



Documenting Nonorganic Ingredient Use

Using a nonorganic ingredient or processing aid in a certified organic product takes a careful, proactive paper trail. Other articles cover what is allowed and how to source it. This one is about the documentation itself, the workflow of gathering big-three affidavits, completing a natural flavor declaration when one applies, updating your Organic System Plan, and submitting the package for your certifier's approval before you use the substance.



What You'll Learn

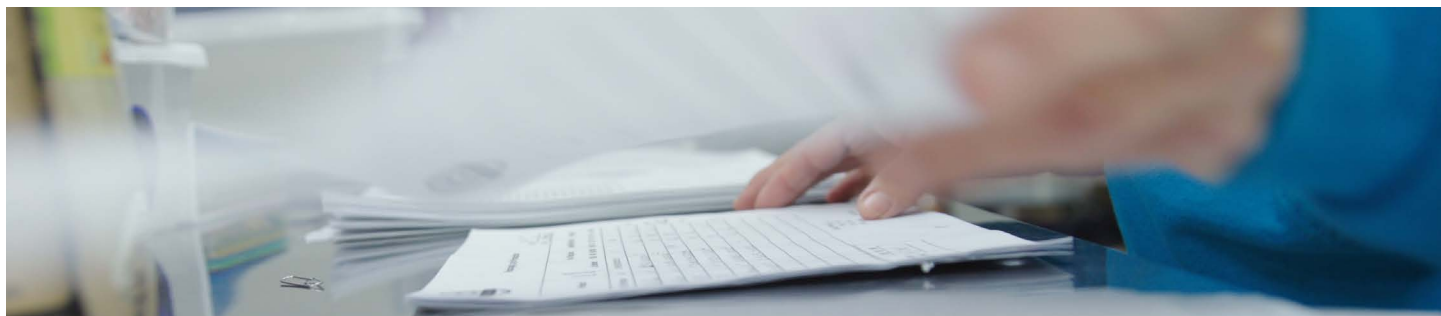
- The approval workflow for any nonorganic ingredient or processing aid, from documentation to certifier final approval
- What the "big three" affidavits cover and why they need to come from the manufacturer, not the distributor
- When a natural flavor declaration is required and what it needs to disclose
- How subingredients inside a nonorganic substance can trigger their own documentation requirements

Getting a nonorganic ingredient or processing aid approved for use in an organic product doesn't have to be complicated, but it does require some effort and time. You need to confirm the substance is on the National List, gather the right documentation from your supplier, update your Organic System Plan, and wait for your certifier's written approval all before anything can go into certified organic production. This article walks through that workflow so you know exactly what to collect, when to collect it, and what happens if something in the package is missing.



HANDLER TIP

Why are nonorganic ingredients and processing aids allowed in organic products at all? Not every substance used in food production is available in certified organic form, including things like salt and baking soda, but are low-risk and necessary for certain types of products. Some could be certified organic but are available only in limited forms or quantities, like yeast or natural flavors. The hope for these types is that these inputs become more available over time. Allowing a nonorganic form in the meantime for specific, necessary substances lets organic products be made and sold consistently.



BEFORE YOU BEGIN

Nonorganic ingredients and processing aids are allowed for use only in products in the “organic” or “made with organic” product composition categories, never in a product labeled “100 percent organic.”¹ Every nonorganic substance, agricultural or not, must appear on the National List and meet the restrictions in its listing, in §205.606 for agricultural products and §205.605 for nonagricultural ones.^{2,3} Many of these inputs also carry a commercially available condition, meaning an organic form must be used when one is available in the form, quality, and quantity you need.^{4,5}

