

## Feed Labeling Committee Meeting Minutes

AAFCO Annual Meeting  
Tuesday, January 18, 2022  
1:15 – 2:15 PM CST

Committee Recommendations: None

Board Recommendations: None

Committee Participants:

- **Members Present:** David Dressler (PA), Erin Bubb (PA), Liz Beckman (WA), George Ferguson (NC), Stevie Glaspie (MI), Chris Berg (IA), Jamie Spencer (KS), Jordan Mancini (MN), Jamie Good (ND), Dragan Momcilovic (FDA), Adam Orr (FDA).
- **Advisors Present:** Jan Campbell (NGFA), Dave Dzanis (ACVN), Meghan Dicks (AFIA), James Emerson (USPA), Chris Olinger (NGFA), Kevin Ragland (PFI), Pat Tovey (PFI), Emily Helms, (ETA).
- **Absent:** Mark Ashcroft (UT), Kelly Younker (NM), Tom Phillips (MD), Lisa Fantelli (VT), Julia Fidenzio (APPA), Roger Hoestenbach (APPA), Steve Younker (AFIA).

Committee Report:

The meeting was called to order by David Dressler at 1:15 PM CST. Announcement was made of changes to the committee roster. Roll call of members and advisors was taken, with a quorum established (11 of 15).

### Work Group Liaisons

- Notification was made to the committee that Jamie Good and Tom Phillips have volunteered to replace Heather Bartley as the Feed Labeling Committee Liaisons to the Analytical Variation Workgroup under the Enforcement Issues Committee.
- A volunteer is needed to replace Heather Bartley as the Feed Labeling Committee Liaison to the Philosophy Communications Workgroup with the Current Issues and Outreach Committee. Discussion of the charge of this workgroup was held. After the committee meeting, Chris Berg sent an email volunteering to fill this spot.
- A committee advisor inquired about industry participating in the Analytical Variation Workgroup. Being that this workgroup is within the Enforcement Issues Committee, all participants must be regulatory.

### OP Edits Workgroup Recommendation

- A workgroup has been reviewing the required guarantees for poultry within the AAFCO model regulations (Regulation 3(a)(4)(II)) as well as removing menadione sodium bisulfate complex (MSBC) from the ingredient listing of the swine complete and supplement feed label found within the Feed Labeling Guide in the Official Publication as well as the publication found on AAFCO's website. The workgroup provided their report to the committee for consideration.
  - MOTION: Erin Bubb moves to accept the workgroup report, Jamie Good seconds. MOTION PASSES.
- Poultry guarantees in AAFCO Model Regulations.
  - CVM stated that the recommended changes to the model regulations would not match up to what is listed in Appendix III in the Guidance for Industry #191. Due to these factors, FDA would not support such change.
  - An industry liaison to the workgroup stated that the document showing the workgroup's recommendation is different than the document that was sent to her. Due to this and FDA's

comment about the Guidance for Industry #191, it was requested the workgroup continue to work on the document.

- No action was made on this recommendation.
- Remove Menadione Sodium Bisulfate Complex (MSBC) from the ingredient listing of the swine complete and supplement feed label found within the Feed Labeling Guide.
  - MOTION: Jamie Good moves to accept the workgroup's recommendation by removing MSBC from the ingredient list. Jamie Spencer seconds.
  - Discussion noted that MSBC was moved by membership to publish in Chapter 5 of the AAFCO Official Publication a recommendation that MSBC can be used in all species. This recommendation is not outside regulatory boundaries to have in the ingredient statement.
  - Since the reason for the removal of MSBC from the ingredient statement was because it was not approved for use in swine feed, that has since changed with the earlier membership vote, thus this change should not take place.
  - Due to the membership vote to approve publication of MSBC letter in Chapter 5, Jamie Good withdraw his motion. Jamie Spencer agrees and withdrew his second. MOTION WITHDRAWN.
  - No action was taken on this topic and MSBC will remain in the ingredient statement.

### **Multi-Pack Labeling**

- Discussion was held to determine what should be present on the outer package as well as each internal package of variety packs or packages with different flavors/styles of products inside.
- Industry was curious what brought about this topic for discussion. Were there any regulatory issues?
  - The purpose of this discussion was to standardize these packages to see if there are requirements that should be made for these products, or if there should be guidance within the Feed Labeling Guide.
- 16 CFR 500.27 is a federal regulation that addresses multi-unit packaging. This regulation specifies what must be present on the outer package as well as the inner package.
- There was no further discussion or actions taken on this topic.

### **Lot Numbers**

- With the need for facilities to have a form of traceability of products one step forward and one step back, should lot numbers be added as a labeling requirement within the AAFCO Model Bill?
- Washington, Oregon, Colorado and Canada all require some form of lot identifiers on the label.
- Industry is concerned about specifying what a lot number should look like, because companies use different ways of identifying products. Bulk products use a bill of lading number as the identifier, which can be used for traceability. Using a lot number on bulk material would be difficult due to how large a lot would be.
  - The intent is to allow the companies develop their own lot numbers and format how they see fit. They would just need to have a number that would be unique to a particular batch, so they are able to trace product. It will also be a way for consumers to relay information back to the company.

- The term “lot number” could be called something else.
- Industry agrees lot codes should be in place, however there is a lot to consider, such as how lot numbers are defined between firms. The concern is being too descriptive about what a lot number is, thus a firm might not be able to comply. This should be discussed at the federal level because of the FSMA requirements.
  - 21 CFR 507.38 (recall plans) only apply to facilities that are required to have preventative controls and are required to have a recall plan. Recall plans don't require lot numbers.
  - There are a lot of smaller facilities that don't have lot numbers.
- Recommendation from the committee to have a workgroup formed, which includes industry, to look into this and report back to the committee if this is worth pursuing or provide a recommendation back to the committee.
  - MOTION: Erin Bubb moves to form a workgroup to discuss the feasibility of requiring a lot number on feed labeling. Jamie Good seconds. MOTION PASSES.
  - Charge of the workgroup: Discuss the need of having a unique identifier on a label for traceability and not being descriptive as to for a company to do something they can't comply with.
  - After the meeting, Chris Berg agreed to lead the workgroup.

**Meeting adjourned at 2:20 PM CST**

**Action Item Table**

Responsible	Item	Action	Timing / Status
David Dressler	OP Updates	Reconvene workgroup to review FLC's sections of the OP and determine if any areas need edited.	2022 Annual Meeting.
David Dressler	Lot Identifier Workgroup	Solicit members and advisors to participate in work group to discuss the need of having a unique identifier on a label for lot traceability.	February 2022
Chris Berg	Lot Identifier Work Group	Convene workgroup to discuss the lot number topic and provide a report/recommendation back to the committee.	2022 Annual Meeting