



Rules and regulations associated with organic and alternative livestock

Continuing education series for veterinarians, veterinary technicians, extension, and other animal health professionals

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CFSPH

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THE LIVESTOCK PROJECT

SUPPORTING ORGANIC/
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Introduction

This chapter is designed to help veterinarians better understand the rules and regulations associated with organic and alternative livestock production in the United States.



Lucky Star Farm

Learning objectives

- Identify agencies responsible for certifying and enforcing organic rules and regulations.
- Demonstrate how to find national rules and regulations for organic livestock production.
- Define **USDA** standards for pasturing certified organic ruminant livestock.
- Recognize treatment options common to both conventional and organic livestock production.
- Compare and contrast rules and regulations for organic and alternative livestock production.

1. Overview of organic agriculture

Organic agriculture is based on the principle of sustainability – meeting current needs without jeopardizing the ability of future generations to meet their needs ([USDA Guide for Organic Producers](#)). The National Organic Program (NOP) and National Organic Standards Board (NOSB) define organic agriculture as a production systems approach that seeks to understand how all the parts of the system work together. Organic farmers focus on how soil, water, plants, animals, insects, bacteria, fungi, and all other parts of the system interact to promote production systems and wholesome food products.

The Organic Agriculture Movement in the United States began in the early twentieth century. It stemmed largely from sustainable European and Asian practices, which aimed to not only conserve but also regenerate the soil. This strategy, called humus farming, “embodied a commitment to sustainability through soil regeneration” (Kuepper, 2010). The terminology was replaced by “organic farming” in the 1940s to describe the farming system as a whole, not just the soil. As public concern over pesticide use grew in the 1960s, the popularity and visibility of organic agriculture also grew. Up until 1990, when the Organic Foods Production Act was passed, third-party organic certifiers carried out independent assessments to verify compliance but had an inconsistent set of standards. Since 1990, rules and regulations have been set by the federal government to provide a uniform structure within and across states.

Below are some selected milestones associated with the organic agriculture movement:



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As you can see, widespread agreement on a set of national standards has been a complex and collaborative process spanning several decades. The development of rules and regulations surrounding organic agriculture has involved many different groups and agencies.

The [Organic Foods Production Act \(OFPA\)](#) of 1990 (7 U.S.C. 6501-6522) was enacted by Congress to establish national standards for organically produced products. Responsibility for establishing the program was given to the U.S. Secretary of Agriculture (**USDA**). The **OFPA** established the National Organic Standards Board (NOSB) to assist with the development of the National Organic Program (NOP).

Select each stakeholder below to learn more about their role in organic and alternative agriculture.

United States Department of Agriculture (USDA)

The USDA's Agricultural Marketing Service (AMS) oversees the **NOP** by certifying farmers who wish to carry the organic label. They establish a list of allowed and prohibited substances used in organic livestock, accredit the certifiers, require organic processing of carcasses, outline record-keeping standards, and enforce reports of violations by producers, handlers, and certifying agencies.

National Organic Standards Board (NOSB)

The NOSB is a 15-member board that makes recommendations to the NOP about materials and practices that may be used in organic production. The NOSB includes farmers, processors, retailers, environmentalists, scientists,

consumers, and representatives of certification agencies. The board meets twice a year to hear public comments and continually evaluates and improves the standards as new information and materials become available.

National Organic Program (NOP)

The NOP oversees the production standards through regulation called the National Organic Program (NOP), found in the Code of Federal Regulations (CFR) ([7 CFR 205](#)). It also maintains the National List of Allowed and Prohibited Substances. This list specifies approved synthetic substances that may be used in organic production and natural substances that may not be used ([7 CFR 205.600 – 606](#)).

Organic certification agencies

The USDA accredits certification agencies to act on its behalf and can grant or revoke organic certifications. Accredited Certification Agencies (ACAs) ensure that farms and processing facilities are complying with organic regulations. In addition to determining certification status, these agencies keep farmers updated about changes to regulations. Currently, fifteen states and dozens of other organizations and non-profit associations also provide organic certification services across the country. A list of **ACAs** can be found at [USDA Accredited Certifying Agents](#).

Organic inspectors

Organic inspectors are trained individuals who visit farms to audit records, inspect fields and facilities, and verify that the NOP rules are being followed. They do not grant or revoke certification. Instead, they provide the information to the certification agency to decide. Organic inspectors are not allowed to recommend farming practices or products. This may be in contrast with inspectors for alternative certifications who can give insight to the farmers being inspected.

