

Feed Labeling Committee Minutes
The Nines Hotel
Portland, Oregon
August 2, 2010

Meagan Davis	Rob Hougaard	Scott Ziehr	Ken Bowers
Ricky Schroeder	Ken Jackson	Richard Ten Eyck	Tim Darden
Kris Mantey	Jan Campbell	Sue Hays	Sue Carlson
Ellen Slaymaker	Randy Sample	Jim Barritt	Nancy Cook
David Dzanis			

1.) Non-Pet Food Label Design and Format Guide – Meagan Davis

Due to the changing Federal regulations concerning the sub-therapeutic use of oxytetracycline and neomycin in milk replacers, the example label used in the Guide will be removed. Ricky Schroeder will review the other medicated example labels with similar intended uses. There was discussion concerning using the Blue Bird Labels in place of the current example labels and charging a fee for the Guide, however, both ideas were tabled.

Ellen Slaymaker and Meagan Davis will draft a general guidance for labeling single ingredients by providing examples using common feed ingredients.

Excerpt from Redondo Beach FLC Minutes

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.) OP Model Regulations Change to Finish Pig Weight Classes – Ricky Schroeder

Ricky Schroeder made a motion to change the current model regulations Regulation 3(a)(4)(l)(a)(4) from “Finisher – 110 to 242 pounds (market)” to “Finisher – 110 pounds to market weight.” Rob Hougaard seconded the motion. Motion passed. ACTION REQUIRED. Send to BOD for submission to the MBRC.

3.) Proposed Crude Fiber Guarantee Removal (replacement: Acid Detergent Fiber) from Model Regulations – Richard Ten Eyck

Richard Ten Eyck followed up on this previous failed motion and brief discussion occurred of the incompatibility of the proposed change in regulations and current state regulations.

Questions regarding page 127 in the 2010 OP – “Criteria for Labeling Nutritional Indicators” and the number of “experts” necessary to make up the “recognized experts” is uncertain. Meagan Davis is to speak with Eli Miller in order to determine if there is a declared number that had been omitted from the criteria (Eli Miller, former FLC Chair and Feed Coordinator for Kentucky

may have historical information on file). Richard Ten Eyck, Tim Darden, Randy Sample, Mika Alewynse (Benz), Meagan Davis and Tim Darden have volunteered to participate in the working group to clarify this criteria.

4.) Separation of Goat and Sheep Labeling Requirements – Richard Ten Eyck

(Information tabled until working group can meet)

Excerpt from Redondo Beach FLC Minutes

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.

5.) Feed Label Training Module - Gloria Dunnavan

Gloria Dunnavan is developing a feed labeling training module for ORA U for Inspector Certification. She has provided the group with the draft outline and requested feedback from the AAFCO Feed Labeling Committee. Rob Hauggard, Jan Jarman, Jim Barritt, Ken Bowers, Ricky Schroeder, Jan Campbell and Ellen Slaymaker volunteered to review the document and report to Glo by September 15th, no later than October 1st. (See attached document “AAFCO Feed Label Training Module.”

Comments can be addressed to Gloria Dunnavan at dunnawang@bellsouth.net.

Attachment: AAFCO Feed Label Training Module

Title: Animal Feed Labeling

Course Description: This course is designed for regulatory program personnel who are involved with the review and evaluation of labels and labeling for animal feed products including livestock feeds, pet food, and medicated feeds. Participants will acquire the following skills and knowledge: types of feed labeling, the format and design of feed labeling, required information for feed labels, additional requirements for medicated feeds, types of packaging and delivery systems for animal feeds, and the differences between state and federal labeling requirements.

Objectives: Upon completion of this course, participants will be able to:

- Identify different types of feed labels and labeling
- Recognize the different label formats and designs
- Determine completeness of required information on feed labels
- Determine completeness of required information for medicated feeds
- Recognize the different types of packaging and delivery systems for animal feed
- Identify the differences between state and federal labeling requirements

Target Audience: This course is intended for state, local, and FDA field inspectors and investigators who review and evaluate feed labeling during inspection, investigation, sample collection and other surveillance activities, and regulatory personnel who review and evaluate feed labeling for compliance decisions.

