



April 24, 2023

Federal Trade Commission
Office of the Secretary
600 Pennsylvania Avenue NW
Suite CC-5610 (Annex J)
Washington, DC 20580

RE: Green Guides Review (16 CFR part 260) (Matter No. P952501)

To Whom It May Concern

Thank you for this opportunity to provide comments on the Federal Trade Commission's (FTC) Guides for the Use of Environmental Marketing Claims ("Green Guides"). FTC is requesting comments about the efficiency, costs, benefits, and regulatory impact of the Guides to determine whether to retain, modify, or rescind them.

The Organic Trade Association (OTA) is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States, representing organic businesses across 50 states. Its members include growers, shippers, processors, certifiers, farmers' associations, distributors, healthcare professionals, importers, exporters, consultants, retailers and others. OTA's Board of Directors is democratically elected by its members. OTA's mission is to promote and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

OTA strongly supports FTC's efforts to help marketers ensure that the environmental claims marketers make are true and substantiated. The FTC Green Guides is a critical resource that helps marketers avoid greenwashing. We strongly believe there is not only a need for its continuation, but a need for modifications to ensure it is keeping up with the numerous environmental claims that have emerged since the Guides was last updated. We applaud FTC for giving the public the opportunity to weigh in and for its efforts to ensure the Guides is keeping up with science and consumer perception.

In summary, OTA would like to see the Guides updated to address **organic labeling and marketing claims** made on **agricultural 'non-food' products** that fall outside of the United States Department of Agriculture's (USDA) National Organic Program (NOP) enforcement jurisdiction. Marketing a **product** as "organic" when it, in fact, contains very little organic material is misleading and inaccurate; it creates consumer confusion and can lead to consumers mistrusting the integrity of the word "organic" on USDA-NOP certified products. This, in turn, negatively affects the success and growth of legitimately certified USDA organic products and can disenfranchise consumers in their ability to trust labels in general. We believe the Guides could effectively provide marketers across the country with guidance on how to avoid making misleading and/or inaccurate organic claims on non-food products.

We offer the following more detailed comments.

The term “organic” is a well-established and largely regulated label claim

Organic continues to be the fastest growing sector in agriculture from its start at one billion dollars in 1990 when the organic law passed, to \$8.6 billion in 2002 when the organic rule was federally implemented, to a total (food and non-food) of \$66 billion today. A niche industry in the huge food sector just a decade ago, consumer purchases of organic products first broke through the \$30 billion mark in 2012 and now account for more than 6% of the nearly one trillion annual market for food sales in the United States.

Consumers are not just eating organic; they are incorporating organic into their lifestyles. While organic food sales accounted for 91% of the organic sales, non-food organic products—including flowers, textiles, personal care, household products and pet food—continue to make quick and significant inroads. Sales of non-food organic products, at nearly \$6 billion, have jumped eight-fold since 2002, though still occupy an appreciably small percentage of the total market for non-food products sales¹.

There is no question that the term “organic” is well established in the marketplace. Organic products are now available in nearly 20,000 natural food stores and nearly 3 out of 4 mainstream grocery stores. After twenty years of operating under a thriving USDA organic program that promotes and regulates the term “organic,” consumers look to “organic” as a regulated term held to strict standards, and they are willing to pay more for it. This should be a fact that consumers can trust when they purchase organic products, regardless of the grocery store aisle or retail outlet they are shopping in.

Consumers are misled by unregulated organic claims

Consumers have received consistent messaging from the government for over 20 years that “organic” is a term regulated by USDA’s NOP, and that agricultural products making organic claims **must** be certified to the NOP regulations. In 2005, NOP also clarified that certain products, such as personal care products and textiles, **may** be certified to the NOP regulations by virtue of their organic agricultural content, but they do not need to be certified provided the USDA organic seal is not used and certification claims are not made. Unfortunately, consumers are largely unaware of the difference between a product in the food aisle that must be certified if an “organic” claim appears on the front label vs. an “organic” product claim in the non-food aisle that may or may not be certified. USDA has opened the door to organic certification of non-food products such as shampoo, household cleaners and mattresses, **and** it allows the term “organic” to be used on these same products when they are not certified. This juxtaposition creates a very confusing, if not misleading, situation for shoppers.

OTA’s *U.S. Families’ Organic Attitudes and Beliefs Study* has tracked shoppers’ understandings and behaviors surrounding organic products since 2009. The study relates to organic “products,” as opposed to organic “non-food products,” but the findings are supportive of the themes discussed in these comments and more recent surveys we have conducted that specifically address “non-food products.”

Some highlights from previous OTA surveys include:

¹ Organic Trade Association’s 2023 Organic Industry Survey (consumer sales).