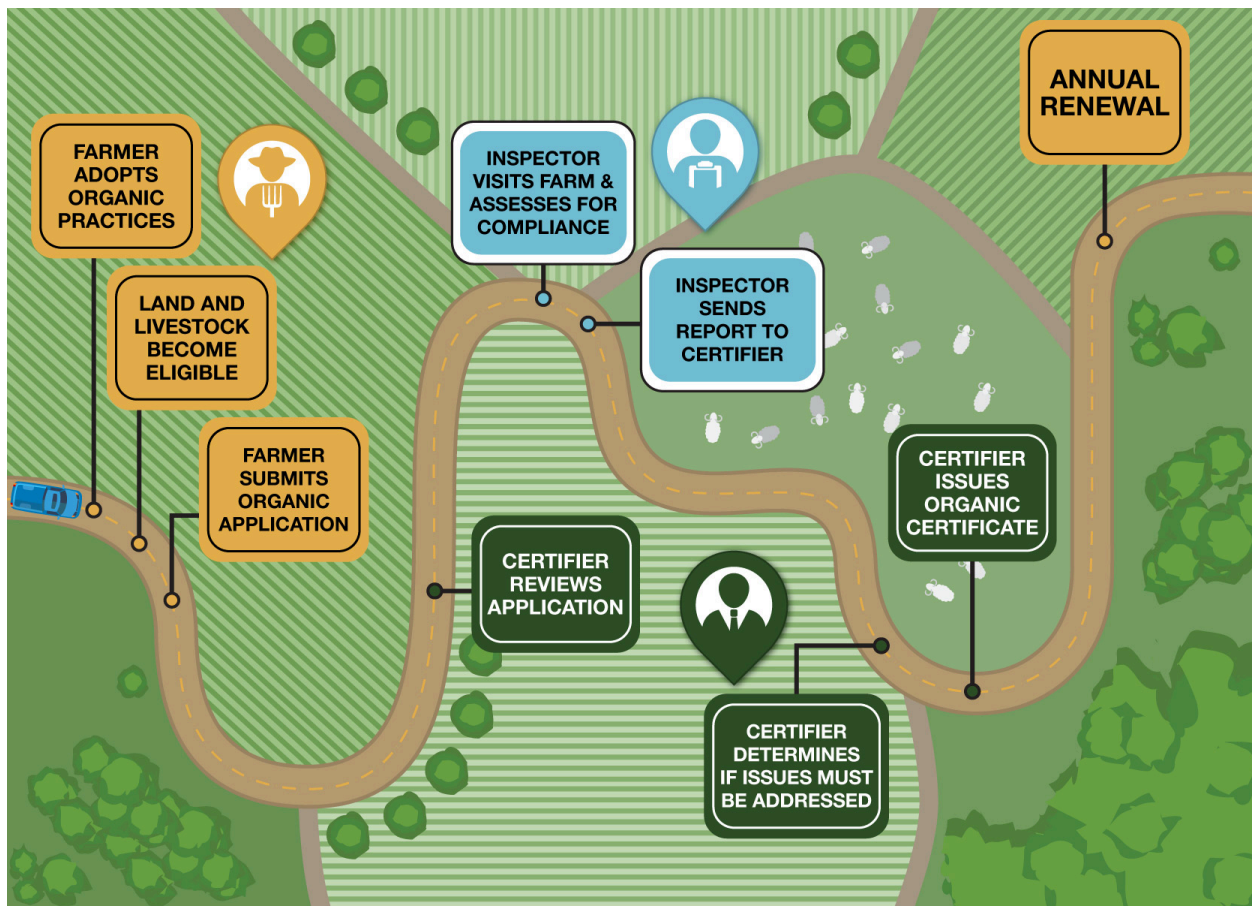
USDA certified organic vs alternative farmers

While the NOP sets the requirements for farmers to be considered USDA certified organic, there are currently no federal regulations defining alternative farmers. Designations that will be used in this chapter:

- **USDA certified organic:** A labeling term that indicates an agricultural product has been produced through approved organic methods, defined by USDA as the application of a set of cultural, biological, and mechanical practices that support the cycling of on-farm resources, promote ecological balance, and conserve biodiversity.
- **Split Operations:** Operations that include both organic and conventional production.
- **Transitional:** Farms that are in the process of USDA organic certification but are not yet certified. These farms are included in this chapter under the term “alternative”, described below.
- **Alternative:** Farmers and ranchers who are not USDA certified organic (including transitional operations) but follow non-conventional pasture practices (such as free-range or grass-fed) or welfare certification standards that might include the use or non-use of antibiotics, hormones, pesticides, or genetically modified organisms (GMOs).

2. Steps of the certification process

Organic certification is meant to assure consumers that the farmer followed all requirements of the **USDA** organic regulations. During the certification process, the farmer works with the certifier and inspector through several different steps. Veterinarians may find it helpful to understand the certification process so they can communicate readily with organic and alternative farmers. This section will provide an overview of the certification process for livestock farmers and ranchers. More information can be found in [7 CFR 205.400](#) and Chapter 3 of the [USDA Guide for Organic Producers](#).



Determine eligibility of the land and livestock

A farmer can apply for organic certification of pastureland after a 36-month period of documented practices show no prohibited materials were applied. Farmers and ranchers need to document all land use and applications of material during the three-year transition period. This land requirement is a crucial concept for organic livestock farmers and ranchers since their animals must only eat organic feed and ruminant livestock must graze organic pasture. One exception is for dairy farmers who are allowed to feed a ration of their forage or feed from organically managed land during its final year of transition (i.e., during the 12 months prior to the sale of milk and milk products), so that the land and dairy herd together are completely transitioned in 3 years.

The origin of livestock is also a crucial component of a farmer's eligibility for organic certification. Organic livestock must be under continuous organic management from the last third of gestation, including organic milk and milk

products from dairy animals¹. One exception to this requirement is that poultry and edible poultry products must be under continuous organic management no later than the second day of life.

Application process

Farmers may apply for certification to any **ACA** they choose. The certification process typically takes 3 to 6 months to complete, so it is recommended that farmers apply before the end of their transition period. The farmer submits several pieces of documentation with the application, such as a farm map, field histories, and the Organic System Plan (OSP).

