



A report by OrganicEye • August 2020

# **Spotting the Hackers of the Hemp**

## **The Value of Authentic Certified Organic CBD Products**



The research, writing, and editing of this report was done by a wide swath of OrganicEye staff, including experts in organic policy and certification law, scientists, and an agricultural journalist.

We want to thank the nonprofit foundations and individual OrganicEye donors for underwriting this project. Due to the controversial nature of our work, our default, unless advised otherwise, is to maintain the identities of our member-donors in strict confidence.

The organic farming movement started as a values-based industry. It was built on a loving, collaborative relationship between family-scale farmers and shoppers willing to pay for food produced based on superior environmental stewardship, humane animal husbandry and economic justice for the people who produce our food. OrganicEye's mission is ensuring these values and commitments are not compromised in the modern food system.

### **OrganicEye Mission**

OrganicEye endeavors to leverage the extensive experience of our management and staff in farm policy, scientific research, and political and marketplace education/advocacy in our work acting as corporate and governmental watchdogs, educating the public, and preventing the erosion of the foundational precepts that the organic movement was founded upon.

OrganicEye is a project of Beyond Pesticides, a public interest group that has spent nearly 40 years overseeing the conduct of the Environmental Protection Agency and advocating for the elimination of toxics in food production, our homes, schools, and communities.

**Beyond Pesticides is Organic.**

### **OrganicEye**

701 E Street SE • Suite 200  
Washington DC 20003

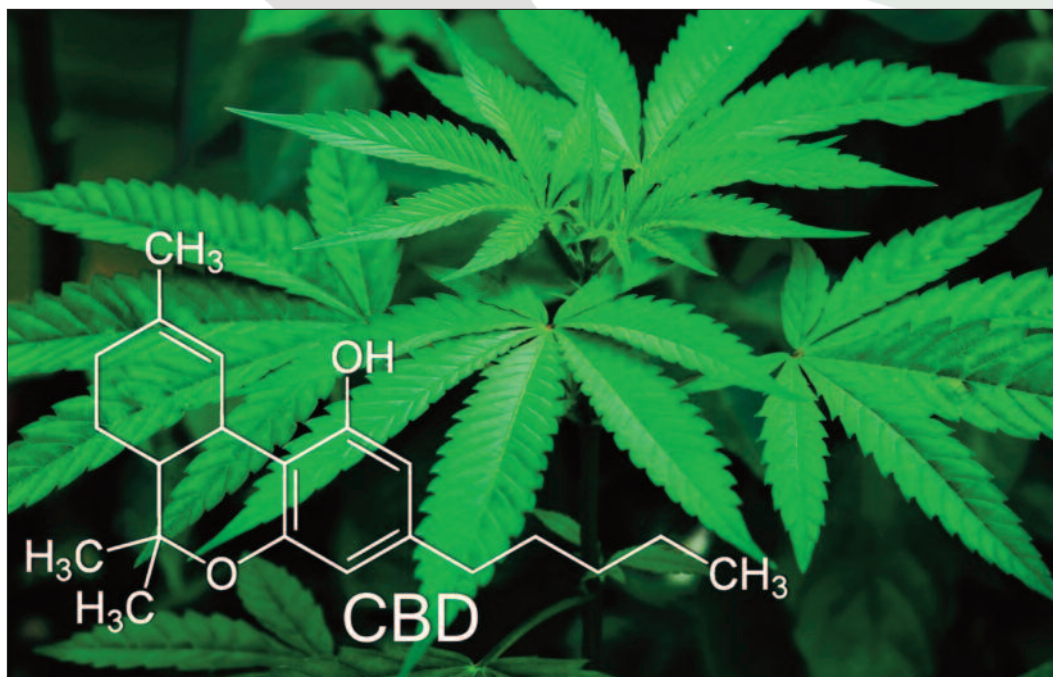
info@organiceye.org  
www.organiceye.org

Report design and layout:  
T DESIGN • Madison, WI  
tdesignmadison.com

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# Spotting the Hackers of the Hemp

## The Value of Authentic Certified Organic CBD Products

### Executive Summary

The global cannabidiol market is expected to expand at a compound annual growth rate of 22.2% from 2019 to 2025, putting it on track to reach \$23.6 billion by 2025.<sup>1</sup>

With aggressively-growing consumer demand for hemp-derived cannabidiol (CBD) and related products, it shouldn't be surprising that some marketers would engage in misleading or even fraudulent practices, including representing their products as being grown and processed organically without going through the rigorous third-party certification regime required by federal law.

OrganicEye's report on CBD was generated in response to multiple accounts of questionable organic claims sent to us by industry stakeholders and concerned consumers. In it, we review the organic claims made by a cross-section of manufacturers of CBD products in this rapidly growing industry; provide an overview of organic CBD production and the certification process; and separate authentic organic products—certified organic from the farm to the consumer — from those with unsubstantiated organic claims.

If a company was found to be making organic claims for hemp, CBD, hempseed oil, or hemp extract, we attempted to verify their certified organic status by checking the Organic Integrity Database on USDA's (United States Department of Agriculture) National Organic Program (NOP) website. If the brand/manufacturer was not listed, we contacted the company directly and requested the certificate for their organic products.

Many of the companies we investigated were indeed certified by an accredited certifier under the USDA organic program. When companies indicated that their products were organic but were not able to provide verification or evidence that the products were actually produced and packed by a certified organic operation, we included them in a formal legal complaint filed with USDA's Agricultural Marketing Service. We also submitted complaints regarding

non-certified companies whose product labels do not appear to comply with FTC and USDA regulations. Several companies claimed to be using only organic hemp and some even created their own organic logos (as opposed to the official USDA organic seal that is reserved for certified operations who have met the required standards). We believe many of those claims are misleading, at best, and likely illegal, when the company itself is not certified. We requested the NOP take action on that issue, as well.

Furthermore, we filed formal complaints against the practice of marketers using "organic" in their corporate or brand names when not exclusively selling certified organic products. Although there has always been some degree of fraud, misuse, and misleading marketing and labeling language involved in the organic industry, the Wild West of CBD products seems to be more flagrant. It nonetheless serves as an excellent case study for why the NOP needs to monitor and tighten up enforcement on labeling violations in general.

And finally, in addition to the review of organic claims, this report explains the benefits of choosing certified organic supplements and explains how consumers can determine whether the product has been certified organic by a USDA-accredited third party, to provide assurance of quality.

### Introduction

As the staff at OrganicEye became aware of alleged improprieties in claims for organic hemp and hemp-derived products, such as CBD, we saw the need to investigate their accuracy. We reviewed organic claims made on company websites and product labels to reveal any false or misleading statements. We have also provided advice to help consumers evaluate the organic claims of CBD products on their own.

For the purposes of this report, we will be using "CBD" to refer to an extract of hemp containing CBD, not the purified isolate that would be found in a prescription pharmaceutical.

