



Non-GMO Project Verification Guide

Welcome to the Non-GMO Project Product Verification Program!



ABOUT THE NON-GMO PROJECT

The Non-GMO Project believes everyone has the right to know what is in their food. As a mission-driven nonprofit organization, the Non-GMO Project is committed to preserving and building sources of non-GMO products, educating consumers, and providing Verified non-GMO choices. We offer North America's most trusted third-party verification program for non-GMO food and products.

THE NON-GMO PROJECT PVP

The Product Verification Program (PVP) evaluates products for compliance with the Non-GMO Project Standard. The Standard is a consensus-based document crafted with insight from a number of industry experts, reflecting a dynamic range of perspectives.

This collaboration with engaged stakeholder groups makes the Non-GMO Project Verified label a meaningful and achievable way for suppliers and brands to show their commitment to transparent non-GMO choices in the marketplace.

THE BUTTERFLY

The Non-GMO Project was created in 2007 by two grocery stores, The Natural Grocery Company in Berkeley, California and The Big Carrot Natural Food Market in Toronto, Ontario—both of which had spent the preceding years working diligently to provide their customers with more information about GMOs. They combined their efforts into the Non-GMO Project with the goal of creating a standardized definition for non-GMO products in the North American food industry. Today, the Non-GMO Project Verification Mark (the Butterfly label) is recognizable to consumers and continues to be one of the fastest-growing and most trusted clean labels on store shelves.

Why Choose Non-GMO Project Verified?



Nearly half of consumers seek to avoid GMOs.¹



CONSUMERS SEEK NON-GMO PRODUCTS

As of 2018, 36 percent of consumers said they were buying more non-GMO products than they did the year previously.²



IN A CLASS OF ITS OWN

Non-GMO Project Verified is rated “excellent”—the highest available rating—by Consumer Reports.³

RETAILERS SEEK NON-GMO PRODUCTS

The largest national chains to the smallest shops and natural markets carry Non-GMO Project Verified products.

Whole Foods Market compliance: WFM will require food products making a non-GMO claim to be third-party verified by 2022.⁴

As the 2022 deadline for National Bioengineered Food Disclosure Standard compliance draws nearer, American retailers are seeking third-party assurance that non-GMO products are truly non-GMO.

THE NON-GMO MARKET IS GROWING

Consumer demand for Non-GMO Project Verified products increases at nine percent per year.

The number of Non-GMO Project Verified products now exceeds 60,000 and sales have topped \$40 billion.

Forty-seven percent of Non-GMO Project Verified products are also certified USDA Organic.

1. Hartman Group, Organic and Natural GMO Special Report. 2018.

2. Ibid.

3. Consumer Reports, Non-GMO Project Verified.

<https://www.consumerreports.org/food-labels/seals-and-claims/non-gmo-project-verified>.

4. Whole Foods Market, GMO Labeling. Accessed August 2021.

<https://www.wholefoodsmarket.com/quality-standards/gmo-labeling>.

Get Verified!

Companies work with the Non-GMO Project and a Technical Administrator (TA) to enroll in the PVP and get their products Non-GMO Project Verified. All three parties communicate and work together, but the participant has specific responsibilities to complete with the Project and with their TA. Keep reading for more information about each step.

1 FAMILIARIZE YOURSELF WITH THE VERIFICATION PROCESS (NGP)

Check out our online resources to learn more about our program, and select a Technical Administrator for your product evaluation.

<https://www.nongmoproject.org/product-verification/technical-administrators/>

2 SIGN A CONTRACT AGREEMENT WITH YOUR TECHNICAL ADMINISTRATOR (TA)

Once you select your TA, you will sign a contract agreement and enroll your products. This agreement should be returned to your Technical Administrator.

3 SIGN A LICENSE AGREEMENT (NGP)

Your Non-GMO Project License Agreement outlines the parameters of your participation in the program and the use of the Non-GMO Project's name and verification mark. This is separate from your TA contract agreement and should be returned to the Non-GMO Project. Once the license agreement has been signed, we will provide you with our trademark artwork to be used for design purposes only.