The **OSP** is an important tool for the farmer to describe their operation. The OSP essentially describes the farm practices, recordkeeping system, management practices, all substances that may be used (also known as the **Materials List**), estimates of projected organic yields and sales, and physical barriers used to prevent commingling and contamination of organic and prohibited substances (which is an especially important consideration for **split operations**). Veterinarians should pay close attention to what is included in the Materials List since it includes all potential feeds, insecticides, and health care products that might be used on the farm. If an unlisted product needs to be used, the certifier must first be contacted to approve the product and add it to the OSP. If this process isn't followed correctly, the certifier may revoke certification and/or prohibit an animal to be slaughtered under organic status. However, it is important to keep in mind that organic regulations require sick animals to be treated with organically approved methods and/or conventional treatments, "even if doing so jeopardizes the animal's organic status" ([§205.238](#)). More details on the treatment of organic and alternative animals can be found in "Treatments and practices for organic and alternative livestock".

The certifier reviews the application and determines whether additional documentation is necessary. Applications may be denied, delayed for further clarification, or approved for inspection. Inspections are then performed by an inspector.

The organic inspector is a representative of the certifying agency and trained to maintain confidentiality. They inspect every organic farm each year to look for violations, verify the OSP is accurate, and examine the farm's records. More information on record-keeping practices are available in subsequent chapters, "Practice management considerations for working with organic and alternative livestock clients" and "Treatments and practices for organic and alternative livestock clients". The inspector asks questions, visits each area, assesses the health of all livestock and their living conditions, and performs an exit interview with the farmer. As an independent third-party, the inspector is not allowed to provide advice on farming practices or overcoming certification barriers.

Once the inspection is complete, the inspector writes a report and sends it to the certification agency for their review. The reviewer considers the seriousness of each issue identified on the farm and determines if there are issues that must first be addressed before the farm is considered in compliance for certification. The farmer will receive a letter from the certifier with a range of notices, including:

- issuance of the Organic Certificate;
- a notice of noncompliance (with correctable actions identified); or
- denial of certification or proposed revocation.

Once the Organic Certificate is issued by the certifier, the farm remains certified until the farmer renews or surrenders

1. Prior to April 5, 2023 the NOP requirement allowed milk and milk products to be from animals under continuous organic management no later than one year prior to production of organic products ([NOP Origin of Livestock April 5, 2022 Final Rule](#)).

the certification or it is suspended or revoked by the certifier. Organic farmers and ranchers are required to either renew or surrender their certification every year. If not renewed, certification will be suspended. The renewal process involves updating the OSP, signing an operator agreement, paying an annual fee, and undergoing an annual inspection. Also, among other activities to strengthen enforcement and reduce fraud, as of March 19, 2024 the **NOP** will require certifiers “to conduct unannounced inspections of at least 5% of the operations they certify” ([NOP Strengthening Organic Enforcement March 20, 2023 Final Rule](#)).

Further information about noncompliance procedures can be found in [7 CFR 205.660 – 663](#).

3. Navigating the NOP regulations

The **NOP** develops rules and regulations for the production, handling, labeling, and enforcement of all organic products. With some exceptions, any food or food product labeled “organic” must be certified organic by the **USDA**.¹

The regulations for the NOP are found in Title 7 (Agriculture) of the CFR in Part 205 of Chapter I (Agricultural Marketing Service), Subchapter M. The regulations may also be cited as [7 CFR 205 et. seq.](#) The NOP regulations are divided into subparts A through G, and include important items such as definitions, certification, and administrative requirements.

For instance, farmers and ranchers seeking organic certification must meet these requirements:

- Organic food must be produced without using conventional pesticides, petroleum-based fertilizers, sewage sludge-based fertilizers, herbicides, genetic engineering (biotechnology), antibiotics, growth hormones, or irradiation ([§205.105](#)).
- It is a land requirement to have no prohibited substances applied for 3 years preceding the harvest of a crop ([§205.202](#)).
- Animals raised on an organic operation must meet animal health and welfare standards, not be fed antibiotics or growth hormones, be fed 100-percent organic feed, and be provided access to the outdoors with at least 30% dry matter intake (DMI) from pasture during the year ([§§205.236 – 240](#)).

Veterinarians who work with organic and alternative farmers don't need to fully understand all the NOP regulations. However, it is important to know where to find information, when needed. Each of the following subparts has been designed to help you explore and become more familiar with the NOP. This chapter is not meant to comprehensively go through all the NOP regulations, but it has pulled out some sections that veterinarians may find the most relevant to working with organic farmers. **After reading about each subpart, click on the links provided to answer the interactive question(s), descriptively called “Look it up and learn”, within each section.**

Subpart A – Definitions

Subpart A defines several terms included in the NOP regulations. For definitions of terms used in organic production, which may be helpful as you communicate with organic and alternative farmers and ranchers, visit [§205.2](#).

LOOK IT UP AND LEARN 1



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1. One exception to this rule is that farms that make less than \$5000 gross annual income do not have to be certified organic to label their products as organic. According to §205.101, these agricultural products must be unprocessed, practices need to follow the NOP requirements, and farmers are not allowed to use the USDA organic seal. Some farmers may find this exemption sufficient for their purposes while other businesses may choose to pursue certification for the broader marketing benefits and consumer appeal.

Subpart B – Applicability

Subpart B includes information on which operations need to be certified and those that are exempt from certification, as well as use of the term “organic” and recordkeeping practices for certified and exempt operations. For instance, records need to be clearly understood during the inspection process and maintained for at least five years. Therefore, you can assist farmers by providing itemized invoices (ensuring all products used are listed) for every sale and service you provide. For more information on recordkeeping requirements of certified operations, visit [§205.103](#).

LOOK IT UP AND LEARN 2



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Subpart C – Organic Production and Handling Requirements

Subpart C addresses requirements for the organic farm’s **OSP** and standards for soil fertility, crop nutrients, and other crop-related practices. Several regulations in this subpart also address requirements for the origin of livestock, livestock feed and living conditions, as well as standards for health care, pest management, and pasture practices. One particular regulation veterinarians and farmers must abide by is that you must NOT “withhold medical treatment from a sick animal in an effort to preserve its organic status” ([§205.238](#)).