- From the 2015 *Study*: Shoppers were asked, “**During the last 6 months, how often did you choose organic products in the following categories?**”
 - Supplements – 48% indicated always or most of the time. Organic supplement sales in the U.S. in 2015 were \$1.115 billion, or 2.89% of the total market.
 - Personal Care Products – 43% indicated always or most of the time. Organic Personal Care Products sales in the U.S. in 2015 were \$848 million, or 1.25% of the total market.

These results indicate consumer confusion about the products they have purchased, and whether they are or are not organic. Consumers of these products often perceive they are making an organic purchase when market reality makes it clear this is simply not possible.

- Following up on the issue, in 2021, consumer research conducted by Edelman² on behalf of the Organic Trade Association asked shoppers, “When considering purchasing the following products, do you tend to buy organic or conventional?” Respondents said they sometimes / usually purchase organic in the following categories. Total market penetration of organic options for those products has been provided as a point of reference:
 - Supplements – 31%
(Actual organic market penetration – 3.3%)
 - Personal Care – 29%
(Actual organic market penetration – 1.4%)
 - Household Products 28%
(Actual organic market penetration – .49%)
 - Pet Food – 24%
(Actual organic market penetration – .38%)
 - Fiber – 23%
(Actual organic market penetration – .8%)
 - Flowers – 23%
(Actual organic market penetration – .29%)

These results speak to the importance of guaranteeing that consumers can trust products with “organic” claims they are willing to pay more for.

In 2016, OTA partnered with May Media Group LLC to conduct a research study to explore consumers’ attitudes, behaviors, understanding and expectations surrounding the topic of organic labeling as it specifically pertains to non-food products and services (**Appendix A**). Following are the key findings from the research:

- Consumers believe organic non-food products and services are available across a wide range of categories, including personal care, supplements, mattresses and more.

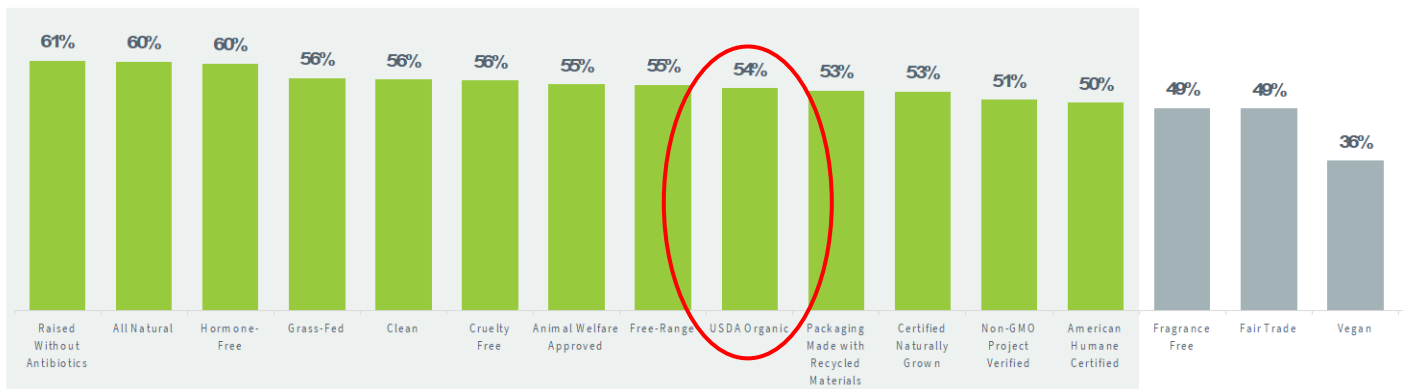
² Organic Trust Barometer, Produced by Edelman for Organic Trade Association 2022

- Most respondents believe a non-food product or service that is labeled “organic” must be certified by USDA or some other government agency.
- A majority of shoppers indicate a high or somewhat high level of trust that regulations relating to growing, manufacturing and formulating practices are being adhered to in the case of non-food products labeled as “organic.”
- Consumers feel strongly that a certification process, such as is used by USDA’s National Organic Program in relation to food/agricultural products, should apply to organic non-food products.
- Consumers believe organic non-food products should be held to the same standard as organic food products.

