



# Labeling Requirements for Products Intended for Human Use

For organic handlers, understanding the rules is essential to maintaining eligibility, protecting organic integrity, and building consumer trust. From labeling categories to approved claims, this article provides an overview of the key organic labeling regulations handlers need to navigate confidently in today's organic marketplace.



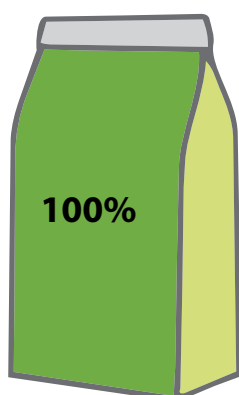
## What You'll Learn

- Key organic labeling requirements, including allowable claims, use of the USDA organic seal, ingredient statement requirements
- Labeling requirements that apply to all organic products, as well as requirements and options specific to different product composition categories
- Labeling allowances and prohibitions for products that are not certified organic

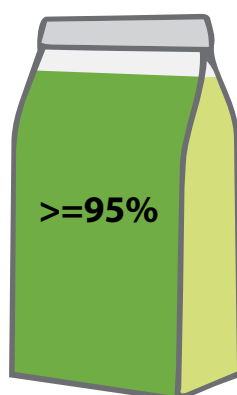
Organic labels are more than marketing tools. They are regulated claims that communicate compliance with the USDA organic standards and help consumers make informed purchasing decisions. For organic handlers, understanding labeling requirements is a critical part of maintaining certification, avoiding costly compliance issues, and ensuring products are represented accurately throughout the supply chain. Whether you are developing a new product, updating packaging, or inspecting packaged incoming ingredients, understanding labeling requirements can help you confidently bring compliant organic products to market.

## PRODUCT COMPOSITION CATEGORIES

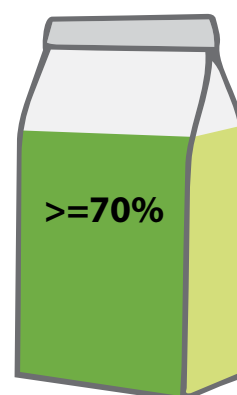
Some organic labeling requirements are specific to the product composition category your product falls into, including the claims you can make and the seals you can use. The composition categories are defined by the percentage of organic ingredients they contain.<sup>1</sup> There are three certified organic composition categories:



**100% Organic**



**Organic**



**Made with Organic  
(Ingredients)**

Because certain label requirements are specific to the product's composition category, you may have slightly different label conventions across your product lines. If you're in the beginning stages of developing your label design, it might be helpful to consider how each composition category would look under a unified design system.

For a deeper understanding of these composition categories take a look at the article [Product Composition - 100% Organic, Organic, and Made with Organic](#).

## LABEL APPROVAL PROCESS

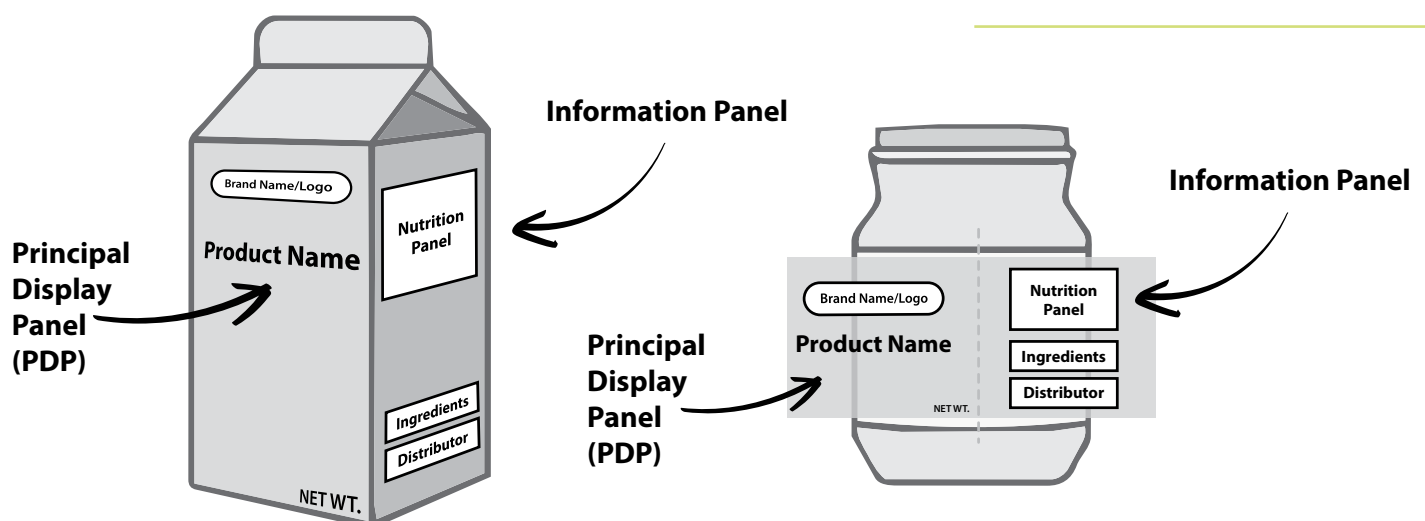
All organic labels must comply with USDA organic labeling requirements and must be reviewed and approved by an accredited organic certifier before being printed or used in the marketplace. This review process helps ensure that organic claims, ingredient statements, use of the USDA organic seal, and certifier information meet USDA organic regulations and accurately represent the product being sold. Failing to get pre-approval can lead to costly financial consequences, such as having to discard printed packaging or apply corrective stickers by hand, as well as face a noncompliance.