Another commonly discussed topic within this section is the Pasture Rule, a 2010 amendment that clarifies livestock feed and living conditions for ruminants. A full set of guidelines has been written for farmers to understand the Pasture Rule and can be found at [Pasture for Organic Ruminant Livestock: Understanding and Implementing the NOP Pasture Rule \(USDA\)](#). According to these guidelines, organic ruminant livestock must have free access to certified organic pasture for the entire grazing season. This period is specific to the farm’s geographic climate but must be at least 120 days. Due to weather, season, or climate, the grazing season may or may not be continuous. Other requirements include:

- Organic ruminants’ diets must contain at least 30% dry matter (on average) from certified organic pasture, during the grazing season. Dry matter intake (DMI) is the amount of feed an animal consumes per day on a moisture-free basis. The rest of its diet must also be certified organic, including hay, grain, and other agricultural feed products.
- Ruminants must have free access to the outdoors year-round outside the grazing season except under specific conditions (such as inclement weather) ([§205.239\(b\)](#)).
- During the finishing period, ruminant slaughter stock are exempt from the minimum 30 percent DMI requirement from grazing. The finishing period for ruminant slaughter stock cannot exceed one-fifth of the animal’s total life or 120 days, whichever is shorter ([USDA Organic 101](#)).

To help encourage farmers to be compliant with the Pasture Rule, download and print this helpful handout: [Tip sheet for the National Organic Program’s \(NOP\) Pasture Rule](#).

For further requirements that may affect organic livestock you work with, visit:

- [Origin of livestock \(§205.236\)](#)
- [Livestock feed \(§205.237\)](#)
- [Livestock health care practice standard \(§205.238\)](#)
- [Livestock living conditions \(§205.239\)](#)

- [Pasture practice standard \(§205.240\)](#)
- [Facility pest management practice standard \(§205.271\)](#)

While pasture access is not required for organic poultry, outdoor access must be provided. However, temporary confinement may be allowed during certain circumstances. For instance, farmers with birds located near outbreaks of Highly Pathogenic Avian Influenza (HPAI) can work with their certifiers to determine appropriate steps of approval and living conditions. More information about organic poultry requirements can be found at [Tipsheet: Organic Poultry Production for Meat and Eggs \(ATTRA\)](#) and [Confinement of Organic Poultry due to risk of Avian Influenza \(USDA\)](#).

LOOK IT UP AND LEARN 3



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LOOK IT UP AND LEARN 4



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LOOK IT UP AND LEARN 5



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Subpart G – Administrative

Subpart G contains administrative regulations surrounding evaluation criteria of allowed and prohibited substances for use on organic farms as well as requirements for State organic programs, fees, noncompliance procedures, and appeals processes. Most importantly, it includes the National List of Allowed and Prohibited Substances, which is something that veterinarians who work with organically produced animals need to be familiar with. In general, natural substances are allowed (unless specifically prohibited), synthetic substances are prohibited (unless specifically allowed), and some substances may only be used in specific situations or up to a maximum amount.

The NOSB meets twice a year to review items on the list and evaluate items that may be added or removed from the list. Every substance on the list undergoes a thorough “sunset review” by the NOSB every five years to confirm it continues to meet the program’s requirements. The NOSB makes recommendations to the Secretary of Agriculture through the NOP. If the substance is determined by the NOSB to continue to be allowed on the list, USDA may publish a Federal Register notice. On the other hand, if the substance is given a recommendation of removal from the list, the USDA may initiate rulemaking (which includes an opportunity for public comments). The certification agency then updates their farmers and ranchers when items are added or removed from the list. While the NOSB is critical in this process to initiate a particular recommendation to the NOP, the NOP has the final word in what they ultimately do with

that recommendation. A library of recommendations, meeting minutes, and more information on the sunset review process can be found at [NOSB Recommendations](#).

A non-profit agency, the Organic Materials Review Institute (OMRI), has developed a product review program and is considered to be the gold standard of approval. Suppliers of agricultural inputs can have their proprietary active and inert ingredients reviewed for compliance with NOP regulations. The **OMRI** seal can help farmers determine what is approved for use. It's important to note that not all suppliers will pay to have the OMRI review and certify their products, but the materials may still be allowed. Certifiers typically review products on their own and are not required to follow OMRI's decisions. It is essential for organic farmers and ranchers to always check with their certifier to verify if a specific brand name or formulation is approved for organic production.



For specific information on what substances are allowed and prohibited as well as how the National List is evaluated and amended, visit the following:

- [The National List and Petitioned Substances Index](#)
- [Evaluation criteria for allowed and prohibited substances, methods, and ingredients \(§205.600\)](#)
- [Synthetic substances allowed for use in organic livestock production \(§205.603\)](#)
- [Non-synthetic substances prohibited for use in organic livestock production \(§205.604\)](#)
- [Amending the National List \(§205.607\)](#)

To help you better understand which common substances are allowed and prohibited on organic farms, practice the activity below by using the resources found in the following handout: [Guidance for treating organic and alternative livestock](#). Select each of the four drawers to choose commonly allowed substances in each drawer. After all drawers are completed, select the “Allowed Substances” bag to see a summary of allowed substances used in this activity.



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More details on prevention and treatment practices of organic and alternative animals can be found in “Prevention and organic/alternative animal health” and “Treatments and practices for organic and alternative livestock”.

