Labeling and Marketing Guide

Rules for Use of Food Alliance Certification Claims and Trademarks







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Section 1: Overview

This section provides a general organizational overview of Food Alliance and its programs. The guidance provided in this handbook is primarily intended for marketing staff and decision makers for:

- Marketers of Food Alliance Certified products
- Food Alliance Certified Producers (farms and ranches)
- Food Alliance Certified Handlers (packers, processors, and distributors)
- · Retailers and users of Food Alliance Certified products and ingredients.

1.1 Introduction to Food Alliance

Food Alliance works at the juncture of science, business and values to define and promote sustainability in agriculture and the food industry, ensuring safe and fair working conditions, humane treatment of animals, and careful stewardship of ecosystems.

Food Alliance defines sustainability in agriculture and the food industry with comprehensive sustainability standards and a third-party certification program that address a wide range of consumer and industry concerns. Food Alliance Certified farms, ranches and handling operations produce beef, lamb, pork, poultry, dairy, eggs, shellfish, grains, legumes, fresh fruits and vegetables, and packaged products containing these ingredients. In 2012 Food Alliance expanded its certification program to include nursery and greenhouse operations that produce woody ornamentals, annuals, perennials, potted flowering plants, foliage plants and cut flowers.

Started in 1995 as a project of Oregon State University, Washington State University, and the Washington State Department of Agriculture, Food Alliance was incorporated as a 501(c)(3) nonprofit organization in 1997.

1.2 The Food Alliance Approach

Food Alliance's holistic, multi-leveled approach to defining and supporting sustainability in agriculture and the food industry is based on three core tenets:

- **Whole Farm Approach:** Food Alliance takes a 360-degree "whole-farm" focus working to understand and improve the system, instead of highlighting a single issue.
- **Continual Improvement:** Food Alliance knows sustainability is not a destination. Every farm and food business that earns Food Alliance certification has taken meaningful steps to improve outcomes and constantly strives for more sustainable practices.
- Total Supply Chain: Food Alliance works with people at all levels of the food system from small
 farmers and ranchers, to processors, distributors, chefs, retailers and wholesalers to accelerate the
 pace of change together.



1.3 Food Alliance Guiding Principles

These eight principles are the overarching framework of the FA Sustainability Standards and the Food Alliance Certified program:

Protect, enhance, and conserve soil resources, water resources, and biodiversity

Food production improves soil productivity, protects water quality and supply, and supports healthy native plant and animal communities.

Conserve energy, reduce and recycle waste

Waste streams from food production are minimized while reuse, recycling, and composting of resources is maximized. Businesses invest in innovation and improvement to ensure efficient use and management of natural resources for energy and packaging, transport, and daily operations.

Reduce use of pesticides, and other toxic and hazardous materials

Food businesses avoid use of chemicals that have adverse impacts on the health of ecosystems. Agriculture relies on a biologically based system of Integrated Pest Management. Materials used for sanitation, pest control, waste treatment, and infrastructural maintenance are chosen to reduce overall negative impacts.

Support safe and fair working conditions

Farmers and food industry workers have secure and rewarding jobs that provide a sound livelihood. Employers respect workers' rights and well-being, make safety a priority, maintain a professional workplace, and provide opportunities for training and advancement.

Ensure healthy, humane animal treatment with no artificial growth promotants or routine/sub-therapeutic antibiotics

Animals are treated with care and respect. Living conditions provide access to natural light, fresh air, fresh water, a healthy diet, shelter from extremes of temperature, adequate space, the opportunity to engage in natural behaviors, and have social contact with other animals. Livestock producers minimize animal fear and stress during handling, transportation and slaughter.

Guarantee product integrity, no genetically engineered or artificial ingredients

Foods are not produced using synthetic preservatives, artificial colors or flavors, genetically modified organisms (GMOs), or products derived from livestock treated with sub-therapeutic antibiotics or growth-promoting hormones.

Maintain transparent and traceable chain of custody

Throughout the entire supply chain, food is produced and handled in accordance with these Guiding Principles. Transparency is maintained independent standards, third-party audits and clear labeling.

Continually improve practices

Food businesses are committed to continually improving management practices. Improvement goals are integrated into company culture, regularly monitored, and acknowledged when achieved. Food buyers are proactively engaged in the food system, and support companies that are transparent about their improvement goals and progress.



1.4 Sustainability Standards for Food and Agriculture

Food Alliance has five standards that define sustainability practices in agricultural production, food processing, and distribution:

- Sustainability Standard for Crop Production
- Sustainability Standard for Livestock Production
- Sustainability Standard for Farmed Shellfish Production
- Sustainability Standard for Nursery and Greenhouse Production
- Sustainability Standard for Food Processors and Distributors

1.5 The Food Alliance Certified Program

Food Alliance certification verifies the practices behind social and environmental claims in agriculture and the food industry, providing genuine transparency, traceability and accountability in how food and agricultural products are produced.

Food Alliance certification is a tool that ensures safe and fair working conditions, humane treatment of animals, and careful stewardship of ecosystems. Certification also verifies product traceability in food supply chains, which enhances the integrity of the certification guarantee from producer to package.

The Food Alliance Certified seal helps agricultural producers and handlers communicate with customers and the wider public. To determine if a product or operation is eligible to display the Food Alliance Certified seal independent third-party inspectors use the detailed evaluation criteria and indicators in the FA Sustainability Standards to asses whether and how desired management outcomes are being achieved.

Food producers, packers, processors, and distributors invest in Food Alliance certification to improve managment practices, increase credibility of social and environmental sustainabillity claims, protect and enhance brand value, increase customer loyalty, increase sales, secure contracts, access new markets, capture price premiums, and generate positive publicity.

Certification by an independent non-profit organization that provides clear and professional standards and criteria such as Food Alliance is a credible way of demonstrating socially and environmentally responsible agriculture and food handling. Food Alliance certification is applicable to operations throughout North America.



Section 2: Use of Food Alliance Certified™ Seals

To protect the value and credibility of Food Alliance certification, all users of Food Alliance branded products and materials, including certification seals and organizational logos, should be familiar with the concepts and rules related to their appropriate and best use.

Certified Product Seals

For use by Certified operators that market Food Alliance Certified products. In certain circumstances, others may use product seals but only for the direct promotion of a Food Alliance Certified products (see Guidelines for Retailers section for details).



Where to use: On Certified Produce, Meat, Dairy, Eggs, Grocery, Bulk, and Packaged Products



Where to use: On Certified Grassfed Meat Products



Where to use: On Certified Nursery and Greenhouse Products



Where to use: On Certified Shellfish Products

Certified Producer Operation Seal

For use by Food Alliance Certified independent producers or contract producers only.



Where to use:
Anywhere that relates to
the Food Alliance Certified
agricultural operation. The
operation seal should NOT
BE USED on product labels
or packaging.

Certified Handler Operation Seals

For use by Food Alliance Certified packing facilities, processing facilities, and distribution facilities only.







Where to use: Anywhere that relates to the Food Alliance Certified handling operation and facility. The operation seal should NOT BE USED on product labels or packaging.



2.1 How to Display the Food Alliance Certified Seals

Request and Approval

As a community promoting more sustainably grown food and agricultural products, we all share an interest in safeguarding the credibility of the Food Alliance certification program. Food Alliance Certified producers, processors and distributors invest both time and resources to achieving and maintaining certification.

The Food Alliance Certified seals may be used only for identification and promotion of Food Alliance Certified products or operations. To ensure the integrity and credibility of certification, any use of Food Alliance Certified seals requires approval before production and distribution. Use of the Food Alliance certification seal for generic materials or promotions where viewers may incorrectly assume certification for non-certified products or facilities will not be approved.

