Brief Introduction to Requirements for Production of Organic Livestock Feed according to Regulation (EC) 834/2007[1]

1. Scope:

- ❖ This document applies to commercial production of concentrated, compound, and supplementary feed
- ❖ Farms producing feed for their own animals need to comply with most of the requirements described here, but do not need a separate certification for this purpose
- ❖ Farms selling hay, silage and similar "roughage", need a certification only for crop production.

2. Where to find the requirements for organic feed production:

Basic rules	Reg. (EC) 834/07; Art. 7 and 18
General provisions for composition	Reg. (EC) 889/08; Art. 22
Allowed feed materials (other than organic plant products)	Art. 22 and Annex V
Allowed (non-agricultural) additives	Annex VI

3. Origin of organic raw materials:

- ✓ First of all (which may be self-evident for many), all feed producers must understand that **only certified organic raw materials** can be used for organic feed – with the exceptions listed below.
- ✓ Only **EU certified** raw material can be used for products for the EU market
- ✓ The organic feed producer must introduce a reliable procedure for **verifying the organic condition** of the raw material that the company receives. A **risk assessment** should be done for different suppliers, and adequate measures established for minimising risks (e.g. residue testing, supplier audits).
- ✓ Except for open raw material, arriving directly from the field, only **packed** and labelled products can be accepted for organic processing, unlabelled products should be returned to the supplier. Trucks and transport containers must be properly sealed. The waybill must include all the necessary information

4. Non-organic agricultural ingredients:

Most exemptions for use of non-organic feed have been phased out in the course of the last years, remaining only the following:

Provision for the farmer	**Implications for Complete Feeding stuffs[2]**	**Implications for Complementary Feeding stuffs[3]**
Up to 5% conventional protein concentrates in the yearly ration (for non-herbivores only)	Maximum 5%	Higher percentage is possible – the label must include the respective "feedings indications"!
Up to 1% of the sum of conventional spices, herbs and molasses – provided these ingredients are not available from organic sources	Maximum 1%	
Up to 30% feed from production "in conversion" (from the second year on)	Maximum 30%	

5. Additives:

Additives must be **limited** to those that are absolutely **necessary**. Non-agricultural additives are restricted to those listed in Annex VI. Please note that this Annex changed as of May 2016! Some specifics to be taken into account:

- ✓ Products from **sustainable fishery** can be used only for **non-herbivores**. Sustainability of fishery can be proven e.g. through a MSC certificate
- ✓ Inactivated or killed **yeast** may be used from non-organic sources – but **not** with **carriers** of agricultural origin (e.g. malt sprouts)

---

[1] Inside the EU, the Regulation has to be implemented in a "conform" way (1:1), while outside the EU; it can be implemented only in an "equivalent" way. Please refer to the CERES document 4.1.1 for further details.

[2] Complete feeding stuffs: Compound feed that contains all the necessary ingredients for the respective species. This is common e.g. for poultry.

[3] Complementary feeding stuffs: Product that is added to other feed, coming e.g. from the own farm.

- ✓ Only the **acids** listed in Annex VI are allowed as **preservatives**, not their respective salts!
- ✓ Use of vitamins is restricted to those derived from agricultural products, or identical to these. For **ruminants, only vitamins A,D,E** are allowed from synthetic origin. Inside the EU, this is subject to authorisation by the competent authority. In third countries, use of vitamins for ruminants is subject to authorisation by the respective control bodies at the farm level.
- ✓ **Ethoxyquin** is a common anti-oxidant (preservative) used in feed, which is not allowed in organic feed production. Some EU member countries authorise ethoxyquin **only for stabilising vitamin A**, but not for other purposes! In third countries, CERES authorises ethoxyquin for the same purpose as "equivalent".

6. Separation:

- ✓ Some companies produce only organic, but most do both: organic and conventional.
- ✓ These latter have to set up a **good system for separating organic products from conventional** ones: from the moment of reception of the raw material, through all steps of processing, storage, etc., up to sale.
- ✓ The best separation, of course, is **in space**: have separate warehouses and processing lines for organic.
- ✓ However, this may often not be possible; in this case, you can separate **in time**: you process organic at different times on the same line as conventional; before processing organic, you have to **clean** the line.
- ✓ Feed manufacturing normally involves a **continuous process**, using equipment that cannot be cleaned easily. The operator must make sure that at the beginning of organic processing; a reasonable quantity of organic product is used for "**flushing**" the line, and sold as conventional.
- ✓ Special attention must be given to the risk of **contamination** of organic feed with genetically modified (**GM**) crops. Very small residues of e.g. GM maize, soybeans or rapeseed can lead to positive laboratory results!
- ✓ Where separate warehouses are not feasible, an adequate **separation within the existing storage** room may be sufficient: e.g. rows separated by a line on the floor, or separate shelves, properly labelled.

7. Documentation:

- ✓ An organic producer needs an **organic management plan.** If the company has a quality management system, the quality handbook should contain a chapter referring specifically to processing of organic food.
- ✓ Wherever parallel production of organic and conventional products takes place, bags, containers, boxes with organic products have to be **labelled**, at all steps throughout your facility.
- ✓ The operator has to keep and file **supplier certificates, waybills, reception notes, processing records, storage books, and invoices**; all these records have to refer to "organic".

8. Pest control, sanitation, polluting substances:

- ✓ Before using any substances for **pest** control, the operator must take the necessary steps for **preventing** them.
- ✓ The operator must make sure that the organic product at **no moment** comes into touch with **polluting substances**, such as fuels, pesticides, wood preservatives, detergents, moulds etc.
- ✓ For **pest control on stored products**, only substances mentioned in Annex II of Reg. (EC) 889/08 are allowed.
- ✓ For cleaning, sanitation, and pest control of processing lines and rooms, the general rules of "good manufacturing practice" apply. The processor must take the necessary measures in order to avoid contamination by detergents, disinfectants or pesticides.
- ✓ Beyond this, CERES has a policy that after application of conventional pesticides in a processing facility, the **waiting time** until bringing organic products into the respective room has to be **doubled**, as compared to the time officially indicated for the respective substance; all surfaces, which enter into contact with the organic product, have to be rinsed with abundant clear water.

9. Labelling:

- ✓ Processed feed may carry the **EU organic logo**, provided that:
  - **All** ingredients from plant and animal origin are organic
  - At least **95%** of the **total dry matter** (including minerals and other additives!) are organic

  Please refer to our "Brief Info on Organic Labelling" for further details about the EU organic logo
- ✓ Feed containing less organic ingredients, but complying with the requirements from Section 4 and 5 above, may carry a reference "**Can be used in** organic production according to Regulation EC 834/2007".
- ✓ Furthermore, the label **must include**:

	% of agricultural ingredients (DM[4])	**% of total DM**	**Which ingredients / additives**
Total agricultural ingredients		x	
Ingredients from organic production	x		x
Ingredients from production in conversion	x		x
Conventional ingredients	x		x
Minerals and additives		x	x

- ✓ The certifier code number (XY-BIO-140 [5] for CERES)

! *Please be aware that this is only a selection of essential requirements of the organic standard, meant as an introduction. The operator, of course, has to learn about and meet <u>all</u> requirements of the respective standard.*

[4] DM = Dry matter
[5] XY stands for the respective country code – see our Brief Info on Organic Labeling