More recently, in October 2021, OTA partnered with Edelman IP to conduct a research study to uncover perceptions on the organics industry, as well as examine the factors influencing trust and buying habits and to discover what expectations consumers have for organic products – and how these expectations differ from conventional products. For several of the questions the study relates to organic “products” but includes specific response options for product types within both the “food” and “non-food” categories. Some key findings from the research are:

- Consumers believe organic food and non-food products are available across a wide range of categories, including organic personal care, supplements, household products, fiber and flowers.
- Even though organic labeling claims for non-food products are outside of USDA-NOP’s scope of authority, trust for organic and non-food products is about the same.
- Americans cite health reasons for purchasing organic non-food products. Although international shoppers are more likely to cite environmental impact as their reason for buying these products, Americans say the top reasons they buy organic are health and quality.
- Overall, Americans think organic products are healthier, have less pesticides, and less GMOs than conventional production.
- Americans also believe that by purchasing organic they are helping small farms, supporting a more ethical farming system, and investing in a system that is better for animal welfare.

Another finding from Edelman is that labels have an impact on purchasing decisions, even when the labels are not grounded in meaningful standards. In the below illustration, shoppers were asked if they were more or less likely to purchase products with the included labels.



Only one label depicted – USDA Organic – is federally defined, backed by a meaningful government-administered standard, and verified through USDA-accredited 3rd party certification. Yet, it is lost in the middle, with half of shoppers saying they would be more likely to purchase products carrying other eco-labels. Some of the labels more frequently cited by shoppers, such as “clean,” or “all natural,” are so nebulous as to be rendered meaningless.

Unlike other eco-labels like “natural” or “clean,” shoppers have come to trust that the USDA Organic label is backed by 3rd party certification, federally enforced, and provides traceability from the farm to the consumer. Because of this, they are in a position to be misled by marketers of non-food products that exploit the enforcement gap, by labeling a product “organic” that may have very little to do with what consumers have come to expect from the label.

The lack of oversight of organic claims made on non-food products creates a fraud incentive.

Consumer demand for organic products continues to show strong and consistent growth providing market incentives for organic producers, handlers and marketers across a broad range of products. It also provides great incentive for marketers to take advantage of the term “organic” and apply it to products that may contain little to no “organic” material. This is particularly the case in the non-food sector, where misleading organic label claims persist in the marketplace and remain largely unaddressed by USDA-NOP. Although “organic” claims made on agricultural food products fall under the oversight and enforcement authority of USDA-NOP and the agency will take enforcement action, non-food products unfortunately will not be addressed unless the product uses the USDA Organic seal or makes a reference to NOP certification.

In the non-food sector, particularly in personal care, cosmetics, and textiles, it is not uncommon to find products marketed as wholly organic when, in fact, they may only contain little to no organic content. Two such examples were recently the subject of FTC complaints:

September 2017 - FTC Matter / File Number 162 3128

In this case, a mattress company marketed its products with a range of claims on its website and packaging. The company represented that its mattresses were “organic,” when the substantial majority of the content of these mattresses were non-organic. The cores and fire barriers contained no organic content at all, and the cotton cover was 70% non-organic. In fact, according to the FTC, the only purely organic content was the mattress ribbon, a minor decorative component. FTC settled the charges in the matter prohibiting the company from making misleading representations and requiring it to have competent and reliable evidence to support any claims it makes in this area.

This was FTC’s first action against a falsely made organic claim. In its press release, FTC stated, “**Consumers won’t take deceptive organic claims lying down.** Advertisers must substantiate their organic claims. The U.S. Department of Agriculture’s National Organic Program develops standards for organically-produced agricultural products. For other product categories not covered by the National Organic Program, long-standing FTC substantiation principles apply. Advertisers must have a reasonable basis for claiming that their non-agricultural products – for example, mattresses – are “organic.”

OTA strongly agrees. We urge FTC to memorialize this important precedent and update its Green Guides to help address and prevent misleading organic claims from occurring in the marketplace.

September 2019 – FTC Matter / File Number 192 3077

In this case, a Miami-based retailer marketed its bath and beauty products as “Organic” when the products are neither “100% organic” nor “certified organic” by USDA-NOP. In some cases, the products contain no organic ingredients at all. In this case, Andrew Smith, Director of FTC’s Bureau of Consumer Protection remarked, “To know if a product is *truly* organic, consumers have to rely on companies to be truthful and accurate. That’s why we’ll hold companies accountable when they lie about their products being organic, especially when they’ve used fake certificates and ignored USDA warnings.”

OTA agrees with FTC’s assessments and commends its action on both cases. We believe it sets an important precedent and similar situations could be prevented if the Green Guides were updated with marketing guidance. There is a significant distinction between products wholly or largely comprised of organic content, and products that contain some organic content. Under USDA-NOP, organic “product” claims may only be made on the principal display panel of a label if the product is third-party certified and meets specific processing, labeling and composition requirements (at least 70% percent organic in the “made with” category, at least 95% organic in the “organic” category, or “100% organic.”).