Four things you must remember when displaying the Food Alliance Certified seal:

- All use of Food Alliance Certified product and operation seals must be submitted to Food Alliance for review and approval before production and distribution. (Please allow at least three working days for a response.)
- 2. Use must meet color and size specifications listed under "Technical Specifications."
- 3. The product seals are for products and product descriptions only.
- 4. Failure to seek approval may be grounds for suspension or revocation of certification.

The Food Alliance Certified seals may be used on Food Alliance Certified product labels, on product packaging, in point-of-sale materials for Food Alliance Certified products, and related facility promotional materials (printed materials, trucks, buildings, etc.). Please see Section 3 for detailed guidance on labeling Food Alliance Certified products.

Certified operations may make certification claims only in respect to enterprises and products that comply with the requirements of Food Alliance and for which certification has been granted. Certified operations will ensure that references to certification on packaging and marketing materials comply with these requirements by submitting them to Food Alliance for approval before use. Please see Section 4 for detailed guidance on marketing Food Alliance Certified operations.

Obtaining Use, Reporting Abuse

Please contact Food Alliance to request a copy of the Food Alliance Certified seal, to request approval of usage, or to report any questionable use of Food Alliance trademarks: (503) 267-4667 or email, info@foodalliance.org.



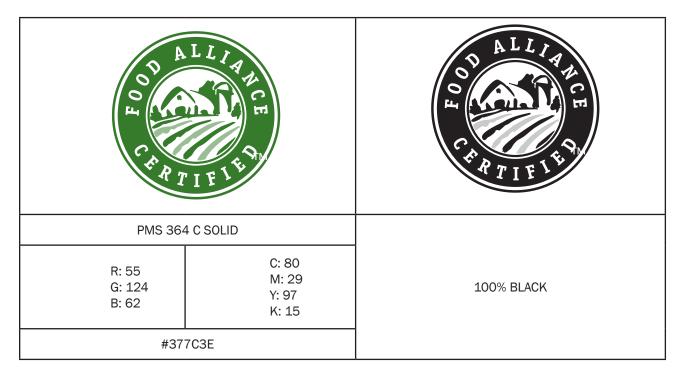
Section 2: Rules for Use of the Food Alliance Certified™ Seals

2.2 Technical Specifications for the Food Alliance Certified Seals

Color Specifications

Food Alliance Certified product and operation seals are a one-color image with tints. They may be printed in either 100% solid PMS 364 C or a solid 100% black. The crop rows in the inner circle are 50% tint of the solid color.

Please note: exceptions may be made to these color guidelines if and only when the inks used to print product packaging do not include black or green. All use of the Food Alliance Certified seals requires approval. See previous page for details.



Please Do Not:

- go to print without gaining approval. Food Alliance is not responsible for costs of reprinting materials resulting from failure to seek approval.
- use the seals in any color other than the Food Alliance organizational colors specified above unless the inks used to print product packaging do not include black or green.
- reconfigure or alter the size and position relationships of the seals' elements.
- substitute the seals' typeface.
- embellish the seals with drop shadows, glows, or lighting effects.
- apply any computer-generated special effects to the seals.
- · combine the seals with another logo.



Section 3: Labeling Food Alliance Certified™ Products

This section explains the policies, rules, and technical guidance for labeling and marketing Food Alliance Certified products and ingredients. It includes specific guidelines for use of the Food Alliance Certified product seals and examples of appropriate marketing claims for Food Alliance Certified products.

Food Alliance Certified products and ingredients come from farms, ranches and processors that meet stringent sustainability standards and evaluation criteria, as determined through an independent third-party inspection. Meat or dairy products come from animals raised without sub therapeutic antibiotics or growth hormones. Food Alliance Certified foods never contain artificial colors, flavors, preservatives, or genetically modified ingredients.

3.1 Requirements for Food Alliance Certified Products and Ingredients

Following is an overview of the certification requirements for products and ingredients. For a full description of these requirements, including evaluation criteria and indicators, refer to the FA Sustainability Standards and Evaluation Tools.

- 1. Grown or raised by a Food Alliance Certified operation
- 2. Verified supply chain traceability from production through packaging
- 3. No added hormones and antibiotics used in animal production

Animals are raised with respect for their needs and comfort, provided access to sunlight, room to graze, and an environment where they can socialize and express normal animal behaviors. Livestock are handled with great care to minimize fear and stress. Animals are raised without using hormones or antibiotics to stimulate growth. Antibiotics are used only to treat a sick animal, not as a substitute for healthy living conditions.

- 4. No genetically modified crops, livestock, or ingredients
 - Crop and livestock products are not derived from transgenic or genetically modified organisms out of respect for public concerns over potential ecological impacts or effects on human health.
- 5. Preserve product integrity, no artificial flavors, colors, or preservatives

Handling operations maintain the integrity of Food Alliance Certified ingredients with no added artificial flavors, colors, or preservatives. Processes are carefully evaluated and selected to maintain the highest nutritional quality of the final products. Communication to the consumer is assured through clear labeling.



3.2 Labeling Rules for Food Alliance Certified Products

Following is an overview of Food Alliance labeling rules for packaged products. Letters of Certification and/or Certification Certificates must be on file for each supplier of products or ingredients bearing Food Alliance certified content claims. Additionally:

- · Label samples must be submitted and approved by Food Alliance prior to use, and
- Licensing fees apply to all packaged products which include any of the following labeling claims. Please see Food Alliance policy "Supply chain verification requirement" regarding supply chain verification requirements for labeling packaged products.

3.2.1 Four Types of Food Alliance Certified Labeling Claims

There are four options for including reference to Food Alliance certification on a product label. Below is a brief summary of labeling requirements for each option. Additional requirements and potential exceptions are detailed further below in this section (3.2).

1. "Food Alliance Certified" Product with Food Alliance Certified seal

100% Food Alliance Certified content for single-ingredient products.

80% minimum content of Food Alliance Certified ingredients not counting added water and salt.

No non-agricultural synthetic materials other than those found on the Food Alliance allowed synthetics list.

2. "Made with Food Alliance Certified Ingredients" (NO Food Alliance seal)

50% minimum content of Food Alliance certified ingredients not counting added water and salt. No non-agricultural synthetic materials other than those found on the Food Alliance allowed synthetics list.

3. "Contains Food Alliance Certified Ingredients (NO Food Alliance seal)

25% minimum content of Food Alliance certified ingredients not counting added water and salt. No non-agricultural synthetic materials other than those found on the Food Alliance allowed synthetics list.

4. Food Alliance Certified in ingredient Statement Only (NO Food Alliance seal)

Contains some Food Alliance Certified ingredients but less than 25% minimum content. May contain synthetic materials that would otherwise be prohibited for Food Alliance labeling claims.

3.2.2 Whole State or Single Ingredient Products

Grains, legumes, fresh fruits, and vegetables sold in a whole state, ornamental plants, shellfish, and primal or sub-primal cuts of meat using "Food Alliance Certified" content claims, and packed in boxes, plastic bags, or other containers for transport, wholesale or retail sale must contain 100% Food Alliance Certified raw product.

Single-ingredient processed food products identified and/or labeled as "Food Alliance Certified" must contain 100% Food Alliance Certified raw product.



3.2.3 Products with Multiple Ingredients

All products bearing Food Alliance Certified content claims must have labeling to disclose all known ingredients.

