

**ITEM FOR PUBLIC COMMENT**  
[NOSB Pet Food Task Force Interim Report](#)

The National Organic Standards Board recommended in October 2004 that a Task Force be formed to develop labeling standards for organic pet food. A Federal Register notice was posted on January 24, 2005 to solicit nominations, and the Pet Food Task Force was selected by NOP in May 2005. The Task Force includes individuals experienced in organic and conventional pet food manufacture, consultants with organic expertise, as well as state and federal regulatory authorities. The NOP has acknowledged in the Federal Register notice that pet food is “unregulated” by NOP regulations, but that further consultation with the pet food industry and NOSB was needed to craft specific regulations for organic pet food. The NOSB noted that the existing organic livestock regulations may not be suitable for pet food application, as they restrict the use of mammalian products fed to mammals, and do not allow a “Made with Organic” label claim. The existing human food processing standards do not allow for use of natural feed additives and processing aids that are allowed in livestock feed.

In establishing the regulatory objectives for the Pet Food Task Force, the NOSB specifically asked the Task Force to:

- Determine which aspects of the existing regulation pertain to pet foods;
- If needed, draft amendments to the regulation for consideration by the full board; and
- Identify substances used by pet food manufacturers to be petitioned for possible addition to the National List.<sup>1</sup>

The organic Pet Food Task Force (PFTF) decided that the primary tasks should be undertaken in two phases:

- 1) Propose changes in the organic regulations to support labeling of organic pet food, and
- 2) Evaluate where any conflicts may exist between organic labeling claims and the existing state requirements for pet food labeling, and propose remedies in collaboration with state officials.

At the present time, the PFTF has completed a draft proposal for organic regulation changes for public and NOSB consideration: [the interim report of pet food task force](#), submitted April 7, 2006. The PFTF will continue to work further on evaluating any conflicts with state requirements, as embodied in the Association of American Feed Control Officials (AAFCO) model Pet and Specialty Pet Food regulations. Organic pet food manufacturers will have to comply with both the NOP regulations and existing state pet food regulations, so the goal will be to reconcile any conflicts and propose guidance for the AAFCO officials in interpreting organic claims.

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<sup>1</sup> Recommendation on “National Organic Program Scope”, adopted by NOSB, as revised Oct.13, 2004

In the meantime, public comment on the pet food task force's interim report is sought. Please submit comments by September 1, 2006. With respect to the receipt of comments, the following provisions have been established:

- **Mail:** Persons may submit comments on the Pet Food Task Force Interim Report to:  
Valerie Frances, Executive Director,  
National Organic Standards Board (NOSB)  
USDA-AMS-TM-NOP  
Room 4008-South Building  
1400 Independence Ave, SW  
Washington, DC 20250-0001
- **E-mail:** Comments may be sent via internet to: [NOSB.Processing@usda.gov](mailto:NOSB.Processing@usda.gov)
- **Fax:** Comments may be sent via fax to (202) 205-7808

In reviewing and commenting the Pet Food Task Force's interim report, please consider and respond to the following criteria:

1. Do the recommended standards communicate effectively?
2. Provide clear and adequate context of scope, product coverage, and production systems?
3. Identify and address key stakeholders and their concerns and challenges?
4. Include vision and strategy for achieving consistency with organic principles demonstrated in the Organic Foods Production Act of 1990 and its implementing regulations?
5. Present measurable objectives that are enforceable?
6. Present a clear expectation of targets and goals?

Clearly indicate if you are for or against the recommended standards or some part of it and why. Include recommended wording changes as appropriate. Include a copy of articles or other references that support your comments. Only relevant material should be submitted.