4. Enforcement of organic rules and regulations

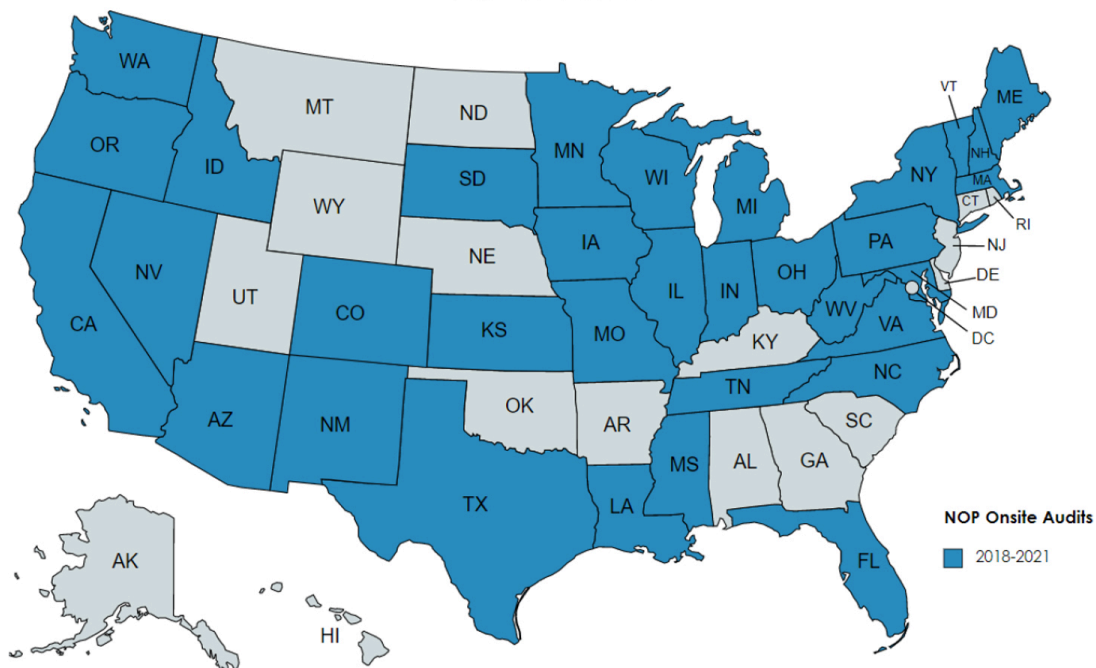
According to the [2022 Annual Organic Oversight and Enforcement Report](#), there were 45,830 certified organic farms and businesses worldwide with about 62% being in the United States. That number continues to steadily grow. The **NOP** manages the organic certification process and audits activities to ensure the integrity of the organic label. Accredited Certification Agencies (ACAs) also play a role in protecting consumer trust in the organic label by issuing noncompliance notices and investigating allegations reported to the NOP.

Complaints can be filed by anyone who believes the farm or certifier has violated the NOP regulations. For instance, farmers and ranchers can be found noncompliant with organic regulations if they do not provide adequate documentation on livestock feed or treatments to their certifiers, or if they use prohibited substances on their operation (adventently or inadvertently) and do not report it to their certifier.

Since 2018, the NOP has conducted a national surveillance program, the Organic Livestock Compliance Initiative, to perform unannounced on-site audits with farms. In 2021, notices of noncompliance were issued to certifiers for not verifying:

- the percentage of dry matter intake obtained from pasture,
- all ruminants have access to pasture throughout the grazing season,
- and temporary confinement practices meet the NOP criteria.

Location of Onsite Audits Organic Livestock Compliance Project 2018-2021



Map courtesy of USDA

This surveillance project has improved consistency in the application of regulations across organic operations as well as the enforcement efforts of certifiers. Procedures for noncompliance and investigations can be found in Subpart G of 7 CFR, Sections [205.660 – 668](#). More information can be found at [NOP Enforcement Activities](#).

Penalties

Farmers and certifiers who disagree with a noncompliance notice can submit an appeal within 30 days. If the noncompliance issue is determined to be valid, a wide range of repercussions may ensue depending on the severity. For instance, **ACAs** may provide an option for the farmer to resolve the issue within a certain time, the Organic Certificate could be suspended or revoked, and/or a financial penalty may be imposed. According to [7 CFR 3.91\(i\)\(b\)\(xxxvi\)](#), a maximum penalty of \$20,130 can be issued for knowingly selling or labeling a product as organic unless in accordance with the Organic Foods Product Act of 1990. The use of fraudulent documents to sell organic agricultural products is punishable by fines.