<sup>1</sup> Dorbian, Iris. "CBD Market Could Reach \$20 Billion By 2024, Says New Study." Forbes, May 2019,

<https://www.forbes.com/sites/irisdorbien/2019/05/20/cbd-market-could-reach-20-billion-by-2024-says-new-study/#640bcda349d0>

# An Overview of Hemp and CBD

## Hemp is not Marijuana

The difference between hemp and marijuana lies in their chemical composition. Both plants are *Cannabis sativa*, but the term marijuana refers only to strains of *Cannabis sativa* that contain more than 0.3% of the psychoactive component, tetrahydrocannabinol (THC). Strains of *Cannabis sativa* that contain less than 0.3% THC are referred to as hemp. Hemp can also be *Cannabis* that is harvested early, before significant THC production occurs. These strains have provided raw materials for textiles, rope and twine, food, animal feed, and other uses for thousands of years. Today they are grown specifically for industrial and other uses of the derived products. Hemp has lower concentrations of THC and higher concentrations of cannabidiol (CBD), which decreases or eliminates its psychoactive effects.

## Increase in CBD products is related to legalization of hemp

Federal law historically outlawed growing any form of cannabis in the US. The 2014 Farm Bill established the definition of industrial hemp, setting the threshold for THC at 0.3% on a dry weight basis, and allowed for limited cultivation by state agriculture departments and institutes of higher education as part of a pilot program and in accordance with state laws. The 2018 Farm Bill went on to legalize the production of hemp as an agricultural commodity and removed it from the list of controlled substances.<sup>2</sup> This allowed organic certification of the crops and organic certification of the processed products – CBD oil, hempseed oil, hemp extract, and supplements – formulated with these ingredients.<sup>3</sup> Marijuana remains illegal federally, although some states have legalized it for medical and/or recreational use. This report focuses only on non-psychoactive compounds found in hemp plants and the supplements made with those compounds.

## Processing affects the final product

The method of extraction and processing of a hemp extract can have a big impact on the contents, quality, and purity of a given product. Extraction of cannabinoids may be done with supercritical CO<sub>2</sub>, ethanol, food-grade oils (e.g. olive oil, coconut oil), or volatile solvents/hydrocarbons (e.g. butane, propane, hexane, acetone, isopropyl alcohol).<sup>4</sup> It is possible for trace amounts of THC to remain, regardless of the extraction process used.

The use of supercritical carbon dioxide—known as CO<sub>2</sub> extraction—is the most prevalent commercial method of separating CBD and other cannabinoids from hemp plants. This method requires expensive equipment in order to bring carbon dioxide to the critical temperature and pressure that changes CO<sub>2</sub> from a gas to a liquid. However, it allows a finely-tuned extraction of CBD.<sup>5</sup> The extract may be purified using ethanol (also known as winterization) and/or filtration prior to bottling.

Solvent extraction using food-grade ethanol is a traditional method of obtaining cannabinoids from hemp plants. The plant material is soaked in ethanol, which transfers cannabinoids to the liquid. The solids are strained out, and the liquid is evaporated, leaving the concentrated cannabinoids in an oil form. This can result in a potent CBD-rich oil, containing the full spectrum on cannabinoids. The drawback is that it may contain unwanted contaminants, such as trace amounts of the solvent, or small amounts of THC.<sup>6</sup> If the final product is to be labeled organic, the extraction must be done with organic ethanol. (Organic ethanol is produced through a natural process - the fermentation of organically-produced sugars by yeasts. Synthetic ethanol, produced by a petrochemical process, is prohibited in organic products.)

<sup>2</sup> “2018 Farm Bill Provides A Path Forward for Industrial Hemp.” American Farm Bureau Federation, February 28, 2019. <https://www.fb.org/market-intel/2018-farm-bill-provides-a-path-forward-for-industrial-hemp>

<sup>3</sup> Hemp CBD Scorecard. Sept. 2019. Center for Food Safety. 14 pp. <https://www.centerforfoodsafety.org/reports/5719/hemp-cbd-scorecard-an-evaluation-of-hemp-cbd-producers>.

<sup>4</sup> Sigman, Zoe. “CBD Oil: An Introduction.” Project CBD, 2020, <https://www.projectcbd.org/cbd-101/what-is-cbd-oil>; Arnone, Vince. “How is CBD Oil Made?”

<sup>5</sup> Beginners Guide to Hemp Extraction.” Big Sky Botanicals, 4 September 2019. <https://bigskybotanicals.com/education/how-is-cbd-oil-made/>.

<sup>6</sup> Sigman, Zoe. “CBD Oil: An Introduction.” Project CBD, 2020, <https://www.projectcbd.org/cbd-101/what-is-cbd-oil>.

Synthetic volatile solvents, such as butane, hexane, or propane, are sometimes used to extract CBD. The process is effective at separating cannabinoids, but these solvents are neurotoxins, and trace amounts of the solvents may remain in the final product.<sup>7</sup> Organic regulations do not allow these synthetics to be used. Purchasing certified organic products will guarantee that these solvents have not been used in manufacturing your CBD products.

Non-toxic oils, or lipids, may be used for extraction. Olive oil, coconut oil, avocado oil, and hemp seed oil have been used. Note: Coconut oil may be listed on the label as MCT (medium-chain triglyceride) oil. The hemp plants are heated, then steeped in oil to infuse the oil with cannabinoids.<sup>8</sup> If the final product is to be labeled organic, any oils used for extraction must be organic.

## Understanding the ingredients in CBD products

The extraction methods described above result in oil infused with the cannabinoids that were in the hemp plants, often simply called CBD oil. Labels for hemp products may also list CBD, CBD isolate, hempseed oil, or hemp extract.

### Cannabidiol (CBD)

Over 100 different cannabinoids have been isolated from Cannabis plants. Cannabidiol, abbreviated CBD, is one of the non-psychoactive cannabinoids. There are eight types of CBD compounds found on the Cannabis plant.

The human body has an endocannabinoid system, a series of receptors found throughout the body that interact with various compounds in hemp plants. The endocannabinoid system helps regulate sleep, anxiety, depression, pain, and other functions of the body. CBD may

provide health benefits through its effect on this endocannabinoid system. CBD also has anti-inflammatory properties.<sup>9</sup>

### Hempseed oil

Hemp oil (hemp seed oil or hempseed oil) is oil obtained by pressing seeds of *Cannabis sativa*, typically from varieties that do not contain significant amounts of THC. Raw hempseed oil can be dark green, or it can be refined to produce a clear, colorless oil. Hempseed oil does not contain cannabinoids (neither CBD nor THC), as these compounds are not found in the seeds of the Cannabis plant.<sup>10</sup>

### Full Spectrum CBD extract

Full Spectrum CBD is a hemp extract that contains a full range of the various cannabinoids and terpenes found in the hemp plant. The chemical composition can be verified by looking at lab test reports. It may contain a small amount of THC, even if made from hemp, but must be diluted in the final product to the legal maximum of 0.3% THC by weight.<sup>11</sup>

### Broad Spectrum CBD

Broad Spectrum CBD is the same as the Full Spectrum CBD, but the THC has been filtered out. The absence of detectable THC is verified by lab tests.<sup>12</sup>

### CBD Isolate

After cannabinoids have been extracted from a plant, it is possible that Full Spectrum CBD extract can be refined by removing other cannabinoids and terpenes. The result is 99% pure CBD isolate. The isolate can be added to hemp oil or MCT oil, but the resulting product has only one cannabinoid, not the full range found in whole-plant extracts.<sup>13</sup>

<sup>7</sup> Sigman, Zoe. "CBD Oil: An Introduction." Project CBD, 2020, <https://www.projectcbd.org/cbd-101/what-is-cbd-oil>.

<sup>8</sup> Sigman, Zoe. "CBD Oil: An Introduction." Project CBD, 2020, <https://www.projectcbd.org/cbd-101/what-is-cbd-oil>.

