

Hot Topics and Certification Requirements for the Organic Brewing Industry

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USDA National Organic Program Agricultural Marketing Service-USDA 7 CFR 205

Organic Production-
A production system that is managed in accordance with the Act and regulations in this part to respond to site-specific conditions by integrating cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity.



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Why get certified?

- Required if making a Principle Display Panel Claim
- Federally regulated and enforced eco-label
- Third party verification = consumer confidence
- Support and promote organics by participation
- Prominently communicate use of organic ingredients and organic practices



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NOP Handling Requirements Protecting Organic Integrity

- Organic Handling Plan / Application
- Commingling/Contamination Prevention
 - Organic Standard Operating Procedures (OSOP)
- Product Composition & Labeling
- Records to support compliance with the regulations



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NOP Handling Requirements

Product Composition § 205.301

- **100% Organic** - contains ‘100% organic’ ingredients. Processing aids must be ‘organic’
- **Organic (95%+)** - 5% non-organic ingredients must be on the National List (§ 205.605 or § 205.606).
- **“Made with” (70%+)** - 30% must be on the National List if *non-agricultural*; non-OG *agricultural* allowed in 30% without commercial availability requirements



Certification Considerations

National List Examples



§ 205.605 (a) Nonsynthetic	§ 205.605(b) Synthetic	§ 205.606 Agricultural
Bentonite	Paracetic Acid	Carrot Juice Color
Calcium Sulfate	Ozone	Corn Starch
Carageenan	Carbon Dioxide	Hops (removed)
Yeast (revised)	Octadecylamine	Konjac Flour
Diatomaceous Earth	Silicon Dioxide	Lemongrass, frozen
Nitrogen	Cellulose	Gelatin
Microorganisms	Calcium Phosphates	Kelp



Product Composition

You must now use ORGANIC HOPS in beer labeled or represented as organic



Product Composition

New requirements for using yeast

§205.605(a)

Yeast- When used as food or a fermentation agent in products labeled as “organic,” yeast must be organic; nonorganic yeast may be used when organic yeast is not commercially available. Growth on petrochemical substrate and sulfite waste liquor is prohibited.



Product Composition

Commercial Availability

- **Commercially available**- The ability to obtain a production input in an appropriate **form, quality, or quantity**.
- **Cost** does not constitute commercial *unavailability*.
- Industry standard- documented search of at least three sources. Must check viable sources.
- Potential for International suppliers.



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Product Composition

US/EU Organic Equivalency

- June 1, 2012- Equivalency Arrangement signed.
- EU and NOP products deemed equivalent.
- NOP certified processors may source and use organic ingredients certified to COR standards in products certified to the NOP. **Must be produced in and shipped from an EU member state.**
- Alcoholic beverages may be exported for sale as organic in the EU. **Must be produced in and shipped from the United States.**
 - Apple and Pear restriction.



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Product Composition

US/Canada Organic Equivalency

- June 17, 2009- Equivalency Agreement signed.
- COR and NOP products deemed equivalent.
- NOP certified processors may source and use organic ingredients certified to COR standards in products certified to the NOP.
- Alcoholic beverages may be sold as organic in Canada.
 - Sodium nitrate and hydroponic restriction.



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Product Composition

Carrageenan recommendation Fall 2013

The NOSB recommends the relisting of carrageenan on the National List under §205.605(a) Nonagricultural (non-organic) substances allowed, as ingredients in or on processed products labeled as "organic" or "made with organic" with the following annotations:

1. Only carrageenan with the following CAS numbers are permitted for use as a food processing ingredient: 9000-07-1, 9062-07-1, 11114-20-8, and 9064-57-7.
2. Prohibited in infant formula for children under the age of six month.



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Product Composition

Ancillary or “other ingredients”

The NOP is requesting guidance for the “other ingredients” present in §205.605 and §205.606 materials.

1. Should all agricultural ingredients that are “other ingredients” be organically produced?
2. Are synthetic preservatives allowed as “other ingredients?”



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Product Composition

Ancillary or “other ingredients”

“Other Ingredients” have the following characteristics:

- Added during manufacturing of a non-organic substance and are not removed.
- Not added directly by the certified handler.
- Present in food at insignificant levels- no technical or functional effect in the finished product.
- Not required to be listed on the label.



