



# The USDA Organic Label for Pet Food and Livestock Feed

*Where are we Now, and Where are we Headed?*

USDA Agricultural Marketing Service  
National Organic Program  
Emily Brown Rosen  
AAFCO Annual Meeting  
August 12 , 2013



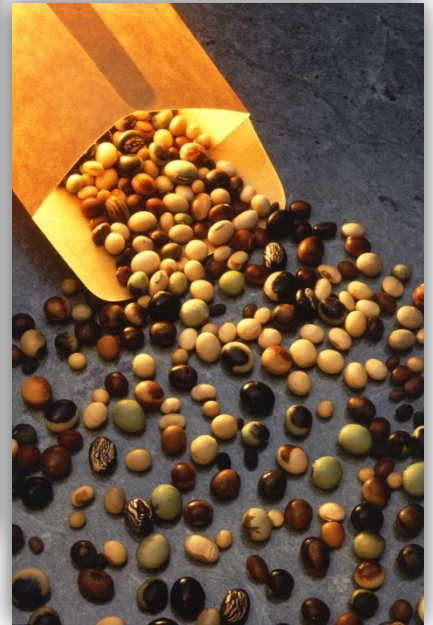


- USDA organic livestock feed regulation
  - Composition, permitted ingredients
  - Labeling categories, and required label information
  - Who does the certification
- Pet Food
  - How is it currently certified
  - Label claims
  - Plans for new standards

# The USDA Regulates the Organic Seal



**USDA's National Organic Program (NOP) ensures the integrity of USDA organic products in the United States and throughout the world**





- Regulations are published at 7 CFR, Part 205
- Authorized by Organic Foods Production Act, 1990
- Program initially implemented Oct. 2002
- Many amendments since then
- See [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop) for all the details

USDA United States Department of Agriculture Agricultural Marketing Service

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## National Organic Program

### Welcome to the National Organic Program

**What is organic?**  
Organic is a labeling term that indicates that the food or other agricultural product has been produced through approved methods that integrate cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity. Synthetic fertilizers, sewage sludge, irradiation, and genetic engineering may not be used. [Consumer Information](#).

**Our Mission**  
Ensuring the integrity of USDA organic products in the U.S. and throughout the world. [About Us](#) | [USDA Organic Seal](#)

**Organic Standards**  
Regulations and guidance on certification, production, handling, and labeling of USDA organic products. [Learn more](#).  
[Organic Regulations](#) | [Program Handbook](#) | [Draft Guidance](#)  
[Rulemaking & Notices](#) | [National List & Petitioned Substances](#)

**National Organic Standards Board**  
Members of the organic community appointed to advise USDA on National List materials and regulatory topics. [Learn more](#).  
[Recommendations](#) | [Meetings](#) | [Members](#)

**Organic Certification & Accreditation**  
Third-party agents around the world certify operations to USDA organic standards. [Learn more](#).  
[List of Certified Operations](#) | [List of Certifying Agents](#)  
[Getting Certified](#) | [Financial Assistance](#) | [Training](#)  
[Info for Organic Operations](#) | [Certifying Agents](#)

**Want to Become Certified Organic?**

**Subscribe to the NOP Organic Insider!**

**Fertilizers in Organic**

**Carrageenan In Organic?**

**General Information**

- [Frequently Asked Questions \(FAQs\)](#)
- [April 2013 Organic Integrity Quarterly Newsletter \(PDF\)](#)
- [Fact Sheets](#)

## The NOP Organic Insider

USDA National Organic Program

### Welcome to the NOP Organic Insider Archive!

The NOP Organic Insider is an email update service that informs the organic community on a wide range of National Organic Program functions.