? LEARN MORE

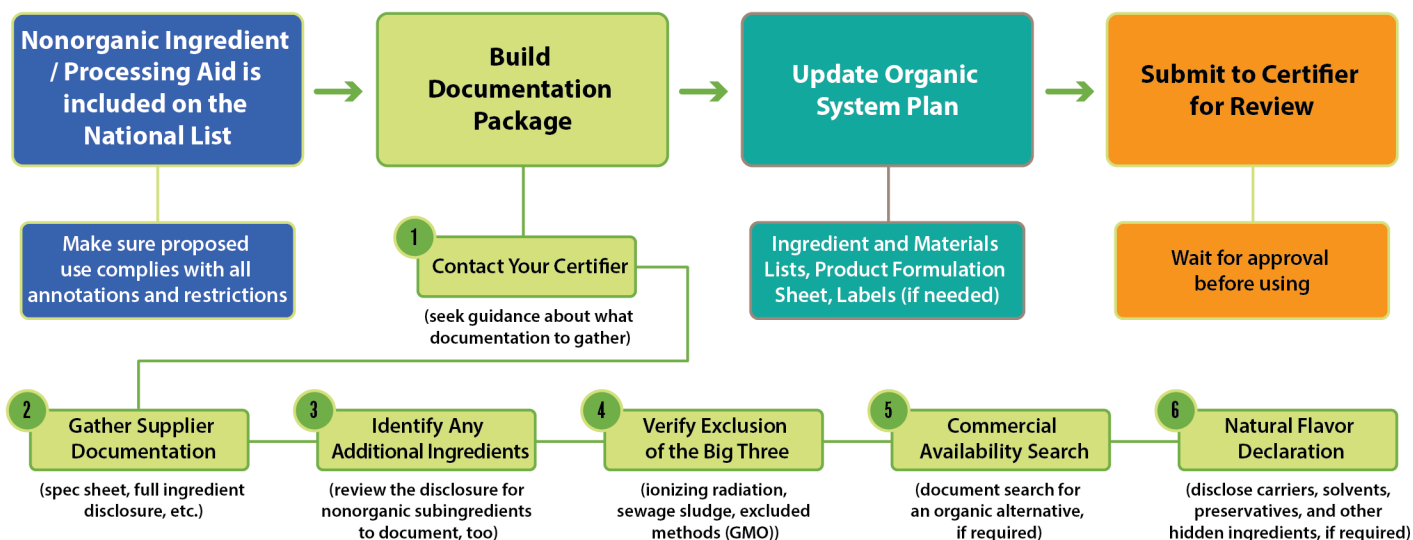
If you have not yet confirmed that your nonorganic ingredient or processing aid is allowed, start here:

- [Allowed Ingredients and Processing Aids in Organic Products](#) contains detailed definitions of terms used throughout this article.
- [Verifying Compliant Ingredients and Processing Aids](#) includes information on the specific documents required to verify the eligibility of substances.
- [Product Composition - 100% Organic, Organic, and Made with Organic](#) helps you pin down your product’s composition category.
- [Navigating the National List for Allowed Ingredients and Processing Aids](#) shows how to confirm a specific substance is allowed and understand its restrictions.
- [Commercial Availability Requirement for Nonorganic Ingredients and Processing Aids](#) details the process for conducting a search for an organic version, when required.

APPROVAL WORKFLOW

Not every product or brand of an allowed substance will meet all of the requirements to be used in your organic product. It is your responsibility as outlined in your OSP to document that a specific substance meets organic requirements and to submit that proof to your certifier.⁶ You will assemble a documentation package, update your Organic System Plan, and submit both for review. Your certifier then reviews your submission and decides whether the input is approved for your operation. You must wait for that approval. Even with a complete package, the substance cannot be used until your certifier formally approves it.

Nonorganic Ingredient Approval Workflow



Do not use any nonorganic ingredient or processing aid until you have certifier approval.

BUILD A DOCUMENTATION PACKAGE

Collect documentation for any nonorganic ingredient or processing aid you want your certifier to review. For the full table of which documents apply to which kind of substance, see [Verifying Compliant Ingredients and Processing Aids](#). Most certifiers require specific documentation and forms for ingredients and processing aids, so ask for these before you contact your supplier.

Step 1. Gather supplier documentation

Start with the core information from your supplier, the specification sheet, a full ingredient disclosure, and the identity of the manufacturer, not just the supplier or distributor. You need to know exactly who made the input and what is in it before going further. For working with suppliers, see [Building and Maintaining a Supplier Approval Program](#). The documentation must be sufficient to demonstrate to your certifier that the substance meets any of the annotations or restrictions on manufacture process or source on the National List.

Step 2. Identify any additional ingredients or processing aids

Read the full ingredient list for anything else contained in the product, such as anti-caking agents, carriers like maltodextrin, or other processing aids. These ancillary ingredients and processing aids, as well as any substances that come in contact with the product, have to be disclosed and evaluated just like the main one, so consult with your certifier about what documents may be needed.

Step 3. Verify exclusion of the big three

Next, confirm the input was not produced using the three prohibited methods: ionizing radiation, sewage sludge, excluded methods (e.g. genetic modification).⁷ Ask your certifier whether they have a specific affidavit form, since most do. If so, that legally binding affidavit must be completed and signed by the manufacturer, not the distributor. If your certifier has no form, request a letter signed by the manufacturer stating that none of the three methods were used.

Step 4. Complete a commercial availability search, if required

For every nonorganic agricultural input and some nonagricultural ones, you must determine whether an organic version is commercially available.^{2,3,4} When this restriction is required, conduct and document the search and keep the record, updating it at least once a year. For more details on conducting a search, see [Commercial Availability Requirement for Nonorganic Ingredients and Processing Aids](#).