Multi-ingredient processed food products identified and/or labeled as "Food Alliance Certified" must contain at least 80% Food Alliance Certified ingredients as measured by weight, not including added water and salt. No formulation may have both certified and non-certified forms of the same ingredient. (Example: Flour is one of the ingredients in a Food Alliance Certified bakery product. To be considered a Food Alliance Certified ingredient, 100% of the flour needs to be Food Alliance Certified.)

Non-Food Alliance Certified ingredients in products labeled as "Food Alliance Certified" must not be derived from genetically modified organisms (GMOs) or from livestock treated with non-therapeutic antibiotics, growth-promoting hormones (including implants) or other growth promotants, and must not contain non-agricultural synthetic materials other than those found on the Food Alliance allowed synthetics list (see Food Alliance Handling Operation Standards & Procedures Manual).

Multi-ingredient processed food products identified and/or labeled as "Made with Food Alliance Certified Ingredients" must contain at least 50% Food Alliance Certified ingredients as measured by weight, not including added water or salt. No formulation may have both certified and non-certified forms of the same ingredient. Non-Food Alliance Certified ingredients in products labeled as "Made with Food Alliance Certified Ingredients" must not contain non-agricultural synthetic materials other than those found on the Food Alliance allowed synthetics list (see Food Alliance Handling Operation Standards & Procedures Manual).

An additional labeling option exists for multi-ingredient processed food products produced in Food Alliance Certified Handling Facilities which contain less than 50% (but at least 25%) Food Alliance Certified ingredients as measured by weight, not including added water or salt. (See following pages - "Containing some Food Alliance Certified Ingredients".)

3.2.4 Calculating the Percentage of Certified Ingredients

The percentage of all Food Alliance Certified ingredients in an agricultural product sold, labeled, or represented as "Food Alliance Certified," "Made with Food Alliance Certified (specified ingredients or food group(s))," or that include Food Alliance Certified ingredients is calculated by:

- 1. Dividing the total net weight (excluding water and salt) of combined Food Alliance Certified ingredients at formulation by the total weight (excluding water and salt) of the finished product, **or**;
- 2. If the product and ingredients are liquid: by dividing the fluid volume of all Food Alliance Certified ingredients (excluding water and salt) by the fluid volume of the finished product (excluding water and salt. If the liquid product is identified on the principal display panel or information panel as being reconstituted from concentrates, the calculation should be made on the basis of single-strength concentrations of the ingredients and finished product, or;
- 3. For products containing Food Alliance Certified ingredients in both solid and liquid form: by dividing the combined weight of the solid ingredients and the weight of the liquid ingredients (excluding water and salt) by the total weight (excluding water and salt) of the finished product.

The percentage of all Food Alliance Certified ingredients in an agricultural product must be rounded down to the nearest whole number. The percentage must be determined by the handler who affixes the label on the consumer package and may be verified by Food Alliance.



3.2.5 Exceptions to Percentage of Certified Ingredient Requirements

At its discretion, Food Alliance may allow limited exceptions to the percentage requirements for products using the Food Alliance Certified seal or with Food Alliance Certified Ingredients claims. Two circumstances where exemptions may be approved are described below. Please be aware that exceptions will not be automatically granted and any variation from the percentage requirements for certified ingredients MUST BE APPROVED IN WRITING BY FOOD ALLIANCE before implementation.

To qualify for an exception businesses must submit and receive approval of a written and auditable plan with clear targets and timelines for how the business will meet ingredient percentage requirements and achieve full compliance in a fixed period. Details and progress will be subject to verification.

To ensure maximum integrity and transparency, all exceptions must be publicly disclosed with an unambiguous written notice accompanying products and on the company website identifying any ingredients affected by the exception and the certified content percentage. The wording of such notices must be approved by Food Alliance.

Phase-In Exceptions

A Phase-In Exception may be granted to new applicants for certification or to currently certified businesses that are introducing new certified products. The purpose of the Phase-In Exception is to facilitate adoption of Food Alliance certification and expansion of the certification across all product lines. It is intended to apply to products that will ultimately qualify for the "Food Alliance Certified" claim with use of the product seal (at least 80% Food Alliance Certified content by weight, with 100% Certified content for any single ingredient contributing to the total).

The Phase-In Exception is most likely to be granted to cooperatives or other joint marketing ventures involving multiple farmer/rancher members, or to brands or handling operations that are procuring products or ingredients from a supply pool involving multiple farmers and ranchers. Food Alliance recognizes that businesses in these circumstances may face challenges organizing applications by their members/suppliers and getting them through the certification process. Food Alliance believes that allowing a phase-in over a fixed period of time is justified by the social and environmental benefits resulting from achievement of full compliance with the certification standards by the group by the end of the period.

The Phase-In Exception will not be granted for a single farmer or rancher or for a brand or handling operation supplied by a single farmer or rancher.

Phase-in Exceptions allow for limited and controlled blending of Food Alliance Certified and non-certified ingredients. Certified ingredients MUST be fully segregated and traceable to the point of blending. Non-certified ingredients MUST be documented to meet Food Alliance's fixed standards (no hormones, no sub-therapeutic antibiotics, no genetically modified ingredients, etc.).

The business applying for a Phase-in Exception MUST provide a written Phase-In Plan to Food Alliance detailing how it will scale up to meet required ingredient percentage thresholds, and naming and documenting the anticipated volumes of products from members/suppliers that will be expected to apply for certification.

No Food Alliance related marketing claims will be approved until at least 30% of products/ingredients are certified.

The Phase-in Plan MUST also be completed within a time period not to exceed 36 months (three years).



While each Phase-in Plan will be unique to product formulations and business goals, a sample timeline for annual supply targets and allowable Food Alliance Certified claims follows:

- Initial approval of Phase-in Plan: 30% certified content. ("Made with Food Alliance Certified Ingredients" claim WITH exception notice. NO use of the product seal)
- End of Year One: 40% certified content. ("Made with Food Alliance Certified Ingredients" claim WITH exception notice. No use of product seal allowed.)
- End of Year Two: 60% certified content. ("Food Alliance Certified" claim WITH exception notice. Use of product seal allowed)
- End of Year Three: 80% certified content. (Labeling requirements met.)

Supply Shortage Exceptions

Supply Shortage Exceptions are intended to help businesses manage unforeseen circumstances without interruption of their Food Alliance Certified claims, the expense of changing labels and marketing materials, or the risk of losing customers. Supply Shortage Exceptions allow for flexibility when product or ingredient percentages fall below the minimum thresholds for "Food Alliance Certified" or "Made with Food Alliance Certified Ingredients" claims.

Businesses applying to Food Alliance for a Supply Shortage Exception should document the cause of the shortage and plans for return to full compliance within a fixed period.

Supply Shortage Exceptions may be approved in two circumstances:

- 1. Unanticipated loss of supply, or;
- 2. Opportunities requiring a period of rapid growth expected to exceed available supply.

Acceptable causes of unanticipated loss of supply may include crop damage or losses due to pests or inclement weather, or the loss of a supply relationship due to closure or other reasons beyond the control of the applicant.

Opportunities requiring a period of rapid growth should be documented in sufficient detail to make clear the reality of the situation and the increase in scale expected to be achieved. New or potential customers should be identified by name, and should ideally submit a letter stating their interest in procuring Food Alliance Certified products.

Supply Shortage Exceptions allow for limited and controlled blending of Food Alliance Certified and non-certified ingredients. Certified ingredients MUST be fully segregated and traceable to the point of blending. Non-certified ingredients MUST be documented to meet Food Alliance's fixed standards (no hormones, no sub-therapeutic antibiotics, no genetically modified ingredients, etc.).