## ANATOMY OF A PRODUCT LABEL

Like other labeling regulations, organic labeling requirements often include specifications on placement of different content and phrases. These placement conditions center on the package's Principal Display Panel (PDP) and Information Panel, terms you may be familiar with from FDA labeling requirements.

*"There was one instance where we accidentally sent to the printer one of our labels and had it printed and realized after the fact that it didn't say 'Certified Organic by MOSA' because that little line just got cut somewhere in the digital editing. And so we printed 1,200 little stickers and placed them on by hand..."*

**Jessica Jones**  
Founder  
Giant Jones Brewing



The Principal Display Panel<sup>2</sup> is the portion of the package that is most likely to be displayed, presented, or examined by customers at the time of purchase. It is more commonly referred to as the "front" of the package. Some of the label elements relevant to this panel, which are explained in more detail below, include organic claims, organic percentage statements, and the use of seals and logos.

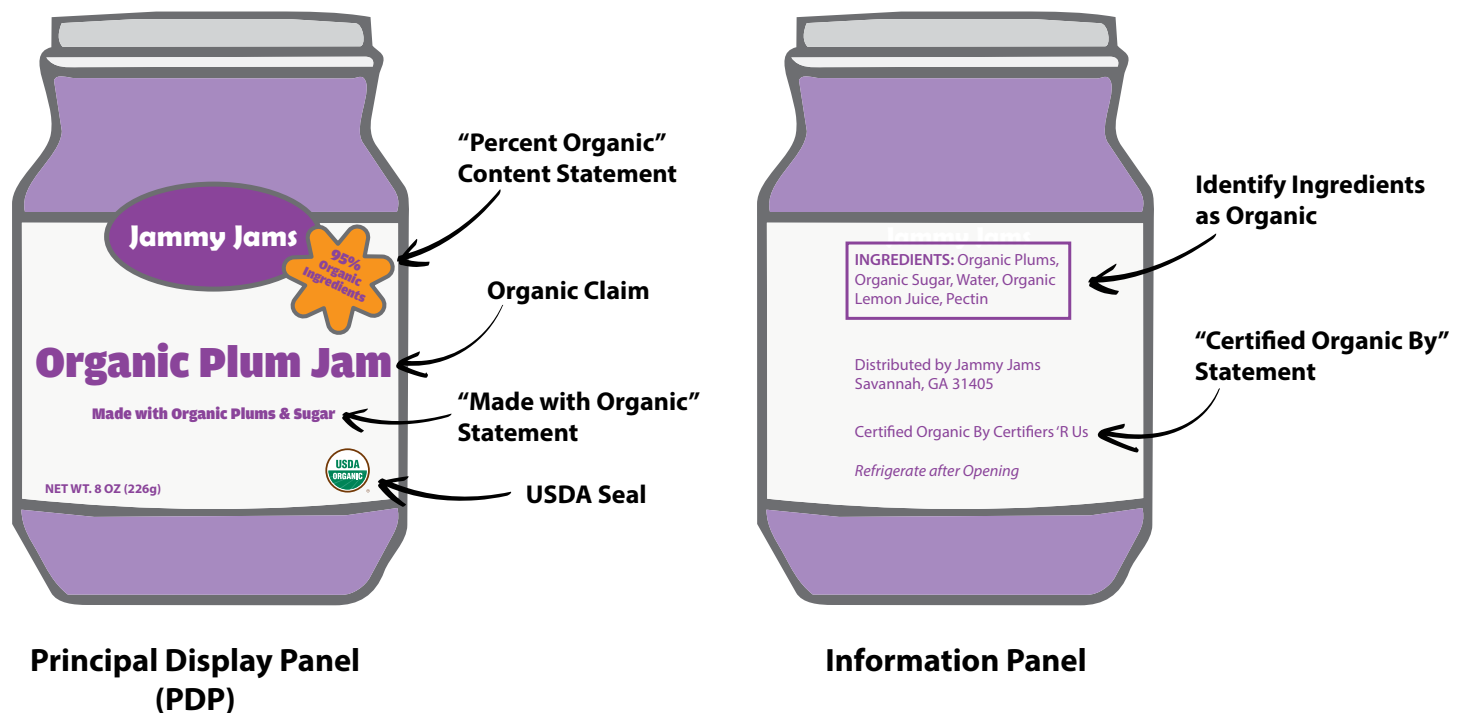
The Information Panel<sup>3</sup> (also called the “secondary” panel) is the portion of the package that is typically located immediately next to, and to the right of, the PDP, unless the package’s size or irregular shape requires it to be placed elsewhere. It is more commonly referred to as the “right side panel” and devoted to regulatory and traceability information. Some of the label elements relevant to this panel, which are explained in more detail below, include the ingredient statement, handler or distributor information, and the certifier statement.

