



Guidance

Evaluating Allowed Ingredients and Sources of Vitamins and Minerals For Organic Livestock Feed

1. Purpose

This guidance clarifies the agricultural, nonsynthetic, and synthetic ingredients permitted in organic livestock feed. This guidance also addresses the feed supplements and feed additives that must be reviewed for compliance with the USDA organic regulations.

2. Scope

This guidance applies to all National Organic Program (NOP) certifying agents, certified and exempt organic livestock producers, and suppliers of feed, feed supplements, and feed additives.

3. Background

Animal feed labeling requirements are regulated by the U.S. Food and Drug Administration (FDA) at 21 CFR § 501. Feed additive requirements, the list of approved feed additives that are generally recognized as safe (GRAS), and the substances prohibited from use in animal feed are published in 21 CFR §§ 570-571, § 573, § 582, § 584, and § 589. The FDA also recognizes the list of additives and feedstuffs published in the Association of American Feed Control Officials (AAFCO) *Official Publication*, which is updated and published annually.¹

Under the USDA organic regulations, organic producers must provide livestock feed pursuant to 7 CFR § 205.237. Section 205.237 states that agricultural ingredients included in the ingredients list for livestock feed products must be organically produced. Pasture and range used for feed and forage must be certified organic.² All forages, feed, and feed supplements must be listed in the organic system plan, as required at § 205.201(a)(2). Pursuant to § 205.402(a)(1), certifying agents must verify that all forage, feed, feed supplements, and feed additives provided to organic livestock comply with the requirements in § 205.237.

4. Policy

- 4.1 Certified organic livestock operations must feed organic animals certified organic livestock feed, including all pasture and forage crops (§ 205.237(a)).

¹ Copies of AAFCO's *Official Publication* may be obtained through their Assistant Secretary-Treasurer. For more information, please go to their website at <http://www.aafco.org>.

² Please see the Pasture Guidance series *NOP 5017* in the *NOP Program Handbook* for detailed information regarding pasture access and management.



- 4.1.1 Certified operations must describe all forages, feed ingredients, formulated feed products, feed supplements, and feed additives in the organic system plan (OSP), as required at § 205.201(a)(2).
- 4.2 Feed additives and supplements include:
- 4.2.1 Nonsynthetic, nonagricultural ingredients, including direct-fed microorganisms (“probiotics”), yeast, and enzymes are allowed in organic feed under § 205.237 provided that excluded methods, as specified by § 205.105(e), are not used in their production.
- 4.2.2 Allowed synthetic feed additives and supplements as listed in § 205.603 can be used as ingredients in organic livestock feed as per § 205.237(a).
- 4.2.3 Minerals and vitamins in feed additives or feed supplements identified as approved by the FDA at 21 CFR § 501, §§ 510-558, §§ 570-571, § 573, § 582, § 584, § 589, or listed in the current edition of the AAFCO *Official Publication* (Mineral Products or Vitamins), including metal amino acid chelates, metal amino acid complexes, and metal (specific amino acid) complexes are permitted with the following limitations:
- a. Proteinated mineral sources (metal proteinates) containing protein sourced from slaughter by-products or produced by excluded methods are not permitted when fed to poultry or mammals.
 - b. Minerals sourced from bone such as bone charcoal, bone meal or bone phosphate are considered slaughter by-products and are also not permitted in feed for poultry or mammals.
 - c. Individual minerals and vitamins and minerals may contain other ingredients that are considered part of the approved vitamin or mineral source. For example, “Vitamin A supplement” has an AAFCO official feed definition as “forms of Vitamin A that contains a minimum of guarantee of two million International Units of Vitamin A per pound.”³ Minor ingredients such as carriers that may be part of the formulation of the Vitamin A supplement need not be further reviewed.
- 4.2.4 All agricultural ingredients included in the ingredients list for livestock feed additives and supplements (i.e. wheat middlings, rice hulls, vegetable oil, or molasses) used as carriers, diluents, or dust suppressants for the final formulated feed must be certified organic (§ 205.237(a)).

³ AAFCO Official Publication, 2011, Section 90.14, Vitamin A Supplement.