In the event of a supply shortage, businesses should notify Food Alliance immediately and submit a written plan identifying the source and nature of any products/ingredients used to supplement the Food Alliance Certified supply, with targets and timelines for returning to full compliance within a period of no more than 12 months (1 year).

Supply Shortage Exceptions are most likely to be granted when the variance requested requires incorporation of no more than 20% non-certified products/ingredients.

Supply Shortage Exceptions will only be approved on a limited basis. They are not intended for regular use. Routine or repeated Supply Chain Exception requests may be cause for suspension of Food Alliance Certified status.



3.2.6 Labeling Rules: "Food Alliance Certified" with Product Seal

If you want to claim:	"Food Alliance Certified" (or similar statement)
Your product:	Must contain at least 80% Food Alliance Certified ingredients, not counting added water and salt. May contain up to 20% Non-Food Alliance Certified ingredients, provided those ingredients are NOT derived from genetically modified organisms (GMOs) or from livestock treated with non-therapeutic antibiotics, growth-promoting hormones (including implants) or other growth promotants, MUST NOT contain non-agricultural synthetic materials other than those found on the Food Alliance allowed synthetics list (see FA Handling Operation Standards & Procedures Manual).
Your label MUST:	Show an ingredient statement when the product consists of more than one ingredient. Identify Food Alliance Certified ingredients as "Food Alliance Certified" in the ingredients statement. (IS)
Your label MAY show:	The term "Food Alliance Certified" to modify the product name. (PDP/IP) (For meat products) The term "Food Alliance Certified Grassfed" or "Food Alliance Certified Pasture Raised" to modify the product name, but ONLY if 100% of the meat ingredient(s) are Food Alliance Certified under one of these production modules. (PDP/IP) "X% Food Alliance Certified" or "X% Food Alliance Certified ingredients." (Note: X must be 80% or higher) (PDP/IP) The Food Alliance certification seal ² . (PDP/IP) The term "Food Alliance Certified Facility", or variations thereof (e.g. Processed in a Food Alliance Certified Facility, Prepared in a Food Alliance Certified Handling Facility, etc.) (PDP/IP) Social and Environmental claims related to Food Alliance certification or Food Alliance Certified Ingredients, in accordance with Food Alliance Certification Claims Guidance document, and approved by Food Alliance. (PDP/IP) The Food Alliance Internet address, www.foodalliance.org. (PDP/IP)
Your label MUST NOT show:	The word "Sustainable" to modify the term "Food Alliance Certified"

¹To identify an ingredient as Food Alliance Certified, in the ingredients statement, use the words, "Food Alliance Certified" in conjunction with the name of the ingredient, or an asterisk or other reference mark which is defined below the ingredient statement.

² Certification Seal for Food Alliance Certified Grassfed or Pasture-Raised meat products may include "Grassfed" or Pasture Raised" collars. Letter Codes for the information in this table indicate position on package and are defined as:

PDP: Principal Display Panel (The part of a label that is most likely to be displayed, presented, shown, or examined under customary conditions of display for sale.)

IP: Information Panel (Any information panel, other than the Principal Display Panel).

IS: Ingredients Statement (The list of ingredients contained in a product shown in their common and usual names in the descending order of predominance.)



3.2.7 Labeling Rules: "Made with Food Alliance Certified Ingredients"

If you want to claim:	"Made with Food Alliance Certified Ingredients" (or similar statement)
Your product:	Must contain at least 50% Food Alliance certified ingredients, not counting added water and salt. MUST NOT contain non-agricultural synthetic materials other than those found on the Food Alliance allowed synthetics list (see Food Alliance Handling Operation Standards & Procedures Manual).
Your label MUST:	Show an ingredient statement. Identify Food Alliance Certified ingredients as "Food Alliance Certified" in the ingredients statement. ¹ (IS)
Your label MAY show:	The term "Made with Food Alliance Certified (specified ingredients or food groups)." (PDP/IP) "X% Food Alliance Certified" or "X% Food Alliance Certified ingredients." (Note: X must be at least 50%) (PDP/IP) The term "Food Alliance Certified Facility", and variations thereof (e.g. Processed in a Food Alliance Certified Facility, Prepared in a Food Alliance Certified Handling Facility, etc.) (PDP/IP) Social and Environmental claims related to Food Alliance certification or Food Alliance Certified Ingredients, in accordance with Food Alliance Certification Claims Guidance document, and approved by Food Alliance. (PDP/IP) The Food Alliance Internet address, www.foodalliance.org. (PDP/IP)
Your label MUST NOT show:	The term "Food Alliance Certified" to modify the product name and/or the Food Alliance certification seal The word "Sustainable" to modify the term "Food Alliance Certified"

¹To identify an ingredient as Food Alliance Certified, in the ingredients statement, use the words, "Food Alliance Certified" in conjunction with the name of the ingredient, or an asterisk or other reference mark which is defined below the ingredient statement.

Letter Codes for the information in this table indicate position on package and are defined as:

PDP: Principal Display Panel (The part of a label that is most likely to be displayed, presented, shown, or examined under customary conditions of display for sale.)

 $[\]textbf{IP: Information Panel (Any information panel, other than the Principal Display Panel)}.\\$

IS: Ingredients Statement (The list of ingredients contained in a product shown in their common and usual names in the descending order of predominance.)



3.2.8 Labeling Rules: "Contains Food Alliance Certified Ingredients"

If you want to claim:	That your product contains <u>some</u> Food Alliance Certified ingredients (at least 25%)
Your product:	Must contain at least 25% Food Alliance certified ingredients, not counting added water and salt.
	MUST NOT contain non-agricultural synthetic materials other than those found on the Food Alliance allowed synthetics list (see Food Alliance Handling Operation Standards & Procedures Manual).
Your label MUST:	Show an ingredient statement.
	Identify Food Alliance Certified ingredients as "Food Alliance Certified" in the ingredients statement. ¹ (IS)
Your label MAY show:	"X% Food Alliance Certified ingredients" when Food Alliance Certified ingredients are identified in the ingredient statement. (Note: X must be at least 25%) (IP)
	The term "Food Alliance Certified Facility", and variations thereof (e.g. Processed in a Food Alliance Certified Facility, Prepared in a Food Alliance Certified Handling Facility, etc.) (PDP/IP)
	Social and Environmental claims related to Food Alliance Certified Ingredients, in accordance with Food Alliance Certification Claims Guidance document, and approved by Food Alliance. (IP)
	The Food Alliance Internet address, www.foodalliance.org. (IP)
Your label MUST NOT show:	The term "Food Alliance Certified" to modify the product name, the term "Made with Food Alliance Certified Ingredients", or the Food Alliance certification seal.
	The word "Sustainable" to modify the term "Food Alliance Certified"

¹To identify an ingredient as Food Alliance Certified, in the ingredients statement, use the words, "Food Alliance Certified" in conjunction with the name of the ingredient, or an asterisk or other reference mark which is defined below the ingredient statement. Letter Codes for the information in this table indicate position on package and are defined as:

PDP: Principal Display Panel (The part of a label that is most likely to be displayed, presented, shown, or examined under customary conditions of display for sale.)

IP: Information Panel (Any information panel, other than the Principal Display Panel).

IS: Ingredients Statement (The list of ingredients contained in a product shown in their common and usual names in the descending order of predominance.)



