Guidelines n°26:

RULES ON COMPOSITION AND LABELLING OF ANIMAL FEED

according to EU Regulation (EC) no.834/2007 and no.889/2008

These guidelines shall not apply to feed processed on the farm by livestock operators (or subcontracted to a third party service provider), please refer to specific guidelines on livestock production.
I. Scope

Guidelines apply to feed intended for animals which may be eligible for organic certification as per R(EC) 834/07 and 889/08 i.e. from the following species: bovine, equidae, ovine, caprine, porcine, poultry and aquaculture livestock such as fish and shellfish. (NB: Guidelines do not apply to bees as external feed supplements are mostly prohibited and with very few exceptions. Guidelines do not apply to molluscs and echinoderms either as they are not fed by keepers)

The scope of the European regulation does not include pet food or feed for fur animals.

However, organic pet food may be eligible for certification as per national standards or private labels recognized by Member States, as France does.

Feed for pets and for animals bred for fur are not eligible. However, organic feed for pets can be certified according to national regulation or private standards which are approved by the Member States, as it happens for France.

II. Process

A. General rules

The current European organic regulation does not provide a detailed list of authorised and unauthorised processes. However a few items have been clearly identified as malpractices with regards to organic certification:

- **The use of ionising radiation** for the treatment of organic food, animal feed or raw materials used in organic food or animal feed.
- **The use of GMOs** and products processed from or with GMOs as food, animal feed, processing aids and micro-organisms.
- **Organic processed feed must contain feed materials and may not be processed using chemical solvents.**
- The use of substances and techniques restoring product quality that has been lost through processing and storage of organic food and feed, or even through negligence in the processing of the products (e.g. : nanotechnology).
As a general rule, operators must:

- Take all precautionary measures to prevent cross-contamination by unauthorised substances or products
- Implement suitable cleaning measures, monitor their effectiveness and record these operations
- Ensure that non-organic products are not marketed with a statement referring to organic production
- Be able to provide the control body with updated records of all operations and quantities processed (manufacturing factsheet)

Special attention should be paid to risk factors of cross-contamination by GMO, medicinal additives, pesticides and chemical aminoacids.

**B. Mixed operations**

When both non-organic and organic products are prepared, packaged or stored in the same facility, then operators must:

- Carry out the organic operations continuously until the complete run has been dealt with
- Separate by place or time organic operations from similar operations performed on non-organic products (ibid. for storage of feed materials and finished products).
- Take necessary measures to ensure identification of lots (traceability)
- Carry out operations on organic products only after complete emptying and suitable cleaning of the production equipment (if a full clean out of the equipment cannot be achieved in between organic and non-organic production, the first production runs must be downgraded to non-organic)

NB: For processors and distributors, the European organic regulations do not provide a restrictive list of products for cleaning and sanitisation (this type of list may be found only for breeders and aquaculture farmers). Therefore, general legislation on food processing applies.
III. Transport of organic products

A. Bulk collection of products and transportation to production and preparation units

Simultaneous collection of organic and non-organic products may be allowed provided:

✓ Appropriate measures are taken to prevent any possible mixture or exchange and to ensure the identification of the organic products

✓ Operators keep a record of the information relating to collection days, hours, circuit and date and time of reception of the products available to the control body.

B. Feed transport

1. Packaging and transport of products to other operators or units

Organic products must be carried in packaging, containers or vehicles closed and provided with a label stating the following details:

✓ Name and address of the operator

✓ Name of the product

✓ Reference to the organic production method

✓ Name and/or code number of the control body

✓ Lot identification mark if applicable

2. Specific rules

The transport of processed feed for organic animals must be well separated in terms of time and space from other processed goods being transported.

Quantities of products delivered including all delivery location details should be recorded.

Vehicles and containers which have been used previously for the transport of non-organic must be cleaned out adequately before if may be used for the transport of organic raw materials and feed. Clean out operations must be documented and records must be made available to the control body.
IV. Composition of feed

A. General rules

All additives, feed materials and substances listed as feed ingredients for organic animals must be GMO-free or not produced from GMOs, i.e. not derived, in whole or in part from GMOs but not containing or consisting of GMOs.

An organic ingredients list must not include simultaneously organic and non-organic forms of the same ingredient.

The use of growth hormones and chemical aminoacids are prohibited.

Depending of the animal, specific rules on the composition of feed shall apply.

There are 2 main types of feed:

- "complete feedingstuff": ingredients complying with the regulation requirements on all aspects, especially on the aspect of approved levels of in-conversion organic and conventional. Suitable for daily feed ration.

