

AAFCO Feed Labeling Committee
Redondo Beach, California
January 21, 2010

Committee Members

Meagan Davis, Co-Chair
Ricky Schroeder, Co-Chair
Richard Ten Eyck
Tony Claxton
Mika Alewynse
Tim Darden
Mike Davidson
Cama Coffman
Scott Ziehr
Ken Bowers
Rob Hougaard

Industry Advisors/Representatives

Randy Sample
Sue Carlson
Bruce Arenston
Kris Mantey
Nancy Cook
Jim Barritt
Jan Campbell
David Dzanis
Angele Thompson

Ricky Schroeder called the meeting to order at 10:30 AM. Introductions were made and the meeting started with previous business yet unfinished.

1. Non Pet Food Labeling Guide

Meagan Davis informed the committee and those present in the audience that the Non-Pet Food Labeling Guide was going to be under revision until the language between the OP and the Guide are uniform. The document will be removed from the AAFCO website until the revisions to the wording are complete and the committee is satisfied with the final draft. As soon as a revised document is available it will be added to the website as a PDF file. Meagan announced that this document can be accessed through a portal on the AAFCO website that allows an accredited member of the committee to download a word document of this file so that revisions can be accessed. The revisions of the Guide are estimated to be completed by August 2010 – the Annual Meeting in Portland, Oregon.

A working group was identified by the committee to address additional information to be included in the Guide. A request to form a working group to look into adding a section for labeling single ingredient feeds was entertained by the committee. This working group will consist of Ellen Slaymaker (not present at the meeting), Jan Campbell, Randy Sample and Mika Alewynse.

2. Separation of Goat and Sheep Labeling Requirements

Richard Ten Eyck addressed the FLC with a document concerning the compiled findings and opinions of the previously formed expert panel (*see attached document*). The expert panel was formed to determine whether or not additional guarantees may be required. Richard Ten Eyck made a motion to

accept the report from the panel and the motion was seconded by Alewynse. The motion passed and it was determined that the expert panel could be disbanded.

Richard Ten Eyck made a motion to accept the 2 statements and forward to the BOD of Directors to be then moved to the Model Bill and Regulations Committee. The motion was seconded by Bowers and the Motion passed by majority vote. Motion was later rescinded by Ten Eyck, seconded by Mika and the original vote was unanimously rescinded.

- 1.) Add acid detergent fiber (ADF) max % in the guaranteed analysis section of all goat feeds.
- 2.) Change the copper guarantee to: minimum and maximum parts per million (ppm) if added. If no copper is added, state "none added" in guaranteed analysis section of the label.

The consensus from the industry representation was to allow a voluntary guarantee for ADF but not make it a requirement.

There were concerns about the inclusion of the phrase "none added" under the suggested copper requirements. The phrase does not collaborate with the "if added" term used for other required guarantees listed in the OP. The explanation from Ten Eyck was the language is coming from the expert panel speaking for the consumer. However, "none added" was determined to be a voluntary claim and would be allowable by some regulatory officials if it was not misleading.

There was also question about the addition of including a minimum and maximum spread for copper. Would copper then be incorporated in the same percentage spread allotment that regulates calcium, salt and sodium? This range would need to be set since copper guarantees are usually expressed in PPM not percentages. Further research will be required to determine further requirements.

A working group was formed following the rescinding of the previous motion and will consist of Ricky Schroeder, Mika Alewynse, Richard Ten Eyck, Bruce Arentson, and Ken Bowers. The charge of this working group is to review the results of the expert panel and reword the language so that it correlates with existing language already in use in the OP.

3. Carbohydrate Working Group

Richard Ten Eyck presented a report of findings from the AAFCO Carbohydrate Working Group that included proposed Model Bill Changes (*see attached document*). Ten Eyck made a motion to accept the submitted report. The motion was seconded by Alewynse. Motion passed and the report was accepted by the committee.

Ten Eyck made a motion to accept recommendation number 1: Expression of Guarantees. The motion was seconded by Alewynse. After revising the wording, the recommendation was accepted and the motion passed.

The recommendation was reworded to remove the term “carbohydrate.” Further information may be needed regarding carbohydrate claims, specifically “low carb” claims. There are no set standards regarding “low” claims in general, but comparative claims may be allowable.