Prerequisites: Review of AAFCO Labeling Guides [ANY ORA U COURSES???

Course Outline:

I. OVERVIEW

- A. Purpose of feed labeling.
- B. Legal basis of labeling requirements – FD & C Act and state laws.
- C. Describe the scope of “feed” labeling – not just complete feed, includes mineral mixes, nutritional supplements, pet treats [Show pictures with examples of these additional non-traditional types of animal feed]
- D. Show pictures of different types of labels – feed tags, feed bags, prepared labels, delivery tickets or invoices for custom formula feed.

- E. Show pictures of types of feed being fed to animals – bulk feed in feed bunkers, bagged feed added to feed bins, canned pet food, mineral blocks, aquaculture feeding. Emphasize the variety of animals, growing and feeding conditions, quantity of feed, delivery systems.
- F. Give an example of feed mix-up because of poor labeling to emphasize the need for complete and accurate labeling [CAN AAFCO HELP IDENTIFY A GOOD EXAMPLE?]

ii. Types of Feed Labeling

- A. Commercial Feed Labeling [Describe each type and show photograph or diagram of example]
 - 1. Preprinted bags
 - 2. Preprinted feed tags
 - 3. Labeling for bulk commercial feed – placard, delivery ticket, other labeling that accompanies the shipment
- B. Customer Formula Feed Labeling [placards, delivery ticket, invoice, other labeling that accompanies the shipment]
- C. Other material that would be considered labeling – brochure, feeding guide

III. Format and Design of Feed Labels [Describe and show photographs or diagrams of examples]

- 1. Format and Design of Livestock Feed Labels
- 2. Format and Design of Medicated Feed Labels
- 3. Format and Design of Pet Food Labels

IV. Required Information on a Feed Label [Show several examples of labels with this information – photographs, real example labels]

- 1. Product name
- 2. Ingredient statement
- 3. Species
- 4. Directions for Use
- 5. Purpose/Claims
- 6. Net Quantity of contents
- 7. Name and place of manufacturer or distributor
- 8. Caution statements
- 9. BSE labeling statements
- 10. Additional requirements for custom formula feed – name and address of purchaser and date of sale or delivery

11. Additional requirements by states, especially Guaranteed Analysis [Show examples and emphasize these additional requirements may vary from state to state]

V. Required Information on a Medicated Feed Label [Show several examples of labels with this information – photographs, real example labels]

A. Describe importance/difference for medicated feed labeling

B. Specific Information

1. Product name
2. Active drug ingredient(s)
3. Ingredient statement
4. Purpose/Claims/Conditions of Use
5. Species
6. Directions for Use
7. Pre-slaughter or pre-market withdrawal times for food-producing animal feed
8. BSE labeling statements
9. Other Caution statements
10. Veterinary Feed Directive caution statement
11. Net Quantity of contents
12. Name and place of manufacturer or distributor
13. Additional requirements for custom formula feed – name and address of purchaser and date of sale or delivery
14. Additional requirements by states [Show examples and emphasize these additional requirements may vary from state to state]

VI. Pet Food Labeling Requirements [Show several examples of labels with this information – photographs, real example labels]

1. Product name
2. Ingredient statement
3. Species
4. Directions for Use
5. Purpose/Claims
6. Net Quantity of contents
7. Name and place of manufacturer or distributor
8. Caution statements
9. BSE labeling statements

10. Additional requirements for custom formula pet food – name and address of purchaser and date of sale or delivery
11. Additional requirements for specialty pet foods

VII. What If you Find Labeling Problems?

- A. Follow your District or state guidance
- B. Document with sample and records establishing jurisdiction (for FDA - Interstate commerce), product distribution, who is responsible for the product
- C. Can take enforcement action including official correspondence, embargo if state, seizure, or other court action
- D. Firm could recall the product
- E. Firm could correct labeling on the next printing, applying additional sticker, replacing the labeling through an on-site visit

VIII. Resources

- A. Title 21, Code of Federal Regulations
- B. AAFCO Pet Food Labeling Guide
- C. Other???

Draft:GJDunnavan:gjd:7-25-2010

AAFCO Animal Feed Labeling Module