4 PRODUCT EVALUATION (TA)

Your TA will design and guide you through your evaluation process. Prepare for your evaluation with documentation, which could include, invoices, proofs of purchase, standard operating procedures for your facility, and certificates of analysis for your ingredients.*

5 VERIFICATION (TA)

You will receive a Certificate of Verification (COV) from your TA. Questions about your COV? Your TA can help!

6 VERIFICATION & MARKETING OPPORTUNITIES (NGP)

Once your product evaluation has been successfully completed, the Non-GMO Project Verified Mark can be used on your products. Additionally, our Client Experience team can connect you with our Marketing team to explore sponsorship and other marketing support options.

7 ANNUAL RENEWAL (TA)

Your TA will review your verified product on an annual basis. If you would like to add new products to your portfolio at any time, please contact your TA directly. Your TA will design and guide you through the re-evaluation process. You will receive an updated Certificate of Verification from your TA. Renewal fees apply.

*Testing and/or affidavits are required for high-risk crops and their derivatives and must be completed by a Non-GMO Project approved laboratory. An on-site inspection of your facility may be required.

1. STEP ONE CHOOSE A TECHNICAL ADMINISTRATOR

The Non-GMO Project's integrity is reinforced by the credibility of the Non-GMO Project Standard and the expertise of third-party TAs. The Project sets and controls the Standard, and four independent TAs evaluate products to determine compliance. Each TA has a unique pricing model and selection of additional services.

The Project encourages Participants to research each TA and contact them directly to find the one that best suits their needs. It is possible to work with multiple TAs as long as different products are submitted to each.



FoodChain ID
foodchainid.com
+1 (641) 469-6181 x3



NSF International
nsf.com
+1 (800) NSF International MARK
Tel: +1 (734) 769-8010



Where Food Comes From
wherefoodcomesfrom.com
+1 (866) 395-5883



SCS Global Services
scsglobalservices.com
Prospective Clients: +1 (510) 993-0235
PVP Participants: +1 (800) 326-3228

**LEARN MORE ABOUT EACH TA AND
DOWNLOAD THEIR OUTLINE OF FEES AT:**

[HTTPS://WWW.NONGMOPROJECT.ORG/PRODUCT-VERIFICATION/TECHNICAL-ADMINISTRATORS/](https://www.nongmoproject.org/product-verification/technical-administrators/)

2. STEP TWO: ENROLL PRODUCTS

Once a TA is selected, they will guide Participants through enrollment, completing a contract agreement, and designing a plan for product evaluation.

3. STEP THREE: SIGN THE LICENSE AGREEMENT

Participants must sign a license agreement with the Non-GMO Project in order to participate in the PVP. The license agreement covers important elements of participation in the program, and permits use of the Project's trademarks. Once the license agreement is complete, the Project will issue trademarks to the Participant for design purposes only.

4. STEP FOUR: COMPLETE A PRODUCT EVALUATION

TAs review each product's complete formulation, including inputs and processing aids that are not present on the final ingredient panel or supplement facts panel. During this evaluation, TAs request documentation and/or test results to demonstrate that inputs are not GMOs and are not derived from GMOs.

Every product is unique, so no two product evaluations will be exactly the same. Time to verification depends on the TA, the complexity of the product formulation, and how quickly the Participant can provide the necessary documentation. On average, the process takes three to six months.

Most Participants will benefit from gathering the following documents and materials before they begin the evaluation process with a TA:

Document Checklist

- ✓ Product formulation
- ✓ Specification sheets for each input
- ✓ Source and supplier information for each input
- ✓ Certificates of verification for any Verified inputs, Organic, IP, or other certifications as applicable
- ✓ Manufacturing facility information
- ✓ Sampling and testing plan (for products with high-risk inputs)
- ✓ Product label and/or packaging

TAs manage all fees associated with verification. Costs vary depending on which TA is selected and the number and types of products being evaluated. Single-input products and products made without high-risk inputs are the least expensive, while multi-input products and products made with high-risk ingredients tend to incur more expenses. Keep reading to learn more about product evaluation and the Non-GMO Project Standard.