The AAFCO Carbohydrate working group has drafted a few different sets of language regarding recommendations for labeling pet food. However, the working group feels that the Pet Food Committee would be better suited to finalizing the language. Ten Eyck made a motion to turn this information over to the Pet Food Committee. The motion was seconded by Claxton. The motion passed.

A motion was made to disband the AAFCO Carbohydrate Working Group, seconded by Ziehr. Motion passed and the group was disbanded. *The Feed Labeling Committee would like to extend thanks to those who worked diligently in the Carbohydrate Working Group. Congratulations and thanks for all the hard work!

4. Principal Display Panel Definition

Ken Bowers made a motion to accept a recommended principal display panel definition (*see attached document*). Ten Eyck seconded the motion and the motion passed.

Ken Bowers made a motion to accept the recommended changes to the regulations to be forwarded to the Model Bill Committee via the Board. Claxton seconded the motion. The motion passed.

5. New Business

Richard Ten Eyck made a motion to set a deadline for the cessation of use of crude fiber guarantees in the Model Bill and Regulations; with an estimated deadline of the 2015 OP. Alewynse seconded this motion. Motion failed.

Further investigation will be performed by the Feed Labeling Committee and other relevant AAFCO Committees to develop more information to present to the membership and industry representatives.



**Expert Panel Summary Report on Goat Feeds
to the Feed Labeling Committee of AAFCO**

December 30, 2009

TO: AAFCO Feed Labeling Committee: members, advisors and all other interested parties.

Attached is a summary sheet of the recommendations and comments from a panel of experts assembled by AAFCO to review what is important on a goat feed label. The panel held one conference call and exchanged several e-mails.

Recommendations to forward to model bill committee via the board:

- 1) Add Acid Detergent Fiber (ADF) max % in the guaranteed analysis section of all goat feeds.
- 2) Change the Copper guarantee to: Minimum and Maximum ppm, if added. If no copper is added, state "none added" in guaranteed analysis section of the label.

Comments from the panel:

Crude fiber is no longer "important" but they did not want to remove it due to historical and customer expectations.

Copper was the biggest discussion point. All of the panel members agreed the "none added" claim was critical to add. Half of the panel did not think a copper maximum was necessary.

If you have any questions, please e-mail me before the meeting so I can query the panel. I will be at the committee meeting to make a motion to accept the above recommendations.

Respectfully submitted,

Richard Ten Eyck
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	Current labeling model regulations	Expert Panel consensus			not on call
Nutrient			Lynch	Goetsch	Ely
Crude Protein, %	Minimum percentage	Minimum percentage	same	same	voting with Hutchens
Non-protein nitrogen, %	Maximum percentage of equivalent crude protein from Non-Protein Nitrogen (NPN) when added	Maximum percentage of equivalent crude protein from Non-Protein Nitrogen (NPN) when added	same	same; because nutritionally it would not seem to make much if any difference if NPN is from urea or ammonium chloride, specifying the level of ammonium chloride may not be needed	
Crude Fat, %	Minimum percentage	Minimum percentage	same	same	
Crude fiber, %	Maximum percentage	Maximum percentage	same	same	
ADF %	NONE	Maximum %		Maximum	Max
Calcium, %	Minimum and maximum percentage	Minimum and maximum percentage	same	same	Same
Phosphorus, %	Minimum percentage	Minimum percentage with some interest in also max.	same	minimum and maximum; adding the maximum is suggested in regards to maintaining a certain Ca:P ratio to aid in avoiding urinary calculi	Same
Salt, %	Minimum and maximum percentage if added	Minimum and maximum percentage if added	same	same	
Sodium, %	Minimum and maximum percentage shall be guaranteed only when total sodium exceeds that furnished by the maximum salt guarantee	Minimum and maximum percentage shall be guaranteed only when total sodium exceeds that furnished by the maximum salt	same	same	same
Copper, ppm	Minimum and maximum if added, or if total copper exceeds 20 ppm.	Minimum and maximum ppm if added or "none added"	Minimum and Maximum if added, or statement made "None Added"	min and max; feedstuffs may be sufficiently variable in Cu to justify min and max, in addition to desires to meet minimum requirements and avoid potentially toxic levels	Minimum and Maximum, or statement made "None Added"
Selenium, ppm	Minimum ppm	Minimum ppm	min	same	Minimum
Vitamin A, IU/lb	Minimum, other than precursors of Vitamin A, if added	Minimum, other than precursors of Vitamin A, if added	same	same	same
Put initials in this row when you update your info.			GLL	ALG	tkh