[Become an Organic Insider!](#)

**About the National Organic Program**  
The NOP facilitates trade and ensures integrity of organic agricultural products by consistently implementing organic standards and enforcing compliance with the regulations throughout the world. [Learn more](#)

### NOP Organic Insider Archive

Comment Opportunity: Sunset 2013 Proposed Rule (5/3/2013)  
Microloans for Small Farms + 'Sound and Sensible' on USDA Blog (4/24/2013)  
April 2013 Organic Integrity Quarterly (4/15/2013)  
Technical Assistance + Information Submission Requirements (4/8/2013)  
Classification of Materials + Materials for Crop Production (4/2/2013)  
Conflict of Interest Guidelines for NOSB Members (4/1/2013)  
'Sound and Sensible' Organic Certification (3/29/2013)

**National Organic Program Website:**

<http://www.ams.usda.gov/nop>

**Organic Insider Newsletter:**

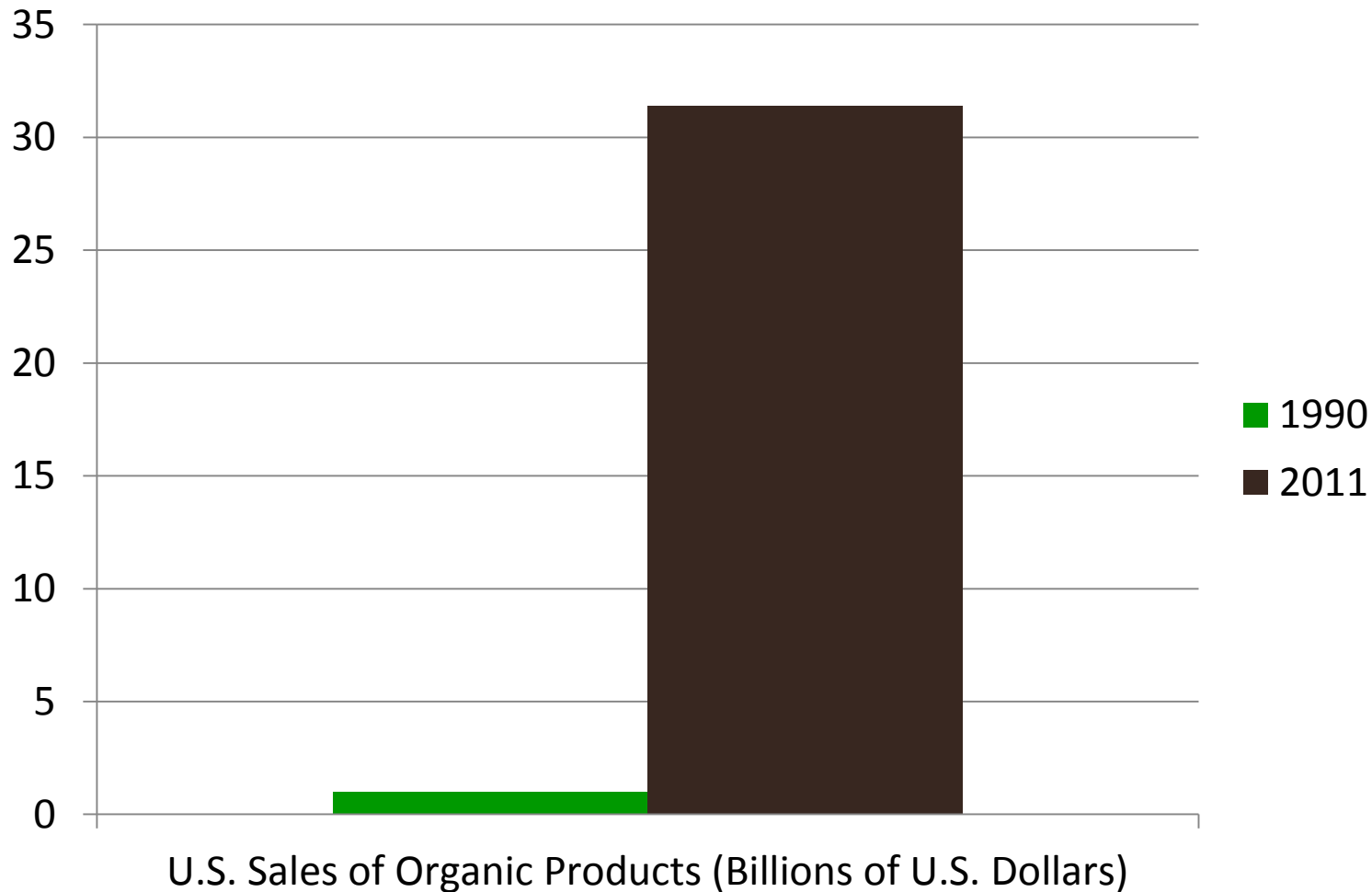
<http://bit.ly/NOPOrganicInsider>

# Role of the National Organic Program



- Develop and maintain organic standards
- Accredite and oversee third party organic certifying agents, who certify organic farms and businesses
- Investigate complaints of violations
- Manage the National Organic Standards Board, a citizen advisory committee
- Oversee 25,000 certified organic operations
- **All agricultural products labeled as organic in the U.S. must follow the USDA organic regulations**

# Growth of U.S. Organic Sales



# Requirements for Livestock Operations



- Governed by **Organic System Plan**
- Provide **access to the outdoors** and good living conditions year-round
- Use 100% **organic feed**
- Antibiotics, growth hormones, slaughter byproducts, and genetic engineering not allowed
