

2017 Bellevue Attachment G

Good morning,

Kristi Smedley and I took the comments regarding dried insects in wild bird food, into consideration and have drafted the following SUIP for Model Bill Committee to review.

30. Dried Insects for Wild Bird Food- Insects, all life stages, that are commonly found in the wild as North American wild bird food sources may be reared and dried for use in commercial wild bird feed. These insects are considered common food. The dried insects must be feed grade. The label must include the appropriate common name of the insect . Example: Black Shoulder Fly Larvae

There is no intention to circumvent the ingredient definition process. Based upon discussions with CVM and the IDC Chair, it has been recognized that wild birds have a plethora of options for food sources that are not limited to commercially produced animal food. Larvae and insects that are found in North America are a staple part of the wild bird food diet and should likely pose no safety risk when offered in commercial bird seed mixes and suet cakes, provided the dried insects are feed grade (not adulterated).

Please consider the opportunity to list the dried insect larvae and dried insects for wild bird food use only in a Statement of Uniform Interpretation and Policy to ensure the regulators and industry have a standard to follow.

Many thanks,

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Bureau of Plant Industry

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