



## Organic Claims on Websites and Other Marketing

Organic claims on websites, social media, and other marketing must be truthful and not misleading about the status of organic and nonorganic products. Websites and social media are considered market information and can be reviewed using [NOP 205 Subpart D Market Information](#) (205.300-311). As the regulations are more specific to package labeling, website review is often somewhat subjective. We review websites, social media, and other marketing using the following guidelines. We may purchase products online or subscribe to services to review online marketing. Operations who do not follow these guidelines may receive notices of Noncompliance.

### What CCOF reviews:

- We review all websites for CCOF certified operations with online sales.
  - For web only E-commerce businesses, your website will be part of your Organic System Plan (OSP). Changes to organic product or business representation on the website must be disclosed to CCOF.
  - For businesses with physical and online sales, we review websites during annual inspections.
- We review any website or marketing information related to a complaint or investigation.
- We may review social media marketing including online ads and search engine results.
- We may review third party online stores or digital sales channels managed or established by the CCOF certified operation, such as Amazon marketplace stores.
- We may review other marketing such as customer-facing signs.
- Website, social media, and other marketing reviews of over one hour will be billed the rate for technical services per CCOF Certification Services Manual.
- We do not generally review sales channels that the CCOF certified operation does not manage, such as resellers or distributors.
- We do not generally review promotional materials such as T-shirts, cooking utensils and other marketing materials.

### What CCOF looks for:

- We look for the word "organic" as well as the USDA Organic seal, CCOF's name, and CCOF's logo on webpages and other marketing, especially webpages where product can be ordered, including the "shopping cart".
- Where consumers can purchase products on your website, each individual product must have accurate, specific claims at the point of sale. A consumer must be able to determine whether a specific product is organic or not prior to purchase.
  - Listing an organic product on your website before CCOF has approved the product and added it to your organic certificate may be a Noncompliance.
- True statements about what is certified organic may be made on the website home page, other pages on your website, and other marketing. Claims must be specific and reflect what appears on the organic certificate.
  - Compliant example: "Our handling of all organic items is certified."
  - Noncompliant examples: "Organic ingredients" when not all ingredients sold are organic. "We strive to use organic ingredients," is a general claim that does not specifically disclose to consumers what is certified.
- Percentage statements are discouraged as they are potentially misleading and difficult to prove. If you make a statement about the percentage of organic products offered, your claim must be specific and either your website or OSP must explain how you calculate that percentage. Explanation not required if you calculate by weight or fluid volume as described in NOP 205.302.
  - Compliant example: "70% of the total number of products we purchase are organic. Actual quantity of organic ingredients in your delivery may be less than 70%."
  - Noncompliant example: "We strive for at least 70% organic ingredients." It is unclear to the consumer what percentage of ingredients they receive are organic.





- You must be able to describe to a CCOF inspector how you verify organic claims. You may be required to include your verification process on your website and in your OSP.
  - Example of a compliant claim requiring verification: “We always source organic eggs.”
- For web only E-commerce businesses:
  - As the website functions as retail labeling, “Certified Organic by CCOF” (or similar phrase) must appear on website at least once in legible font.

### Use of the USDA Organic seal or CCOF logo:

- The USDA seal or CCOF logo may be used to represent your business as certified organic.
  - The USDA seal may be used only if you have at least one “Organic” or “100% Organic” product. The USDA seal must not be used if you only offer “Made with Organic...” products.
  - The CCOF logo may be used by any CCOF certified operation, including those that only offer “Made with Organic...” products.
  - If using both USDA seal and CCOF logo, the USDA seal should be more prominent.
- If you also offer nonorganic products, the USDA seal or CCOF logo must be accompanied by a clear and conspicuous explanation of what is certified. For websites, this includes use of the USDA seal or CCOF logo on the home/landing page as well as headers, footers, and navigation menus. The claim must be supported by your organic certificate.
  - A written statement of the claim must appear next to the USDA seal or CCOF logo even if there is a hyperlink to a separate page that more fully outlines the claim.
  - The written statement must be legible and similar in size to the USDA seal font size.
  - When both USDA seal and CCOF logo are used, the written statement must appear near the USDA seal, at a minimum.
  - Pop-outs and hover-overs are not sufficient to explain the claim.
- If you offer organic and nonorganic products and individual products appear or can be purchased from a page (or a retail or restaurant display case) that displays the USDA seal, CCOF logo or other organic claim, the organic status of each product must be clear. Nonorganic product must be represented so that a reasonable person will not assume that a nonorganic product is organic. Examples of compliant use:
  - USDA seal in page header next to statement “Products below are all organic,” all products on the page are certified organic. A separate page for nonorganic products does not include the USDA seal in page header.
  - Organic and nonorganic products are displayed on the same page, USDA seal next to individual organic products but not next to conventional products, no USDA seal in header.
  - USDA seal in page header next to statement “We offer both organic and nonorganic products,” and “Organic” is written next to organic products but not nonorganic.
- When used in relation to specific products, including ordering pages or shopping carts, the USDA seal may only be used on “Organic” and “100% Organic” products.
- When the USDA seal or CCOF logo appears in an image or photo, all products or ingredients in that image must be eligible to display the seal/logo, i.e. be certified “100% Organic” or “Organic” (USDA seal), or certified as “Made with Organic...” (CCOF logo).
  - If not all products or ingredients in the image are certified, neither USDA seal nor CCOF logo can be used unless there is a clear and conspicuous explanation of what is certified organic, as described above.
  - Compliant examples:
    - Prepared organic chicken wrap or prepared organic smoothie containing only certified organic ingredients, all disclosed within your OSP. The USDA or CCOF logo may be used without additional explanation.





- Prepared or disassembled meal kit Salmon Veggie Bowl. All vegetables are organic, while salmon is not organic. USDA or CCOF logo may be used only if there is a clear and conspicuous claim attached (i.e. Proudly made with only Organic produce).