<sup>9</sup> Gill, Lisa L. "CBD Goes Mainstream." Consumer Reports, May 2019, [www.consumerreports.org/cbd/cbd-goes-mainstream/](http://www.consumerreports.org/cbd/cbd-goes-mainstream/).

<sup>10</sup> Sigman, Zoe. "CBD Oil: An Introduction." Project CBD, 2020, <https://www.projectcbd.org/cbd-101/what-is-cbd-oil>.

<sup>11</sup> Arnone, Vince. "CBD Extract Guide: Full-Spectrum, Broad Spectrum, & Isolate". 4 Sept. 2019. <https://bigskybotanicals.com/blog/cbd-extract-guide/>.

<sup>12</sup> Arnone, Vince. "CBD Extract Guide: Full-Spectrum, Broad Spectrum, & Isolate". 4 Sept. 2019. <https://bigskybotanicals.com/blog/cbd-extract-guide/>.

<sup>13</sup> Arnone, Vince. "CBD Extract Guide: Full-Spectrum, Broad Spectrum, & Isolate". 4 Sept. 2019. <https://bigskybotanicals.com/blog/cbd-extract-guide/>.



# Organic Certification – Benefits, Requirements, and Labeling

## The benefits of organic certification

When purchasing a CBD product, is it worthwhile to purchase a certified organic product, even if it is more expensive? Absolutely! Organic certification is a transparent process used to monitor food from seed to consumer. Organic practices protect the environment, farmers, and farmworkers. This section gives an overview of the certification process and the specific requirements, to support our claim that organic products are worth the money.

In the United States, organic “non-chemical” farming began in the early 20th century as a response to the widespread adoption of synthetic nitrogen fertilizers. It gained momentum after World War II, with the introduction of use of chemical pesticides. Although there was general agreement on the meaning of organic, there was a need for uniform standards and certification systems as organic food grew in popularity. In 1990, Congress passed the Organic Foods Production Act (OFPA), which established the National Organic Program (NOP) within the United States Department of Agriculture (USDA). In OFPA, Congress also established the National Organic Standards Board (NOSB), a volunteer group of expert stakeholder representatives from diverse segments of the organic community. The initial regulations that were developed by the NOP and NOSB went into effect in 2002.<sup>14</sup>

Organic certification is a type of third-party assessment to verify that certified operations are following all applicable federal organic regulations. The first party is the producer (farmer) or handler (processor, packer, distributor, etc.), the second party is the buyer (wholesale or retail), and the third party is the certifier. Consumers rely on the certifier to review all aspects of the organic operation and affirm that the first party complies with organic regulations.

## The certification process involves five steps:

1. The farmer or handler submits an application to

an accredited certification agency (ACA.)

The application includes an Organic System Plan (OSP), the description of procedures, as they initially propose them, to meet organic certification requirements.

2. The certifier reviews the OSP to verify that it complies with organic regulations.
3. An inspector visits the farm or handling operation to determine whether the OSP is being followed.
4. The certifier reviews the inspector’s report.
5. The certifier issues an organic certificate if no issues are found.

These five steps are repeated each year, with an updated organic system plan, initial review, inspection, final review, and issuance of the certificate. In order to be authorized to issue organic certificates, the certification agency must be accredited by the USDA. The requirements are outlined in the NOP regulations, and the process is similar to the certification process of organic operations, requiring an application, inspection, and final review (with subsequent audits every five years).

## General Requirements for Organic Certification

All requirements for USDA organic certification can be found in Title 7, Part 205 of the Code of Federal Regulations (CFR).<sup>15</sup> The regulations are publicly available on the NOP website to be read by anyone and can only be changed by a transparent process in which USDA first consults with the NOSB and then publishes proposed regulations for public comment.

Part 205 also includes the National List of Allowed and Prohibited Substances. In general terms, natural materials are allowed in organic crop production and manufacturing/processing, and synthetic materials are prohibited. Synthetic and non-organic crop inputs may be added to

<sup>14</sup> SARE, Transitioning to Organic Production, <https://www.sare.org/Learning-Center/Bulletins/Transitioning-to-Organic-Production/Text-Version/History-of-Organic-Farming-in-the-United-States>.

<sup>15</sup> Website: [https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&sid=3f34f4c22f9aa8e6d9864cc2683cea02&tpl=/ecfrbrowse/Title07/7cfr205\\_main\\_02.tpl](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&sid=3f34f4c22f9aa8e6d9864cc2683cea02&tpl=/ecfrbrowse/Title07/7cfr205_main_02.tpl).

the National List as allowed materials if they are first reviewed/approved by the National Organic Standards Board. The NOSB must consider safety to humans and the environment, the need (essentiality) for that specific material, and compatibility with organic production practices.

When applying for organic certification, the applicants must indicate to the certifier exactly which crops, livestock, or products are to be certified. For example, a farmer certified for sweet corn who decides to grow organic hemp must inform the certifier, and the hemp crop must be inspected before it is added to the organic certificate and is qualified for sale, labeled as organic. Similarly, a manufacturer certified for CBD oil who wishes to sell a different organic CBD product must submit an application and obtain certification of that new product. It is common for businesses to sell both organic and non-organic products. As part of the OSP, and throughout the inspection process, “split” operations must demonstrate the ability to segregate organic and conventional ingredients and finished products throughout the entire production process.

All certified operations must maintain records on the production and handling of organic products for not less than 5 years. These records are audited each year at the annual inspection and must be made available to the certifiers and the USDA at any time upon request. The inspection includes at least one traceback audit, and one in/out balance audit looking at inputs and finished products, to verify that procedures are in place to ensure organic integrity.

### Specific Requirements for Crops

NOP regulations define organic production as “A production system that is managed ... to respond to site-specific conditions by integrating cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biological diversity” [CFR § 205.2]. Fields must be managed with no prohibited substances applied for a minimum of 3 years immediately preceding harvest of the first organic crop.

In practical terms that means no synthetic fungicides, herbicides, insecticides, or other pesticides are used,

unless they are specifically allowed in the regulations. Farmers are required to keep records of every input applied to the crops, and inspectors review these records annually. Soil fertility is enhanced with compost, manure, and mined minerals. The use of synthetic fertilizers is restricted – for example, synthetic micronutrients may be applied, but only after deficiencies have been documented.

The reliance on large amounts of chemical fertilizer, common in conventional crops, is prohibited in organic agriculture. Farmers manage harmful insects, pests, and plant diseases through cultural methods such as crop rotation, biological methods, and natural materials, or a very limited number of approved synthetics as a last resort. Botanically-based materials are preferred because they typically do not persist as a danger to the environment the way agrochemicals do, which limits their long-term impact. When compared to conventional pesticides, these organic methods are safer for farmers, wildlife, and consumers.

Organically-produced seeds are required if commercially available; seeds treated with insecticides or fungicides are expressly forbidden. Genetically-engineered crops are also banned.

### Specific Requirements for Handlers

Any business that processes or repackages organic products must be certified as an organic handler. The certifier reviews each organic product, each ingredient in the products, and the recipe used to make them. They even review the cleaners and sanitizers used on equipment – to ensure that organic foods are not contaminated by traces of harmful chemicals. And finally, they review organic claims on the label to verify that it conforms to federal law.