If a **product** is not USDA-NOP certified, the product/company may only identify the **organic content** (ingredients) of the product in the ingredient statement on the information panel. These operations do not need to be USDA Organic certified, however they still must maintain records demonstrating that agricultural products identified as organic were organically produced and handled and verify the quantities of organic agricultural products received and shipped or sold (7 CFR 205).

These labeling provisions were specifically designed to help consumers differentiate between organic “product claims” as verified through third-party certification and organic claims that apply only to the “content” of a product. OTA believes these requirements are basic consumer protection principles and should apply to all agricultural products, food and non-food.

FTC guidance in the Green Guides is needed to uniformly reach marketers and consumers

OTA has weighed in on this topic for many years. Consistent with the comments made by FTC in the cases cited above, we emphasize that advertisers must substantiate their organic claims. This is especially important because unlike terms such as “regenerative,” “sustainable,” and “natural,” the term organic is the only eco-label that is federally defined and governed by law, regulations and 3rd party certification. The inconsistent oversight and failure to enforce the use of the term “organic” on all products across the board creates consumer confusion, can be misleading or inaccurate, and can lead to consumers mistrusting the integrity of the word “organic” on USDA-NOP regulated products. Consumers should not need a law degree or a decoder to decipher the validity of products making organic claims. Similarly, marketers should not be allowed to take advantage of and loosely use a well-established term (organic) that is federally defined and regulated. Marketers need guidance and

consumers need education tethered to a consistent labeling policy that applies to all products equally (agricultural and non-agricultural, food and non-food).

To bring greater clarity to the situation, OTA urges FTC to work with USDA-NOP to develop a policy on the appropriate use of organic claims on products that fall outside of USDA NOP's scope of authority. It would be most helpful if this guidance were publicly accessible to all stakeholders in FTC's Green Guides. OTA has adopted and published industry vetted Guidance for its membership (Appendix B and C), but federal guidance accessible to all stakeholders would have a much greater impact.

OTA requests a public comment period on draft guidance be provided, and once finalized, the Green Guides be updated accordingly.

Consistent with the Best Labeling Practices OTA has developed for its membership, OTA requests the following guidelines be included in draft policy made available for public comment:

Organic Product Claims

Organic product claims made on the principal display panel of a product should be reserved for NOP certified organic product or products produced in accordance with an accredited or NOP recognized standard when NOP standards do not exist (i.e. [GOTS](#)).

If a product only contains certified organic ingredients/components, then the organic claim should be limited to an **organic content claim** (e.g., "shampoo - contains organic lavender oil"). This is consistent with NOP's labeling requirements, and it supports **truth in labeling**. We believe there is an important distinction between using the term "organic" to modify a product name (indicating the entire product is organic) vs. using the term "organic" to accurately communicate that some part of the product is "organic."

Organic Content Claims

If a product is not certified to an organic standard but instead simply **contains** organic ingredients, the product (as a whole), should not be labeled as an organic product. Instead, marketers should be provided with guidance on best labeling practices that describes the appropriate use of an **organic content claim**.

Consistent with the USDA-NOP standards for specific organic ingredient listing only ([7 CFR 205.101\(a\)\(4\)](#) and [7 CFR 205.305](#)), OTA supports the following label options for organic content claims:

- The product may only identify the organic content in the product by identifying each certified organic ingredient in the ingredient statement with the word "organic" or with an asterisk or other reference mark that is defined below the ingredient statement to indicate the ingredient is organically produced.
 - Ingredients: Water, Aloe Vera*, Calendula Flower Extract*, Vegetable Glycerin
*Organic
- If the organically produced ingredients are identified in the ingredient statement, the product's percentage of organic content may also be displayed on the information panel.

- The specific ingredients that are identified as “organic” must be USDA-NOP certified or meet the terms of a [USDA-NOP equivalency agreement](#).
- Products must not display the USDA seal or any certifying agent seal, logo or other identifying mark that represents USDA organic certification of the product.

Organic Textiles and the Global Organic Textile Standard (GOTS)

FTC and USDA have model policy to build from. On May 20, 2011, NOP announced a [Policy Memorandum](#) addressing the labeling of textile products containing organic ingredients (such as organic cotton, organic wool, and organic linen). NOP Policy Memo 11-14, entitled “Labeling of Textiles that Contain Organic Ingredients,” clarifies that while the NOP regulations do not include specific processing or manufacturing standards for textile products, a product can be labeled as “organic” and make reference to NOP certification if it is produced in full compliance with both the NOP production standards (crops and livestock for raw materials) and the NOP handling standards (processing for the finished product). However, as most of these methods and ingredients are not applicable to textile processing, NOP labeling is likely unachievable for most garments and textile products using a variety of dyestuffs and auxiliary agents.