- "supplementary feedingstuff ": mix of ingredients containing high levels of specific substances (e.g. in conversion ingredients > 30% for livestock animals). Suitable for daily feed ration provided they are combined with other food.

B. Specific rules on livestock animals (mammals, poultry)

1. Agricultural feed materials

   a. Organic

   - Plant origin: no restriction

   - Animal origin: exclusively those listed in Annex V.2 of R(EC) 889/08 in compliance with EU restrictions (ex: only milk products for herbivores)

   b. Conversion year 2 (C2)

   - Plant origin: no restriction on the type, maximum 30% in average of yearly feed ration (% of dry feed solids of plant origin)

   - Animal origin: there is no concept of in-conversion animal product in EU organic regulation, therefore considered as conventional
c. Conversion year 1 (C1)
Feed materials from plots within their 1st year of conversion are considered as conventional.

NB: Livestock operators producing their own feed from their own plant production may use up to 100% of C2 plant production or integrate to the feed 20% of following C1 plant production: pastures, permanent grassland crop, annual fodder crops, protein crops sowed on C1 areas.

d. Conventional
For herbivores, conventional agricultural feedstuff is prohibited.

For monogastric animals (porcine, poultry), if they are not available under organic form, feed materials of plant and/or animal origin listed in Annex V.1-2 of R(EC) 889/08 may be used for feed under conventional form until 31 December 2011; in their daily ration, the feed materials may not go over a yearly average of 5% of the total amount of agricultural feed (calculated on the basis of dry solids).

2. Other substances

a. Feed materials of mineral origin
Resources listed in Annex V.3 of R(EC) 889/08 (for the following minerals: sodium, potassium, calcium, phosphorus, magnesium and sulphur) may be used in all cases.

b. Nutritional additives
Sources of trace elements listed in Annex VI.11 of R(EC) 889/08 may be listed in all cases.

Natural vitamins and chemical vitamins identical to natural ones may be used for monogastric animals.

For herbivores, on top of natural vitamins, only chemical vitamins A, D, E which are identical to natural ones may be used.

c. Zootechnical and technological additives
Enzymes and micro organisms as well as preservative, antioxidant, binding and anti-caking agents listed at Annex VI 1.3 may be used in all cases.

d. Other substances
*Saccharomyces cerevisiae* and *Saccharomyces carlsbergiensis* yeasts may be used in all cases.
### C. Specific rules for aquaculture animals (fish, shellfish)

#### 1. Feed materials of agricultural origin

<table>
<thead>
<tr>
<th>Animal types</th>
<th>Main source</th>
<th>Other sources when not available</th>
<th>Composition (%) and other restrictions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Carnivorous species</strong></td>
<td>Feed originating from <strong>Organic</strong> aquaculture</td>
<td>Fishmeal and fish oil from trimmings of <strong>non-organic</strong> fish (bred thru aquaculture or caught for human consumption in non-sustainable fisheries until 31/12/14, and max 30% of daily feed ration)</td>
<td>No more than 60% of organic plant products in the daily feed ration</td>
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<tr>
<td></td>
<td>Fishmeal and fish oil from trimmings of <strong>organic</strong> fish caught for human consumption in sustainable fisheries</td>
<td></td>
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<tr>
<td></td>
<td><strong>Organic</strong> feed materials of plant and animal origin (as listed in Annex V with some restrictions)</td>
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<tr>
<td><strong>For salmon and trout:</strong></td>
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<tr>
<td></td>
<td><strong>Organic</strong> Astaxanthin (extracted from the shells of organic shellfish)</td>
<td>Astaxanthin of natural origin (e.g. : Phaffia yeast)</td>
<td></td>
</tr>
</tbody>
</table>
### Animal types

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<td><strong>Fish in in-land waters:</strong> Carp and related species produced in the context of polyculture (perch, strurgeon, atlantic wolffish, vendace, pike...)</td>
<td>As a rule, no external source of feed (only natural feedstuff from lakes and ponds)</td>
<td>Organic feed of plant origin or seaweed</td>
<td></td>
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<tr>
<td><strong>Shellfish:</strong> Penaeid shrimps and freshwater prawns</td>
<td></td>
<td></td>
<td>For shellfish and panga: Fishmeal and fish oil from sustainable fisheries Maximum 10%</td>
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<tr>
<td><strong>Freshwater tropical fish:</strong> tilapia, chanos, panga.</td>
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</table>

### 2. Other substances

#### a. Feed materials of mineral origin

Resources listed in Annex V.3 of R(EC) 889/08 (for the following minerals: sodium, potassium, calcium, phosphorus, magnesium and sulphur) may be used in all cases.

