Products for feeding including silage additives

Basic Admission Criteria

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1. Introduction

This document is published by the Research Institute of Organic Agriculture (FiBL) and EASY-CERT services GmbH organic inputs evaluation (EASY-CERT). It describes the criteria that need to be fulfilled in order for feeding products / silage additives to be included in any of the FiBL and EASY-CERT Input Lists. Additional criteria may apply for products to be included in a national list or a list of a private association for organic farming. The document will be updated whenever necessary. The most recent version, which is available on the websites of FiBL (www.input-list.com) and EASY-CERT (www.betriebsmittelbewertung.at), is the only valid version.

Requirements of EU organic legislation regarding feed and feeding

EU organic farming is governed by a 'framework regulation' plus an 'implementing regulation'.

Under the current organic legislation, Article Art. 8 and Art. 24) 1) d) of Reg. (EU) 2018/848 outline the principles of processing of organic feed, Annex III of Reg. (EU) 2021/1165 lists those substances that may be used as feed materials (Part A) and feed additives (Part B).

The Basic Admission Criteria

The Basic Admission Criteria, developed by FiBL and EASY-CERT, are a competent interpretation of this legislation (see above), enabling a standardised evaluation of inputs for organic farming in Europe and a harmonised, cross-border approach. They provide the basic requirements that must be met for products to be included in any of the FiBL and EASY-CERT Input Lists.

Since national legislation is nevertheless relevant with regard to the categorization of certain products, there may be national differences in the conformity of individual products, due to applicable national legislation.

Scope of products included

The FiBL and EASY-CERT Input Lists cover all kinds of inputs which are used in the context of animal feeding, such as primary feed materials, compound animal feedstuff, feed concentrates, mineral feed, complementary feed, feed premixes, additives for feedstuff products and products for silage preparation.

Note: Some national lists include only a reduced scope of product types.

Safeguard clause

In addition to the requirements outlined in this document as well as in the general business contract, FiBL and EASY-CERT reserve the right to exclude substances or products from all product categories if the evaluation team considers that their use does not comply with the objectives and principles of organic production according to Reg. (EU) 2018/848 Art. 4 and Art. 5, or if there is evidence that they could have serious adverse effects on human health and/or the environment (e.g. carcinogenic, mutagenic, toxic to reproduction, endocrine disrupting, toxic to aquatic organisms, low biodegradability, persistent).

2. General requirements

2.1 Non-use of GMOs

Background

The EU organic legislation explicitly states that the use of GMOs and products produced from or by GMOs is excluded[1].

Requirements

Products to be listed on the FiBL and EASY-CERT Input Lists may not contain any GMOs and/or products thereof. At the moment, a 'non-GMO declaration' is required for all products containing GMO relevant materials, in particular:

- Micro-organisms (fungi, bacteria, yeasts) and microbial products;
- All organic acids (e.g. ascorbic acid) and enzymes which are used as preservatives or silage agents;
- Vitamins and provitamins;
- Components of agricultural origin (e.g. maize, rapeseed, cotton, sugar beet) must generally be produced organically. For materials with an organic certificate, a 'non-GMO declaration' is not required. However, for conventional materials used under an exceptional rule (see below), the evaluation teams may request a non-GMO declaration.
- In case that microbial products contain significant remains of the growing media in the final product, the applicant shall prove that the growing media are of non-GMO origin.
- If considered relevant, the evaluation teams may request a non-GMO declaration also in other cases.

[1] Art.11 of Reg. (EU) 2018/848

2.2 Requirements for feed materials of agricultural origin

Background

Reg. (EU) 2018/848 requires that animals shall be fed with feed materials from agricultural holdings[2].

Requirements

- Feed components of agricultural origin (plant and animal) must come from organic production[3]. For exceptions, see below.

3. Specific requirements

3.1 Specific requirements for spices, herbs and molasses

Background

Spices, herbs and molasses for feeding purposes should preferably be of organic origin. However, spices, herbs and molasses[4] may also be used in non-organic form under certain conditions[5].

Requirements

Non-organic spices, herbs and molasses are authorized under the following conditions:

- their organic form is not available, and
- they are produced or prepared without chemical solvents, and
- their use is limited to 1 % of the feed ration of a given species, calculated annually as a percentage of the dry matter of feed from agricultural origin.

[2] Art. 30, 6.) b), of Reg. (EU) 2018/848

[3] Art 6 (m) of Reg. Reg. (EU) 2018/848

[4] In several countries (e.g. Germany, Austria, Switzerland), a sufficient supply of organic molasses has recently become available. In such countries, the national evaluation teams will phase out the use of conventional molasses.

[5] Art. 24, 3)(e)(iv) of Reg. (EU) 2018/848

3.2 Exceptions for specific protein compounds

Background

Reg. (EU) 2018/848 rules out the use of non-organic protein feed of plant and animal origin for livestock[6] with the following exceptions:

- exemptions for non-organic protein feed where farmers are unable to obtain protein feed exclusively from organic production and
- it authorizes the use of a limited proportion of non-organic protein feed for piglets up to 35 kg and/or young poultry up to 18 weeks of age.