- a. If the product is a premix containing combinations of vitamins and minerals that are mixed with other ingredients, all agricultural ingredients, including carriers and diluents, on the labels of these products must be organic. If the product is purchased in bulk and is not labeled, the purchaser should review the complete ingredients list from the supplier to verify that all agricultural ingredients are organic.
 - b. Pursuant to § 205.237(b)(5), agricultural ingredients cannot be sourced from slaughter by-products from poultry or mammalian sources (if being fed to poultry or mammals).
- 4.3 Livestock feed sold, labeled or represented as “100% organic” must contain only organically produced and handled agricultural products certified under the NOP regulations, for a total content of 100% organic ingredients. All feed additives and other ingredients must be organic.

5. Procedures for Certifying Agents

- 5.1 Certifying agents must verify that all forages, feed ingredients, formulated feed products, bulk feed products, feed supplements, and feed additives fed to organic livestock comply with the USDA organic regulations (§ 205.402(a)(1); § 205.237).
- 5.2 Livestock feed additives and supplements may be certified organic if they contain agricultural content that meets the USDA organic requirements, and the formulated products are compliant with USDA regulations per § 205.301(e) and § 205.306.

6. References

6.1 USDA Organic Regulations

§ 205.2 Terms defined.

Feed. Edible materials which are consumed by livestock for their nutritional value. Feed may be concentrates (grains) or roughages (hay, silage, fodder). The term, “feed,” encompasses all agricultural commodities, including pasture ingested by livestock for nutritional purposes.

Feed additive. A substance added to feed in micro quantities to fulfill a specific nutritional need; i.e., essential nutrients in the form of amino acids, vitamins, and minerals.

Feed supplement. A combination of feed nutrients added to livestock feed to improve the nutrient balance or performance of the total ration and intended to be:

- (1) Diluted with other feeds when fed to livestock;
- (2) Offered free choice with other parts of the ration if separately available; or
- (3) Further diluted and mixed to produce a complete feed.



§ 205.237 Livestock feed.

(a) 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 handled by operations certified to the NOP, except as provided in § 205.236(a)(2)(i), except, that, synthetic substances allowed under § 205.603 and nonsynthetic substances not prohibited under § 205.604 may be used as feed additives and feed supplements, *Provided*, That, all agricultural ingredients included in the ingredients list, for such additives and supplements, shall have been produced and handled organically.

...

(b) The producer of an organic operation must not: ...

(5) Feed mammalian or poultry slaughter by-products to mammals or poultry;

(6) Use feed, feed additives, and feed supplements in violation of the Federal Food, Drug, and Cosmetic Act;...

§ 205.301 Product composition.

...

(e) *Livestock feed.*

(1) A raw or processed livestock feed product sold, labeled, or represented as “100 percent organic” must contain (by weight or fluid volume, excluding water and salt) not less than 100 percent organically produced raw or processed agricultural product.

(2) A raw or processed livestock feed product sold, labeled, or represented as “organic” must be produced in conformance with §205.237.

§ 205.306 Labeling of livestock feed.

§ 205.603 Synthetic substances allowed for use in organic livestock production.

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(d)(2) Trace minerals, used for enrichment or fortification when FDA approved.

(d)(3) Vitamins, used for enrichment or fortification when FDA approved.

6.2 AAFCO Definitions

Carrier: An edible material to which ingredients are added to facilitate uniform incorporation of the latter into feeds. The active particles are absorbed, impregnated or coated into or onto the edible material in such a way as to physically carry the active ingredient. (AAFCO 2012 Official Publication)

Diluent: An edible substance used to mix with and reduce the concentrate of nutrients and /or additives to make them more acceptable to animals, safer to use, and more capable of being mixed uniformly in a feed. (AAFCO 2012 Official Publication)



6.3 Other Laws and Regulations

21 CFR § 501 Animal Food Labeling

21 CFR § 582 – 584 Substances Generally Recognized As Safe (GRAS)

21 CFR § 589 Substances Prohibited from Use in Animal Food or Feed

Association of American Feed Control Officials (AAFCO) Official Publication

6.4 NOP Program Handbook

NOP 5017 – Pasture Series

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