As a practical alternative, the policy memo explicitly confirms that textile products produced in accordance with the [Global Organic Textile Standard \(GOTS\)](#), such as apparel, mattresses, or socks, may be sold as “organic” in the U.S., although they may not refer to NOP certification or carry the USDA Organic seal.

FTC should make clear to marketers that in the absence of government standards, private standards for textiles have been developed and NOP Policy is in place that expressly recognizes the GOTS standard. OTA requests FTC also expressly acknowledge GOTS, defer to NOP’s Policy Memorandum on Textiles, and monitor and enforce the use of the term “organic” on textiles not certified either under NOP or GOTS. For products making organic content claims only, OTA requests that FTC include reference to the Textile Exchange [Organic Content Standard](#).³

Organic Personal Care Products

In the absence of mandatory federal standards for organic label claims on personal care products, independent third-party certifications created from private voluntary standards can provide systems of transparency and lend legitimacy to organic label claims. Therefore, personal care companies may seek voluntary validation of organic claims, but still need to work within the limitations of USDA-NOP standards.

- OTA recognizes there are distinct needs of personal care product formulation. If a personal care product does not qualify for USDA-NOP certification, OTA encourages companies to seek out independent third-party certification to a private personal care standard to verify organic claims and support truthful and accurate labeling.

³ The Organic Content Standard (OCS) is a voluntary global chain-of-custody standard that provides third-party verification to a final product containing a given amount of organically grown content. The OCS does not address the use of chemicals or any other aspects of production beyond the integrity of the organic material.

- To ensure the certification process is carried out in a competent, consistent and reliable manner, the third-party certifier should be ISO/IEC accredited (*ISO/IEC 17065:2012 Conformity assessment – Requirements for bodies certifying products, processes and services*).
- To ensure transparency and to promote education and consumer awareness, the standard should be publicly available.
- To ensure the views of all interests are taken into account, standards development should be carried out using a multi-stakeholder, consensus-based approach.
- Finally, products labeled with an organic content claim (e.g. “contains organic X”) on the front panel must contain at least 70% organic content.

Personal care products not certified to the USDA-NOP standards or to a private personal care standard as described above should not use the term “organic” anywhere on the principal display panel. **Organic content claims** should follow the “content claim” policy described above.

Organic Dietary Supplements

In the United States, dietary supplements are considered food, whether consumed in the U.S. or exported. Dietary supplements are not regulated by USDA. They are regulated by FDA under the Dietary Supplement Health and Education Act of 1994 (“DSHEA”). DSHEA defines dietary supplements as a category of “food.” DSHEA sets up special rules for supplements as a particular kind of food but does not eliminate them from the category of food.

OTA’s position is that organic claims made on herbal (agricultural) dietary supplements fall under NOP’s scope of enforcement because they are agricultural and regulated as “food.” Therefore, any herbal dietary supplement product labeled as “100% organic,” “organic” or “made with organic (specified ingredients or food group(s))” must be certified under the USDA-NOP regulations. Products containing less than 70% organic content or only identifying organic ingredients on the information panel should follow the “Content Claim” policy described above which is consistent with the USDA-NOP labeling regulations at 7 CFR 205.305.

Conclusion

The Organic Trade Association and many other organizations and consumers have been requesting that FTC update its Green Guides to address misleading organic claims for over 20 years. USDA has opened the door to USDA organic certification of products such as shampoo, household cleaners, sheets, mattresses and dietary supplements as well as the allowance to use the term “organic” on products that are not certified. With this dual allowance comes a responsibility to ensure that organic advertising claims are truthful and not misleading.

Supported by years of data collected by OTA, consumers believe there are benefits to buying organic products and they expect a guarantee. Many consumers have come to trust and understand that organic products are also certified to strict standards and that those claims are regulated and enforced by the federal government. This should be a fact that consumers can trust when they purchase organic products, regardless of the grocery store aisle or retail establishment they are shopping in. Failure to enforce the use of the term "organic" on all products creates consumer confusion, can be misleading or inaccurate,



and can lead to consumers mistrusting the integrity of the word "organic." This is in no one's interest - not USDA, which administers the National Organic Program, nor the FTC, which has a consumer protection mandate.

Again, in the absence of government guidance and oversight, OTA has developed industry "Best Labeling Practices for Non-Food Products" for its membership. Our members find the Guidance to be very useful, but its reach and impact simply cannot compete with the effectiveness of FTC's Green Guides. All of this would significantly help prevent misleading or fraudulent organic claims, ensure consumer confidence in the term "organic," and help protect the USDA National Organic Program and the 27,642 certified organic operations nationwide.

On behalf of our members across the supply chain and the country, the OTA thanks FTC for the opportunity to comment.

