

Products for feeding including silage additives

Basic admission criteria for the European Input List

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I. Introduction

This document describes the criteria that need to be fulfilled in order for feeding products / silage additives to be included in the European Input List. Additional criteria may apply for products to be included in a national list or a list of a private association.

This document will be updated whenever necessary. The most recent version, which is available on the project website (www.inputs.eu) 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'. By 1 January 2022, both of the current regulations will be repealed by new regulations¹. For the time being, this document provides references to the old as well as the new organic legislation.

Under the current organic legislation, Art. 22 of Reg. 889/2008 states which substances may be used in the processing of organic feed and for feeding organic animals, Annex V of Reg. 889/2008 lists the authorised feed materials and Annex VI of Reg. 889/2008 lists the authorised feed additives.

Under the new 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. 2021/1165 lists those substances that may be used as feed materials (Part A) and feed additives (Part B).

The European Input List – a private standard

The European Input List is a private standard. It is based on the relevant EU legislation (see above). However, it also comprises additional criteria and interpretations, which were set by FiBL, in order to ensure compliance with the objectives and principles of organic production.

Scope of products included

The European Input List covers 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.

¹ Reg. (EC) 834/2007 repealed by Reg. (EU) 2018/848; Reg. (EC) 889/2007 repealed by Reg. (EU) 1165/2021

Safeguard clause

In addition to the requirements outlined in this document as well as in the General Business contract, the European Input List reserves the right to exclude substances or products from all product categories 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 excluded².

Requirements

Products to be listed on the European Input List may not contain any GMOs and/or products thereof. At the moment, a 'non-GMO declaration' is required for all 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.

² Art. 4 of Reg. (EC) No. 834/2007; respectively Art.11 of Reg. (EU) 2018/848

2.2 Requirements for feed materials of agricultural origin

Background

The EU organic legislation requires that animals shall be fed with feed materials from agricultural holdings³.

Requirements

- Feed components of agricultural origin (plant and animal) must come from organic production⁴. 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 molasses⁵ may also be used in non-organic form under certain conditions⁶.

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.

³ Art. 14 (d)(i), Reg. (EC) No. 834/2007; respectively Art. 30, 6.) b), of Reg. (EU) 2018/848

⁴ Art. 14 (d) of Reg. (EC) No. 834/2007; respectively Art 6 (m) of Reg. Reg. (EU) 2018/848

⁵ 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.

⁶ Art. 22(b) of Reg. (EC) No. 889/2008; respectively Art. 24, 3)(e)(iv) of Reg. (EU) 2018/848

3.2 Exceptions for conventional protein components

Background

The organic regulation rules out the use of non-organic protein feed of plant and animal origin for livestock⁷ 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.

Requirements

- Products containing non-organic protein components may be included into the European Input List. However their listing is subject to the following restriction: 'Only authorised for piglets up to 35 kg and young poultry within the 5 % buying-in limit⁸ for conventional feed until 31.12.2026'.
- Slaughterhouse wastes from conventional animals are excluded.

3.3 Requirements for fishery products

Background

The organic regulation specifies under which conditions fishery products may be used⁹.

Requirements

Fishery products are authorized under the following conditions:

- they originate from sustainable fisheries, and
- they are produced or prepared without chemical solvents, and
- their use is restricted to non-herbivores, and
- the use of fish protein hydrolysate is restricted solely to young animals.

⁷ Reg. (EC) No. 889/2008, Art. 43; respectively Reg (EU) 2021/1165, Annex III, part A (2)

⁸ The 5 percent limit refers to the dry matter of feed of agricultural origin and is calculated on an annual basis.

⁹ Art. 22(e) of Reg. (EC) No. 889/2008 respectively point 3.1.3.1(c) of Annex II, Part III of Reg (EC) 2018/848

3.4 Requirements for fermentation (by-)products

Background

The organic regulation specifies under which conditions fermentation (by-)products may be used¹⁰.

Requirements

Fermentation (by-)products are authorized under the following conditions:

- currently, *Saccharomyces cerevisiae* and *Saccharomyces carlsbergiensis* are allowed, and
- The products are produced or prepared without chemical solvents¹¹, and
- Their cells are inactivated or killed

4. Requirements for feed materials of mineral origin

Background

The organic regulation lists the allowed feed materials of mineral origin.

Requirements

- Feed materials of mineral origin are restricted to those listed in the organic legislation¹².

4.1 Specific requirements for salts

Background

The organic regulation specifies the use of sodium chloride (salt)¹³.

Requirements

- Sea salt and coarse rock salt are authorized.

¹⁰ Art. 22 of Reg. 889/2008; respectively Annex III, part A(2)

¹¹ Reg. (EU) 2018/848, Art. 24(3)(e)(iv)

¹² Reg. (EC) No. 889/2008, Annex V, Section 1; respectively Reg. (EU) 2021/1165, Annex III, Part A

¹³ Reg. (EC) No. 889/2008, Art. 22; respectively Reg. (EU) 2021/1165, Annex III, Part A

5. Requirements for feed additives

Background

The organic regulation lists the authorized feed additives.

Requirements

- Feed additives are restricted to those listed in the organic legislation¹⁴.

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

Background

The organic regulation authorizes the use of certain nutritional additives¹⁵, among them vitamins, pro-vitamins and chemically well-defined substances having similar effect and compounds of trace elements.

Requirements

For the time being the European Input List does not set any additional requirements for vitamins and trace elements. However, certain national lists further limit their application. The respective national approaches follows national guidelines and private standards.

6. Requirements for silage additives

Background

Silage additives shall only be applied, if weather conditions do not allow an adequate fermentation to happen. The organic regulation lists the authorized silage additives¹⁶.

Requirements

The following silage additives are allowed:

- enzymes, micro-organisms
- formic acid, sodium formate
- propionic acid, sodium propionate

¹⁴ Reg. (EC) No. 889/2008, Annex VI; respectively Reg. 2021/1165, Annex III, Part B

¹⁵ Reg. (EC) No. 889/2008, Annex VI (3) a); respectively Reg. 2021/1165, Annex III, Part B (3)

¹⁶ Reg. (EC) No. 889/2018, Annex VI(1)(e); respectively Reg. (EU) 2021/1165, Annex III, Part B(e)

7. Note on the use of natural rooting materials

Natural materials such as peat or lignocellulose may be used as litter or rooting materials. However, they are not authorized as feed materials in organic production and are therefore listed together with the products for cleaning, disinfection and hygiene.

8. Compliance with general legislation

The European Input List requires products to comply with relevant general EU and national regulations. It is the responsibility of the applicant company to comply with the general legal requirements. The European Input List reserves the right to verify the information provided by the applicant in this regard as part of its internal quality assurance. If there is insufficient evidence of compliance with general legislation, it may postpone the listing until the applicant has demonstrated legal compliance.