The trace-back, or backtrack, audit includes a review of organic certificates, purchase invoices, and other documents that show organic status of ingredients, and follows specific lot numbers of ingredients from receipt to the finished product. The in/out balance audit calculates the quantity of ingredients used to manufacture the finished products – and compares that to the quantity of raw ingredients purchased. This shows that sufficient organic ingredients were purchased to make the finished products.



## Organic Labeling and Product Composition

There are four categories of label claims. The *100 percent organic* category is the most stringent. In this category, all ingredients other than water and salt must be 100% organically produced. The CBD would need to be extracted from organic hemp with a certified organic ingredient (oil or ethanol) to be considered 100% organic.

A product can be labeled *organic* if it contains at least 95% organic ingredients. The remaining ingredients must be organically produced unless they are not commercially available in organic form, or they must be on the National List parts §205.605 or §205.606 (CFR §205.301 Product Composition). For example, if CBD is extracted from organic hemp using carbon dioxide, then the product can be labeled as organic because carbon dioxide is on the National List. The product cannot be labeled *100% organic* because carbon dioxide is not organic.

If the product contains at least 70% organic ingredients, it can be labeled “made with organic [ingredients].” The remaining ingredients may be non-organic agricultural ingredients or may be nonagricultural substances on the National List (such as diatomaceous earth used as a filtering aid). For products labeled *organic* or *made with organic*, no ingredients may be grown or processed with prohibited practices (genetic engineering, sewage sludge, ionizing radiation).

All of the above products are required to have the statement “Certified organic by... [certifier name]” on the information panel under the distributor’s name, if using the word organic on the front label. Products that are not certified organic may still identify organic ingredients in the ingredient statement but may not state organic anywhere else on the label.

A final category includes products that are not organic, even if made from organically-grown hemp. If CBD is extracted using volatile solvents (a prohibited practice), such as butane, hexane, and propane, the resulting product cannot be labeled organic.

### Meaningless or Misleading claims

Many companies make statements on their websites or in product brochures that may lead consumers to believe that

the hemp and/or the products themselves are certified organic. Marketing statements such as sustainably grown, regenerative, naturally-farmed, and eco-farmed, do not have any legal meaning.

For example, ShiKai® claims that their hemp is sustainably grown. There is no list of requirements for this term, and no verification of the farming practices. This is in contrast to organic certification, a federal government program with detailed requirements for farming and processing.

### Regenerative Organic Certified™

Regenerative Organic Certified™, an initiative of the Rodale Institute, is a new program being developed by the Regenerative Organic Alliance, <https://regenorganic.org/>. Since this is a certification program, the Regenerative Organic Certified™ symbol will be displayed along with evidence of USDA organic certification. (USDA organic certification is a prerequisite for Regenerative Organic Certified™.) If a company merely claims to use regenerative farming practices but holds no certification, its practices may not have been reviewed and verified.

It should be noted that “extra label” claims of this nature do not include the oversight, under federal law, of the party inspection/certification process. The Regenerative Organic Program (ROP) has contracted with the National Sanitation Foundation (NSF) to conduct the inspections and certification for their label. NSF, controlled by corporate agribusiness, is the parent of Quality Assurance International (QAI), one of the largest USDA accredited certifiers, which has been implicated in improprieties, including certifying livestock factories as organic.

### Recommendations

When purchasing a CBD product, read the label to see whether it states that the product is organic. Some companies sell both certified organic products and products that are not certified and do not qualify for organic labeling, so relying on the company or brand name alone is no guarantee. You can search for the company on USDA’s Organic Integrity Database, <https://organic.ams.usda.gov/Integrity/Default.aspx>, to help verify the authenticity of organic claims.

Organic claims made on a website are not sufficient evidence that the product is actually certified organic. Look for the official USDA Organic seal or certifier listed on the product label itself.

“Read the ingredients carefully before purchasing a CBD oil product and look for evidence of laboratory tests and verification of CBD concentrations when buying a CBD remedy or supplement.”<sup>16</sup> ... from The Project CBD website

Many reputable manufacturers test their products to assure potency. Tests typically verify the presence of high concentrations of non-psychoactive cannabinoids, and low concentrations (less than less than 0.3%) of THC. Some manufacturers post test results on their website. Others include a QR code on the product label that will take you to a webpage displaying results. Test results may be presented in a Certificate of Analysis (COA). Look for high levels of CBD, and low levels of THC, heavy metals, and pesticides.

Product and consistency problems in the industry have been common.

If you would like to know more about hemp and CBD, you will find a great deal of information on the internet. Just as you would be careful purchasing a CBD product, it pays to be careful when researching CBD. For unbiased information, we recommend checking sites that do not manufacture, sell, or distribute hemp-derived products. For example, Project CBD, <https://www.projectcbd.org/>, is a non-profit educational news service, that does not sell or distribute any CBD/cannabis products.<sup>17</sup> They provide extensive links to articles in trade journals.<sup>18</sup> Consumer Reports®, also a nonprofit that provides unbiased information, has ongoing reporting on CBD at [www.consumerreports.org/cbd/cannabis-and-cbd-guide/](http://www.consumerreports.org/cbd/cannabis-and-cbd-guide/).



<sup>16</sup> Sigman, Zoe. “CBD Oil: An Introduction.” Project CBD, 2019, <https://www.projectcbd.org/cbd-101/what-is-cbd-oil>.

<sup>17</sup> [www.projectcbd.org/](http://www.projectcbd.org/).

<sup>18</sup> [www.projectcbd.org/about/press](http://www.projectcbd.org/about/press).



# CBD Buyers Guidance: Organic Claims of Major Brands

We have grouped companies into categories based on organic claims on hemp cultivation and CBD products. In some cases, the brand on the front label is the name of the manufacturer and/or distributor. In others, the manufacturer is only listed on the information panel, and the name on the front is merely a brand or tradename. Other products are also “white labeled,” a practice in which a product is manufactured by one company (a “copacker”) and then packaged and sold by other companies under their own brand names. The name of the actual manufacturer is often considered proprietary information and the label typically states “distributed by” the brand/marketer involved.

## Certified organic products

As of July 2020, there were 65 certified organic CBD processors listed on the USDA Organic Integrity Database (in addition some listings fall under hemp in the governmental database). This number is subject to change at any time, as new companies become certified and others exit the industry or surrender or have their certification revoked.

Consumers can verify organic claims on their own, before purchasing a product, by looking at the product label to see whether an organic certifier is listed on the packaging (a legal requirement).

If no certifier is listed, consumers can contact the company and request a copy of their organic certificate. But the integrity of the company should already be in question. Be sure to review the certificate to see whether the specific product is listed (hemp oil, not just hemp), and verify that the certificate was issued within the last 18 months. If a brand is unable to provide an organic certificate issued to their company, it is possible they are not certified organic. As noted above, consumers can also visit the USDA’s Organic Integrity Database, <https://organic.ams.usda.gov/Integrity/Default.aspx>, to verify organic claims.

A list of operations certified for CBD on the USDA Organic Integrity Database, as of July 2020, can be found in the Appendix.

When searching the Organic Integrity Database, note that the certification is listed under the company that manufactures or distributes the organic products, which may be different from the brand name on the front label. For example, Dexter Labs, LLC is certified by CCOF for distilled hemp extract (non-retail). They manufacture hemp extract but do not package it for retail sales. The organic extract is sold under other companies’ brands.