The Ingredient Statement is one element found on the Information Panel. It is the list of ingredients shown in their common and usual names in descending order of weight in the product’s formula.

Another element found on the Information Panel is the identification of the manufacturer, packer, or distributor of the product.

## ORGANIC CLAIMS AND STATEMENTS ALLOWED ON LABELS

The USDA regulations describe a set of organic claims and statements that you can make on the product label. Which claims and statements your product is required and/or eligible to use depends on the product composition category that it qualifies for. Each of the allowable claims and statements comes with its own set of use criteria and requirements. Let’s take a look at each one.



### "100% Organic" Claim<sup>4</sup>

This is the highest organic claim that a product can be eligible to make. For eligible products, the term “100 percent organic” may be used to modify the name of the product on the Principal Display Panel, Information Panel, and any other panel of the package. It may also be used on any labeling or marketing information concerning the product.

### "Organic" Claim<sup>4</sup>

For eligible products, the term “organic” may be used to modify the name of the product on the principal display panel, information panel, and any other panel of the package. It may also be used on any labeling or marketing information concerning the product.

USDA Organic Seal<sup>5</sup>

Certain product composition categories are permitted to display the USDA organic seal on the product label. There are specific requirements governing the appearance of the USDA organic seal. Permitted versions include a green-brown-and-white seal or a black-and-white seal with allowable transparent elements. No other color combinations are allowed.<sup>5,6</sup> Official files and corresponding Pantone color specifications are available on the [USDA Organic Resource Webpage](#).



Certifier Logo<sup>4,7</sup>

All certified organic products may display the seal, logo, or other identifying mark of the certifying agent of the handling operation. Certifiers may have their own requirements governing the use of their certification seal or logo. Before planning to use a certifier logo on a label, you should review and follow that certifier’s specific branding and labeling guidelines.

If you use both a certifier logo and the USDA organic seal on a product label, the certifier logo cannot be “more prominent,” such as larger in size. See [Using the USDA Organic Seal](#) for more details.

 LEARN MORE

See this article to learn more about the restrictions and requirements pertaining to Using the [USDA Organic Seal](#).

Identify Ingredients as Organic in the Ingredient Panel<sup>4,7</sup>

In most product composition categories, you must identify each certified organic ingredient within the ingredient statement. This can be done by placing the word “organic” before the ingredient name or, to conserve label space, you may use an asterisk or other reference mark that is defined below the ingredient list. When listing an organic ingredient with subingredients, identify both the organic ingredient and any organic subingredients as organic. Water and salt are not included in the organic content of a product. See the article on [Product Formulation and Calculating Organic Content](#) for more information on how water and salt are handled in organic products.

Compliant Ways of Identifying Organic Ingredients

| Option 1                                                                                                                                                                                                                                              | Option 2                                                                                                                                                                                        |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Ingredients:</b> Organic wheat flour, organic chocolate chips (organic sugar, organic chocolate liquor, organic cocoa butter, organic vanilla extract), organic cane sugar, organic butter, organic rolled oats, organic vanilla, sea salt.</p> | <p><b>Ingredients:</b> Wheat flour*, chocolate chips* (sugar*, chocolate liquor*, cocoa butter*, vanilla extract*), cane sugar*, butter*, rolled oats*, vanilla*, sea salt.</p> <p>*Organic</p> |

## “Certified Organic By” Statement<sup>4,7</sup>

All organic products must identify the product’s certifier in a “Certified Organic By” Statement, which reads “Certified organic by [certifier’s name].” The statement appears on the Information Panel directly below the information identifying the handler or distributor of the product. There can be no intervening text, barcodes, or other material between the distributor’s information and the certifier statement. The certifier’s address can be listed below the “Certified Organic By” Statement if desired, but it is not required.