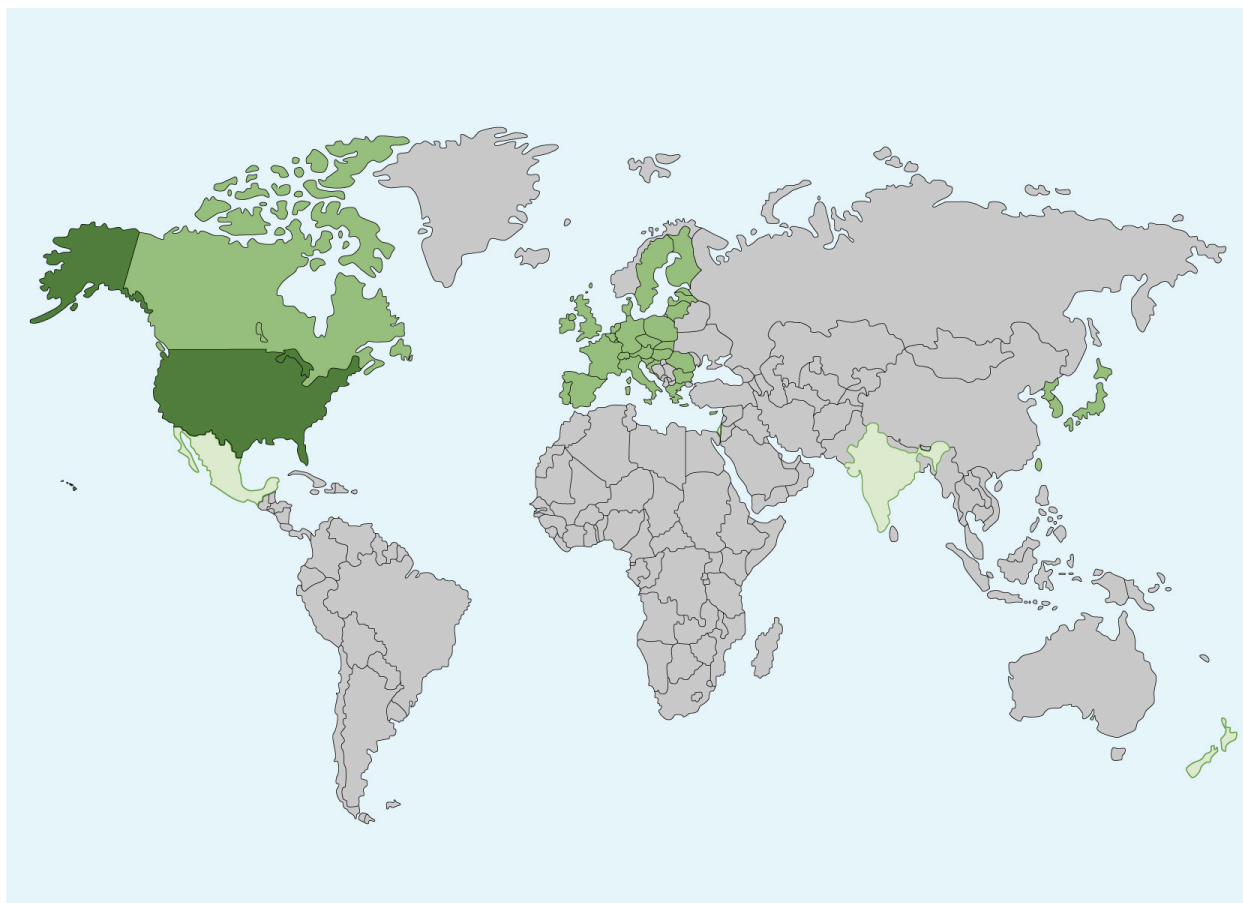
State organic programs

As mentioned previously, 15 state agencies are currently accredited by the NOP to be ACAs. If they wish, states may also implement a state organic program with their own regulations. Those regulations must follow the NOP although states are allowed to implement higher standards with approval from **USDA**. Only one state, California, has an approved state organic program in the United States. This means that California's organic program is responsible for enforcing the [California Organic Products Act of 2003](#) and the **OFPA** of 1990. Visit the following websites for more information on organic farm requirements in California:

- [California State Organic Program \(USDA\)](#)
- [California State Organic Program \(California Department of Food and Agriculture\)](#)

International agreements

Products that originate outside of the United States can be sold in the United States as certified organic if the country of origin has a trade agreement with the United States. The NOP works to establish international trade arrangements so that both countries recognize each other's organic regulations being equivalent. The United States has organic equivalency arrangements with several other countries, allowing exportation to seven countries and importation from 11 countries (see map below). The [USDA's Joint Organic Compliance Committee](#) was created to strengthen monitoring and enforcement of organic products traded between the United States and Mexico. This committee is currently working towards an organic equivalency arrangement with Mexico's certifiers on policy guidance and training.



World map, as of May 2023, showing countries the United States (dark green) allows exportation and importation of organic products (medium green): Canada, European Union, Taiwan, Japan, Korea, Switzerland, and United Kingdom. Four other countries (light green) allow exportation from the U.S. but not importation of organic products into the U.S: India, Israel, Mexico, and New Zealand.

Additional resources regarding enforcement activities of the NOP, include these USDA websites:

- [How to file a complaint on organic regulations](#)
- [List of revoked and suspended Organic Certificates](#)
- [Organic Integrity Database](#)

5. “Rules” for alternative livestock production

Every farm is unique. The geography, climate, animal species (domesticated and wild), land cover, and farmer’s own set of beliefs and expectations tie into how the land and livestock are managed. For organic operations, federal regulations set the requirements for almost all the farming practices involved (such as record-keeping and treatment of animals). This section focuses on alternative operations – ones that are not **USDA** certified organic (including transitional operations) but follow non-conventional pasture practices (such as free-range or grass-fed) or welfare certification standards that might include the use or non-use of antibiotics, hormones, pesticides, or GMOs.

Spoiler alert: there are no national rules and regulations for alternative farmers and ranchers.

Alternative agriculture may be considered an umbrella term with organic agriculture, non-conventional agriculture (such as greater pasture use), and higher-welfare certification programs falling underneath it. Organic agriculture, as we’ve previously discussed, has legally binding definitions and practices established for those who wish to seek USDA organic certification. The lack of federal regulations for other non-conventional farming practices and farm animal welfare has led to the formation of voluntary



Lucky Star Farm

certification programs. These programs vary in their standards, geographical reach, animal species covered, and popularity with consumers. Some farmers may choose to seek USDA organic certification and/or any of the following certification programs, if they find that the standards align with their own set of practices and offer a marketing advantage. For various reasons, other farmers may follow similar practices but choose not to become certified by USDA or any other program. Farmers who choose not to become certified may still hire a third-party auditing company to assess their operation.