Respectfully submitted,

A handwritten signature in black ink, reading "Gwendolyn V. Wyard".

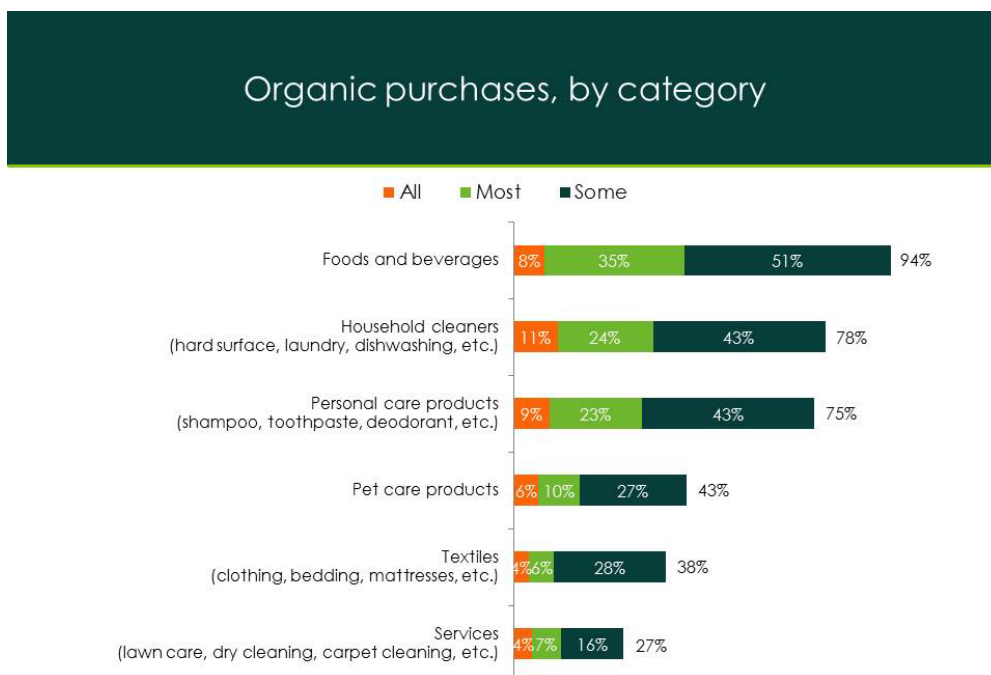
Gwendolyn Wyard
Vice President, Regulatory and Technical Affairs
Organic Trade Association

cc: Tom Chapman
Chief Executive Officer
Organic Trade Association

Appendix A: OTA Survey Concerning Organic Labeling of Food and Non-food Products and Services

Conclusion 1: Consumers believe that organic non-food products and services are available across a wide range of categories. Further, they believe that they frequently purchase organic household cleaners, personal care products, pet care products and more.

Question: During the past 6 months, how many of the following products or services purchased by you were labeled as organic?



The critical takeaway here is that the total U.S. market for household cleaners was \$16.5 billion, making it highly unrealistic that 35% of the sample group actually purchases “some or all” organic household cleaners. The entire U.S. market for organic household cleaners was \$80 million in 2015, or about 0.48% of the total market.

Similarly, according to *OTA’s 2014 U.S. Consumers’ Organic Attitudes and Beliefs Study*, a high percentage of category buyers believe they had purchased an organic product at least once in the past six months in the following areas:

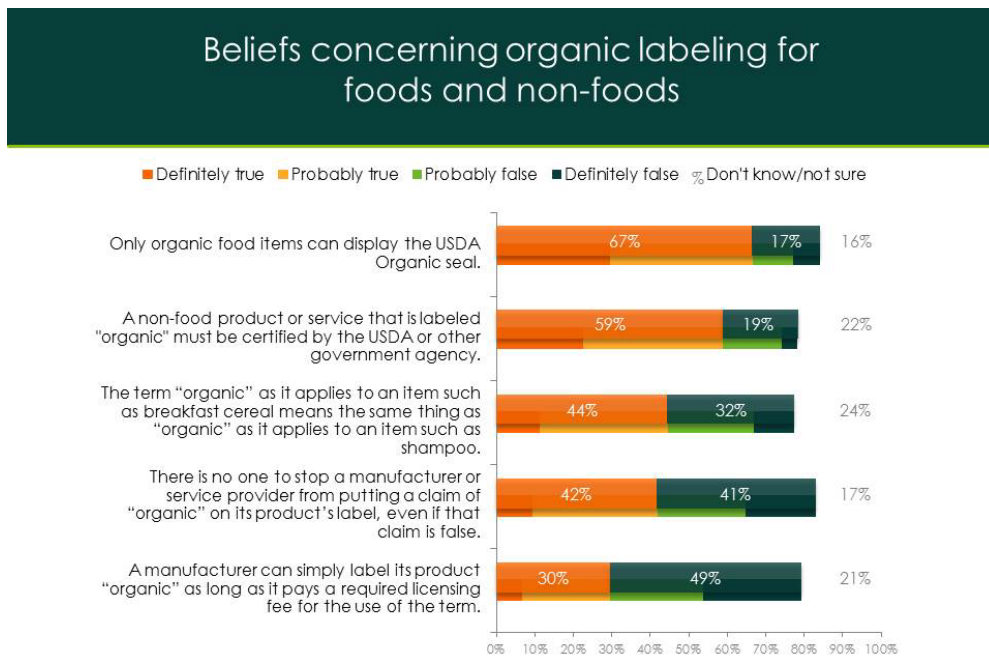
- Supplements – 78%
- Personal Care – 74%
- Flowers – 68%
- Pet Food – 65%
- Fiber, Linens/Clothing – 63%