## Unsubstantiated Claims made by non-certified companies

The NOP regulations provide strict rules about organic claims on product labels.

From NOP website:

Can a product be labeled “organic” without being certified?

Overall, if you make a product and want to claim that it or its ingredients are organic, your final product probably needs to be certified. If you are not certified, you must not make any organic claim on the principal display panel or use the USDA organic seal anywhere on the package. You may only, on the information panel, identify the certified organic ingredients as organic and the percentage of organic ingredients.<sup>19</sup>

NOP Regulations state the following:

§205.305 Multi-ingredient packaged products with less than 70 percent organically produced ingredients.

(a) An agricultural product with less than 70 percent organically produced ingredients may only identify the organic content of the product by:

(1) Identifying each organically produced ingredient in the ingredient statement with the word, “organic,” or with an asterisk or other reference mark which is

<sup>19</sup> Organic Labeling, USDA, <https://www.ams.usda.gov/rules-regulations/organic/labeling>, 02/26/2020.



defined below the ingredient statement to indicate the ingredient is organically produced, and

(2) If the organically produced ingredients are identified in the ingredient statement, displaying the product's percentage of organic contents on the information panel.

A cautionary note: it is legal for a marketer to indicate that ingredients are organic on the ingredient panel, even when the final product is not certified under the USDA National Organic Program.

The above USDA NOP regulations specify requirements for product labels. Organic claims are not allowed on the front panel if the product is not certified. The regulations are less clear about organic claims made on a website or other marketing materials when the final product is not certified organic. We believe that such website and marketing claims are misleading to consumers and should not be allowed. Examples are given below of the two types of claims: (1) organic ingredients on labels and (2) organic claims on websites or other marketing materials.

### Claims of Organic ingredients on label

Manufacturers can list ingredients as organic on the ingredient panel of the label, even if the product is not certified organic. However, no organic claims are allowed on the front panel unless the product is USDA Certified Organic. Bear in mind that organic claims are not verified by a third party if the product is not certified. Examples of acceptable labeling practices include:

- ✓ Gaia Herbs® – While Gaia is certified for several organic herbal extracts, their hemp extract is not certified organic. “Organic hemp seed oil” is listed on the ingredient panel but no additional organic claims are made elsewhere on the label.
- ✓ Straight Hemp™ – Full Spectrum CBD Oil is not certified organic. “Organic hempseed oil” is listed on the ingredient panel but no additional organic claims are made elsewhere on the label.

### Claims of organic ingredients on website

Although NOP regulations specifically address the legality

of organic claims on product labels, regulations do not specifically address the legality of product claims on websites. (Remember, the NOP was established by the Organic Foods Production Act of 1990 – before websites became ubiquitous.)

Companies are legally obligated, according to practices enforced by the Federal Trade Commission (FTC), to make only true and accurate claims on their websites. However, that is not always the case. For example, we found that organic claims on websites are sometimes made for products not qualified for organic labeling, as evidenced by the ingredient list on the label pictured on the same site.

Organic claims made for products that are not USDA Certified Organic have not been verified by a third party, thus creating the potential for misrepresentation and confusion. While descriptors such as “natural” or “sustainably grown” do not have legal meanings, the word “organic” indicates that a certain set of standards has been met and verified. In response to an inquiry, USDA stated, “If a company is claiming ‘organic’ on their website, their product needs to be certified by an accredited certifying agent. The claim ‘organically grown’ is not a valid claim and cannot be used as it infers that the product has been certified.”<sup>20</sup>

The following companies have organic claims on their websites indicating that the CBD is made from organic hemp. We have been unable to verify the claims and requested the USDA further investigate:

- Garden of Life® – “Our farmers continually follow Organic Farming Practices...”
- Premium Jane – “100% organic hemp”
- Sagely Naturals® - Claims organic hemp on its website.
- Vital Leaf® - Claims organic hemp on its website.
- PureKana – Claims organic hemp on its website.
- My CBD Organics® (Organic Touch brand) – “Organic Gourmet Tea Blend” claims it has “Organic Hemp Phyto Cannabinoid” added.
- Trust the Earth Hemp – Claims organic hemp seed oil and “100% Organic” on its website.

The following company has claims on their website indicating that the processed ingredient in their CBD product is organic. Claims of organic ingredients (hempseed oil, hemp extract) on a website may be misleading, and might not be legal. These ingredients can only be represented as organic if they were purchased from a certified organic processor.

- Innovative CBD® – The website claims “organically grown hemp oil” (not stated on the label’s ingredient list).

### No organic claims (conventionally produced/processed)

As part of our research, we reviewed websites and marketing claims of several prominent brands that are not certified organic. The following brands are not certified and were not making organic claims at the time of our review: CBD Distillery™, CBD Living®, Feals™, Fountain of Health, Gnome Serum™, Hemp Fusion®, Innesscents™, Irwin Naturals®, Kannaway™, Koi CBD, Lord Jones, Medical Marijuana, Inc., Prime My Body®.

In addition, the Nature’s Plus® product labels on the company website do not make organic claims about ingredients or the CBD product itself. Nature’s Plus® is a division of Natural Organics, Inc. Per the USDA Organic Integrity Database, Natural Organics, Inc., dba Nature’s Plus, is certified by EcoCert. However, company certification does not mean that all products are organic – a company may choose to sell both organic and non-organic products.

### Misleading logos

*Logos that include the words “Organic” or “Organically grown”*

Certified organic products may, optionally, display the USDA seal. Logos designed by non-certified companies that may imply organic certification are likely misleading and/or illegal. OrganicEye has filed a formal legal complaint with USDA’s Agricultural Marketing Service regarding these organic logos. Two companies (HempWorx and Winged) were found to have questionable logos at the start of our investigation but have since modified or

removed them from the websites. They were included in our complaint with the changes noted.

**HempWorx** – Created their own logo with the words “Organic Methods.”



Logo as seen on the HempWorx website (February 26, 2020).

[Removed from their website subsequent to launch of OrganicEye investigation.]

**Trust the Earth Hemp** – Created their own “100% Organic” logo for use on their website and product label. (Included in both Logo and “100% Organic” complaints.)



As found on the website (August 20, 2020).

<https://www.trusttheearthhemp.com/hempcbdoil>

**Medterra** – Created their own non-GMO logo incorporating the words “Organically Grown Hemp.”



As found on the website (August 11, 2020).

<https://medterrahemp.org/>

**Winged™** – Created their own “Organically Grown Hemp” logo.



Logo as seen on the Winged website (May 4, 2020).

[Changed to “Pesticide Free” subsequent to launch of OrganicEye investigation.]

**NuLeaf** – Created their own “Made with Organic Hemp” logo.



As found on the website (August 11, 2020).

<https://nuleafnaturals.com/>

**Kore Organic™** – Created their own “Organic CBD” logo.



As found on the website (August 11, 2020).

<https://koreorganic.com/p/cbd-oil-tincture-450-mg/>

### Labels that do not appear to comply with FDA or USDA regulations

*Company names that contain the word “Organic(s)”*

**Ithaca Organics** is certified organic and is growing organic hemp. They sell organic dried hemp plants. They also sell non-organic CBD oil. The website claims this is “Organically Made,” however Ithaca Organics is not certified as a handler and the oil is not certified organic. The claim “organically made” is analogous to the claim “Made with organic [ingredients]” – a claim that can only be made if the product itself is certified organic. OrganicEye has filed a formal legal complaint with the USDA regarding the use of the word “organic” in the names of companies selling non-organic products.

