

Guidance Notes for Farmers on the use of Organic and Permitted Non-Organic Animal Feeds

Note : Information in this leaflet is correct at time of publication and is intended for guidance only.

Please refer to the OF&G Control Manual for full details of legislation and interpretation and to the OF&G Technical Newsletters, for updates. Organic requirements are in addition to statutory legislation

Livestock that are organic or in-conversion must normally be fed only organically produced feedstuffs. However, because these have been in short supply, there has been a derogation to allow the use of some non-organic, non-GM feedstuffs. This derogation expired on 24/08/05.

There is now a new derogation in place that allows reduced amounts of non-organic feedstuffs, but justification is required for their use. (Details are given below and in Section 8.4 of the revised OF&G Control Manual.)

All Mills supplying compound feeds for converting or organic animals must be registered with one of the Defra approved Organic Certification Bodies, such as OF&G.

Feed Records detailing the type and amounts of all feeds used must be kept by the farmer (OF&G Record Sheet 20 can be used for this purpose). Remember, only ingredients listed in Section 8.4 of the OF&G Control Manual may be used as the non-organic portion of the feed. Only the non-organic feeds on the Green List (see below) can be used by farmers without a derogation from OF&G.

PERCENTAGE OF NON-ORGANIC FEED ALLOWED FROM 25th AUGUST 2005

For herbivores/ruminants:-

A maximum of 5% non-organic feed from 25/8/05 until 31/12/07.
After this time, feed must be 100% organic.

For pigs, poultry and other non-ruminant species:-

A maximum of 15% non-organic feed from 25/8/05 until 31/12/07.
A maximum of 10% non-organic feed from 1/1/08 until 31/12/09.
A maximum of 5% non-organic feed from 1/1/10 until 31/12/11.
After this time, feed should be 100% organic.

These percentages are to be calculated on an annual dry matter basis of ingredients from agricultural origin. The maximum daily non-organic allowance is 25% dry matter.

Please note: The information above is now Statutory Law. The information below is OF&G Guidance and may be subject to amendment. We will keep you updated by means of our Technical Newsletters.

PERMITTED NON-ORGANIC INGREDIENTS

Defra has made it clear that fully-organic feed should be used wherever possible and that the new derogation allows non-organic feed to be used only where organic feed is not available.

However, Defra accepts that organic forms of certain feedstuffs may not currently be available in sufficient quantities. These are listed below in the 'Green List'.

THE GREEN LIST

Non-organic ingredients that can be used by a farmer without a derogation from OF&G but only where the same material or a suitable alternative is not available as organic.

1 st Year conversion forage (only own feed grown on farm for own use)	
Maize gluten meal (Prairie Meal)	
Potato Protein	Wheat middlings
Brewers' grains	Rape seed expeller
Sunflower seed expeller	Egg and egg products
Fish, other marine animals and their by-products	
Sugar beet pulp	Molasses
Powders and extracts of plants	Seaweed meal
Spices and herbs	Vegetable oils (physical extraction)
Milk and milk products (non-organic milk replacer)	

This Green List will be reviewed regularly by Defra and items will be removed from the list as soon as organic sources become available in sufficient quantity. We will keep you updated via our Technical Newsletters.

FEED MATERIALS ON THE GREEN LIST

Farmers can use these feedstuffs, within the non-organic allowances listed above, without applying to OF&G for a derogation. However, in every case, they must complete OF&G Record Sheet 25 'Non-Organic Feed Justification Record', to record the reason for using a non-organic feed and the efforts that have been made to obtain the organic version.

A copy of the completed Non-Organic Feed Justification Record RS25, together with copies of any relevant evidence, must be given to the Inspector at each inspection. These will be returned to the Certification Office for assessment and reporting to Defra.

FEED MATERIALS NOT ON THE GREEN LIST

Where farmers wish to use a non-organic feedstuff that is not on the Green List, but is listed in Section 8.4 of the OF&G Control Manual as a permitted non-organic feed, they must first apply to OF&G, with written justification. (OF&G Record Sheet 26 'Non-Organic Feed Derogation Application Form' must be used for this purpose.) The request must be approved, in writing, by OF&G before the feed is bought.