Step 5. Complete a Natural Flavor Declaration, if needed

For nonorganic natural flavors, many certifiers provide a form for the manufacturer to complete called a Natural Flavor Declaration. It confirms: no synthetic solvents or artificial preservatives were used, compliance with the FDA natural flavor definition,⁸ whether an organic version is available, and the flavor's nonsynthetic source. Your certifier will evaluate the carriers, solvents, and preservatives, since these must meet organic requirements and be fully disclosed.

The OMRI Shortcut

An [Organic Materials Review Institute \(OMRI\)](#) listing can simplify this, though it never replaces certifier approval. If a nonorganic substance is OMRI-listed, your certifier may accept the OMRI certificate in place of some or all of the documents above. Not every certifier or product works this way, so confirm what your certifier accepts before you rely on it.

UPDATE YOUR ORGANIC SYSTEM PLAN

Once your documentation package is complete, update the relevant parts of your Organic System Plan (OSP).⁶ If there is a section within your OSP describing nonorganic ingredient usage, review it and update as needed. Accurate OSP records are essential to show compliance at inspection.⁹

Update your Product Formulation Sheets (ingredient declaration or recipe) as well, and make sure nonorganic ingredients are not counted as organic on the label or in the organic percentage of the finished product. Since nonorganic substances do not add to organic content, they count as zero percent organic in the composition calculation,¹⁰ which you can work through in [Product Formulation and Calculating Organic Content](#).

SUBMIT TO YOUR CERTIFIER FOR REVIEW

With records updated, submit the documentation package and OSP forms to your certifier.^{6,7} Your certifier may have follow-up questions or request additional information from the manufacturer. Do your best to be responsive to continue moving things along. Wait for written approval before using the ingredient or processing aid in any organic product. Even if you believe you submitted everything that's needed, don't use a new substance (or risk approving packaging reflecting such) until your certifier officially approves it.

“If a handler wants to change an ingredient or product formulation, it is best to contact your certifier ahead of time and see what type of documentation you might need. ... These changes would need to be reviewed and approved by your certifier before you began to sell or represent any new products as organic. So the most important thing is to realize that this takes time.”

Lynne Haynor
Organic Conservation Specialist
Organic Trade Association

Keep Your Documentation Current

Current records keep you compliant and head off delays, noncompliances, and forced reformulations. For any nonorganic input that requires proof of commercial availability, perform and document a fresh search at least once a year. Your certifier will periodically re-review your nonorganic ingredients and processing aids, and if you learn a substance's composition has changed, contact them to confirm it is still approved. Do not wait for annual renewal to seek approval for a new nonorganic substance. Every one must be reviewed and approved before use.

CONCLUSION

Some nonorganic substances are allowed in organic products, but only when they meet the regulatory requirements and are properly documented. Collecting the verification documents, getting approval before use, and keeping that documentation current is what keeps your operation compliant. Clear records and steady communication with your certifier are what protect your organic integrity.

ACTION ITEMS

- List the nonorganic ingredients and processing aids you plan to use.
- Confirm each product fits the requirements of your product composition category.
- Confirm each nonorganic substance is on the National List and meets its restrictions.
- Check whether any input needs a commercial availability search.
- Contact your certifier about any new proposed ingredients. Consult with them on what documentation will be needed.
- Work with the supplier to build the documentation package.
- Update your OSP forms, then submit the package to your certifier.
- Wait for approval before use, and keep every record current.

SOURCES CITED

1. USDA National Organic Program, [7 CFR §205.301](#).
2. USDA National Organic Program, [7 CFR §205.606](#).
3. USDA National Organic Program, [7 CFR §205.605](#).
4. USDA National Organic Program, [7 CFR §205.270\(b\)](#).
5. USDA National Organic Program, [7 CFR §205.2 \(Commercially available\)](#).
6. USDA National Organic Program, [7 CFR §205.201\(a\)\(2\)](#).
7. USDA National Organic Program, [7 CFR §205.105\(e\)–\(g\)](#).
8. U.S. Food and Drug Administration. 21 CFR §101.22(a)(3) *Foods; Labeling of Spices, Flavorings, Colorings and Chemical Preservatives*. Retrieved from [https://www.ecfr.gov/current/title-21/chapter-I/subchapter-B/part-101/subpart-B/section-101.22#p-101.22\(a\)\(3\)](https://www.ecfr.gov/current/title-21/chapter-I/subchapter-B/part-101/subpart-B/section-101.22#p-101.22(a)(3))
9. USDA National Organic Program, [7 CFR §205.403\(d\)\(2\)](#).
10. USDA National Organic Program, [7 CFR §205.302\(a\)](#).

DIG DEEPER

1. U.S. Department of Agriculture, Agricultural Marketing Service. *Organic System Plan Template*. Retrieved from <https://www.ams.usda.gov/reports/organic-system-plan-template>



United States Department of Agriculture
Agricultural Marketing Service
National Organic Program