	Current labeling model regulations	Expert Panel consensus		not on call		not on call
Nutrient			Hutchens	Wooten	Thompson	Sachtleben
Crude Protein, %	Minimum percentage	Minimum percentage	Same	same	same	same
Non-protein nitrogen, %	Maximum percentage of equivalent crude protein from Non-Protein Nitrogen (NPN) when added	Maximum percentage of equivalent crude protein from Non-Protein Nitrogen (NPN) when added	Same	same	same(see no need to add statement)	modify NPN statement to declare "from ammonium chloride."
Crude Fat, %	Minimum percentage	Minimum percentage	Same	same	same	same
Crude fiber, %	Maximum percentage	Maximum percentage	same	same	same	same
ADF %	NONE	Maximum %	Max		Maximum	none
Calcium, %	Minimum and maximum percentage	Minimum and maximum percentage	Same	same	same	same
Phosphorus, %	Minimum percentage	Minimum percentage with some interest in also max.	Same	same	Also add Maximum %	same
Salt, %	Minimum and maximum percentage if added	Minimum and maximum percentage if added		Drop	same	same
Sodium, %	Minimum and maximum percentage shall be guaranteed only when total sodium exceeds that furnished by the maximum salt guarantee	Minimum and maximum percentage shall be guaranteed only when total sodium exceeds that furnished by the maximum salt	same	same	same	same
Copper, ppm	Minimum and maximum if added, or if total copper exceeds 20 ppm.	Minimum and maximum ppm if added or "none added"	Minimum and Maximum, or statement made "None Added"	Minimum and Maximum, or statement made "None Added"	Min % if added or none added	Minimum ppm or none added
Selenium, ppm	Minimum ppm	Minimum ppm	Minimum	Minimum only, testing has a wide range (20%+/-)	same	same
Vitamin A, IU/lb	Minimum, other than precursors of Vitamin A, if added	Minimum, other than precursors of Vitamin A if added	same	same	same	same
Put initials in this row when you update your info.			tkh	gw	JMT	SSS

	Current labeling model regulations	Expert Panel consensus		not on call	
Nutrient			McCoy	Ramsay	Warren
Crude Protein, %	Minimum percentage	Minimum percentage	same	No input received	same
Non-protein nitrogen, %	Maximum percentage of equivalent crude protein from Non-Protein Nitrogen (NPN) when added	Maximum percentage of equivalent crude protein from Non-Protein Nitrogen (NPN) when added	modify NPN statement to declare "from ammonium chloride."		modify NPN statement to declare "from ammonium chloride"
Crude Fat, %	Minimum percentage	Minimum percentage	same		same
Crude fiber, %	Maximum percentage	Maximum percentage	same		same
ADF %	NONE	Maximum %	none		maximum %
Calcium, %	Minimum and maximum percentage	Minimum and maximum percentage	same		same
Phosphorus, %	Minimum percentage	Minimum percentage with some interest in also max.	same		same
Salt, %	Minimum and maximum percentage if added	Minimum and maximum percentage if added	same		drop
Sodium, %	Minimum and maximum percentage shall be guaranteed only when total sodium exceeds that furnished by the maximum salt guarantee	Minimum and maximum percentage shall be guaranteed only when total sodium exceeds that furnished by the maximum salt	same		minimum , maximum must be in if salt is declared
Copper, ppm	Minimum and maximum if added, or if total copper exceeds 20 ppm.	Minimum and maximum ppm if added or "none added"	Minimum ppm if added or "none added"		minimum ppm if added, or "none added"
Selenium, ppm	Minimum ppm	Minimum ppm	same		same
Vitamin A, IU/lb	Minimum, other than precursors of Vitamin A, if added	Minimum, other than precursors of Vitamin A, if added	same		same
Put initials in this row when you update your info.			rm		jhw

January 6, 2010

Carbohydrate AAFCO Working Group
Proposed Model Bill Changes
(VERSION 23)

Group contact: Richard Ten Eyck, Oregon Dept Ag. 503-351-0965

Background: We now have feed terms to describe three of the carbohydrate fractions that are important in the animals' diet: Dietary Starch, Sugars and Fructans.

Industry would like to produce and label horse feeds and pet foods that produce a modulated glycemic response when fed. One of our struggles is with the guarantee of fructans. It's important that the fraction is quantified when using equine feeds containing cool season grasses. There is not currently an economical test for fructans.