5. STEP FIVE: VERIFICATION

TAs determine when a Participant's products have achieved verification based on successful completion of evaluation and licensing. Once verification is achieved, Participants may request a [Certificate of Verification](#) from their TA and their products will be listed on the Non-GMO Project's website.

6. STEP SIX: PROMOTE YOUR VERIFICATION

Participants receive permission to use the Project's trademarks along with a helpful suite of marketing materials and support from the Project upon product verification. Please read the Benefits of Non-GMO Project Verification section for more examples of the Project's commitment to helping brands promote their product verification.

7. STEP SEVEN: COMPLETE ANNUAL RENEWAL

Verification must be renewed annually. The TA will oversee the renewal process and inform the Participant of any required documentation or testing. Participants should consult their TA before making any change to their product formulation or process.

The renewal process includes a product review to ensure that products and inputs remain compliant with the Standard. This means reviewing any changes to the product or its processing and confirming the resolution of any non-conformities discovered during the year. If changes to the Standard impact a product's verification, this will also be addressed at renewal.

RESOURCES

- Find more information about the Non-GMO Project on our website nongmoproject.org and [Product Verification Resources](#) page.
- Fill out a Get Started Form at nongmoproject.org/product-verification/get-started/ to connect with our Business Development team.
- Email verification@nongmoproject.org with any questions. We're happy to help!

Product Evaluation and the Non-GMO Project Standard

WHAT IS A GMO?

A genetically modified organism (GMO) is an organism in which the genetic material has been changed through biotechnology in a way that does not occur naturally by multiplication and/or natural recombination; cloned animals are included within this definition.

GMOs are changed through biotechnology, not through natural selection or traditional breeding methods.

WHAT IS BIOTECHNOLOGY?

Biotechnology is the application of in vitro nucleic acid techniques, including recombinant deoxyribonucleic acid (DNA) and the direct injection of nucleic acid into cells or organelles; or fusion of cells beyond the taxonomic family, that overcame natural physiological, reproductive, or recombination barriers and that are not techniques used in traditional breeding and selection.

Biotechnology means artificially altering DNA in a context where only the genetic material of an organism is altered or artificially merging DNA from different species that would not reproduce on their own. Biotechnology includes new genetic engineering techniques such as CRISPR and RNAi. All products of these and similar new breeding techniques are GMOs.



ELIGIBILITY

THE FOLLOWING TYPES OF WHOLESALE OR RETAIL GOODS ARE ELIGIBLE FOR VERIFICATION:

- Seed and vegetative propagation materials
- Wholesale or retail goods for human or pet use that are either ingested or topically applied over-the-counter (OTC) drugs and homeopathic remedies
- Wholesale or retail goods for human or pet use that are not ingested or topically applied
- Livestock, poultry, bee, and seafood feed and supplements

THE FOLLOWING TYPES OF GOODS ARE INELIGIBLE FOR VERIFICATION:

- × Prohibited inputs and ingredients listed in the Standard
- × Goods that are not sold in the US or Canada (regardless of where they are grown or produced)
- × Certain medicines and other medical goods
- × Live animals
- × Synthetic pesticides
- × Goods that are composed entirely of non-risk inputs and ingredients and are also part of a non-risk category
- × Controlled substances under U.S. or Canadian law
- × Goods making a voluntary or mandatory disclosure under The National Bioengineered Food Disclosure Standard

INGREDIENT CLASSIFICATION

The Non-GMO Project Standard classifies inputs and ingredients according to three attributes: weight percentage represented in or present in the product (weight percentage), likelihood that they are derived from a GMO (risk level), and whether a testable precursor exists at any point in the supply chain (testability). These important classifications determine the type and rigor of evaluation for each input and ingredient, which impact the cost and length of the evaluation process.

WEIGHT PERCENTAGE

Ingredients are classified by their weight percentage as present in the product.

Weight Percentage Classifications

Major Ingredients	5% or more
Minor Ingredients	At least 0.5% but less than 5%
Micro Ingredients	Less than 0.5%

Weight percentage impacts the depth of evaluation of each ingredient; the more of an ingredient is used, the more intensely it will be examined. For example, major ingredients require testing or affidavits when they are high-risk. Minor ingredients may require affidavits. Micro ingredients may require affidavits or be eligible for micro exemptions in some cases.