- **Document** the organic status of all animals
- Ruminants must have **access to pasture** during the grazing season: 30% of the animal's dry matter intake must come from pasture; grazing season must be at least 120 days





Agricultural commodities in feed must be organic.  
Natural materials (if FDA approved) are allowed  
as feed additives and supplements

**Any synthetic substance must be on the National  
List, for the intended use**

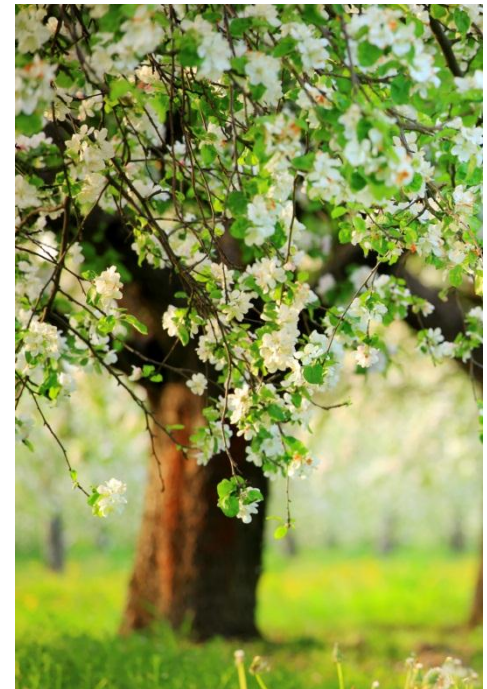
**ALL FEED SOLD AS ORGANIC MUST BE CERTIFIED**



# Allowed and Prohibited Substances



- The **National List of Allowed and Prohibited Substances** is part of the **organic** regulations.
- The National List includes **synthetic** substances which are **allowed** and **natural** substances which are **prohibited**.
- The National List has separate sections for **crops, livestock, and handling/food processing**.
- All substances are reviewed by the **National Organic Standards Board**. The Board makes recommendations on substances to the USDA.



# Feed Additives for Organic Use



- Natural (nonsynthetic ) substances allowed
  - Oyster shell
  - Direct fed microorganisms (probiotics)
    - *Bacillus, Aspergillus, Lactobacillus, Yeast*
    - Must be Non-GMO
  - Fish meal – (without synthetic preservatives)



# Feed Additives for Organic Use



- Approved synthetic substances
  - Vitamins and minerals – must be FDA approved forms
  - DL –Methionine, for poultry at maximum levels per ton of feed
    - 2 lbs for layers and broilers
    - 3 lbs for turkeys and other poultry
  - No other amino acids permitted for livestock