3.2.9 Labeling Rules: Food Alliance Certified in Ingredient Statement Only¹

If you want to claim:	That your product contains Food Alliance Certified ingredients in the product's ingredient statement (IS) ONLY.
Your product:	May be produced in a non-Food Alliance Certified handling facility.
Your label MUST:	Show an ingredient statement. Identify Food Alliance Certified ingredients as "Food Alliance Certified" in the ingredients statement. ² (IS)
Your label MUST NOT show:	The term "Food Alliance Certified" to modify the product name (PDP/IP), the term "Made with Food Alliance Certified Ingredients" (PDP/IP), or the Food Alliance certification seal (PDP/IP).

¹Multi-ingredient products which are prepared in non-Food Alliance certified handling facilities, but contain Food Alliance certified ingredient(s), may list the Food Alliance certified ingredient(s) in the ingredient statement ONLY. While the handling operation does not need to be Food Alliance certified, records must be maintained to (i) prove that ingredients identified as Food Alliance certified were produced and handled by Food Alliance certified operations and (ii) verify quantities produced from such ingredients.

²To identify an ingredient as Food Alliance Certified, in the ingredients statement, use the words, "Food Alliance Certified" in conjunction with the name of the ingredient, or an asterisk or other reference mark which is defined below the ingredient statement. Letter Codes for the information in this table indicate position on package and are defined as:

PDP: Principal Display Panel (The part of a label that is most likely to be displayed, presented, shown, or examined under customary conditions of display for sale.)

IP: Information Panel (Any information panel, other than the Principal Display Panel).

IS: Ingredients Statement (The list of ingredients contained in a product shown in their common and usual names in the descending order of predominance.)



3.3 Appropriate Use of the Food Alliance Certified Product Seals









Who can use these seals?

Food Alliance Certified producers, packers, and processors may use the Food Alliance Certified product seals. Marketers and retailers may also use these seals, but only for the direct promotion of Food Alliance Certified product(s). See Section 5 for detailed guidance for use by non-certified entities.

Where?

The Food Alliance Certified product seals may only be used to promote Certified products and ingredients. Product seals may be displayed on product packaging, promotional materials, and websites with direct reference to the Certified product(s). Use must be approved by Food Alliance. Refer to Section 2 for detailed technical guidance.

When?

Certified product seals may only be used once product certification is formally awarded. If product certification status is revoked or suspended, producers or handlers must immediately cease use of the Certified product seal. Use of Grassfed product seal requires certification under the grassfed audit module. Use of the shellfish seal requires certification under the FA Sustainability Standard for Farmed Shellfish Production. Use of the nursery seal requires certification under the FA Sustainability Standard for Nursery and Greenhouse Production. Refer to Section 3.2, Food Alliance Certified Product Labeling Rules for specific requirements related to Food Alliance Certified product claims.

How?

Certified Product seals may be used as a stand-alone mark, but are most effective when accompanied by clear and concise marketing claims that explain the meaning of the seal. Marketing claims and product statements may relate to specific sustainability features of the product and brand, or generally explain the overall significance of the seal. See next section, Approved Marketing Claims for Food Alliance Certified Products for approved examples product marketing claims and seal use.



3.4 Off-Product Use of the Food Alliance Certified Seals

The Food Alliance Certified product seal may be used on marketing materials that explicitly promote certified products. The seal may not be used to promote products pending certification, or at any time prior to a product becoming certified.

For companies that promote Food Alliance Certified products or ingredients alongside non-certified products, the seal must be accompanied by written text explicitly indicating the products to which the seal applies. In such cases care should be taken to ensure display of the seal does not imply or suggest all products are Food Alliance Certified.

The product seal may also be approved for use on non-product materials such as annual reports, websites, or other company publications by businesses wishing to communicate their production, purchasing or sale of Food Alliance Certified products or ingredients. Display of the seal in such publications must include a clear indication of the related certified product or ingredients in writing. Any use of the product seal in off-product applications should include an unambiguous statement directly referencing the certified product(s), and provide a link to Food Alliance website, FoodAlliance.org.

For Food Alliance Certified handling operations, the operation seal is a better choice for businesses wishing to promote their certified status. However, businesses with non-certified facilities must not display the operation seal in ways that imply all operations are certified.

Off-product materials and website that incorporate the seal or that refer to the Food Alliance must be submitted for review and approval.

3.5 Approved Claims for Food Alliance Certified Products

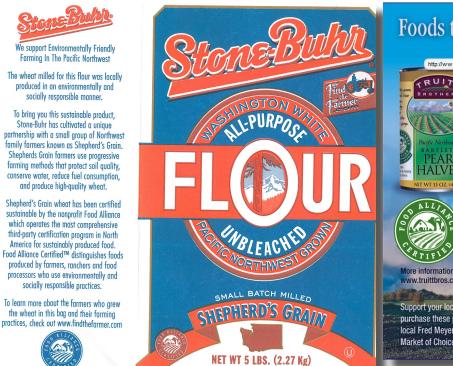
Following are a few examples of explanatory text that should accompany the Food Alliance Certified product seal on product packaging or labels. Other claims may be approved upon request.:

- A. This product is certified to Food Alliance Sustainability Standards ensuring conservation of natural resources and biodiversity, safe and fair working conditions, and humane animal treatment. It is produced without genetically engineered or artificial ingredients.
- B. Food Alliance is a nonprofit organization that defines and promotes sustainability in agriculture and the food industry. Food Alliance Sustainability Standards define safe and fair working conditions, humane treatment of animals, and careful stewardship of natural resources. By choosing products with the Food Alliance Certified seal, consumers help protect the environment and support sustainable agriculture and accountability in how food and farm products are grown and handled. Learn more about Food Alliance: www.foodalliance.org.
- C. The Food Alliance Certified seal on this [product] connects your purchase with farms and food businesses committed to environmental stewardship, humane animal care, and social responsibility.
- D. Buying [product] with the Food Alliance Certified seal supports a healthy environment and improved quality of life for rural communities.
- E. Buying [product] with the Food Alliance Certified seal supports sustainability practices in agriculture and the food industry. Learn more: www.foodalliance.org.



- F. Buying products with the Food Alliance Certified seal helps support the well-being of farm workers, the conservation of natural resources and the protection of wildlife and the environment.
- G. Food Alliance Certified supporting sustainability in agriculture and the food industry.
- H. Food Alliance Certified products meet stringent and comprehensive sustainability standards, as determined through an independent, third-party audit process.
- I. Food Alliance is a nonprofit organization that defines and promotes sustainability in agriculture and the food industry. Agricultural and handling operations are certified to Food Alliance's Sustainability Standards earn the right to display the Food Alliance Certified seal. Certification ensures that soil, water and wildlife habitat are protected, farm animals are treated humanely with healthy living conditions and not given artificial growth hormones or routine antibiotics, and that workers have safe and fair working conditions. Farm owners [or Farmers] must commit to a process of continual improvement, and their farms are audited every three years in order to maintain their certification. By shopping for products bearing the Food Alliance Certified seal, consumers can support a healthy environment and help to improve the quality of life for farm families. To learn more about the Food Alliance, visit www.foodalliance.org.

