

VII. COMPLIANCE, ACCREDITATION AND CERTIFICATION SUBCOMMITTEE

PROPOSAL:

CALCULATING PERCENTAGE OF ORGANIC INGREDIENTS IN MULTI-INGREDIENT PRODUCTS

Cornucopia supports the proposal. While public comment to the Fall 2012 discussion document suggests that the change in language in 7CFR205.302—substituting “of all ingredients” for the existing “of the finished product”—is not a priority, we agree that the recommended change would bring the regulatory language in line with current practices.

We agree that organic single ingredients in multi-ingredient products can be counted as 100% organic, even if they do not meet the 100% organic labeling requirements due to the use of non-organic processing aids. However, it must be made abundantly clear that a single ingredient that is organic but not eligible for the 100% claim should be considered 100% organic only for the purposes of calculating the organic percentage of a multi-ingredient product, and not for the purposes of determining the labeling claim. A multi-ingredient product with only organic ingredients should not be eligible for the 100% organic claim, unless each organic ingredient qualifies for the 100% labeling claim.

In line with apparent unanimous agreement in public comment in response to the Fall 2012 discussion document, we support the proposal that sodium chloride is the only “salt” that may be excluded from the organic percentage calculation. Any source of salt that appears on the National List must be entered into the calculation and cannot be excluded.