

Bellevue MBRC Attachment A

From: Ben L. Jones [<mailto:blj@otsc.tamu.edu>]
Sent: Wednesday, August 17, 2016 4:19 PM
To: Lueders, Doug (MDA) <doug.lueders@state.mn.us>
Subject: RE: MB Inconsistency

Doug,

I'm not sure to which preference you refer. How to move forward in the AAFCO process or which way to fix the inconsistency? I would be in favor of changing Model Regulation 4(c) to mirror the intent of 4(b)(3). Something like:

(c) Vitamin Guarantees

(1) Guarantees for minimum vitamin content of commercial feed shall be listed in the order specified and are stated in mg/lb unless otherwise specified.

(I) Vitamin A, other than precursors of vitamin A, in International Units per pound.

(II) Vitamin D-3 in products offered for poultry feeding, in International Chick Units per pound.

(III) Vitamin D for other uses, International Units per pound.

(IV) Vitamin E, in International Units per pound.

(V) Concentrated oils and feed additive premixes containing vitamins A, D, and/or E may, at the option of the distributor be stated in units per gram instead of units per pound.

(VI) Vitamin B-12, in milligrams or micrograms per pound.

(VII) All other vitamin guarantees shall express the vitamin activity in milligrams per pound in terms of the following: menadione; riboflavin; d-pantothenic acid; thiamine; niacin; vitamin B-6; folic acid; choline; biotin; inositol; p-amino benzoic acid; ascorbic acid; and carotene.

(2) Products labeled with a quantity statement (e.g. tablets, capsules, granules, or liquid) may state vitamin guarantees in milligrams per unit (e.g. tablets, capsules, granules, or liquids) consistent with the quantity statement and directions for use.

Just an example of a possibility.

Thanks,

BLJ

From: Lueders, Doug (MDA) [<mailto:doug.lueders@state.mn.us>]
Sent: August 15, 2016 12:30 PM
To: Ben L. Jones <blj@otsc.tamu.edu>
Subject: RE: MB Inconsistency

Ben,

I do not disagree. What would your preference be? I'm actually surprised that AFIA didn't pick up on that. I wish that I knew what the rationale was back in the day.

Regards,

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From: Ben L. Jones [blj@otsc.tamu.edu]
Sent: Monday, August 15, 2016 11:42 AM
To: Lueders, Doug (MDA)
Subject: MB Inconsistency

Doug,

Recently discovered what I see as a inconsistency in a section of the model regulations under the model bill and the model pet food regulations. At least may deserve consideration and discussion.

Regulation 4. Expression of Guarantees

4(b)(3) Mineral Guarantees allows for the expression of mineral guarantees in mg/unit (e.g. tablets, capsules, granules, or liquids) consistent with the quantity statement and directions for use.

4(c) Vitamin Guarantees allows for the expression of vitamins in mg/lb or units consistent with those employed for the quantity statement unless otherwise specified.....and then lists some specific expressions for certain vitamins, implying that those specific expressions cannot be guaranteed in mg/unit.

Regulation PF4. Expression of Guarantees

PF4(c)(3) allows for expression of minerals in mg/unit.

PF4(d)(3) allows for expression of vitamins in mg/unit.

You may ask..."so what?" So, if a companion animal, say horse, product is in a tablet, capsule, granule, or liquid form, they can guarantee minerals in a mg/unit form, can guarantee some vitamins in mg/unit, but cannot guarantee all the vitamins in a mg/unit form. Makes it difficult to convey information to the consumer in a consistent manner.

Your thoughts?

Thanks,

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