Note: Defra does not expect there to be many of these applications because there are sufficient organic sources of these feedstuffs. All requests for non-organic feeds not on the Green List, whether approved or not, will be referred to Defra so that they can monitor the situation.

COMPOUND FEEDSTUFFS

Where farmers are buying in part-organic compound feeds it is the Feed Compounder that applies for the derogation from their Certification Body. The farmer must however keep a copy of the product label, attached to the Non-Organic Feed Justification Record RS25. This will act as written justification for the unavailability of the organic form of the ingredient.

FEED ALREADY PURCHASED / PACKED

For non-organic feeds already on farm, or ordered before 31/7/05, no derogation is required. However farmers must keep a record of any non-organic feedstuffs that have been used and justify their use on the Non-Organic Feed Justification Record.

OF&G expects these feeds to have been used by 31/10/05. If these feeds are to be used after this date then a derogation is required for products not on the Green List. (For products on the Green List, a Non-Organic Feed Justification Record RS25, must be completed.)

PLEASE NOTE

These new requirements take effect from 25/8/05.

GREEN LIST, TECHNICAL LEAFLETS AND RECORD SHEETS

Any amendments to the Green List will be published in our 2-monthly Technical Newsletter. Please make sure you read it!

All OF&G Record Sheets and Technical Leaflets can be obtained from the OF&G Certification Office or downloaded from our website.

GENETICALLY MODIFIED INGREDIENTS

Genetically modified organisms, or materials derived from them, are not permitted in organic farming. All OF&G-registered feed mills will be required to sign a statement that they “will take all reasonable precautions and exert all due diligence to ensure that approved feeds are free of GMOs and their derivatives.” Farmers buying non-approved feeds (eg for animals that will shortly be converted to organic) must request a similar statement from their feed supplier.

IMPORTANT NOTE: Feed can no longer be labelled as ‘GM-free’ or ‘Non-GM’. The law has changed and feeds can now only refer to GMOs if they contain them. So OF&G can no longer request that feed labels carry a non-gm statement.

The following information has not been affected by the recent change in the feed derogation.

PROHIBITED MATERIALS

Feed used for organic livestock must not contain the following:

- Materials produced with the use of genetically modified organisms or products derived from them
- Feedstuffs that have been solvent extracted or to which chemicals have been added
- Synthetic amino acids or amino acid isolates
- Urea and other synthetic nitrogen compounds
- Synthetic growth promoters or stimulants
- Synthetic appetisers/flavourings
- Preservatives (other than those listed in Section 8.4 of the Control Manual)
- Artificial colouring agents
- All types of excrement including droppings, dung, manure
- Farm animal by-products (eg abattoir waste)
- Ingredients that have been subject to ionising radiation
- Medicated ingredients (except under Veterinary prescription and with derogation)
- Non-food ingredients and fillers
- Fats and oils used to produce high energy diets for quick maturing or high levels of production

ADDITIONAL SPECIFIC REQUIREMENTS FOR RUMINANT FEEDS

- Synthetic vitamins A,D & E are only permitted on an as-needed basis and must have a derogation from OF&G. Feeds containing these vitamins should be labelled as "Restricted".

ADDITIONAL SPECIFIC REQUIREMENTS FOR NON-RUMINANT FEEDS

- Roughage, fresh or dried fodder or silage must be added to the daily ration for housed pigs and poultry

NOTE: The requirement that at least 65% of the feed for table birds be made up of cereals has now been deleted

IMPORTANT: It is the farmer's responsibility to make sure his/her livestock are fed according to the Standards in the OF&G Control Manual and obtain derogations where relevant. It is the feed mill's responsibility to label the feeds clearly and correctly. (For bulk feeds, a label should be attached to the delivery note.)

Please contact your Certification Officer if you have any questions.

Contact details are given below.

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