



## ***Working for organic farming in Europe***

International Federation of  
Organic Agriculture Movements –  
EU Regional Group

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Registered in Sweden,  
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number 817606-9436

Brussels, 19 November 2010

Mr. Jean-Francois Hulot  
Head of Unit, Organic Farming  
DG AGRI  
Rue de la Loi 130  
1049 Brussels  
Belgium

### **100 % organic feed for monogastrics**

Dear Mr Hulot,

As from January 1, 2012 all agricultural ingredients in feed for monogastrics (poultry and pigs) must be from organic origin. The IFOAM EU Group is strongly in favor of this principle and is convinced that the sector needs to strive to reach that goal. In general, we support Action 9 of the European Organic Action Plan to maintain the deadline for derogations. This is because the extension of derogations undermines the progress made by those operators (farms and other businesses) that have invested in changing their practices in line with the requirements of standards.

However, we have information from our members, that, if enforced after 2011, the requirement will have a serious impact on the supply of feed components rich in proteins. It is important to also consider the situation of countries with less developed organic sectors, where organic protein is even less available (e.g. new member states). Furthermore the availability of the *correct* type of proteins is essential for animal wellbeing and health. Nevertheless, there are well developed organic production systems for monogastrics that successfully meet the 100% organic feed requirement by making optimum use of feed nutrients from organic range lands through good management, supplemented by available organic feed ingredients. Adequate infrastructure and effective knowledge transfer is essential.

In looking for a solution we must consider different regional possibilities and limitations, the use of animal by-products and the possibility of derogations. We ask you, when discussing this topic in the SCOF meeting, to consider this problem in all its complexity along with the alternatives we suggest. Therefore the IFOAM EU Group would like to share with you the following considerations:

**More research on appropriate breeds and systems of organic production of monogastrics.**

This is a priority research topic identified by TP Organics. Some research has shown that the nutritional requirements of breeds appropriate to high output conventional animal production are not the same as the nutritional requirements of breeds well suited to organic farming, where lower production levels are more appropriate. Thus, the whole system needs to be taken into account, including the expected production levels and growth rates, the market and economic consequences for farmers and consumers arising from the use of less productive breeds, the real needs for specific amino acids, and the potential for effective use of nutrients from pasture by appropriate animal management systems supplemented by available organic feedstuffs. Together these can meet the nutritional needs of the animal in an organic production system. This of course is a mid term strategy and will take longer to achieve.

**Types of proteins:**

Proteins are essential in animal feed. In the digestive system of animals, they are broken down into amino acids that are used by the animal for fuel or construction. Some amino acids cannot be produced by monogastric animals, including methionine, cysteine and lysine. These essential amino acids are important for all animals, but especially for the growth of young poultry and piglets.

**Current supply of proteins:**

**Organic soya cake**

Some organic producers have introduced a higher rate of organic soya cake in the ration because of its high protein and favourable balance of essential amino-acids. This trend was already seen during the transition from 10% to 5% conventional ingredients in monogastrics feed.

**Conventional sources of protein**

While some organic producers can feed their animals a 100% organic diet with the right balance of carbohydrates and proteins, most lack access to organic protein rich feeds. In particular potato protein and corn/maize gluten are used and much of the supply of these essential proteins comes from conventional sources. This is possible within the current 5% conventional feed that may be added to the diet of organic animals.

### **Fishmeal**

The use of fishmeal is also a possible solution. Fish meal from sustainable fisheries is listed in Annex V of Reg. 889/2008 as an allowed feed substance for terrestrial animals. As it turns out, various member states interpret the use of fish meal in different ways. Some do include it in the calculation of the to date allowed 5%, others don't, meaning the use of fish meal is not restricted in these countries and will not be restricted by the 100% rule.

### **Future supply of proteins: many bottlenecks**

The sector faces the following problems in protein supply that will affect moves towards a 100% organic diet:

-**Organic potato protein:** is only available in small quantities, even for the human food market, let alone for feed.

- **Organic gluten:** a survey shows that this is only available in very small quantities

- **Protein rich feed crops in organic quality:** Soybeans, sunflower seeds and rapeseed are good alternatives, all being rich in protein and energy.

Protein from soya is a little low in methionine and cysteine (around 2.9 % of protein), but rather high in lysine (6.2% of protein). Sunflower- and rape protein has higher content of methionine and cysteine (4.0 and 4.5 % of protein), but are a little lower in lysine (3.14 and 5.5 % of protein). Availability of the amino acids is high in soybeans and sunflower seeds (85 %) and lower in rapeseed (70 %).

Organic soya cake is an interesting solution from a nutritional point of view but feed processors have already started to feel pressure on the market price of non-GMO and organic soya cake. Organic Soya cake is often imported from third countries, which is not in line with the organic principles. Adding more soya cake means technically a decrease of organic protein rich feed crops used in rations because of economical reasons..

Grain legumes (pulse crops) are an important protein source which could be locally cultivated, but their cultivation has been reduced due to crop rotation diseases.