3.6 Examples of Approved Certified Product Claims and Seal Use

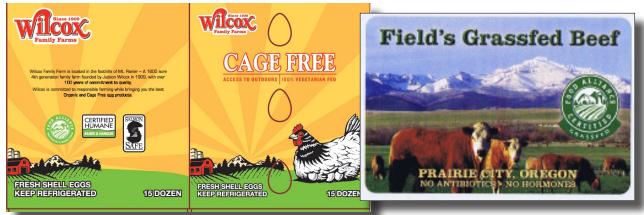




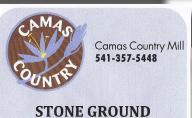




3.6 Examples of Approved Certified Product Claims and Seal Use

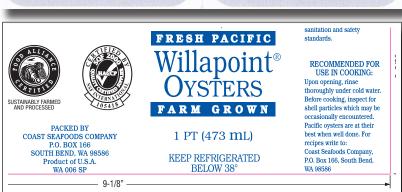






FLOUR
Sustainably grown under Food
Alliance Certification by
Huntons' Farm
Junction City, OR
2 lb net weight

HARD WHITE WHEAT







3.6 Examples of Approved Certified Product Claims and Seal Use





Section 4: Guidance for Food Alliance Certified™ Operations

This section explains the rules and technical guidance for marketing Food Alliance Certified operations including farms and ranches, and packing, processing, and distribution facilities. It includes specific guidelines for use of the Food Alliance Certified operation seals and examples of appropriate marketing claims for Food Alliance Certified operations.

4.1 Food Alliance Certified Producers (farms & ranches)

Food Alliance Certified farms and ranches provide safe and fair working conditions, ensure humane animal treatment, reduce pesticide use and toxicity, conserve soil and water resources, protect wildlife habitat, grow or raise Food Alliance Certified products, and continually improve practices.

4.1.1 Requirements for Certified Producers

Following is an overview of the certification requirements for producer operations. For a full description of these requirements, including evaluation criteria and indicators, refer to the FA Sustainability Standards for Crops, Livestock, Farmed Shellfish, or Nursery and Greenhouse Production.

1. Grow or raise Food Alliance Certified ingredients and/or products

2. Provide safe and fair working conditions

Managers create a work environment with open communication about workplace safety and job satisfaction, with incentives and opportunities for development of employee skills, and with consideration of quality of life issues for farm workers and their communities.

3. Reduced use and toxicity of pesticides through integrated pest management

Integrated pest management (IPM) is fully implemented, with a wide range of natural pest control methods such as beneficial insects, careful weather monitoring and scouting. Least toxic pesticides are used only when natural methods don't work. Overall pest control minimizes negative impacts to human health and environment.

4. Conservation of soil and water resources

Soils are protected by maximizing plant cover, rotating crops, and using cover crops to enrich soil and increase productivity. Management-intensive grazing and tillage methods are used to protect soil quality and promote soil conservation. Clean drinking water and fish habitat are preserved by providing buffer zones along streams; tillage methods conserve the soil's ability to absorb rainfall; animal wastes are managed to prevent ground and surface water contamination.

5. Protect and enhance biodiversity and wildlife habitat

Vegetative cover, food, and water resources necessary for habitat are ensured. Biological corridors are established. Mowing and grazing cycles are managed to have the least impact on wildlife. Wetland prairie and woodland habitats are restored or protected.

6. Continual improvement of practices

Specific goals are set for improving social and environmental performance. Progress toward goals is reported annually.



4.1.2 Appropriate use of Certified Producer operation seal



Who can use this seal?

Independent producers or contract producers that have undergone inspection and received a Letter of Certification from Food Alliance may display this seal.

Where?

The Certified Producer operation seal may be used on buildings, signage near the farm or ranch gate, delivery vehicles, marketing collateral, business cards, websites, or in other ways that clearly and directly relate to the Food Alliance Certified operation. Certified operation seals may not be displayed on product packaging or labels. Refer to Section 3 for guidelines on labeling Food Alliance Certified products.

When?

Once certification is formally awarded, Certified Producers may use the Certified Producer operation seal. If certification status is revoked or suspended, producers must immediately cease use of this and any Food Alliance Certified seal.

How?

Certified Operation seals may be used as a stand-alone mark, but are most effective when accompanied by clear and concise text that explains the meaning of the seal. Explanatory text should generally explain the overall significance of the seal. See Section 4.4, Examples of Approved Certified Operation Marketing Claims and Seal Use for additional guidance.



4.2 Food Alliance Certified Handlers (packers, processors, distributors)

Food Alliance Certified packing, processing, and distribution facilities responsibly handle Food Alliance Certified products and commit to providing safe and fair working conditions, reducing use of toxic and hazardous materials, minimizing waste, conserving energy and water, ensuring quality control and food handling safety, using Food Alliance Certified ingredients, and continually improving practices.

4.2.1 Requirements for Certified Handlers

Following is an overview of the certification requirements for handling operations. For a full description of these requirements, including evaluation criteria and indicators, refer to the FA Sustainability Standard for Processing and Distributor Operations.

1. Pack, prepare, and/or distribute Food Alliance Certified ingredients and/or products

2. Provide safe and fair working conditions

Managers create a work environment with open communication about workplace safety and job satisfaction, with incentives and opportunities for development of employee skills, and with consideration of quality of life issues for facility workers and their communities.

3. Reduce use of toxic and hazardous materials

Operators continually assess their activities to reduce the use of chemicals that have adverse environmental impacts. Materials used for sanitation, structural pest control, waste treatment, and infrastructural maintenance are chosen to reduce overall negative consequences.

4. Conserve energy and water

Operators create a work environment with open communication about workplace safety and job satisfaction, with incentives and opportunities for development of employee skills. Consideration and effort is given to improving quality of life for employees and their communities.

5. Reduce and recycle waste

Dependence on natural resources for energy and transport, and reliance on materials needed for daily operations and packaging, is monitored on an ongoing basis. Efficiency increases over time. Waste streams are minimized while reuse and recycling of materials is maximized.

6. Quality control and food handling safety

Proper measures are in place to ensure food safety is not compromised. Operations conduct monitoring and evaluation to assure best practices and identify opportunities for improvement. Procedures are in place to quickly address questions or challenges raised regarding food safety or product integrity.

7. Continual improvement of practices

Operators make efforts to improve on each of the Food Alliance Handling Operation Program standard areas on an ongoing basis, with progress measured and evaluated at least annually.



4.2.2 Appropriate use of Certified Handler operation seals







Who can use these seals?

Food Alliance Certified packing facilities, processing facilities, and distribution facilities may use the "Certified Packer/Processor/Distributor" operation seals.

Operations granted "Restricted Handler" approval for contracted handling of Food Alliance Certified products may not represent their company or facility as Food Alliance Certified or display these operation seals.

Where?

The Certified Packer/Processor/Distributor operation seals may be used on buildings, on signage near the facility, vehicles, marketing collateral, business cards, websites, or in other ways that are clearly and directly related to the Food Alliance Certified operation and facility. Certified Operation seals may not be displayed on product packaging or labels. Refer to the previous section for guidelines on labeling Food Alliance Certified products.

When?

Once certification is formally awarded, Certified Handlers may use the Certified Packer/Processor/Distributor operation seals. If certification status is revoked or suspended, handlers must immediately cease use of this and any Food Alliance Certified seal.

How?

Certified Operation seals may be used as a stand-alone mark, but are most effective when accompanied by clear and concise text that explains the meaning of the seal. Explanatory text should generally explain the overall significance of the seal. See Section 4.4, Examples of Approved Certified Operation Marketing Claims and Seal Use for additional guidance.



