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
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Overview

• 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.
USDA Organic Program

• 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 for all the details
National Organic Program Website:

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

Organic Insider Newsletter:

Role of the National Organic Program

- Develop and maintain organic standards
- Accredit 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

U.S. Sales of Organic Products (Billions of U.S. Dollars)

- 1990
- 2011
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
Pet Food Labeling

- 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
Pet Food Composition

• Allowance of other nutrients
    • 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

U.S. Department of Agriculture
Questions?

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www.ams.usda.gov/nop

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