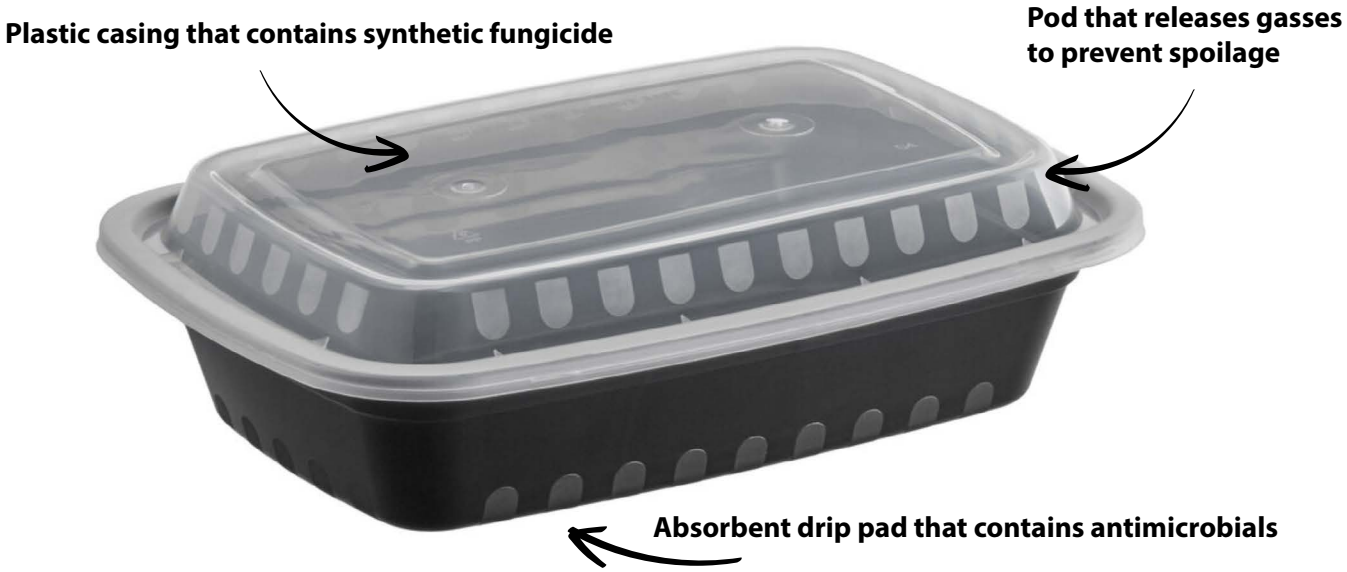
Instead, most certifiers ask only a few questions about packaging materials:[3]

1. What types of packaging are used?
2. Are all packaging materials free of prohibited materials?
3. If packaging materials or containers are reused, what measures are in place to protect integrity of the organic product?

In addition to those answers, your Organic System Plan (OSP) should include your process for determining that your packaging materials are compliant with the USDA organic regulations. It is your responsibility to ensure that the packaging materials you use do not contaminate your product with a prohibited substance.

HIDDEN PACKAGING HAZARDS

Packaging is not always as simple as it seems. Something that appears to be made of only cardboard or plastic could contain other materials like synthetic fungicide or fumigants, and these materials are often NOT allowed in organic. Talk to suppliers about "hidden" components in any intended packaging.



"Active" Packaging

The modern world is quite a wonder. Nowadays food packaging can contain chemicals that are released into the food to preserve it. For example, some packaging contains ethylene scavengers, antimicrobials, or antioxidants that come in contact with the food and help it last longer. These "active" packaging additives are great, but often not allowed for use in organic.

The USDA organic regulations clearly state that handlers are prohibited from using packaging materials, storage containers, or bins that contain synthetic fungicides, preservatives, or fumigants.[2] They are generally prohibited because the active agents can migrate directly into the organic food, which would cause contamination. For example, in conventional banana handling, it is common practice to use cardboard boxes that have been impregnated with a fungicide to extend the shelf life of the fruit. But this "active" packaging would be a clear source of contamination to organic bananas.

WATCH OUT

Packaging can arrive to you compliant but become contaminated inside your own facility! For example, fogging treatments for pest control can deposit prohibited substances onto stored packaging materials that could then contaminate your product. For this reason, packaging must be protected from contamination by all prohibited substances.

With that said, not all "active" packaging substances are prohibited. Check with your certifier about specific substances that you are considering for use in your packaging before you put in the purchase order.

As a handler, you are responsible for collecting all of the necessary information about your packaging to ensure that it is not a source of contamination for your organic product. In order to verify that packaging is compliant, you can collect "Letters of Guarantee" or "Certificates of Conformance" from the packaging suppliers. These letters from the manufacturer clearly state what is and is not in the packaging. They are frequently requested as part of Safe Quality Food, HACCP (Hazard Analysis Critical Control Points), and Good Manufacturing Practices. They are not necessarily required for organic certification, but many handlers consider collecting these documents a best practice in protecting organic integrity.

"We do require those letters of guarantee from our vendors stating that none of the packaging materials that they're supplying us with have any prohibited substances. And that is our main way of verifying that information."

Amanda James-Martin
Food Safety Specialist
Organically Grown Company

TAMPER-EVIDENT PACKAGING

Your certifier considers the risk of contamination or commingling in all their decisions. When the risk is high, they will ask for lots of documentation, but when the risk is low, there is more tolerance. Once organic product is in sealed, tamper-evident retail packaging, the risk of contamination or commingling is greatly reduced.

For this reason, "sealed, tamper-evident retail packaging" is a key concept in organic certification, it is the packaging standard that determines whether certain operations must be certified. Operations that only receive, store, or handle organic products that remain in sealed, tamper-evident retail packaging throughout their control may not need to be certified as handlers. This is because the intact, unbroken package protects organic integrity and greatly reduces risk.[4]

CONCLUSION

Packaging is the final step that links your organic product to your customers. Like the other aspects of organic handling, you need to know the USDA organic regulations in order to get packaging right. Remember that in addition to rules around retail packaging, you also want to be aware of those applying to containers used in your facility for processing, and for nonretail shipping containers. With these considerations in mind, and with effective communication with your certifier, you can choose compliant packaging that makes your product look great and maintains organic integrity.

ACTION ITEMS

- Look out for hidden ingredients in packaging that could cause contamination.
- Collect Letters of Guarantee or Certificates of Conformance from your packaging suppliers.

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United States Department of Agriculture
Agricultural Marketing Service
National Organic Program