Requirements

Products containing non-organic protein components may be included into the FiBL and EASY-CERT Input Lists. However, their listing is subject to the following restriction:

- Only authorised for piglets up to 35 kg and young poultry up to 18 weeks of age within the 5 % buying-in limit[7] for conventional feed until 31.12.2026 Availability is reevaluated annually.

3.3 Requirements for fishery products

Background

Reg. (EU) 2018/848 specifies under which conditions fishery products may be used[8].

Requirements

Fishery products are authorized under the following conditions:

The fish-derived part of feed for fish, crustaceans, and echinoderms must come from either:

- organic aquaculture, or
- fisheries certified as sustainable under a recognized scheme in line with Reg. (EU) No 1380/2013.

For carnivorous aquaculture animals, fishery products can be used in the following priority order:

- Organic feed from aquaculture.

[6] Reg. (EU) 2021/1165, Annex III, part A (2)
[7] The 5 percent limit refers to the dry matter of feed of agricultural origin and is calculated on an annual basis.
[8] Point 3.1.3. of Annex II, Part III of Reg. (EU) 2018/848

- Fish meal and fish oil from organic aquaculture trimmings.
- Fish meal, fish oil, or fish-derived feed from trimmings of fish, crustaceans, or molluscs caught for human consumption in sustainable fisheries.
- Fish meal, fish oil, or fish-derived feed from whole fish, crustaceans, or molluscs caught in sustainable fisheries but not used for human consumption.
- Organic feed materials of plant or animal origin.

In pond and lake farming (grow-out phase), fish, penaeid shrimps, and freshwater prawns should mainly feed on natural pond feed. If not enough is available:

- Organic plant-based feed or algae can be used.
- When supplementing:
    - For shrimps and freshwater prawns, up to 25% fish meal and 10% fish oil from sustainable fisheries are allowed.
    - For Siamese catfish (Pangasius spp.), up to 10% fish meal or fish oil from sustainable fisheries is allowed.

In the grow-out phase and in earlier life stages in nurseries and hatcheries, organic cholesterol may be used to supplement the diets of penaeid shrimps and freshwater prawns (*Macrobrachium spp.*) to meet their dietary needs.

3.4 Requirements for yeast and yeast products

Background

Reg. (EU) 2018/848 specifies under which conditions yeast and yeast products may be used[9].

Requirements

Nonorganic yeast and yeast products are authorized under the following conditions:

- when not available from organic production

[9] Reg. (EU) 2021/1165 Annex III, part A

4. Requirements for feed materials of mineral origin

Background

Reg. (EU) 2018/848 lists the allowed feed materials of mineral origin.

Requirements

- Feed materials of mineral origin are restricted to those listed in the organic legislation[10].

5. Requirements for feed additives

Background

Reg. (EU) 2018/848 lists the authorized feed additives.

Requirements

- Feed additives are restricted to those listed in the organic legislation[11].

5.1 Specific requirements for nutritional additives (vitamins, trace elements)

Background

Reg. (EU) 2018/848 authorizes the use of certain nutritional additives[12], among them vitamins, pro-vitamins and chemically well-defined substances having similar effect, and compounds of trace elements.

Requirements

For the time being FiBL and EASY-CERT do not set any additional requirements for vitamins and trace elements. However, certain national lists further limit their application. The respective national approaches follow national guidelines and private standards.

[10] Reg. (EU) 2021/1165, Annex III, Part A
[11] Reg. (EU) 2021/1165, Annex III, Part B
[12] Reg. (EU) 2021/1165, Annex III, Part B (3)

6. Note on the use of natural rooting materials and biochar

Natural materials such as biochar or lignocellulose may be used as litter or rooting materials. These products are evaluated according to the criteria for fertilizers, soil conditioners and crop management tools. However, they are not authorized as feed materials in organic production and are therefore listed together with the products for cleaning, disinfection and hygiene.

In Switzerland peat can be used as animal enrichment tool and is therefore listed under the category feed material.

7. Compliance with general legislation

The FiBL and EASY-CERT Input Lists include only products that comply with the relevant EU and national legislation. Compliance with relevant legislation is primarily in the responsibility of the applicant companies. However, if national evaluation teams suspect that a product does not comply with the relevant legislation, they may postpone inclusion into the list until the applicant has demonstrated legal compliance.

8. Recommendations for use

It is the responsibility of the applicant companies to ensure that the recommendations for use of their products given on product labels, technical sheets, publications and websites are consistent with organic farming practices. If the national evaluation teams suspect that a product is intended for a use that does not comply with organic farming practices, they may postpone inclusion into the list or remove the product from the list until the applicant has amended the recommendations for use accordingly.

Impressum

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