However, OTA's 2014 Organic Industry Survey showed the combined annual sales for these categories total about \$2.7 billion, or just over 7% of total organic sales. Furthermore, total market penetration for organic products in these categories did not exceed 2.6% (in supplements) and dipped as low as .4% (for flowers).

Thus, it would appear that consumers of these products often perceive they are making an organic purchase when market reality makes it clear that this is simply not possible.

Conclusion 2: Most of the respondents believe that only organic food items can display the USDA seal (67%), and that a non-food product or service that is labeled “organic” must be certified by the USDA or other government agency (59%).

Question: For each of the following statements, please indicate the extent to which you believe them to be True or False.



Furthermore, a predominance of consumers indicated their belief that the term organic, as it applies to food products (e.g. breakfast cereal), means the same thing as when it is applied to non-food products (e.g. shampoo).

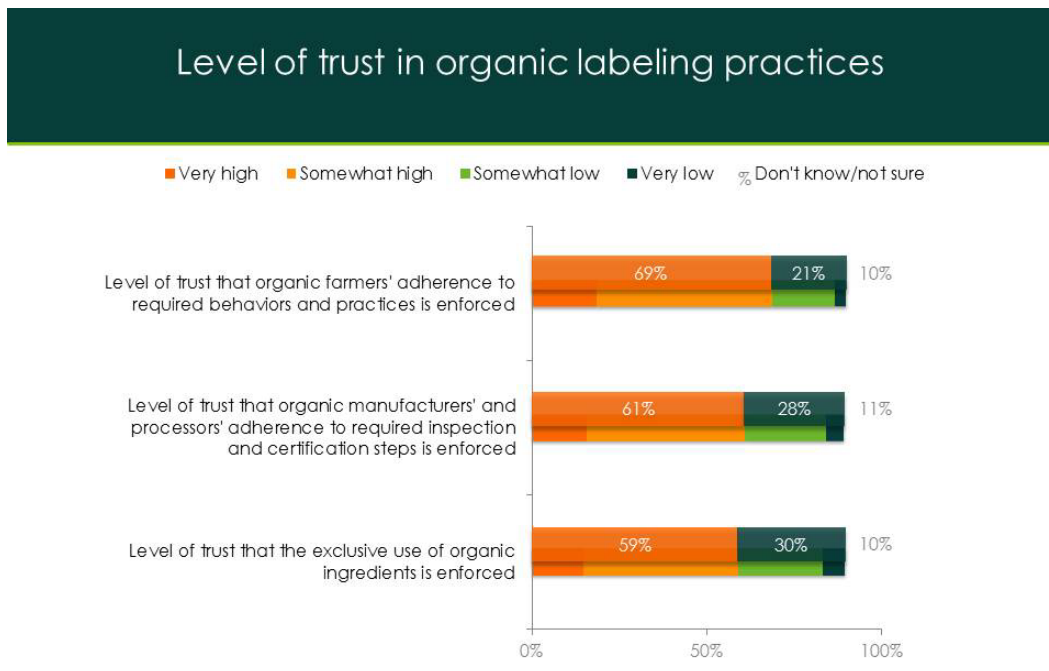
In FTC's own August 2016 study, entitled, "Consumer Perception of 'Recycled Content,' and 'Organic' claims," the issue of consumer understanding of organic claims on non-food products is explored further.

Responses to the question, "Does the word 'Organic' have the same meaning for this product as it does for an apple?" varied by product category, with as many as 41% answering yes when the product was shampoo, and 40% when the product in question was a mattress. Add to those figures an average 30% of additional consumers who aren't sure, and there exists a significant potential for consumer confusion and deception.