Often a single organic product is handled by multiple operations along the supply chain, each certified by distinct organic certifiers. In these cases, it is the certifier of the handler of the finished product who must be listed in the “Certified Organic By” statement below the handler identifying information. For example, if organic buckwheat is first sprouted by Operation X and then milled, packed, and sold by Operation Y, both operations would be certified, but only Operation Y’s certifier would appear on the label. Certified brand owners may list their certifier in the “Certified Organic By” Statement under their identifying information, rather than listing the operation they contract to perform handling services since they are certified for the final product as well.

## “Percent Organic” Content Statements<sup>4,7</sup>

Products in all composition categories may bear a “Percent Organic” Content Statement on their labels. These statements promote the percentage of ingredients that are certified organic in the product with language like “80% Organic Ingredients.” They can appear either on the Principal Display Panel or the Information Panel.

You may display this statement with additional design treatments such as banners or callout badges. However, the font size of the statement cannot exceed one-half the size of the largest typeface on the panel where it appears. The statement itself must also be uniform in size, style, and color. For example, you can’t highlight the word organic within the statement “80% **Organic** Ingredients” so that it stands out more than the remainder of the statement.

It’s important to note that if you are using a “Percent Organic” Content Statement on a Made with Organic product, a Made with Organic claim must appear on the same panel. We’ll get into the specifics of that in our section below specific to Made with Organic products.<sup>8</sup>

## “Made with Organic” Statement<sup>7</sup>

Products in the “Made with Organic” composition category may include a “Made with Organic” Statement on the Principle Display or Ingredient Panels of the label. The phrase must include specific ingredients or specific food groups. It must read exactly “Made with Organic [specified ingredients]” or “Made with Organic [specified food groups]”. Compliant language examples on a cracker product may include “Made with Organic Oats, Thyme, and Rosemary” or “Made with Organic Grains and Herbs.”

You may list up to three ingredients or food groups in the “Made with Organic” statement. If you choose to list food groups, you can only use food groups specifically allowed by the USDA organic regulations: beans, fish, fruits, grains, herbs, meats, nuts, oils, poultry, seeds, spices, sweeteners, vegetables, and processed milk products.

The “Made with Organic” statement must also be completely accurate. Meaning, if you use organic oats and nonorganic rice to make these crackers, the statement cannot read “Made with Organic Grains” because some of the grains are non-organic. Under all circumstances, the broad statement “Made with Organic Ingredients” is prohibited.

You may display this statement with additional design treatments such as banners or callout badges. However, the statement’s font size cannot exceed one-half the size of the largest typeface on the panel where it appears. In addition, the statement itself must also be uniform in size, style, and color.

## LABELING REQUIREMENTS AND OPTIONS BY PRODUCT COMPOSITION CATEGORY

Each product composition category has specific labeling requirements, with some claims and statements being required, some allowed, and some prohibited. For example, while using the USDA organic seal on an organic product is never required, it is only allowed for products that fall under the “100% Organic” and “Organic” composition categories. Let’s look at each composition category and identify their specific requirements.

| Organic Claims and Statements by Product Composition Category |                        |            |                                          |
|---------------------------------------------------------------|------------------------|------------|------------------------------------------|
|                                                               | Composition Categories |            |                                          |
|                                                               | 100% Organic           | Organic    | Made with Organic                        |
| “100% Organic” Claim                                          | Allowed                | Prohibited | Prohibited                               |
| “Organic” Claim                                               | Allowed                | Allowed    | Prohibited                               |
| USDA Organic Seal                                             | Allowed                | Allowed    | Prohibited                               |
| Certifier Logo                                                | Allowed                | Allowed    | Allowed                                  |
| Identify Ingredients as Organic in Ingredient Panel           | Allowed                | Required   | Required                                 |
| “Certified Organic By” Statement                              | Required               | Required   | Required                                 |
| “Percent Organic” Content Statement                           | Allowed                | Allowed    | Allowed with Made with Organic Statement |
| “Made with Organic” Statement                                 | Prohibited             | Prohibited | Allowed                                  |

## “100% Organic” Category<sup>4</sup>

- **Principal Display Panel:** You may use the term “100 percent organic” or “organic” to modify the product’s name.
- **Information Panel:** “Certified Organic By” statement must be present. While it is a good practice to identify individual ingredients as organic in the ingredient statement, you are not required to do so on “100% Organic” products.
- **Seal Usage:** “100% Organic” products are allowed to use the USDA organic seal and/or the certifier logo.
- **Other Statements:** “Percent Organic” Content statement is allowed and optional.