-**Fishmeal from sustainable sources:** if from sustainable sources and not counted as an agricultural ingredient, fishmeal could be one solution, although fishmeal is not part of a natural diet for terrestrial animals and it cannot be seen as part of the "organic cycle". It is, however a good source for all the essential amino acids. There is another drawback related to fishmeal: Information from Greenpeace shows that there is not enough sustainable

fishmeal available and that the definition of “sustainable sources” can be questioned.

Furthermore, in the frame of BSE prevention measures, general feed production regulations require total separation between fish/meat and bone meal production and herbivores feed production. So if fish meal is to be more widely used in organic feed production, there may be a shortage of organic feed producers who can dedicate a whole production site to feed production for monogastrics.

For example, in France all organic feed producers have multi species production sites and very few have the facilities to produce feed exclusively for monogastrics.

As the reduction from 10% to 5% conventional sources by the end of 2009 has been achieved in many European countries by the use of fishmeal, the maximum limits for fishmeal in the diets for monogastric animals are already reached.

**Future possibilities:**

- ***Organic mussels:*** Sweden is working on the certification of organic mussels, as a possible alternative source of proteins in animal feed. But this production is just starting and cannot fill the existing gap. As a first step organic mussels should be added to the list of allowed feed-materials in 889/08 Annex V, 2.2.

- ***“Organic” worm production:*** could be part of the solution, but invertebrates are not included in the scope of the organic Regulation. Before formulating provisions for organic worm production these legal questions need to be solved. Dutch research shows that growing worms as an organic protein source would be very expensive.

- ***Use of protein rich slaughter waste for monogastrics:*** only in organic quality and clear traceability. This is not an option yet as the use of slaughter waste still is banned for the whole feed sector. So this hurdle needs to be taken first before slaughter waste can be an option. IFOAM EU would support that this issue is seen in a mid-term perspective as an option for the whole agriculture sector. Furthermore the public opinion regarding the use of slaughter waste in animal feed must be taken into account. Although chicks and pigs are not vegetarians and protein from terrestrial animal sources is a natural part of their diet we need to take into account consumer’s perception. Good information is necessary to avoid loss of consumer confidence, before slaughter waste can be used.

- Amino acids: IFOAM EU Group maintains its position that synthetic amino acids produced in the common way have no place in an organic diet. If amino acids are produced from organic sources (e.g. plant extracts or fermentation), this could be also a part of the solution.

**Suggestion for discussions in the SCOF:**

- The IFOAM EU Group recommends the Commission that the time until the end of the derogation is used to conduct an evaluation of protein sources for non-ruminants, taking the above options and bottlenecks into account. The evaluation should be on the availability and quality of the proteins, the effects on animal health, and should also consider the sustainability and suitability for use in the organic sector and the market and economic consequences for farmers, consumers and on public opinion. Research and breeding activities concerning grain legumes (pulse crops) should be reinforced in order to foster the cultivation of locally grown vegetable protein sources.
- Further research is needed to find better solutions for the availability of the right types of proteins for the breeds used in organic farming by processing methods such as fermentation.
- A level playing field for the use of fishmeal must be created. The IFOAM EU Group asks the Commission to harmonize the use of fishmeal. We also ask the European Commission to confirm a definition of “sustainable sources” for fishmeal. This should ensure that only fish that has been certified by internationally accepted sustainable standards is used. The use of fishmeal should be restricted to young monogastric animals.
- A distinction should be made between the needs of adult and young animals;
  - For adults it should be possible to reach the 100 % organic level by using all possible options outlined above. For countries that still have difficulties reaching that goal the newly introduced Flexibility rule in Article 22.2.b) of Regulation 834/2007 could be used. The Commission is responsible for the implementation of this procedure, based on an evaluation of the position in those countries that define a clear need. Criteria for evaluation, in line with the principles, will have to be elaborated by the Commission and should take account of the impact on the organic sector in the country concerned and in other countries.
  - For young poultry and piglets the availability of essential amino acids is very important. Therefore we suggest that the derogation for 5% from conventional sources for young monogastric animals should be extended for protein sources in order to guarantee a

good supply of proteins until enough organic proteins of the required sources are available, suitably adapted production systems are in place and appropriate breeds and strains are available. The derogation should be of a limited duration, based on the outcome of the evaluation to be completed.

- In some countries, like France, Germany and the UK, extensive research into the possibilities to achieve 100% organic feed has been started and many projects with different feed regimes and experiments with alternative crops are taking place in Denmark. The Commission should take the results of that research into account.

The IFOAM EU Group emphasises that unlimited extension of the existing derogation without any steps forward is not acceptable. It would discourage all efforts to date by the sector to adapt feed formulations and would place at risk those projects working to provide protein-rich by-products to invest in the organic sector.

We hope that you will take our points into consideration and we remain at your disposal for any further information or discussions on the subject.

Yours sincerely,



Marco Schlüter  
Director

Copy to:

- Alina Ujupan, cabinet Commissioner Ciolos
- Maria-Angeles Benitez-Salas, DG Agriculture
- Standing committee on organic food and farming