

Feed Labeling Committee Meeting Minutes  
AAFCO Annual Meeting  
Hyatt Regency, Austin, Texas  
August 1, 2011

Ricky Schroeder	Ken Bowers	Sue Carlson
Meagan Davis	Scott Ziehr	Richard Sellers
Richard TenEyck	Tim Darden	Doug Alderman
Nate Bartz	Miriam Johnson	Sue Hayes
Kurt Gallagher	Jim Barritt	Jan Campbell
Dave Dzanis	Dave Fairfield	

**1.) Feed Labeling Workshop –**

**Miriam Johnson (NC), Workshop Coordinating Committee Chair**

The Feed Labeling Committee is hosting a Feed Labeling Workshop in conjunction with the AAFCO 2012 Mid-Year Meeting in Reno, Nevada. The workshop will cover the label requirements for animal feeds (other than pet and specialty pet foods) per species and intended use. There will be special emphasis on single ingredient feed and feed ingredient label requirements. The Coordinating Committee is seeking additional partnership for the workshop.

**2.) Single Ingredient Labeling Requirements –**

**Ricky Schroeder (TX), Committee Chair**

There are limited requirements declared in the Model Regulations for single ingredient feeds and there are varying requirements between states concerning the purpose statement that shall be declared on these types of products. Though the Model Regulations state that all feeds shall have a purpose statement, the only specifics for these types of feeds do not have to declare the species and class of animal.

Ricky posed the questions: Do single ingredient feeds require a purpose statement? What about non-nutritive feed ingredients such as diatomaceous earth? Do the Model Regulations need to be changed to reflect single ingredient feeds?

It is difficult to label multi-purpose feed ingredients – for example: soybean hulls can either be fed as is or mixed with other feeds. And though industry wishes to label their product according to the Model Regulations, which require “For Further Manufacture of Feed”, it’s untruthful to declare this information on these multi-purpose feed ingredients.

It was suggested by Sue Carlson that these specific products not be required to declare a purpose statement but have dual directions for the multiple uses of the product. Various state representatives on the committee agreed that this practice would be acceptable in accordance to their state laws and regulations.

Because there are not clear stipulations in the Model Regulations, Richard TenEyck made a motion to form a working group to draft language to propose requirements for these types of feeds that would affect both the label attached to the product and shipping documents. Nate Bartz seconded the motion. Motion passed.

*The working group consists of Ricky Schroeder, Richard TenEyck, Sue Carlson, Karen Sudemyer, Jan Campbell, Scott Ziehr, Nate Bartz and Miriam Johnson.*

**3.) Proposed Label Example for Wild Bird –**

**Sue Hayes, WBFJ**

There have been various discrepancies regarding the required labeling of wild bird foods. Kris Mantey (formerly of Scotts) and Sue Hays volunteered to create a label example to be placed in the Non-Pet Food Label Design and Format Guide. Nate Bartz moved to accept the label as presented to the committee. Tim Darden seconded. Motion passed after discussion. Sue Hays and Doug Alderman agreed to create a second label example to show the correct format for a wild bird food with added vitamins or minerals.

**4.) Proposed addition to Regulation 10. Adulterants: Selenium in Swine Gestation and/or Lactation Complete Diets that exceed 1.00 PPM**

**Richard TenEyck, OR**

Richard TenEyck has proposed this regulation for the Oregon Feed Law and would like for the Feed Labeling Committee to determine if this should be included in the Model Regulations. The proposed change to the Oregon Feed Law is based on the belief that with swine complete diets, little attention is paid to natural sources of selenium in grains, only to that of added amounts, and felt this was a potential animal health issue and has evidence of selenium toxicity in swine in Oregon. TenEyck feels this should be a national concern as Oregon is a major importer of grain to formulate feeds, and these grains are transported across the US for feed formulation.

Questions posed by the committee:

How does this compare to NRC requirements?

Is the intention of this change to the Model Regulation to include pet food?

What is the value of a minimum and maximum selenium guarantee if FDA already has established regulations?

Notes of Interest:

Review of 21 CFR 573.920 necessary to make sure this proposed change to regulation does not conflict.

This is a huge burden on industry and industry wishes to stress that AAFCO not support this requirement, although they support regional differences.

Nate Bartz made a motion to form a working group to research this request. Miriam Johnson seconded. Motion passed.

*The working Group consists of Nate Bartz (chair), Ricky Schroeder, Richard TenEyck, Sharon Benz (invited) and Jon Nelson (invited), (more to be added to this group).*

**5.) Proposed changes to Regulation 3(a)(7): Labeling to include phone number of guarantor**

**Richard TenEyck (OR)**

Richard TenEyck has proposed this regulation for the Oregon Feed Law and would like for the Feed Labeling Committee to determine if this should be included in the Model Regulations.

There was various discussion concerning the addition of a phone number mostly in disagreement with this proposed regulation change. Due to the fact that phone number and area code changes, there would potentially be an increase in non-compliance issues with feed labels if this was accepted by the committee. No motion was made.

**6.) Proposed changes to Regulation 3(a)(4): all feeds containing greater than 0.5% sulfur shall have a maximum sulfur percentage**

**Richard TenEyck, OR**

Richard TenEyck has proposed this regulation for the Oregon Feed Law and would like for the Feed Labeling Committee to determine if this should be included in the Model Regulations.

TenEyck made a motion to form a working group be formed to research this proposed regulation change with the intent to address a means to regulate those feed products with naturally high levels of sulfur. Tim Darden seconded. Motion passed.

*The working group consists of Richard TenEyck (chair), Jon Nelson, Jan Campbell (will appoint member), Kurt Gallagher (will appoint PFI member), Ricky Schroeder, Ken Bowers, Bill Thom, NOPA (invited).*

**7.) Proposed change to Regulation 3(a)(4): All feeds containing greater than 0.5 PPM and less than 25 PPM selenium shall be guaranteed for minimum and maximum selenium PPM, regardless of the source of selenium. Maximum allowable spread shall not exceed 20% of the minimum.**

**Richard TenEyck (OR)**

This item will be followed up by the working group developed in #4.