

## **National Organic Program (NOP) – Organic Pet Food Standards**

### **Issue**

The USDA Agricultural Marketing Service's (AMS) National Organic Program (NOP) is proposing to amend the USDA organic regulations to ensure consistency in the composition and labeling of pet food products bearing organic claims. Specifically, organic pet foods would be permitted to contain organic mammalian or poultry byproducts, synthetic substances allowed as feed additives in organic livestock production, and other nonagricultural substances on the USDA organic National List for use in organic processed products, provided that the ingredients are permitted by the FDA for use in pet food.

### **Background**

The National Organic Program (NOP) is authorized by the Organic Foods Production Act of 1990 (OFPA) (7 U.S.C. 6501 et. seq.) to establish national standards governing the marketing of organically produced agricultural products. With no specific standards for pet food in the regulations, the NOP has maintained that pet food may be certified in accordance with existing standards, namely those for livestock production and organic handling. These existing standards, however, are not entirely applicable to pet food. The USDA organic regulations for livestock production, for example, prohibit the feeding of mammalian or poultry byproducts to mammals, which are common ingredients in pet foods. Likewise, the organic handling standards are intended for human foods and do not permit the use of certain nutrient additives, which may be required to produce a complete and balanced food for pets.

In addition to permitting certain byproducts and approved synthetic substances, the proposed rule will treat pet food as an agricultural product, rather than livestock feed, with regard to composition and labeling requirements. Under the USDA organic regulations, total feed rations of livestock feed must be organically managed and handled. Meanwhile, agricultural products can fall under any of five labeling categories, providing greater flexibility around product composition.

The absence of specific standards for organic pet food production and handling can cause uncertainty among industry and consumers regarding acceptable ingredients and the use of the term "organic" in pet food labeling. This could lead to potentially negative impacts on the credibility of the organic label and the market for organic pet food, which has grown from \$14 million in annual sales in 2003 to \$124 million in 2013 (OTA 2014 Organic Industry Survey). The implementation of pet food standards will fulfill the request by organic stakeholders to provide clear parameters for the production and representation of pet food with organic claims.

### **Possible Benefits to Tribes**

This action has potential benefits for Tribes currently engaged or interested in becoming engaged in the production of organic livestock and crops that supply organic ingredients to pet food manufacturers, or for those involved in pet food manufacturing. Clear standards for USDA organic pet food will strengthen the market and ensure sustained demand and growth in the pet food sector. AMS expects that any cost to Tribes as a result of eventual rulemaking regarding organic pet food will be offset by the total value of annual sales.

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