**Joy Organics** is not certified organic. Hemp extract is not listed as organic on the product labels, although other ingredients are listed as organic. The company name needs to be changed so it does not use the word “organic.”

**Organic Touch** products are not made entirely from certified organic ingredients. In response to our inquiry, they replied that their CBD is “grown at hemp farms that use organic nutrients and farming practices.” The name needs to be changed so it does not use the word “organic.”

**My CBD Organics®** sells Organic Touch products. The website states that their products are organic. Because Organic Touch products are not certified organic, the name needs to be changed so it does not mislead consumers by incorporating the word “organic.”

**Kore Organic™** first came to our attention via a voluntary recall notice sent out by the FDA due to high levels of lead being detected in one of their products. The website makes “Organic CBD” claims but products do not appear to be certified organic. The name needs to be changed so it does not use the word “organic.”

[Precedent has been established in regard to companies that are selling products that do not qualify for organic labeling but nonetheless use the term “organic” in their names. OrganicEye’s director, Mark Kastel, crafted a formal legal complaint against three companies in 2010. Although the complaint was initially dismissed, a pressure campaign spearheaded by Kastel eventually succeeded in causing the NOP to issue a directive on the controversy. Subsequently, Newman’s Own Organics, the most prominent of the three companies, voluntarily changed their name to conform with USDA guidance, as did the other companies included in the complaint.]

### Incorrect USDA seal

The **Rocky Mountain Extraction Services, LLC** extracts oils from hemp plants. They are certified organic, but the USDA seal on their website is not the approved color and design. The image on the company website and should adhere to NOP Regulations: Subpart D.

#### § 205.311 USDA Seal.

(2) On a white or transparent background with black outer circle and black “USDA” on a white or transparent upper half of the circle with a contrasting white or transparent “organic” on the black lower half circle.



As found on the website (August 11, 2020).

<https://www.rmextract.com/>



# Investigating Organic Claims on Websites and Product Labels

Based on our initial review of their websites in the first half of 2020, it appeared that the following companies might not be compliant with USDA NOP regulations: Ancient Nutrition, CBD Mendo™, Green Gorilla™, NuLeaf Naturals, Nuume, PureKana, Aspen Green™ (topical products only), Organic Touch, My CBD Organics®, and Kore Organic™.

For each of the following operations, Organic Eye checked the USDA Organic Integrity Database to determine if the companies were listed as certified organic. Each company was subsequently contacted by email to inquire about their organic status, with a request for their organic certificate when indicated. The requests were followed with additional emails as needed. This section describes the organic claims made by each company. The results of our requests for verification are subsequently detailed in the final portion of the report.

## USDA seal

**Ancient Nutrition** – Many products on the Ancient Nutrition website show the USDA organic seal. The company is not listed on the Organic Integrity Database under its own name and declined to provide verification that they are certified organic. Upon further investigation (see discussion below), we were able to obtain verification from their certifier that their products are certified under a co-packer while completing the certification process under their own name. Although Ancient Nutrition was not included in the formal legal complaint filed by OrganicEye with USDA, an inquiry has been made to the USDA for clarification since the company making a label claim has ultimate responsibility to provide proof of certification when requested. Hearsay assurance from a certifier does not exempt them from that obligation.

**Green Gorilla™** – The USDA seal is prominently displayed on the Green Gorilla™ website and on some product labels. The CBD infused oil is labeled “Made with Organic Oils,” although no certifier is listed on the label shown on a website photo. The certifier may be listed on a part of the label not shown but is commonly found under the ingredients list on the information panel. This varies from product to product pictured on the website. The company

did not appear to be certified under the USDA program on the Organic Integrity Database and did not provide their organic certificate upon request (as required by law), though they did provide the name of their certifier. Through several emails (see discussion below), it appears that at least some of their products are co-packed by a certified organic operation. We were not able to obtain the certificate with the full product list.

## Website makes “100% organic” product claim

**NuLeaf Naturals** – When our investigation began, the website for NuLeaf Naturals stated, “Our cannabis oil is 100% organic and non-GMO.” The company did not appear to be certified under the USDA program, and did not provide verification that their products were certified organic. Upon revisiting their site in June, we discovered that the “100% Organic” claim had been changed to read “Organic Hemp.” The site also includes a logo with the words “Made with Organic Hemp.” NuLeaf Naturals was included in the formal legal complaint filed by OrganicEye with USDA due to the “Made with” claim on the website.

**Aspen Green™** – Aspen Green™ Pain Relief Body Balm is described on the website and label as being “100% Organic.” Aspen Green™ was included in the formal legal complaint filed by OrganicEye with USDA due to making an organic claim on the front label of what appears to be a product that is not USDA Certified Organic.

## Website makes “Organic” or “Certified Organic” product claim

**PureKana** – Along with website claims that their CBD oil “contains organic hemp extract” and is “sourced from USA-grown organic hemp,” PureKana also describes their CBD oil for pets as being “Organic” and their CBD capsules as being “Certified organic.” We were unable to find evidence of organic certification. PureKana was included in the formal legal complaint filed by OrganicEye with USDA.

**My CBD Organics®** – Website claims, “Pure organic hemp makes pure organic products.” Links to the Organic Touch site where “Organic Gourmet Tea Blend” is offered. Also uses “Organic” in company name despite selling non-certified products. My CBD Organics® was included in the

formal legal complaint filed by OrganicEye with USDA.

**Organic Touch** – Website sells “Organic Gourmet Tea Blend.” Also uses “Organic” in the company name despite selling non-certified products. Organic Touch was included in the formal legal complaint filed by OrganicEye with USDA.

**Kore Organic™** – Website makes organic claims for CBD and flavorings. The ingredients listed on the label, as pictured in the recall notice, include “Pure CBD” and “Artificial flavors” and there is no certifying agency listed. Kore Organic was included in the formal legal complaint filed by OrganicEye with USDA.

### **Organic CBD label claims**

**CBD Mendo™** (formerly CBD Solutions) – The label for a tincture on the CBD Mendo™ website states “100% organic ingredients” on the front panel. No certifier is listed on the label, and CBD Mendo™ is not listed in the NOP database. The CBD Mendo™ site on April 28, 2020, showed a slightly different label. Instead of “100% organic ingredients,” the front panel contained the statement “Certified organic grape alcohol infusion.” If this operation is not certified organic, it is prohibited from making organic claims on the front panel and is prohibited from making any claims of “certified organic” ingredients.

CBD Mendo™ did not appear to be certified under the USDA program, and did not provide verification that they are certified organic. CBD Mendo™ was included in the formal legal complaint filed by OrganicEye with USDA.

**Aspen Green™** – All products on the Aspen Green™ website make organic claims on labels and packaging. Their Full Spectrum Hemp Oil is certified organic with the USDA Organic symbol and certifier listed on the label. Their topical products do not appear to be certified, despite indicating on the label that they are between 98-100% organic. According to USDA regulations, organic ingredients can be noted on the ingredient panel, but organic claims may not be made on the label unless the product itself is certified organic.

Therefore, while Aspen Green™ Full Spectrum Hemp Oil is certified organic, they were included in the formal complaint filed by OrganicEye with USDA due to making organic claims on the front labels of their other products.

