### Organic Cotton

Frequently Asked Questions (FAQ)

#### Q. 1 Why does the industry want to use organic cotton?

Organically grown cotton is seen as environmentally friendly, as no synthetic fertilizers, pesticides and herbicides are used in the growing of the cotton. Environmental stewardship is increasingly in the public eye and the use of organic cotton has become very trendy among consumers. Manufacturers and retailers are responding to their demand for more “natural” products.

#### Q. 2 What is organic cotton and how is it grown?

Organic cotton is cotton that has been grown for at least three years without chemical pesticides, defoliants, or fertilizers. Natural fertilizers and fertilizing techniques are used instead, including compost, manure, naturally derived mineral and plant fertilizers, and crop rotation. Third-party certification organizations verify that organic producers employ only approved natural methods and materials in organic production.

#### Q. 3 What is required to label cotton as organic in the United States?

In order to label a product organic, it must be USDA (United States Department of Agriculture) certified, meaning it has met the requirements of the USDA NOP (National Organic Program) standards. Even when not grown in the United States, the cotton must still meet USDA’s NOP standards in order to be labeled as such.

The requirements include:
- Retailers and brands require documentation from growers providing that they have met stringent requirements at every stage of processing, starting at farm level.
- Production practices must comply with the NOP National List of Allowed Synthetic and Prohibited Non-Synthetic Substances.
- Proof must be available on demand.
- Transgenic cotton varieties are not acceptable in organic certification.

**NOTE:** The USDA NOP standards are written for organic cotton fibers and not the end products.

As per the USDA:

"Although the NOP has no specific fiber or textile processing and manufacturing standards, it may be possible for fibers grown and certified to NOP crop/livestock standards to be processed and manufactured into textile and other products which meet NOP standards."

Only textile products certified to the NOP production AND processing standards are eligible to be labeled as “100 percent organic” and “organic”.

**“100 percent organic”:**
- 100 percent organic fiber content.
- Only organic processing aids.
- USDA Organic seal may be displayed on final product, in marketing materials, and in retail displays in proximity to certified products only.
- All operations producing, handling, processing and manufacturing the final product must be certified.

...continued
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Q. 3

"Organic":
- Minimum of 95 percent organic fiber content.
- 5 percent nonorganic substances, as listed in Section 205.605 of the NOP regulation.
- No non-organic fibers.
- USDA Organic seal may be displayed on final product, in marketing materials, and in retail displays in proximity to certified products only.
- All operations producing, handling, processing, and manufacturing the final product must be certified.

Q. 4

What is the minimum certification that I need to legally label my products “organic”?

According to the USDA: Other Uses of the Word “Organic” in Textile Product Labeling:
The NOP does not restrict the use of the term “made with organic ....” in the labeling of textile products to only those products manufactured in certified organic facilities or containing a minimum of 70 percent organic fibers. However, all fibers identified in these textile products as “organic” must be produced and certified to NOP standards.

Labels on textile products from non-certified handling/processing/manufacturing operations:
- May identify specific fibers as being organic if certified to the NOP crop/livestock standards.
- May state the percentage of organic fibers contained in the final product.
- May not use the USDA Organic seal.
- May not imply or lead the consumer to believe that the final product is certified organic.

Q. 5

How often is a farm audited to retain their certification?

A fully organic certified farm goes through annual inspections, as well as un-announced audits at the discretion of the inspector’s judgment.

Q. 6

Can all products that are made with organic cotton and have been certified to USDA NOP standards carry the “USDA ORGANIC” seal?

Only textile products certified to the NOP production AND processing standards are eligible to be labeled as “100 percent organic” and “organic”. “100 percent organic” can carry the USDA seal. USDA Organic seal may be displayed on final product, in marketing materials, and in retail displays in proximity to certified products only.

Following is the USDA Organic logo:
Q. 7 Will I find the USDA Organic seal on all 100 percent organic products, or products with at least 95 percent organic ingredients?

No. The use of the seal is voluntary, but the certification is mandatory.

Q. 8 How is the use of the USDA Organic seal protected?

There are fines up to $11,000 for each violation for anyone who sells or labels a product “organic” when they know it does not meet USDA standards.

Q. 9 How should organic cotton be labelled in the United States?

Labelling requirements for organic fibers are as follows:

- “Organic” - at least 95% of the ingredients must be organic.
- “Made With” – 70 to 95% of the ingredients must be organic.
- “Below 70 %”- US allows identification of organic ingredients on the information panel in products containing 50% or more organic ingredients.
- Percent organic declarations in the US are not mandatory.
- “Transition to organic” - is not allowed.

Q. 10 What documentation does a retailer or brand need to have available in order to prove that the cotton is genuine USDA certified organic?