## “Organic” Category (not less than 95% organic ingredients)<sup>4</sup>

- **Principal Display Panel:** You may use the term “organic” to modify the product’s name.
- **Information Panel:** “Certified Organic By” statement must be present. You must identify each certified organic ingredient within the ingredient statement.
- **Seal Usage:** Organic products are allowed to use the USDA organic seal and/or the certifier logo.
- **Other Statements:** “Percent Organic” Content statement is allowed and optional.

## “Made with Organic” Category (at least 70% organic ingredients)<sup>7</sup>

- **Principal Display Panel:** Products that fall under the “Made with Organic” composition category cannot use the terms “100% organic” or “organic” to modify the product’s name.
- **Information Panel:** “Certified Organic By” statement must be present. You must identify each certified organic ingredient within the ingredient statement.
- **Seal Usage:** Products in the “Made with Organic” composition category **cannot** use the USDA organic seal anywhere on the package. They may use the organic certifier’s logo.
- **Other Statements:** Both the “Percent Organic” Content and “Made with Organic” statements are allowed and optional. A “Percent Organic” Content Statement may appear on a “Made with Organic” product as long as it also has a “Made with Organic” Statement. These two statements must appear on the same panel.<sup>8</sup>

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## LABELING REQUIREMENTS FOR UNCERTIFIED PRODUCTS

### Organic Products Produced by Exempt Handlers<sup>9</sup>

What about organic products that are produced by operations that are exempt from certification? While labels may identify organic ingredients within the ingredient statement, they cannot display the USDA organic seal or a certifier’s logo. In addition, the labeling cannot imply to potential buyers that either the product or the operation is certified organic. Further, products from exempt operations cannot be represented as organic ingredients in products processed by another operation.

For example, say a small bakery qualifies as an exempt operation because they sell less than \$5,000 of organic product annually. The bakery makes and sells organic brownies under the exemption. However, an ice cream manufacturer cannot purchase those brownies and identify the brownie pieces as organic in an organic ice cream product. In this case, the brownie chunks would be treated as nonorganic ingredients. Depending on the final recipe, the ice cream could either qualify for “Made with Organic” certification or not qualify for organic certification at all.



More information about exemptions from organic certification is available in the article [Who is Required to be Certified as an Organic Handler](#).

## Products with Less than 70% Organic Ingredients Produced by Non-Exempt Operations<sup>10</sup>

Products with less than 70% organic ingredients are not eligible for organic certification. As such, they cannot use the term “organic” to modify the product’s name or describe the product or its ingredients in a way that makes them sound organic. These products are also prohibited from using the USDA organic seal or a certifier’s logo anywhere on the package.

Non-certified products can identify certified organic ingredients within the ingredient statement. This can be done by placing the word “organic” before the ingredient name, or by using an asterisk or other reference mark that is defined below the ingredient list to conserve label space. If ingredients are identified as organic in the ingredient statement, a “Percent Organic” Content statement may also be used. Unlike certified organic products, the “Percent Organic” Content statement can only appear on the Information Panel, not on the Principle Display Panel.<sup>11</sup>

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## CONCLUSION

Understanding the different product composition categories and their related requirements and optional elements will help you maintain compliance and consumer trust in your products. From proper use of the USDA organic seal to ingredient identification and “Certified Organic By” statements, every element of a label plays a role in ensuring that organic claims are accurate and properly represented. Take the time to understand these details and communicate them to the person designing your labels. And remember to get your labels reviewed and approved by your organic certifier before printing to help protect your certification status and avoid costly revisions or reprints.

## ACTION ITEMS

- Use [Product composition - 100% Organic, Organic, and Made with Organic](#) to determine your product’s composition category.
- Familiarize yourself with the possible elements and required elements relevant to your product and its specific composition category.
- Make decisions on any elements that are optional (not required). For example, if you have a product that fits the product composition category, decide whether you want to use the USDA organic seal, your certifier’s logo, or both.
- Communicate these choices and the label’s requirements to the person creating or updating your label design.
- Map out a timeline for when compliant labels could be expected to be used in the marketplace that is based on your certifier’s approval timeline.
- Remember, all labels must be approved by your certifier before use.

## SOURCES CITED

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5. USDA National Organic Program, [7 CFR §205.311](#).
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United States Department of Agriculture  
Agricultural Marketing Service  
National Organic Program

