



# CCOF

*Certification Services, LLC*

## **To Feed or Not to Feed What you need to know about additives and supplements**

We all know that livestock feed must be 100% organic; but what about additives and supplements? Vitamins and minerals? Section 205.237 of the National Organic Program standard (NOP) requires that the total feed ration be composed of organically produced agricultural products; *except* that *nonsynthetic* substances and the few synthetic substances that are specifically allowed under section 205.603(c)&(d) may be used as feed additives and supplements. This limits synthetic substances as feed additives to vitamins and trace minerals that are FDA approved, including those forms listed by the Association of American Feed Control Officials (AAFCO). This limits synthetic substances as feed supplements to milk replacers for emergency use only; also, the milk replacers must not contain antibiotics, must not be nonmilk products, and must not be products from BST treated animals. Those are the only synthetic substances allowed as feed additives and supplements.

### **So, what's the difference between a feed additive and a feed supplement?**

The NOP defines a feed additive as: "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."

A Feed supplement is defined as: "a combination of feed nutrients added to livestock feed to improve the nutrient balance or performance of the total feed 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."

Feed additives and supplements do not include agricultural commodities used in feed, forage or formulated rations – these must be certified organic. Both feed additives and supplements must not contain genetically modified organisms or mammalian or poultry slaughter by-products.

If you would like to use a feed additive or supplement that is not already listed as approved (or restricted) on the OMRI or WSDA lists, we must review the ingredients before you use it – see the Material Review Request Form. In order to approve a product for your use, we must know the following:

- That all vitamins and minerals are FDA approved;
- That there are no genetically modified organisms in the product;
- That there are no mammalian or poultry slaughter byproducts in the product;
- How the product will be fed – free choice?; and,
- The amount and role of any non-organic agricultural ingredient.

**Please refer to NOP sections 205.237 and the OMRI Generic Materials List for more information on specific ingredients. Most importantly, if a product is not listed as approved on OMRI or WSDA, please contact CCOF before feeding it to your animals. We're here to help!**