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Sound and Sensible Certification

Goal- Organic certification that is accessible, attainable, and affordable.

- Efficient Processes
- Streamlined Recordkeeping
- Practical Plans
- Fair, Focused Enforcement
- Integrity First



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Web Resources

Additional Information on Topics

- Check out the NOP Insider- best resource available.
- <http://www.tilth.org/Resources/index.html>
- <http://www.ams.usda.gov/nop/indexNet.htm>
- <http://www.ota.com/index.html>
- <http://www.naturalfoodnet.com/nfnportal/>
- <http://www.organic.org/>



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website: www.tilth.org

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Questions?



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If there is additional time:



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Yeast Handling Commingling Prevention

- Separate Yeast Brink for Organically produced Yeast only
- Grown in Organic Malt Extract
- One Brink used to pitch one brew
- Harvested and re-pitched to 2-Brew batch



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Brewery Documentation

- Ingredient Log
- Lot Codes for each individual brew
- Connect receiving records to packaging and shipping

Organic Brew Raw Ingredients and Process Aids Log

Date: _____ Brew #: _____
 Brand: _____ Batch #: _____

TO BE RECORDED ON THIS FORM: MALT, HOPS, SALTS, FININGS, FILTER AIDS (DE AND CELLULOSE), ANTI-FOAM
 EACH ENTRY REQUIRES SIGNATURE OF PERSON MEASURING AND/OR USING THE INGREDIENT

Ingredient or Process Aid	Supplier	Lot #	Weight (lbs)	Brewer Signature
Organic NW Pale Ale Malt	Great Western Mailing			
Briess Organic C-20 Malt	Brewer's Supply Group			
Briess Organic Chocolate Malt	Brewer's Supply Group			
Calcium Sulfate	Univar			
Whitflocc BWS	Brewer's Supply Group			
Cascade Hops Pellets	Hop Union, Inc.			
Centennial Hops Whole Hops	SS Steiner			
Yeast	In-House			
Anti-Foam	Botanix			
Chillguard	Brewer's Supply Group			
FP2 Diatomaceous Earth	Univar			
FP4 Diatomaceous Earth	Univar			
FW-14 Diatomaceous Earth	Univar			
Eagle Picher PB 40M Cellulose	Univar			
Carbon Dioxide	Atigas			

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Product Composition Example Product Formulation



- **Product Name:** Organic Pale Ale
- **Bulk/Retail:** Retail
- **Composition category:** 95% - Organic
- **Actual Percentage:** 97.8% = 97% rounding down

Ingredients	%
OG Malted Barley	13.00
OG Hops (Cascade)	00.80
Carbon Dioxide	00.30
Water (excluded)	85.90

Total	100
Weight of organic ingredients	13.80
Weight of formula w/o H2O	14.10
Percent of organic ingredients	97.80
Processing Aids	
Brewing Yeast	NA
Carageenan	NA
CaCl2 - water treatment	NA
Filter Sheets (cellulose pads w/ diatomaceous earth)	NA

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Certification Considerations

Why get certified?

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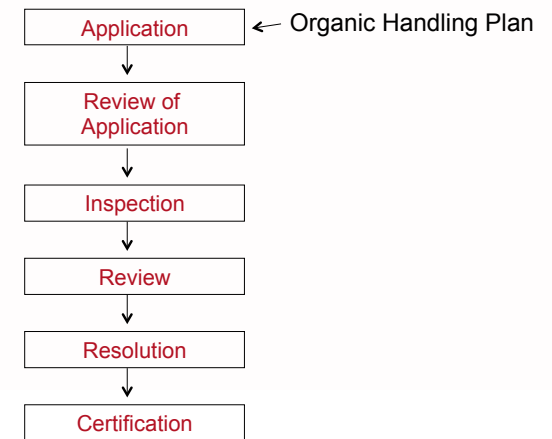


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Certification Process



OTCO Inspector



Allow 8-12 weeks to complete process



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NOP Handling Requirements

Labeling § 205.300

- Consistent with composition parameters
- Retail packaging
 - organic claims - 100% organic, organic, “made with”
 - use and placement of the certifier statement on the information panel of the label
 - use of the USDA seal



- Non-retail (bulk) packaging - lot number