Alternative agriculture can include non-conventional practices like **sustainable agriculture**, **regenerative agriculture**, and **permaculture**. We won’t go into detail as to how each of these approaches are similar and different. Instead, we will simply highlight that those who practice these types of agriculture do not follow prescribed national standards, which leaves definitions and practices open to interpretation by farmers as well as consumers. Oftentimes, the underlying goals are very similar to the goals of organic agriculture and the **NOP**. For instance, the emphasis on natural living conditions for animals, protection of natural resources, and improved soil fertility are common themes for both organic and alternative agricultural farmers.

See the certification programs below that complement or combine organic, alternative, and welfare claims. All these programs involve third-party, independent auditors to verify the operation’s practices. Keep in mind that this list is not meant to be comprehensive or to endorse any particular program. These programs are simply some well-known examples that will help you be more conversive with organic and alternative farmers.



A GREENER WORLD

A Greener World

A variety of certifications offered by [A Greener World](#) (AGW) allow farmers in North America to promote sustainable practices that are “good for the animals, the environment and people”. Farmers can choose between five different certifications, depending on what works best for their operation: Animal Welfare Approved, Certified Grassfed, Certified Non-GMO, Certified Organic (coming soon), or Certified Regenerative.



American Grassfed Association

[American Grassfed Association](#) (AGA) is a certification program that follows a strict set of standards and an inspection process. It is available to beef cattle, dairy, and swine farmers. Practicing veterinarians may become AGA inspectors. While AGA Certified farmers and ranchers must not treat their animals with antibiotics or hormones, they must also:

- Require continuous access to pasture and a diet of 100% forage
- Prohibit confinement to feedlots and the use of hormones and antibiotics



American Humane Certified

Since 1877, American Humane has set standards for animal welfare across many sectors. It created the first welfare certification program for farm animals in the U.S. The Certified Seal of Approval from the [American Humane Farm Program](#) is species-specific and based on the Five Freedoms of Animal Welfare. These standards are science-based and include freedom to express normal and natural behavior as well as freedom from:

- Hunger and thirst
- Discomfort
- Pain, injury, and disease
- Fear and distress



Certified Humane

Humane Farm Animal Care offers a [Certified Humane](#) Raised and Handled logo to assure consumers that the animals have been humanely raised, from birth through slaughter. It is a nonprofit organization located in the U.S. but operates internationally. Their Animal Care Standards are primarily based on animal welfare practices (such as freedom to perform natural behaviors), but also comply with the North American Meat Institute's slaughter standards. The logo can be found on agricultural products as well as pet food, textiles, and personal care products.



Global Animal Partnership

[Global Animal Partnership](#) (GAP) is a global organization that uses certifiers to audit farms and verify compliance with the animal welfare standards and then assign a certification level from 1 to 5+. The tiered labeling strategy is meant to provide consumers with information on how the “animal’s environment mimics a natural environment”, which is specific for each type of animal.



Non-GMO Project

The [Non-GMO Project](#) is a non-profit organization that certifies food products in North America and lets consumers know the products are free of GMOs. Brands can apply for this label through a verification process that includes working with an independent technical administrator, reviewing invoices and standard operating procedures, as well as certificates of analysis for the product’s ingredients.



OPT Certified Grass-Fed Organic

Organic Plus Trust (OPT) offers a certification program for farmers who want to go above and beyond the USDA organic certification. The [OPT’s Certified Grass-Fed Organic Livestock Program](#) sets national standards for organic, grass-fed meat and dairy ruminants. Some notable differences between the NOP standards are that an operation must have a grazing season of at least 150 days a year and grain feeding is not allowed.



Regenerative Organic Certified

Regenerative Organic Alliance is a non-profit organization that offers the label of [Regenerative Organic Certified](#) to ensure consumers that animals were raised on pasture and welfare standards are incorporated into daily living, transportation, and slaughter practices. This certification program is unique in that it leverages existing certifications farmers have already earned. For farmers who want to go above and beyond the USDA organic certification, they can obtain higher-welfare certification through Certified Humane, GAP (at step 4 or higher), or Animal Welfare Approved by A Greener World.

As you can see, there are no widely established “rules” for alternative agriculture farmers and ranchers. Businesses, industries, and consumers have developed their own sets of standards. There are dozens of different product labels and claims that consumers and farmers need to sort through. Unfortunately, some marketing claims like “all-natural”, “ethically-raised”, “free-range”, and “raised without antibiotics” are not substantiated by independent verification. However, a variety of voluntary certification programs are available and may offer a marketing advantage as they provide assurance to consumers about how the animals and animal products were raised and handled.

Animal health professionals can assist farmers and ranchers in meeting their certification goals by contributing and

advising on a wide range of animal husbandry and health topics involved with these various programs. You do not need to be an expert at understanding ALL the different certification programs, but you should recognize when farm practices are mandated by law or label standards. Talking with your farmer to thoroughly understand their guiding philosophies and future goals will help you both be on the same page. You must appreciate all your farmers' values and standards, whether they are established by national regulations, association standards, or simply personal beliefs.