# Other ingredients



- Agricultural substances must be organic
  - Wheat middlings, rice hulls
  - Molasses
  - Vegetable oil
  - Kelp
- Sub-ingredients of an individual vitamin and mineral do not need review
- Guidance published NOP Program Handbook
  - NOP 5030 Evaluating Livestock Feed

# Prohibited Feed Additives



- Slaughter by products prohibited
  - bone ash, bone charcoal, bone phosphate, bone charcoal – spent, bone meal steamed, bone meal – cooked, hydrolyzed fat
  - May not be fed to any mammal or bird species
- Plastic pellets
- Manure or urea
- Animal drugs, including hormones, antibiotics to promote growth
- Synthetic preservatives (BHT, ethoxyquin, calcium propionate, potassium sorbate)
- Mineral oil
- Yellow prussiate of soda

# Requirements for Processors and Handlers (includes feed mills)



- Governed by an **Organic System Plan**
- Prevent the **commingling or contamination** of organic products by non-organic products during processing
- **Prevent pests** using only approved practices
- Use **certified organic agricultural ingredients** in organically-labeled products
- Use only **approved label claims**
- Not use **irradiation** or **genetically engineering**



# Labeling Categories for Livestock Feed



- “100% Organic”
  - All ingredients and additives, including processing aids are organic
  - Water and salt excluded from calculation
- “Organic”
  - All agricultural ingredients must be organic,
  - Others may be natural substances, or
  - Synthetic substances on the National List at 205.603 (substances allowed for livestock)

7 CFR 205.301(e)

# Labeling Categories for Livestock Feed



- There is no minimum % of organic content required in feed
- Vitamin and mineral mixes with minimal agricultural content may be certified
  - If not certified, content must be verified by certifiers before use by farmers
  - Agricultural carriers and additives must be organic

# Statements on Feed Labels



- **Required**
  - Must state “Certified Organic by XXX Agency”
    - Agency must be accredited by USDA NOP
    - Phrase must appear on information panel below name of manufacturer or distributor

# Statements on Feed Labels



- **Optional**
  - the word “Organic” or asterisk linking to term, to identify all organic ingredients
  - The term “100% organic” or “Organic” to modify the name of the feed product
  - Use of the USDA seal
  - Use of a certifier seal

# Statements on Feed Labels

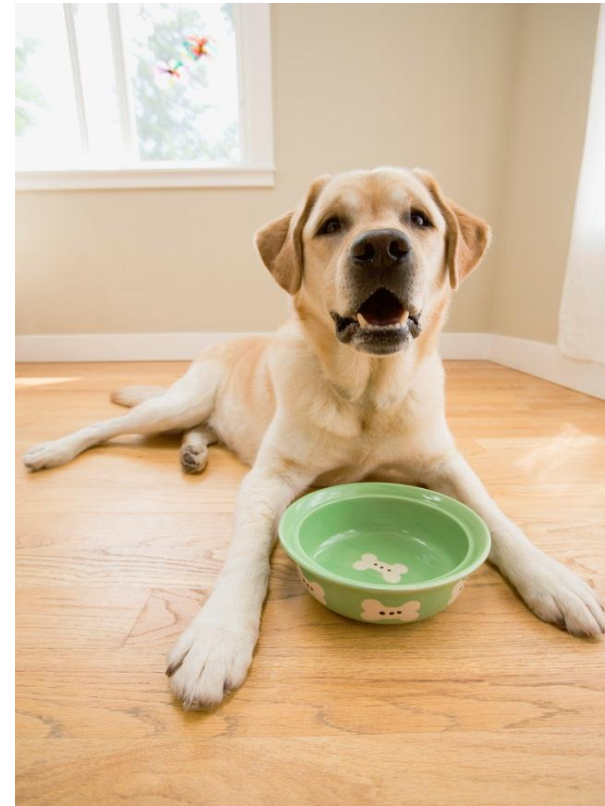


- **Not Permitted**
  - The claim “Made with Organic Ingredients”
  - Identifying salt or water as organic
  - Use of certifier seal that is more prominent than USDA seal if both are present