RISK LEVEL

Inputs and ingredients are also classified by how likely they are to be (or be derived from) GMOs. The Non-GMO Project Standard defines five risk levels:

Verified-status: Products that have been verified under the PVP at wholesale or retail and are purchased for use as inputs or ingredients to different products enrolled in the PVP.

High-risk: Organisms and the inputs and ingredients derived from them for which GMO counterparts are widely commercially available.

Monitored-risk: Organisms and the inputs and ingredients derived from them for which GMO counterparts are in the research and development stages, which have been developed but are not widely commercially available, or for which known GMO contamination has occurred.

Low-risk: Organisms and the inputs and ingredients derived from them that are not classified as monitored-risk or high-risk.

Non-risk: Inputs and ingredients that are not derived from biological organisms and are not, therefore, susceptible to genetic modification.

HIGH RISK INPUTS AND INGREDIENTS

High-risk inputs and ingredients are subject to the highest level of scrutiny during a product evaluation because they are most likely to be derived from GMOs. Products that use high-risk inputs or ingredients will require additional evaluation and are likely to require laboratory testing. A TA will determine if testing is necessary.

High-Risk Inputs

Alfalfa, apple, canola, corn, cotton, eggplant, papaya, pineapple, potato, soy, sugar beets, zucchini and yellow summer squash, microorganisms and enzymes, animal-derived products

Enzymes and microorganisms are high-risk because they are commonly genetically modified. In many cases, a yeast, bacterium, or alga is genetically modified so that it produces a compound that can be used.

Animal-derived inputs and ingredients, including those from apiculture and aquaculture products, are high-risk due to the prevalence of GMOs in feed and forage. When used as minor ingredients, major ingredients, or evaluated as products, animal-derived inputs require traceability and evaluation all the way back to the feed. The Non-GMO Project Standard requires that animals be fed a compliant, non-GMO diet.

For more information on animal-derived inputs and ingredients, please review the [Animal-Derived Inputs: FAQ guide](#).

TESTABILITY

Some inputs and ingredients are testable: they have a testable precursor somewhere in their supply chain and the required test is available. For example, the corn used to make a cornstarch can be tested with commercially available tests before it is processed.

Other inputs and ingredients are non-testable: there is no testable precursor in the supply chain or the required tests are not commercially available. For example, it is not currently possible to test for GM potatoes due to the lack of available testing methodologies.

Testable high-risk inputs and ingredients require testing when they are classified as majors. Non-testable high-risk inputs and ingredients may require signed affidavits when they are major ingredients. Some inputs can be both testable and non-testable.

Testable Inputs

Alfalfa, canola, corn, cotton, papaya, soy, sugar beets, zucchini and yellow summer squash, and animal-derived inputs and ingredients

Non-Testable Inputs

Apple, canola, eggplant, pineapple, potato, soy, microorganisms and enzymes, and animal-derived inputs and ingredients



TESTING

Major testable high-risk inputs usually require GMO testing to demonstrate compliance with the Standard. Testing may need to be performed on source material, such as the soy used to produce soy lecithin rather than the lecithin itself. TAs will notify Participants when testing is necessary. When testing is required, Participants must develop a sampling and testing plan and have it approved by a TA. Testing must be conducted by an approved laboratory.

Please visit nongmoproject.org/labs to view a current list of approved laboratories.

AFFIDAVITS

Major non-testable high-risk inputs require a signed affidavit in lieu of testing. TAs provide standard affidavits for non-testable inputs; these affidavits must be signed by someone who has sufficient knowledge of the supply chain to do so.

In some instances, an affidavit based on country of origin may be used to demonstrate compliance when it can be sufficiently demonstrated that a high-risk input has a consistently low risk of GMO presence. Please consult a TA for more information.

ORGANIC CERTIFICATIONS AND OTHER EQUIVALENCIES

The Non-GMO Project Standard is designed to honor organic certification and build on it by requiring testing of major testable high-risk inputs at critical control points. Submitting organic certificates for inputs may reduce the work required to attain verification, but does not automatically replace testing requirements.