**Nuume Organics** (formerly **Nature's Love™**) – The company Dexter's Lab, LLC—DBA Nature's Love™ was certified organic, but surrendered their certification in November 2019. The USDA website did not list Nuume Organics as a certified operation as of May 6, 2020. On the Nuume Organics website, numerous products are labeled organic, and the USDA seal is prominently displayed. Further investigation (detailed below) verified that their products are now certified by a different certifying agency. Nuume Organics was not included in the legal complaint. However, a request to the NOP, under the Freedom of Information Act, was filed to help ascertain why Dexter's Lab surrendered their certificate and whether it was in response to an enforcement action by their previous certifier or the NOP.

### **OrganicEye's attempts to verify organic claims**

Certified organic products are required to have the statement “Certified organic by [certifying agent],” commonly located on the panel with the name of the manufacturer or distributor of the product. As stated above, we recommend that consumers read labels to determine whether products are certified organic. It is easy to read the back panel of the label when shopping in a store, but it may not be possible when shopping online. If the back label is not available for review, we recommend that consumers search for the company on USDA's Organic Integrity Database, <https://organic.ams.usda.gov/Integrity/Default.aspx>, to verify the authenticity of organic claims. If the brand name on the front label of a product is not listed in the Organic Integrity Database, the product may be co-packed by a different company, a common practice for both organic and conventional products. In these instances, it is necessary to contact the company and request their organic certificate and the name of their certifier.

OrganicEye went through all the steps outlined above to verify organic claims through third parties, but also

wanted to test the feasibility of consumers contacting the companies directly. We accomplished this by having one of our staff members send inquiries to the ten companies noted above, via email or company webform reserved for customer inquiries, without disclosing their connection to OrganicEye.

These inquiries asked about the following companies' certification statuses and requested copies of their organic certificates when indicated: Ancient Nutrition, CBD Mendo™, Green Gorilla™, NuLeaf Naturals, Nuume, PureKana, Aspen Green™, Organic Touch, My CBD Organics®, and Kore Organic™. Here is what we found.

#### **Ancient Nutrition**

**Ancient Nutrition** responded to our email inquiry stating that their organic certificates are on their website. However, the certificates we found were not related to organic certification but rather Certificates of Analysis (COAs), issued after testing the cannabinoids and other chemicals in the products. We followed up with an additional email requesting their organic certificate and they responded, "We do not provide anyone with an actual certificate. The product is Certified USDA Organic on the webpage."

Upon further investigation, we found Ancient Nutrition listed as a "new applicant," as of January 22, 2020, on the California Certified Organic Farmers (CCOF) website. We contacted CCOF on July 25, 2020 to inquire about their status and were told that Ancient Nutrition products are currently certified under a co-packer while they "complete the certification in their own company name." The certifier suggested we contact the company to request a copy of the co-packer's certificate listing the products they pack for Ancient Nutrition. As previously noted, the company had already declined to provide that information.

#### **CBD Mendo™**

**CBD Mendo™** did not respond to our email requests for their organic certificates.

#### **Green Gorilla™**

**Green Gorilla™** did not respond to our initial email inquiry. After a follow-up was sent, they referred us to their certifier (Oregon Tilth® Certified Organic) with instructions to request proof of certification from them.

Oregon Tilth® subsequently confirmed that the Green Gorilla™ brand has a private label agreement with another company and is listed on that company's organic certificate. They instructed us to request a copy of the certificate directly from Green Gorilla™ if we wanted a listing of specific certified organic products. Oregon Tilth® also said they could provide the certificate if Green Gorilla™ would give us the name of the company who final packages their product. Green Gorilla™ did not respond to our subsequent request for either the certificate with product list or the name of their co-packer.

#### **NuLeaf Naturals**

**NuLeaf Naturals** responded to our inquiry by sending the certificate for Organic Infusions™, which they identified as the supplier of their organic hemp seed carrier oil. We followed up with a request for a product list and they sent the full addendum for Organic Infusions™, with Certified Organic Hemp Seed Oil listed under the Organic Infusions™ brand. In further correspondence with the company, we were told that, "The blend of the carrier oil is nearly 95% of our product, which provides us the ability to utilize the "Made with Organic" claim."

#### **Nuume**

**Nuume Organics** responded to our inquiry by sending a copy of the organic certificate issued to Dexter Labs, LLC on March 17, 2020. The certificate showed that Dexter Labs, LLC was certified with CCOF since November 21, 2019 and listed several hemp extracts sold under the brand name Nuume Organics.

#### **PureKana**

**PureKana** responded to our initial inquiry by referring us to lab results and Certificates of Analysis (COAs) on their website. In response to follow-up questions about the organic certification of products described as "Organic" and "Certified organic" on the website, they replied that none of their products were certified but that they do "only use organic ingredients."

#### **Aspen Green™**

In response to our inquiry, **Aspen Green™** replied that their full spectrum hemp tinctures are "100% certified



organic” and their topicals are “98% organic” and are made using their 100% certified organic full spectrum hemp extract. They also said all the other ingredients they use are organic, with the exception of a preservative, tocopherol.

### **Organic Touch**

In response to our inquiry, **Organic Touch** replied that, while their products are not certified organic, their CBD is grown at hemp farms that “use organic nutrients and farming practices.”

### **My CBD Organics®**

We did not receive a response from **My CBD Organics®**.

### **Kore Organic™**

We did not receive a response from **Kore Organic™**.



## Conclusion

As the marketplace for CBD and hemp products continues its rapid expansion, increased guidance and enforcement from USDA's National Organic Program and accredited certifying agencies will be necessary to protect the integrity of the organic label. Current published regulations do not specifically address requirements for websites and other marketing materials, leaving the door open for misleading organic claims to be made.

Increased transparency from companies selling these products online is called for, as well. Providing access to organic certificates on websites (as some companies already do), along with photos of ingredient panels and packaging showing the "Certified by..." information, would enable online shoppers to make well-informed choices and more easily identify the bad actors. And additional training for front-line employees would ensure that inquiries are answered accurately.

More than once, we were sent or referred to Certificates of Analysis (COAs) when requesting proof of the company's organic certification. Certificates of Analysis provide valuable information and are worth examining, but they have no bearing on organic certification.

At present, consumer vigilance is the best way to ensure that CBD and hemp purchases are truly organic. Look for the USDA Organic seal and/or the name of the certifier on the product label itself. Website claims alone are not sufficient. Without organic certification, there is no third-party verification. If you have questions, check the Organic Integrity Database, and/or request the name of the certifier or a copy of the organic certificate from the company.

OrganicEye is preparing a petition to the National Organic Standards Board requesting rulemaking that would require disclosing the certifier on the website of any manufacturer making organic claims. This should include a specific disclaimer in terms of what products hold certification.

**If you come across claims that you feel are deceptive, report them to USDA or contact us at OrganicEye and we will investigate and file complaints, as appropriate.**

This report is not designed to be an all-inclusive examination of currently available organic CBD and hemp products. We attempted to include the major players in the industry; however, there are undoubtedly reputable organic brands that we have not listed and questionable claims that we did not uncover or investigate within the scope of this effort. Website and label claims of companies examined here may also have been altered in the interim. We will continue to monitor the situation and file subsequent legal complaints as we become aware of additional violations.

It is our hope that the information provided will help consumers understand and evaluate organic CBD and hemp products wisely, both for their own good health and to support the companies that are acting ethically and making the extra effort to meet the stringent requirements necessary to be certified organic.