# Organic Pet Food



- No specific regulations at present for organic pet food
- USDA permits certification and sale of pet food as organic
- USDA has received recommendations from an industry Pet Food Task Force, and the National Organic Standards Board
- Regulations are in process of being drafted



# Current Status Quo for Pet food



- Certifiers are applying human food processing standards
- Pet food can qualify for food labeling categories
  - “100% organic”
  - “Organic” - at least 95% organic
  - “Made with (specified ) Organic Ingredients” - at least 70% organic
  - Specific organic ingredients – not certified, but contains identified organic ingredients

# Pet Food Labeling



- “100% Organic”
  - All ingredients must be organic
  - All processing aids must be organic
  - All additives must be organic
  - Must be certified





- “Organic”
  - 95% of ingredients must be organic
  - Other 5% can be:
    - Nonsynthetic substances
    - Synthetic substances on National List (205.603(d) or 205.605)
    - Agricultural items on National List (205.606\*) if not available in organic form
  - Examples: FDA approved vitamins and minerals, tocopherols, lecithin\*, guar gum\*, cornstarch\*

# Pet Food Labeling



- “Made With Organic (Specified Ingredients)”
  - Minimum of 70% organic ingredients
  - Other 30 %
    - Substances on the National List
    - Non-organic agricultural substances
      - Must be non GMO
      - No sludge
      - Not irradiated

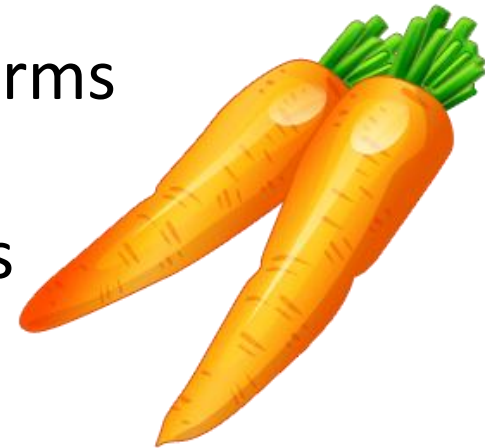


- Product that only lists organic ingredients
  - Not required to be a certified product
  - May have less than 70% organic ingredients
  - May identify ingredients as organic, only in **ingredients list**
  - No limits on other ingredients
  - Must have records to verify
  - No front panel or other organic claim
  - No use of USDA seal
  - **Cannot** say “Made with Organic Ingredients”

# Labeling for “Made With Organic” claim



- Can identify up to 3 items in “Made with” claim
- Or can identify up to 3 food groups-
  - E.g. Made with Organic Grains, Meat, and Poultry”
  - All identified ingredients (or member of identified group) MUST be organic
  - Cannot have organic and non-organic forms of ingredient identified in claim
- If “Made with Organic Carrots” – all carrots must be organic





- Allowance of other nutrients
  - Current food standard: “Vitamins and Minerals, in accordance with 21 CFR 104.20, Nutritional Quality Guidelines for Foods”
    - NOP proposed rule Jan 2012 clarified that some additional nutrients (including taurine) have been incorrectly allowed under this standard
    - This has not been finalized
    - Until new rule making, these are still allowed
  - Future rule making will clarify
    - Which minerals and vitamins allowed in human food
    - Separate list for pet food amino acids

# Pet Food Regulations



- In development
- Will be based on National Organic Standards Board recommendation
- Will be issued as proposed rule for public comment
- Final rule, with implementation period

# Learn How USDA Supports **Organic Agriculture**

Information on Organic Agriculture for  
Farmers, Ranchers, and Businesses



[www.ams.usda.gov/organicinfo](http://www.ams.usda.gov/organicinfo)

U.S. Department of Agriculture

# Questions?

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[www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)



*Organic Integrity from Farm to Table,  
Consumers Trust the Organic Label*