FTC’s study (Figure 4.2.6a), as corroborated by OTA’s data, supports OTA’s position that many to most consumers believe that the term organic, *regardless of whether it is food or non-food*, is certified and regulated according to a government standard. OTA’s data also corroborate FTC’s study (Table 4.2.3a) that many consumers believe that “organic” has the same meaning when it is applied to food products (e.g. breakfast cereal, apples) as when it is applied to non-food products (e.g. shampoo), or they are not sure.

Conclusion 3: Despite the fact that there was no clear consensus concerning whether or not anyone can stop manufacturers from making false organic claims, and whether or not an organic label claim can simply be obtained for a fee, there is generally a high level of trust that organic label claims made on non-food products reflect requirements adhered to and enforced.

Question: How would you rate your overall level of trust that the following elements of organic labeling for non-foods and services are being enforced?

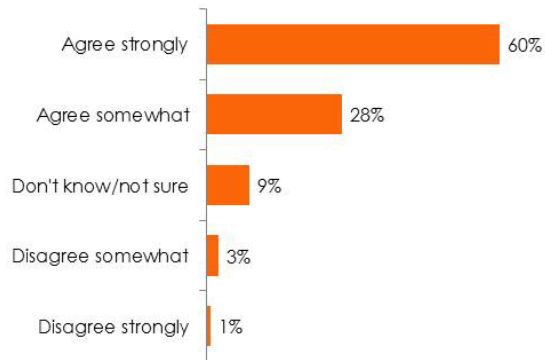


A majority of shoppers indicated a high or somewhat high level of trust that regulations relating to growing, manufacturing and formulating practices were being adhered to in the case of organic non-food products.

Conclusion 4: Consumers feel strongly that a certification process, such as is used by USDA’s National Organic Program in relation to food/agricultural products, should apply to organic non-food products.

Question: How strongly do you agree or disagree with the following statement:

“A certification process such as is used by the USDA to oversee and enforce the labeling of organic foods should also be used to oversee and enforce the labeling of organic non-food products and services such as shampoo, mattresses, and dry-cleaning.”



Conclusion 5: The consensus sentiment obtained from the open-ended comment about government regulation of non-food products was “Any product that uses the organic stamp should be held to the same standards. People should be able to trust that the same procedures are being used across the board.”

Note: The nine sample comments below appear as originally provided by respondents, and as a result may contain spelling, grammatical, or typographical errors. All 804 of the responses are found in Appendix B.

- “The certification process used by the USDA to oversee and enforce the labeling of organic and non-organic products and services should also be used to oversee and enforce the labeling of all organic and non-organic products and services because: 1) the consumer's health & safety is at stake and 2) consumers pay their taxes to appoint government agencies to regulate these matters under the law!!!”
- “Any product that uses the organic stamp should be held to the same standards. People should be able to trust that the same procedures are being used across the board.”
- “Some people will buy only things labeled organic. Sometimes, organic is more expensive. If you can label any item as organic, you are false advertising, and ripping off the consumer.”
- “I agreed strongly because I would love that the same organization that sets the standards for what qualifies as organic to do so for other non-food products and services.”
- “Why should our food be any different than things we put on our bodies? What we put on our bodies are absorbed into our blood through our skin thus affecting us the same as if we ingest something.”
- “If it is labeled organic, it must be certified, inspected & proven so that we as consumers can trust it to be true.”
- “So far, I trust USDA certifications. In order to trust that non-food products are organic, I would like to know the same process is used to certify.”
- “Both categories of products affect health & environment, therefore they should be regulated in the same manner.”
- “Consumers need to trust that there are standards on the organic label for non-food products.”

Methodology and Limitations

Methodology: The methodology employed was an online survey consisting of several multiple-choice questions, one open-ended comment question, and a series of classification questions. The research was conducted by May Media Group LLC from October 5 – 10, 2016, with respondents from the Moms MeetSM Mom Ambassador database and the KIWITM Magazine Parent Advisory Board. Respondents were incented to complete their surveys by the chance to win a \$150 VISA gift card.

The report is based on the responses from approximately 1,300 completed surveys. The respondents completing the survey were primarily females between 18-54 years old, married with an average of two children, white, college-educated, employed, and an average household income of \$62,000.

Limitation: The Moms MeetTM Mom Ambassador database and the KIWITM Magazine Parent Advisory Board consist of consumers who are self-identified as being interested in raising healthy families and participating in the Moms Meet and KIWI magazine online communities of like-minded individuals. Because this population is actively engaged in educating itself on natural, organic, and better-for-you products and services, their opinions, attitudes, levels of understanding, and purchasing behaviors may differ from those of a randomly selected U.S. national sample.