More information about the alternative agriculture approaches mentioned above can be found at:

- Sustainable Agriculture
 - [National Center for Appropriate Technology ATTRA](#)
 - [USDA Sustainable Agriculture](#)
 - [Sustainable Agriculture Research and Education \(SARE\)](#)
- Regenerative Agriculture
 - [Natural Resources Defense Council – Regenerative Agriculture 101](#)
 - [Regenerative certifications and verifications](#)
- Permaculture
 - [Permaculture Research Institute](#)
- Animal Welfare Programs
 - [Animal Welfare Audit and Certification Programs](#)
 - [Animal Welfare Institute](#)
 - [Farm Animal Welfare Certification Guide](#)

6. Key take-aways and resources

The **OFPA** of 1990 established a uniform, national standard for organic agricultural production. The **NOP** is a set of standards that has taken decades to develop and will continue to evolve. It is important to become familiar with the current regulations in your state and the processes for future amendments so you can be aware of proposed changes. And always ask the farmer for their **OSP** or contact their certifier directly with any questions.

For a current listing of all proposed amendments and their status, search “organic” in the [Federal Register](#) or visit [Proposed Rules \(USDA\)](#). An example of a recently proposed rule that you should have on your radar is the Organic Livestock and Poultry Standards ([FR #2022-16980](#)).

Key takeaways

- **USDA** is responsible for certifying and enforcing organic rules and regulations.
- To find the most up-to-date rules and regulations for organic livestock production, visit [7 CFR 205](#).
- USDA standards for pasturing certified organic ruminant livestock include free access to certified organic pasture for at least 120 days of the grazing season, ruminants’ diets must contain at least 30% DMI (on average) from certified organic pasture, and ruminant slaughter stock are exempt from the minimum 30% DMI requirement from grazing during the finishing period.
- Many treatment options are common to both conventional and organic livestock production with general guidelines being that natural substances are allowed (unless specifically prohibited) and synthetic substances are prohibited (unless specifically allowed).
- Organic and alternative livestock production often share similar values, but it’s important for veterinarians to appreciate when farmers need to abide by federal regulations, company standards, and/or personal beliefs.



Lucky Star Farm

Helpful resources

Courses

For in-depth information on prevention measures, communication tips, veterinary medicine practices, and management tools used in organic and alternative production, continue reading the following chapters:

- Prevention and organic/alternative animal health
- Practice management considerations for working with organic and alternative livestock clients
- Communication considerations for working with organic and alternative livestock clients
- Treatments and modalities for organic and alternative livestock

Handouts

- [Guidance for treating organic and alternative livestock](#)
- [Organic Livestock Requirements \(USDA\)](#)
- [Tip sheet for the National Organic Program's \(NOP\) Pasture Rule](#)
- [Tipsheet: Treatment of Sick or Injured Organic Livestock \(NCAT\)](#)

Websites

- [Code of Federal Regulations: National Organic Program](#)
- [NOP Handbook for Certifying Agents and Operations](#)
- [Practical guide to working with organic farms](#)
- [Understanding and Implementing the NOP Pasture Rule](#)
- [USDA Guide for Organic Producers](#)

Thank you!

Remember to return to the course home page to complete this chapter's quiz. After successfully passing the 5-question multiple-choice quiz, you can collect your Certificate of Completion to earn 1.0 RACE-approved CE credit.

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Glossary

ACA

Accredited Certification Agency

AGA

American Grassfed Association

alternative

when a non-mainstream approach is used in place of conventional medicine

AMDUCA

Animal Medicinal Drug Use Clarification Act of 1994

APHIS

Animal and Plant Health Inspection Service

ATTRA

Appropriate Technology Transfer for Rural Areas

AVMA

American Veterinary Medicine Association

CAVM

Complementary and Alternative Veterinary Medicine

CE

continuing education

CFSPH

Center for Food Security and Public Health

complementary

when a non-mainstream approach is used together with conventional medicine

CRP

Conservation Reserve Program

DMI

Dry Matter Intake

EPA

Environmental Protection Agency

EU

European Union

FAD

Foreign Animal Disease

FAMACHA

a system for estimating the level of barber's pole worm among small ruminants

FDA

Food and Drug Administration

G.I.

Gastrointestinal

GAP

Global Animal Partnership

GMO

Genetically Modified Organism

GMOs**integrative**

when conventional and complementary approaches are used together to care for the whole individual in a coordinated way

IOIA

International Organic Inspectors Association

Materials List

A list included in the Organic System Plan of each substance that might be used as a production input (e.g., fertilizers, health care products, feed).

NCAT

National Center for Appropriate Technology

NCCIH

National Center for Complementary and Integrative Health

NIH

National Institute of Health

NOP

United State Department of Agriculture's National Organic Program

NOSB

National Organic Standards Board

O/A

Organic and/or Alternative

OFPA

Organic Foods Production Act

OMRI

Organic Materials Review Institute

Organic Livestock

Certified by the USDA to carry the organic label

OSP

Organic System Plan

Permaculture

A system that develops agricultural systems modeled from natural ecosystems (per USDA).

plain community

Amish and conservative Mennonites

PMO

Pasteurized Milk Order

Regenerative agriculture

An alternative decision-making framework that offers a set of principles and practices to grow food in harmony with nature and heal the land from degradation (per NRDC).

Split operation

An operation that produces or handles both organic and nonorganic agricultural products (per USDA).

split operations

An operation that produces or handles both organic and nonorganic agricultural products (per USDA).

Sustainable agriculture

An integrated system of plant and animal production practices having a site-specific application that will, over the long-term satisfy human needs, enhance environmental quality, make the most efficient use of nonrenewable resources, sustain the economic viability of farm operations, and enhance the quality of life for farmers and society as a whole (abbreviated per USDA).

USDA

United States Department of Agriculture

VCPR

Veterinarian-Client-Patient Relationship