A retailer or brand selling a cotton product in the United States and claiming that the product is made from organic cotton, must be able to prove that the cotton was produced in accordance with the USDA National Organic Program (NOP) regulation 7 CFR 205: The National Organic Standards require all agricultural products sold, labeled or represented as organic in the United States to be certified by a USDA accredited certifying agent.

Three ways this requirement can be met:

- Direct USDA Organic Certification
- Countries Recognized by USDA to Assess and Accredit Certifying Agents
- Countries Recognized by USDA to have Organic Standards Equivalent to USDA National Organic Standards

Each certified organic operation will have an organic certificate that was issued to them by the certifying agent. Each organic cotton product must be traceable back to the operation where the cotton was produced by means of records kept by the certifying agent, producer, processor, manufacturer, and ultimately the brand or retailer. It is the brand and retailer’s responsibility to know where the products it sells originated and if the paperwork is in order.

### Organic Cotton

**Frequently Asked Questions (FAQ)**

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<th>Q. 11</th>
<th>With what countries does the United States USDA have an organic recognition agreement?</th>
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<td>Israel, India, New Zealand, United Kingdom, Denmark, the Standards Council of Canada, and the Canadian provinces of Quebec and British Columbia. Also, the USDA has an export arrangement with Japan. (Bureau Veritas’ USDA approval for certification is through an Organic Recognition Agreement).</td>
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<th>Q. 12</th>
<th>For those countries that the United State has an agreement with, would the certification provided by that country’s certifying agency enable the US retailer or brand to label the cotton with the USDA seal?</th>
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<td>Unless those products have been manufactured in accordance with the NOP handling regulations and contain at least 95% organic content, that product cannot be labeled as organic or use the USDA Organic seal. If the cotton fiber itself is produced and certified to NOP standards, but the manufacturing process does not comply, the product can ONLY be labeled as “made with organic cotton”. This “made with” product may not carry the USDA Organic seal. This pertains to all cotton, whether produced domestically or in a foreign country.</td>
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<th>Q. 13</th>
<th>Can organic cotton be tested to determine it is indeed organic?</th>
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<td>At this time, there is no test that can determine if cotton is organic or traditionally grown.</td>
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<th>Q. 14</th>
<th>Are the physical properties different from traditional cotton?</th>
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<td>No, the physical properties, such as strength, do not differ from that of traditional cotton.</td>
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<th>Q. 15</th>
<th>What is transitional cotton? Can I label it organic?</th>
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<td>Transitional cotton is cotton that has been grown organically, but for less than the three years that are mandatory for it to be labeled organic. Therefore, it cannot be labeled organic as yet. There is a 3 year period under the NOP standard, and a 2 year period under the EEC 2092/2091 directive, for farmers transitioning their land to organic production from conventional production. “Cotton in transition”, “transitional cotton” or “cotton in conversion”, are terms for cotton being grown on land during the transitional period.</td>
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<th>Q. 16</th>
<th>How can I label transitional cotton?</th>
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<td>Currently, labeling for transitional cotton is only allowed in the EU where it is called “organic inconversion” and needs to be certified under the EU organic standard. The Organic Exchange in Europe has a task force focusing on transitional cotton, and is lobbying the USDA to change its rules so that labeling transitional cotton will be allowed in the United States.</td>
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<th>Q. 17</th>
<th>Can Bureau Veritas track when a farm goes from being “transitional” to “organic”?</th>
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<td>Yes, there is a facility available to certify farms as “In-Conversion” until the farm has actually gained the Fully Organic status after the 3 year minimum transitional period. Monitoring is done annually, with flexibility to conduct un-announced inspections, specifically in the farm sector.</td>
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Q. 18 Are there other certifications globally?

At this time there are no certifications that are recognized globally, although a number of organizations are working toward that goal. There are other certifying bodies that encompass more than certifying the cotton crop alone, such as the USDA certification does. GOTS (Global Organic Textile Standard) is another certifying body that encompasses the life cycle of cotton from crop to final garment. This certification is not as widely recognized as others, but has similar plans for accomplishing sustainable products as other certifying bodies.

Following are examples of a few certification marks of certifying bodies around the world.

EU: Eco-Label
Germany: Blue Angel
Hong Kong: Green Label

Q. 19 Does the USDA recognize any other organic standards/certifications?

At this time, USDA does not recognize GOTS, the EU Flower, or any other certifications. The only avenue to sell organic agricultural products in the United States is through an accredited certifying agent confirming that USDA NOP standards for operations, producing, handling, processing and labeling have been followed. Or, through a country with which the USDA has a recognition agreement.

Q. 20 Can Bureau Veritas certify an organic cotton farm?

Yes, Bureau Veritas is certified to perform USDA NOP inspections/certifications in several countries.

Q. 21 How do I contact Bureau Veritas to schedule an organic farm certification?

Please send inquiries to this email address: cps.info@us.bureauveritas.com