#### b. Nutritional additives

Sources of trace elements listed in Annex VI.11 of R(EC) 889/08 may be listed in all cases. Natural vitamins and chemical vitamins identical to natural ones may be used for monogastric animals.

#### c. Zootechnical and technological additives

Enzymes and micro organisms as well as preservative, antioxidant, binding and anti-caking agents and organic lecithin (emulsifier) listed at Annex VI 1.3 may be used in all cases.

#### d. Other substances

*Saccharomyces cerevisiae* and *Saccharomyces carlsbergiensis* yeasts may be used in all cases.
V. Rules on labelling

A. Basic rules
These rules apply to feedstuff, processed feedstuff and feed material ingredients in feedstuff.
All feedstuff, including those which do not contain feed material ingredients from organic farming, should be inspected and certified in order to be eligible for a label referring to "organic farming" or "feed for organic animals".

B. Mandatory references

1. References to organic farming
« produce from organic farming »:
applies to feedstuff containing at least 95% (dry solids) of feed material of organic farming origin (i.e. less than 5% for conventional and in-conversion products, minerals and additives). The % portion should be calculated in relation with the total weight (dry solids), not in relation with only the agricultural portion.
« may be used for organic farming in accordance with regulations (EC) N° 834/2007 and 889/2008»:
applies to feedstuff containing less than 95% (dry solids) overall of feed materials from organic farming origin.
Regulation states that the above references should be displayed choosing a color, format or font, which should not make it stand out more than the feed name.

2. References to the control body
The code number of the control body is mandatory in the display; control body name may also be displayed.

3. List of ingredients
Feed materials from organic farming or in-conversion should be listed.

4. Calculation format: 4 types of % (dry solids weight)
✓ % of feed materials of organic farming origin
✓ % of feed materials from in-conversion farming
✓ % of conventional feed materials (neither organic nor in-conversion):
  conventional feed and minerals
✓ % of feed materials from farming (organic + in-conversion + conventional)
VI. Definitions

**Feed additives**: (REC 1834/2003)

means substances, micro-organisms or preparations, other than feed material and premixtures, which are intentionally added to feed or water in order to perform, in particular, one or more of the following functions:

- favourably affect the characteristics of feed
- favourably affect the characteristics of animal products
- favourably affect the colour of ornamental fish and birds
- satisfy the nutritional needs of animals
- favourably affect the environmental consequences of animal production
- favourably affect animal production, performance or welfare, particularly by affecting the gastro-intestinal flora or digestibility of feedingstuffs
- have a coccidiostatic or histomonostatic effect

**Feed (or feedingstuff)**: (REC 178/2002)

means any substance or product, including additives, whether processed, partially processed or unprocessed, intended to be used for oral feeding to animals.

**Feed materials**: (DIR 96/25/EC)

various products of vegetable or animal origin, in their natural state, fresh or preserved, and products derived from the industrial processing thereof, and organic or inorganic substances, whether or not containing additives, which are intended for use in oral animal feeding either directly as such, or after processing, in the preparation of compound feedingstuffs or as carriers of premixtures.

**Conversion**: (Article 2h REC 834/07)

means the transition from non organic to organic farming within a given period of time, during which the provisions concerning the organic production have been applied.

**In-conversion feedingstuffs**: (Article 2i REC 889/08)

means feedingstuffs produced during the conversion period to organic production, with the exclusion of those harvested in the 12 months following the beginning of the conversion.
VII. References and EU Regulations

European regulation n°834/2007 of 28 June 2007
(Rules & regulation)

Article 9 – Prohibited use of GMO
Article 14(1)d – General rules on feed for livestock animals
Article 15(1)d – General rules on feed for aquaculture livestock
Article 18 – General rules on processing animal feed

European regulation n°889/2008 of 5 September 2008
(implementation rules)

Article 19, 20, 21, 22, 43 + Annexes V & VI
– Rules of composition for feed of livestock animals.
Articles 25(11) to 25 (14) + Annexes V & VI
– Rules of composition for feed of aquaculture animals.
Articles 26 & 35 – Process & storage
Articles 30, 31 & 32 – Transport
Articles 59, 60 & 61 – Labelling
Articles 87 to 90 – Control requirements

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