# Appendix 1

## Prominent Certified Organic CBD Brands

- Ancient Nutrition
- Aqua Vitea
- Aspen Green
- Bloom Hemp
- Bravo Botanicals
- Cannatrait
- CBD & ME
- Clean Remedies
- Cornbread
- Driftless Dreams
- First Crop
- Floramye
- Green Gorilla
- Haleighs Hope
- Head & Heal
- Kefla
- Maple Plus
- Nutiva, Inc
- Nuume Organics
- Ojai Energetics
- One Farm
- Palmetto Harmony
- Rareessence
- RE Botanicals
- Sun God Medicinals
- Sungold Botanicals
- Sunsoil
- Upstate Elevator Supply Company

Some companies sell both certified and non-certified products under the same brand name.

## A note about the Organic Integrity Database (OID)

The OID is a useful tool for verifying the certification status of operations handling CBD and hemp. However, it can be somewhat less helpful when searching for specific brand name products because they are not always listed by name.

This is why we recommend first checking the product label for the USDA Organic seal *and* certifier. If that information is not provided, and a search of the OID comes up empty, we suggest contacting the company to ask for the name of their certifier and a copy of their

certificate and product list. Federal law requires organic certificates to be available to the public.

The above is a list of companies and brands selling certified organic CBD products as found on the Organic Integrity Database under CBD and hemp handlers (as of July 30, 2020) and/or confirmed in the course of our investigation. Due to the evolving nature of the industry, this list is subject to change and not intended to be comprehensive.



## Appendix 2

### Operations certified for organic handling of one or more CBD Products

Downloaded from USDA Organic Integrity Database (OID) on 7/30/2020.

| OPERATION NAME                                       | USDA ACCREDITED CERTIFIER                  |
|--|--|
| Allan Gandelman/Head & Heal                          | NOFA-NY Certified Organic, LLC             |
| Aqua Vitea   | Vermont Organic Farmers, LLC               |
| Aqueous Labs Inc.                                    | CCOF Certification Services, LLC           |
| Baesler, Alice                                       | Kentucky Department of Agriculture         |
| Barlean's Organic Oils, LLC                          | Quality Assurance International            |
| Bravo Botanicals                                     | Vermont Organic Farmers, LLC               |
| BYO Operations, LLC Db a Beyond Organic Nutritionals | CCOF Certification Services, LLC           |
| Cabaniss Group LLC                                   | Natural Food Certifiers                    |
| Cannonhale Extraction Labs LLC                       | Midwest Organic Services Association, Inc. |
| Carolina Botanical Development, LLC                  | Clemson University                         |
| Cattis LLC   | Vermont Organic Farmers, LLC               |
| Clean Remedies, LLC                                  | OneCert, Inc.                              |
| Colorado Cultivars USA LLC                           | OneCert, Inc.                              |
| Colorado Cultivars USA LLC                           | Pro-Cert Organic Systems, Ltd.             |
| Cumberland Extracts, Inc                             | International Certification Services, Inc  |
| Dexter Labs, LLC                                     | CCOF Certification Services, LLC           |
| Driftless Dreams LLC                                 | Minnesota Crop Improvement Association     |
| Dynamic Blending Specialists, Inc.                   | Oregon Tilth Certified Organic             |
| Earth Source, Inc.                                   | CCOF Certification Services, LLC           |
| Elemental Processing LLC                             | Quality Assurance International            |
| Erbaviva   | Oregon Tilth Certified Organic             |
| Far East Summit                                      | CCOF Certification Services, LLC           |
| First Crop, Inc.                                     | Quality Assurance International            |
| Floramy LLC  | Oregon Tilth Certified Organic             |
| Foodscience Corporation                              | Vermont Organic Farmers, LLC               |

| OPERATION NAME                          | USDA ACCREDITED CERTIFIER                     |
|---|---|
| Golden Aloha, LLC DbA Kefla             | CCOF Certification Services, LLC              |
| Haleighs Hope Inc                       | OneCert, Inc.                                 |
| Hammer Enterprises, LLC                 | OneCert, Inc.                                 |
| Health Naturally                        | Natural Food Certifiers                       |
| Herbal Elixirs                          | CCOF Certification Services, LLC              |
| Honeyspoon LLC                          | Natural Food Certifiers                       |
| IHP LLC                                 | Natural Food Certifiers                       |
| Indigo Ridge Hemp Co., LLC              | Clemson University                            |
| King Pharma LLC/7 Hands                 | Natural Food Certifiers                       |
| Konopie LLC                             | Midwest Organic Services Association, Inc.    |
| Kria Botanicals                         | Vermont Organic Farmers, LLC                  |
| Myku Biosciences LLC                    | Quality Assurance International               |
| Northeast Kingdom Hemp                  | Vermont Organic Farmers, LLC                  |
| Northeast Processing LLC                | Vermont Organic Farmers, LLC                  |
| Nutiva, Inc.                            | Pro-Cert Organic Systems, Ltd.                |
| Oak Creek Hemp Company                  | Nature's International Certification Services |
| OG Holdings, LLC                        | Minnesota Crop Improvement Association        |
| Palmetto Synergistic Research, LLC      | OneCert, Inc.                                 |
| Partnered Process LLC                   | Midwest Organic Services Association, Inc.    |
| Plant Science Laboratories, LLC         | NOFA-NY Certified Organic, LLC                |
| Quintessential LLC                      | Vermont Organic Farmers, LLC                  |
| Rareessence, LLC                        | Midwest Organic Services Association, Inc.    |
| Rocky Mountain Extraction Services, LLC | OneCert, Inc.                                 |
| Rogue Bioscience, LLC                   | OneCert, Inc.                                 |
| Shake Brands Corp.                      | OneCert, Inc.                                 |
| Sierra Nevada Bioscience, LLC           | Oregon Tilth Certified Organic                |
| Speedygrow, Inc.                        | CCOF Certification Services, LLC              |
| Sungold Botanicals LLC                  | OneCert, Inc.                                 |

#### OPERATION NAME

Sunsoil  
The Maple Standard, LLC  
To Doggy With Love LLC DbA Kin+Kind  
Tradin Organics USA  
Universal Hemp LLC  
Upstate Elevator Supply Company  
Vaxt Labs, LLC  
Vertosa Wellness LLC  
WAAYB Labs LLC  
Wellness Distributing Company, LLC  
West Star Farm, LLC  
White-Decoste, LLC.  
Windy City Organics

#### USDA ACCREDITED CERTIFIER

Vermont Organic Farmers, LLC  
Vermont Organic Farmers, LLC  
CCOF Certification Services, LLC  
Oregon Tilth Certified Organic  
Natural Food Certifiers  
Vermont Organic Farmers, LLC  
Minnesota Crop Improvement Association  
CCOF Certification Services, LLC  
OneCert, Inc.  
Organic Certifiers, Inc.  
Midwest Organic Services Association, Inc.  
OneCert, Inc.  
Oregon Tilth Certified Organic







OrganicEye is a project of Beyond Pesticides, a 501c(3) tax-exempt public charity dedicated to a safer environment and a safer food supply.

**Beyond Pesticides is Organic**



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Our mailing address is:

**OrganicEye**

701 E Street SE Suite 200  
Washington, DC 20003-2803

[www.organiceye.org](http://www.organiceye.org)