We think that model regulation 3 (a)(4) X (b)(10) opens the door to go ahead and guarantee fructans. That regulation states that a commercial feed with a specialized purpose used to make another feed can guarantee the special nutrient even if there is not a recognized lab method for the special nutrient. We believe the lab methodology to cleanly determine fructans will improve over time. It's more important to provide a value using a company-determined method than allow a loophole that may miss-inform the consumer by not guaranteeing any value.

Fructans are not an issue in the pet food diets as they are typically not present in a carnivore diet. Companies adding fructans will want to guarantee minimums to substantiate their marketing claims.

The work group would also be in favor of adding NDF maximum to equine feeds making carbohydrate claims but felt it was not a critical part of the task as assigned.

Recommendation one (any carbohydrate claims in non-pet feed):

We recommend the AAFCO Feed Labeling Committee forward the following additions via the Board of Directors to the Model Bill and Regulations Committee for addition to the Model Regulations:

Regulation 4. Expression of Guarantees (pg 118 of 2009 OP)

.....insert.....

(i) Guarantees for dietary starch, sugars, and fructans for Commercial Feeds, other than customer-formula feed, Pet Food and Specialty Pet Food Products:

- (1) A commercial feed which bears on its labeling a claim in any manner for levels of “dietary starch”, “sugars,” “fructans,” or words of similar designation, shall include on the label:
 - (a) Guarantees for maximum percentage of dietary starch and maximum percentage sugars, in the Guaranteed Analysis section immediately following the Crude Fiber guarantee.
 - (b) A maximum percentage guarantee for fructans immediately following sugars, if the feed contains forage products.
 - (c) Feeding directions shall indicate the proper use of the feed product and a recommendation to consult with a veterinarian or nutritionist for a recommended diet.

Recommendation Two (pet)

We recommend the word-smithing be done in the pet food committee but follow this concept:

When a pet food or specialty pet food makes claims dealing with (soluble, non-structural, non-fiber) carbohydrates such as dietary starch, or sugars the product should guarantee a maximum percent of Dietary starch and sugars.

Comments:

Richard: “ACVN has proposed a very elegant ratio of dietary starch to calories that eliminates a lot of the caveats for feeding rates and food moistures.”

Angele: “The level and units for “low” should be set similarly to the way the levels were set for the other descriptive terms...via a marketplace survey with input from the regulated industry. This is best done from within the Pet food Committee hence the request to forward the proposal.”

Dave: “The proposed level for “low” was based in part on data collected by ACVN for starch and sugars content of pet foods of varying composition in the marketplace. However, to facilitate input of survey data from the regulated industry, it is recommended that the proposal be forwarded to the Pet Food Committee for further deliberation.”

The work group has a couple of sets of draft language for pet foods they would be willing to send to the pet food committee.

Principal Display Panel – draft changes to Model Regulations

Add

Regulation 1: Definitions and terms

(d) Principal Display Panel means the out-facing side of the feed tag, or if no tag, the part of the label that is most likely to be displayed, presented, shown or examined under normal and customary conditions of display for retail sale.

Revise

Regulation 2

(a) Commercial feed, other than custom formula feed, shall bear the information prescribed in this regulation on the label of the product and in the following format.

- (1) Product name and brand name, if any, as stipulated in Regulation 3(a)(1).
- (2) If a drug is used, label as stipulated in Regulation 3(a)(2).
- (3) Purpose statement as stipulated in Regulation 3(a)(3).
- (4) Guaranteed analysis as stipulated in Regulation 3(a)(4).
- (5) Feed ingredients as stipulated in Regulation 3(a)(5).
- (6) Directions for use and precautionary statements as stipulated in Regulation 3(a)(6).
- (7) Name and principal mailing address of manufacturer or persons responsible for distributing the feed as stipulated in Regulation 3(a)(7).
- (8) Quantity statement.

(b)

- (1) The information as required in regulation 2(a)(1), (2), (3) and –(8) must appear in its entirety on the principal display panel.
- (2) The information as required in Regulation 2(a)(4), (5), (6) and (7) shall be displayed in a prominent place on the feed tag or label, but not necessarily on the principal display panel. When a precautionary statement required by Regulation 2(a)(6) does not appear on the principal display panel, it must be referenced on the principal display panel with a statement such as “See back of label for precautions.”

(c) None of the information required by Regulation 2 shall be subordinated or obscured by other statements or designs.