4.3 Approved Claims for Food Alliance Certified Operations

Following are a few examples of explanatory text that should accompany the Food Alliance Certified operation seal. Other claims may be approved upon request.:

- A. This farm/ranch is a Food Alliance Certified operation ensuring conservation of natural resources and biodiversity, safe and fair working conditions, and/or healthy and humane animal care.
- B. This farm/ranch meets Food Alliance Sustainability Standards which define conservation of natural resources and biodiversity, safe and fair working conditions, and/or healthy and humane animal care.
- C. This packing/processing/distribution facility is Food Alliance Certified for natural resources conservation, safe and fair working conditions, energy and waste reduction, and continual improvement.
- D. The Food Alliance Certified seal means this operation is committed to sustainable management practices that conserve soil, water, and biodiversity, protect workers, and guarantee food integrity. To learn more about Food Alliance, visit www.foodalliance.org.
- E. Food Alliance certification distinguishes farms and ranches that steward their land and communities to benefit current and future generations. To learn more about Food Alliance, visit www.foodalliance.org.
- F. Food Alliance Certified farms/facilities/operations improve workers' lives, protect soil, water and wildlife, ensure supply chain traceability and commit to continual improvement.
- G. Food Alliance Certified farms meet comprehensive standards for sustainable agriculture by protecting and conserving soil, water, wildlife habitat, and biodiversity. To learn more visit: www.foodalliance.org
- H. The Food Alliance Certified seal means that food businesses are committed to sustainable management practices that conserve soil, water, and biodiversity, protect workers, and guarantee food integrity. To learn more about the Food Alliance, visit www.foodalliance.org.
- [crop name] from Food Alliance Certified farms is grown in ways that benefit farm families, wildlife and the environment. To learn more about the Food Alliance, visit www.foodalliance.org.
- J. This Food Alliance Certified farm/ranch/facility is managed for social and environmental responsibility.



4.4 Examples of Approved Certified Operation Claims and Seal Use





4.4 Examples of Approved Certified Operation Claims and Seal Use





Section 5: Guidance for Retailers and Other Non-Certified Entities Promoting Food Alliance and Certified Products

This section assists retailers and other non-certified businesses in promoting Food Alliance and/or marketing Food Alliance Certified products and ingredients. The purpose of these guidelines is to allow use of the Food Alliance name, logo, and certification seals in a clear and consistent manner. All references to Food Alliance or use of the marks requires prior written approval by Food Alliance.

5.1 General Promotion of Food Alliance and Use of the Logo

Q: How can my business reference Food Alliance or show general support of its work?

A: Retailers, restaurants and other non-certified businesses that want to promote Food Alliance's values and definition of sustainability in food and agriculture are encouraged to purchase and promote Food Alliance Certified products and ingredients. Supporting businesses and organizations may also make general references to Food Alliance or display its logo on websites, displays, and other public promotional materials. Such references may include description of Food Alliance's Guiding Principles, Sustainability Standards, certification program, or specific certified operations from which the business purchases products. All references should include the website, FoodAlliance.org. Any mention of Food Alliance or use of its logo and trademarks requires prior review and approval.

Q: What kinds of claims can my business make in promoting support of Food Alliance?

A: The following phrases may be used by non-certified entities to promote general support of Food Alliance:

- This business supports Food Alliance's definition of sustainability in food and agriculture: safe and fair working conditions, humane animal care, and conservation of natural resources and biodiversity. FoodAlliance.org
- We choose Food Alliance Certified products and ingredients to support farmers and food processors working for a better food system. Learn more at FoodAlliance.org.
- ABC Diner is proud to purchase fruits and vegetables from XYZ Produce Company, a Food Alliance Certified distributor. Details at FoodAlliance.org.

5.2 Marketing Certified Products and Use of the Certification Seals

Q: Can non-certified entities display the Food Alliance Certified seal?

A: Yes. The Food Alliance Certified seals may be displayed in direct reference or promotion of Food Alliance Certified products. Products must include the product seal or words "Food Alliance Certified" on original packaging, container, or shipping documents. The seal must clearly relate only to the product(s) being promoted. For example, the product seal may be used on shelf displays or in sales material (fliers, menus, websites, etc.) directly adjacent to Food Alliance Certified product(s) or ingredients, ideally with the words "Food Alliance Certified (product) spelled out in text. The product seal must never be used independent of specific certified products. In cases of supply shortages, the seal may not be used when non-certified ingredients are used to supplement or replace Food Alliance Certified ingredients. The Food Alliance Certified operation seals may not be displayed by non-certified entities. All use of the Food Alliance Certified seals requires prior review and approval.



Q. What are my responsibilities as a retailer or restaurant marketing Food Alliance Certified products?

A. Although Food Alliance Certification is not applicable to retailers or restaurant operations these businesses are responsible for preventing commingling and contamination of Food Alliance Certified products with prohibited substances and for keeping records that show products marketed as Food Alliance Certified have been correctly handled from production through delivery to the customer.

Q. What signage or other displays may I post regarding the Food Alliance Certified status of the product?

A. If the product's original container or shipping documents include the Food Alliance Certified seal or the words "Food Alliance Certified," retail displays, signage and bulk containers may show the Food Alliance Certified seal or the words "Food Alliance Certified." However, if the form of the product is changed, such as food preparation or mixing with other ingredients, Food Alliance may not be referenced. In cases of supply shortages the seal may not be used when non-certified ingredients are used to supplement or replace Food Alliance Certified ingredients.

Q: Do I have to be certified to cut Food Alliance Certified cheeses or meats and package them as certified?

A: No. But areas for handling Food Alliance Certified products should be properly cleaned to avoid contamination. Product packaging of cut cheeses and meats may include the same information as provided on the original product packaging, container or shipping documents, as described in the Food Alliance labeling guidelines (Section 3).

Q. My business makes various multi-ingredient products that contain some Food Alliance Certified ingredients. These products are packaged at the customer's request and labeled with a price and ingredient information. What Food Alliance Certified claims can we make?

A. Display signage may indicate that in-store products are "made with Food Alliance Certified (specified ingredients or food group(s))," as described in the Food Alliance labeling guidelines (Section 3). For example, chicken salad may be sold with a sign that reads, "chicken salad made with Food Alliance Certified chicken." The product may NOT be represented as "Food Alliance Certified" unless made in a Food Alliance Certified handling facility and a certification certificate has been issued for the specfic product marketed as "Food Alliance Certified." The seal may not be displayed on signage or the product label. Food Alliance Certified ingredients should be clearly listed in ingredient lists or on menus when appropriate.

Q: Are certification claims allowed on packaging of products containing Food Alliance Certified ingredients?

A: The ingredient list is the only appropriate place to list Food Alliance Certified ingredient(s). The Food Alliance Certified seal, words "Food Alliance Certified," "made with Food Alliance Certified (specified ingredients or food group(s))," or reference to Food Alliance cannot be made elsewhere on the product packaging.

Q: What can I say to consumers and buyers who ask, "what does Food Alliance Certified mean?"

A: Be clear, consice and as specific as possible. Provide examples of specific Food Alliance Certified products. When appropriate direct people to the Food Alliance website, FoodAlliance.org. Following are a few example statements noncertified entitites may use when promoting Food Alliance Certified products or ingredients.

- Food Alliance is comprehensive certification program for sustainability in food and agriculture. We use Food Alliance Certified (product/ingredients, such as "wheat flour" or "ground beef") to support safe and fair working conditions, humane animal care, and conservation of natural resources and biodiversity.
- Food Alliance is comprehensive certification program for sustainability in food and agriculture. We buy Food Alliance Certified (product/ingredient, such as "vegetables" or "eggs") to support farmers working for a more socially and environmentally responsible food system. Learn more at FoodAlliance.org.



Section 6: Guidance on Social and Environmental Claims

The guidance in this section applies to social and environmental claims included in labeling, advertising, promotional materials and all other forms of marketing, whether asserted directly or by implication, through words, symbols, logos, depictions, product brand names, or through any other means.

