



Named in Text on the
Principal Display Panel

PURPOSE

The Non-GMO Project Standard includes provisions for micro exemptions, which allow certain eligible micro inputs (present at less than 0.5% by weight) to be exempt from evaluation provided no product contains more than 0.9% total exempt micro ingredients by weight percentage. Micro exemptions help the Standard maintain a balance between meaningfulness and achievability.

Additional details about micro ingredients and micro exemptions can be found in the [Non-GMO Project Standard](#) section 3.

Section 3.1.3.a explains which inputs are ineligible for micro exemption.

Section 3.1.3.b explains the depth of evaluation for micro-exempted inputs.

In some cases, a typically eligible input may not be micro exempted if it appears in text on the principal display panel of a package: the main part of a product label that consumers see when they shop. The Non-GMO Project feels it is misleading to advertise an ingredient on the front of a Non-GMO Project Verified product and then micro exempt that ingredient because a reasonable consumer would expect that ingredient to have been evaluated under the Non-GMO Project Standard.

WHAT IS A PRINCIPAL DISPLAY PANEL?

The principal display panel (PDP) is the main section of a product label; the part most likely to face a customer in a grocery store. Customers are likely to use the information presented on the PDP to make shopping decisions, so it is important that the PDP does not misrepresent the GMO or non-GMO status of ingredients.

As a simplified example, if a consumer is seeking a Non-GMO Project Verified green juice and selects a juice with a label that specifically advertises alfalfa as an ingredient, the consumer probably expects that alfalfa to be non-GMO. Accordingly, the alfalfa would need to be evaluated for compliance with the Standard and could not be micro exempted.

DETAILS OF THE NAMED IN TEXT RULE

High-risk micro ingredients that are listed on the ingredient panel or supplement facts panel of a retail product and are also declared on the PDP are ineligible for micro exemption. Artificial and natural flavors, enzymes, and microorganisms are not included in this rule; they may be advertised on the PDP and still be micro exempted when the Standard permits it.

INPUTS WITH MULTIPLE COMMON NAMES

Inputs do not always need to be worded exactly the same way on the PDP and the ingredient panel for this rule to apply. If an ingredient has more than one common name, there may be an indirect match if the ingredient is referred to in text on the PDP by one name and a different common name on the ingredient panel. For example, corn and maize are the same thing, as are alfalfa and lucerne. Technical Administrators determine what is considered a sufficient match.

PARENTHETICALS

Ingredients mentioned on the PDP are sometimes broken down into sub-ingredients inside of parentheses on the ingredient panel or supplement facts panel. In such a case, if one or more of the sub-ingredients is a high-risk micro ingredient and it is considered to reasonably characterize the parent ingredient (which is present in text on the PDP), it is not eligible for micro exemption.

Example: Trail Mix with tropical fruits

Cashews, peanuts, almonds, tropical dried fruits (banana chips, dried pineapple, raisins, dried papaya)

The PDP says “Trail Mix with tropical fruits.” “Tropical dried fruits” is listed as a parent ingredient and the sub-ingredients in parentheses spell out exactly what is considered to be a tropical dried fruit in this product. Papaya is explicitly called out as a tropical dried fruit and a reasonable person would probably agree that papaya is a characteristic example of tropical fruit. As “tropical fruits” is declared on the PDP, the papaya in this mix would not be eligible for micro exemption.

If, however, the ingredients in this product were listed without parentheses, it would become harder to tell which ingredients “tropical fruit” applies to.

Example: Trail Mix with tropical fruits

Cashews, peanuts, almonds, banana chips, dried pineapple, raisins, dried papaya

Papaya is a high-risk crop, but it is not declared on the PDP in this example—only “tropical fruits” is. Without a parenthetical listing to directly link the ingredient papaya to the “tropical fruits” declared on the front, the papaya remains eligible for micro exemption.

FAQs

DOES REMOVING AN INPUT FROM THE PDP MEAN IT CAN BE MICRO EXEMPTED?

Yes, so long as the Standard otherwise permits it. This removes the consumer expectation that the input is non-GMO.

DO IMAGES OF AN INPUT ON A PACKAGE IMPACT MICRO EXEMPTIONS?

No. Participants may include images of micro-exempted inputs on the PDP so long as those inputs are not named in text.

DOES THIS RULE APPLY TO WHOLESALE PRODUCTS?

No, only to products labeled and packaged for retail sale.

WHY DOES IT MATTER IF AN INPUT ON THE INGREDIENT PANEL IS IN PARENTHESES?

Parenthetical listings directly link certain inputs to their parent ingredient. This linkage could lead a reasonable consumer to believe that the items inside the parentheses are characterizing of the parent ingredient, which they may expect to be non-GMO.

DOES THIS RULE IMPACT "ENRICHED" OR "FORTIFIED PRODUCTS?"

Only if the product states what it is enriched with. For example, "enriched flour" does not call out a specific input, but "flour enriched with niacin" does.

DOES THIS RULE IMPACT VITAMINS IN MILK AND OTHER PRODUCTS?

Yes. This change may bring certain vitamins into the scope of evaluation for some products.

