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Update on NOP Requirements for Livestock Feed, Supplements, and Additives

At the recent Accredited Certifier Training held in CA, the NOP clarified that the requirement for the use of 100% organic agricultural ingredients in livestock feed also applies to agricultural ingredients in feed additives and supplements, based on 205.237 (a).

Section 205.237 (a) of the NOP states: *The producer of an organic livestock operation must provide livestock with a total feed ration composed of agricultural products, including pasture and forage, that are organically produced and, if applicable, organically handled: Except, That, non-synthetic substances and synthetic substances allowed under §205.603 may be used as feed additives and supplements.*

Based on this recent NOP clarification, all agricultural ingredients in livestock feed, additives and supplements must be organic.

Feed, Feed Additives, and Feed Supplements

Effective immediately, any agricultural feed, feed additive or feed supplement that contains agricultural ingredients: e.g., soybean meal, or agricultural group listing (e.g. roughage products), must be accompanied with a label/specification sheet and an organic certificate (or other certification documentation) showing that the agricultural ingredients are certified organic.

Please note that feed additive or supplement manufacturers do not need to be certified, but they must be able to supply current organic certification documents for any agricultural ingredients that are used in the feed additives or supplements. Livestock producers must maintain supporting certification documentation with their feed input documents for the organic inspector to review.

Medical Treatments

1. **Feed Supplements used for Acute Conditions (Medical Nutritional Supplements):** If you are making the argument that a feed supplement, which contains non-organic agricultural ingredients, is being used as a medical treatment, the label must clearly denote that the product is to be used for an acute medical treatment on a short-term basis. Examples would be a calcium product with agricultural ingredients used for Ketosis (milk fever) or a feed supplement product containing high levels of electrolytes and nutrients for a calf that has scoured due to shipping stress. Additionally, you will be asked by QAI to submit a procedure outlining the acute condition and time frame for which the product will be used. You will also need to keep a journal detailing the acute condition and length of use so that the inspector can verify that the supplement has been used for medical purposes only.
2. **Homeopathic tinctures and herbal preparation products:** Livestock producers, especially dairy producers, traditionally use homeopathic tinctures or herbal products as health treatments. Again if these products contain non-organic agricultural ingredients, they may be allowed for use if it can be justified that they are used as a medical treatment only. If the herbal product has a health claim and is used on a limited basis, then non-organic sources of the herbs or tinctures will be accepted. Nevertheless, Organic herb preparations and tinctures are becoming more and more commercially available, so QAI's approval for non-organic herbal preparations will be given on a

temporary basis, and a time-line for sourcing and using organically sourced herbal products must be provided.

Carriers in Vitamins/Minerals: The NOP has made it very clear that carriers for feed additives must be organic if from agricultural ingredients. As such, if there are agricultural ingredient carriers listed in the ingredient statement of the FDA/AAFCO allowed vitamins and minerals pre-packs, the carriers must be from organic sources.

Going Forward

QAI realizes that this is a change to previous NOP interpretation with regards to supplements and feed additives. We will be contacting all livestock clients, including dairy and egg producers, individually to discuss the issue in greater detail.

Please note that any livestock feed additive or supplement with non-organic agricultural ingredients fed to organic livestock that has been purchased after the date of this notification will be cited as a major non-compliance due to use of a prohibited substance. Invoices, or other purchase documentation, must be kept on file and made available to the QAI inspector to demonstrate the date of purchase and the quantities purchased. **Suspension of certification may result from the continual use of feed, supplements, or additives containing non-organic agricultural ingredients.**

Please contact your Account Coordinator if you have any questions.