"Best Practices" was adapted from the US Federal Trade Commission's Guides for the Use of Environmental Marketing Claims, "Green Guides," and "Green Claims – Practical Guidance" by the UK Department for Environment, Food and Rural Affairs.

"Checklist: Making the Most of Your Sustainability Certification" was adapted with permission from: "Making the Most of Your Environmental Certification in the Marketplace," by Annie Gardiner, Green Penguin Communications.

This document is intended to provide the basis for voluntary compliance with applicable laws. It offers general principles for clear, truthful and relevant claims for social and environmental responsibility, but does not address all possible considerations in making acceptable claims or disclosures.

Following the guidelines provided in this document does not, by itself, guarantee compliance with law in any country. Consult source materials for additional guidance and examples, and seek professional assistance as necessary. This document offers general guidance on making "good" social and environmental claims.

To ensure maximum credibility, claims should be verified by an independent, third-party certification like Food Alliance. The guidance in this document supports most claims related to Food Alliance certification. If, after reviewing this guidance, you still have questions about specific claims and whether or how Food Alliance certification supports those claims, please contact Food Alliance directly.

6.1 Best Practices

By following best practices for making social environmental claims a business can:

- Strengthen its reputation and credibility with consumers and business partners;
- Enhance the appeal of its products;
- Demonstrate to regulators that it is working to meet or exceed legal requirements.

Be as specific as possible.

- Specific claims are always more credible than general claims.
- · Provide enough information to enable your customers can understand and evaluate your claims.
- While label space is at a premium, take advantage of a website or other marketing materials to give complete information that supports and substantiates your claims. Transparency inspires trust.

Ensure claims are truthful

While it might be obvious that environmental claims should be truthful, this is not always easy to guarantee. Be sure to consider how someone who is not an expert might understand the claim.

- Marketing claims should not overstate the environmental attribute or benefit.
- Avoid implications of environmental benefits if the benefit is in fact negligible.
- Avoid claims for environmental benefits unlikely to occur in practice.
- Make sure a single benefit isn't restated in different terms to infer multiple benefits.
- Don't make claims for 'improvement' related to pre-existing product aspects.
- Don't make claims if they are likely to be misinterpreted, even if literally true.
- For claims that a product is free of a substance, make sure it contains no more than trace contaminant levels of that substance. The threshold level should be specified.



Any qualifications or disclosures regarding claims should be clear and prominent. Clarity of language, relative type size and proximity of the disclosure to the claim being qualified, are all important. If the environmental benefit applies to all but incidental components of a product or package (which do not themselves invalidate the claim), qualification is generally unnecessary.

Ensure claims are specific and unambiguous

Highly generalized claims, such as 'environmentally friendly' or 'nature's friend,' are not credible. General claims are difficult to interpret, and, depending on context, may convey a wide range of meanings to consumers. Without substantiation and appropriate qualification, broad claims should be avoided. This also applies to claims embedded in product or brand names, or implied by images that appear on packaging or marketing materials.

- · Claims should be for specific environmental impacts or improvements.
- Be as clear as possible about the level of environmental improvement or performance. Source reduction claims involving weight, volume, toxicity or other measures should be qualified and specify the amount of the reduction.
- If the claim involves a comparison: Make the basis for the comparison clear, quantify the claim, ensure the comparison is against a product currently or recently in the market that serves the same functions.

Ensure claims are relevant

Relevance is about enabling customers to understand the context within which the claim is made.

- Do not make claims that imply that a product is exceptional when, in fact, all products in the marketplace share the same characteristic.
- Do not make a claim based on the absence of ingredients or features which have never been associated with the product category (or have not for some time).
- Only make claims in circumstances where there is a net environmental benefit. Do not make claims if one environmental hazard has simply been substituted for another.
- It should be clear whether the environmental benefit being asserted refers to the product, the packaging, a related service or to a component of the product, package or service.
- The claim should be specific to the place where the environmental benefit occurs.
- Regularly review and update all claims so they are relevant with changes to legislation, technological advances, or improvements in competing products.

Ensure claims are presented clearly and accurately

It is possible for the information associated with a product to meet all the criteria referred to above, and yet still be unhelpful to customers as a result of the way that it is presented.

- · Make sure that information needed to understand the claim is not buried in the 'small print'.
- · Make sure the intended meaning of any symbols or logos is clear. Add an explanatory statement if necessary.
- Symbols used for environmental claims should be easily distinguishable from other symbols found on products
- Natural objects such as trees, flowers or animals, should only be used if there is a direct and verifiable link between the product, the object and the environmental benefit being claimed.

There is no requirement to use third-party verification or certification for environmental claims – but claims must be substantiated and verifiable. A business may have internal the capacity and established procedures to meet this expectation. However, it may be easier to "outsource" substantiation and verification to the third-party.

- Don't make claims that can only be verified with confidential business information.
- Document and retain information that others may need to verify claims.



6.2 Checklist: Making the Most of Sustainability Certification*

Use certification to boost brand value.

Customers buy products because of their brand value (e.g., quality, cost, customer service). Certification adds value to your brand by verifying your marketing claims. For some customers, it is precisely an added environmental or social benefit that will stimulate preference for your product.

Know your talking points.

Your sustainability claim comes with a set of attributes and benefits. Refer to the rest of this document for help with communicating what your claims mean, how they benefit your customers, and how they differ from other claims in your product area.

Train your sales and marketing staff.

Your sales team is undoubtedly well versed in your product's benefits. Be sure they also know how to promote your product using its environmental and social claims credibly and effectively.

Peel back the eco-label for your customers.

Not all eco-labels are created equal. If you are certified by an independent third-party against scientifically rigorous and publicly available standards, you are a leader among your competitors. Protect and enhance your leadership position by educating your customers on how to critically evaluate eco-labels.

Follow labeling rules and guidelines.

Ensure the certification seal is used with integrity. This document, used in conjunction with the Federal Trade Commission's Guides for the Use of Environmental Marketing Claims, helps ensure accurate representation of the extent and parameters of your claim. Be specific, avoid ambiguity, and never overstate the scope of the claim.

Use the certification seal on products.

On-product labeling helps your customers recognize the environmental and social attributes of your product. Certification seals cultivate trust with sustainability-driven consumers, ensuring transparency and traceability.

Use the certification seal elsewhere, too.

Every customer interaction is an opportunity to build brand recognition and customer loyalty. Include the certification seal—and information about the seal—on your web site, brochures, proposals, email signature line, press releases, advertisements, e-newsletters, etc.

Compose your story.

Develop a concise and emotionally appealing narrative that tells the unique story about your environmental and social responsibility. Complement it with photos and video.

Build relationships.

The sustainability-driven consumer wants a relationship with you! Connect customers with the people, places, and processes behind the production of your product.

Know the sustainability-driven customer.

Inform your communication activities with sound research on the sustainably-driven customer. Create an internal process for continually monitoring the needs and desires of these customers.

Provide adequate information.

The sustainability-driven customer has a robust appetite for information. Complement point-of-purchase materials with more detailed web-based content so customers can access the amount of information that's right for them.

Increase transparency

Demonstrate authenticity by backing up your claim. Show results, acknowledge shortcomings, and engage customers in the process.

*adapted with permission from: "Making the Most of Your Environmental Certification in the Marketplace," by Annie Gardiner, Green Penguin Communications. http://www.greenpenguincomm.com



Labeling and Marketing Guide

Revised 2022

Any use of the Food Alliance Certified seals or trademarks requires review and prior approval.

To request use or report abuse of Food Alliance trademarks contact:

(503) 267-4667

info@foodalliance.org.