While sourcing inputs from countries that do not grow or import GMOs may streamline the verification process, the Non-GMO Project does not offer any formal equivalency with EU guidelines. Please consult a TA to explore options.

REQUIREMENTS FOR PROCESSING FACILITIES

A TA will evaluate facility documents and advise if an on-site inspection is required. Participants must demonstrate that their facilities have standard operating procedures covering traceability of ingredients, segregation and separate storage, and proper clean-outs of shared equipment. A TA will determine if current protocols meet the requirements of the Standard.

Some participants will need to undergo on-site facility inspections as part of the verification process. At a minimum, producing facilities are required to be inspected annually when parallel processing of the same major high-risk input to a product is occurring. TAs determine when facility inspections are necessary.

LABEL REVIEW

Participants must submit a product label to their TA for review as part of the evaluation process. Labels must not make prohibited claims such as “GMO-free” or advertise high-risk inputs that have been micro-exempted. Please review the [Non-GMO Project Trademark Use Guide](#) for additional information.



Benefits of Non-GMO Project Verification

TRADEMARK USE GUIDE AND PACKAGE DESIGN GUIDANCE

PARTNERSHIPS, SOCIAL MEDIA FEATURES, GIVEAWAYS, AND ADVERTISING

MARKETING MATERIALS AND INDUSTRY NEWS



The Non-GMO Project is Here to Help Participants Make the Most of Product Verification!

TRADEMARKS

The Non-GMO Project and its trademark Butterfly is North America's most trusted and most widely recognized third-party certification for GMO avoidance. Participants in the Product Verification Program (PVP) receive the Butterfly for use on their Verified products along with the Trademark Use Guide, which provides directions on how to use the Butterfly and other Non-GMO Project trademarks. Using the Butterfly on Verified products provides instant brand recognition for consumers who seek to avoid GMOs.

MARKETING MATERIALS

Participants also receive a helpful suite of marketing materials upon product verification designed to help highlight their commitment to GMO transparency.

Resources include:

- Media kits full of graphics and posts to use across social media
- Newsletter article, blog post, and press release templates with the option of having a press release posted on nongmoproject.org
- Reviews of other marketing materials and advertisements
- Monthly newsletters with non-GMO trends, insights, and additional opportunities

Let's promote your
Non-GMO Project
Verification!

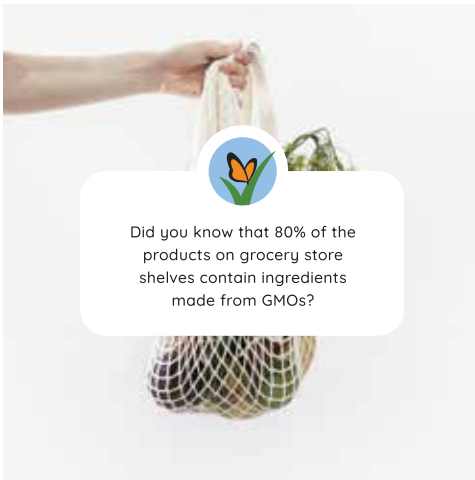


PARTNERSHIPS

The Project is also excited to team up with brands to develop creative content for digital and print media, recognition at the largest industry trade shows, placement in campaigns, ads, and more.

Brands can get involved in ongoing campaigns such as Brand Wednesday, which highlights a newly Verified Participant each week to over 1.3 million social media followers. Brands can also work with our dynamic Marketing team to dive into market research and develop and share content.

The Project values relationships with brands of all sizes. Connect with the team to leverage Non-GMO Project verification in the natural and organic marketplace!





Get in touch today!

Schedule a call to talk about verification.

Connect with our Business Development team at:

getstarted@nongmoproject.org

(360) 255-7704

OR

get started by filling out a form at:

<https://www.nongmoproject.org/product-verification/get-started/>

Already have products enrolled in the PVP and have questions?

Contact us at:

verification@nongmoproject.org

(360) 255-7704

Want more details on our Standard and program requirements?

[Visit \[nongmoproject.org/resources\]\(https://www.nongmoproject.org/resources\).](https://www.nongmoproject.org/resources)