Feed Labeling Committee

Meeting Minutes
Tuesday January 23, 2018
1:30 – 2:30 PM
2018 AAFCO Mid-Year Meeting
Garden Grove, CA

Committee Participants
Members Present:
Chair: Dave Dressler (PA); Vice Chair: Dave Phillips (ND); Jason Schmidt (LA), Liz Beckman (WA), Richard Ten Eyck (OR), Miriam Johnson (NC), Erin Bubb (PA), George Ferguson (NC), Tim Darden (NM), Heather Bartley (WI), Al Harrison (KY), Steve Gramlich (NE).

Advisors Present:
Dave Dzanis (ACVN/APPA), Sue Hays (WBFI), Jan Campbell (NGFA), Chris Olinger (NGFA), Angela Mills (AFIA), Meghan Dicks (AFIA), Pat Tovey (PFI).

Absent:
Mika Alewynse (FDA), Ed Rod (APPA), Charles Starkey (US Poultry Assn), James Emerson (US Poultry Assn),

Introductions and Agenda Review
David Dressler called the meeting to order at 1:30 PM PDT. Roll call of members and advisors was taken and a quorum was established.

Update to Expert Panel for Nutrient Indicators Review for Beef Cattle
Work group has completed their review and recommended the following:
- Addition of ADF and NDF (maximum) to complete and supplement guarantees.
- Addition of Se to complete and supplement guarantees, if a selenium source is added.

Alan Harrison stated that the work group will need to take a formal vote before recommending to the committee and to provide a timeline to address changes in labeling. Once the working group includes a Model Bill revision, they will send to the Model Bill Committee.

Richard Ten Eyck motions to accept the work group report. Erin Bubb seconds. **MOTION CARRIED.**

Maximum Guarantees for Nutrients with Toxicity Levels
Discussion was held to determine if nutrients from Table 2 on page 298 of the 2018 OP “Official Guidelines Suggested for Contaminates in Individual Mineral Feed Ingredients”, when guaranteed should state both a minimum and a maximum guarantees.

A concern was mentioned that mineral levels can change due to other sources of minerals that may be included in the ingredient, such as naturally occurring copper. Since there is a chance for these levels to
change based on other ingredients, how big of a gap will be allowed, considering AAFCO limits the
tolerance to 20%.

There was mention about forming a workgroup to further discuss. It was recommended that the workgroup
that reviewed the NRC be the workgroup to discuss this. It was mentioned that the Feed Manufacturing
Committee has a working group that is reviewing Table 2.

Richard Ten Eyck motions to ask current work group from the feed manufacturing committee to establish
max recommendations for specific minerals. Dave Phillips seconds. **MOTION CARRIED.**

**Non-Medicated Feed Labeling Guide**
The workgroup has nothing new to report at this time. They are still reviewing the guide and should have
a report ready for the annual meeting in Fort Lauderdale.

**Electronic Labeling**
This topic was brought to the committee chair from industry to see if it would be acceptable to allow for feed guarantors to provide labels to customers electronically. With regards to bulk deliveries, they are required to maintain electronic records for DOT requirements, therefore, why not include a complete label as an addition to the DOT records.

There was concern that states may not have the authority to allow electronic labeling to override federal regulations. There could be a conflict between DOT requirements and the requirements of the feed label.

No decision was made to move forward with this topic.

**Non-Medicated Feed Labeling Workshop**
The workshop will be held prior to the AAFCO meeting in Fort Lauderdale. The workgroup is still finalizing the agenda, however potential speakers have been contacted to see if they would be interested in presenting during the workshop. The goal is to have the final agenda complete by April.

**Direct Fed Microbial Products**
Expiration dates are not required to be present on these products. FDA recommends an expiration date
due to organism die-off. Discussion was held to discuss this recommendation.

Mandatory expirations are not necessary, because the label guarantees must be met. Manufacturers are aware that organism die-off happens, which is why they add language to the guaranteed analysis that states “at time of manufacture”. Manufacturers are guarantee for typical shelf life in store. What is the life of the product? What is recommended for expiration dates? No commercial feeds have expiration dates. A concern also is that the guarantor would have no way to control how the consumer handles the product after removing it from the retail market. Organism stability is dependent on the composition of the final ingredients and type of organisms.
Feed Label Review Software
The working group has reviewed the program.

The goal of this software is to promote consistency in label review between state regulators, and assist new regulators that might not have experience with label review.

Some concerns that were discussed is that industry feels this may be another obstacle in the process and that Google recently released technology that will allow recognition software. A comment was made to schedule another webinar demonstration since may could not attend the meeting.

Since this project has a cost associated with it, this should be moved to the Board since there is a cost associated with this program.

Steve Gramlich moves to request Board to continue RFP process to determine if costs for feed label review program is economically feasible for AAFCO. Second by Tim Darden. **MOTION CARRIED.**

Meeting adjourned at 2:40 PM

### Action Item Table

<table>
<thead>
<tr>
<th>Responsible</th>
<th>Item</th>
<th>Action</th>
<th>Timing / Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>David Dressler</td>
<td>Maximum Guarantees for Nutrients with Toxicity Levels</td>
<td>Present this to the Feed Manufacturing Committee Chair for consideration.</td>
<td>July 2018</td>
</tr>
<tr>
<td>Mika Alewynse &amp; Meagan Davis &amp; Angela Mills &amp; Thomas Belloso</td>
<td>Non-Pet Food Label Design &amp; Format Guide</td>
<td>Determine recommendations for name change and formatting</td>
<td>July 2018</td>
</tr>
<tr>
<td>Workshop Working Group</td>
<td>Non-Medicated Feed Labeling Workshop</td>
<td>Develop agenda and select presenters</td>
<td>April 2018</td>
</tr>
<tr>
<td>Dave Phillips</td>
<td>Feed Label Review Software</td>
<td>Approach the AAFCO Board to determine if costs for the feed label review software program is economically feasible for AAFCO.</td>
<td>March 2018</td>
</tr>
</tbody>
</table>