



## **Feed Labeling Committee Special Meeting Minutes**

Thursday September 19, 2019  
1:00 – 2:00 PM  
Conference Call

### **Welcome, Introduction and Opening Remarks**

#### **Introductions and Agenda Review**

David Dressler called the meeting to order at 1:03 PM EDT. Roll call of members and advisors was taken and a quorum was established (8 out of 12).

Agenda change: Vitamin D Guarantee for Rabbit Complete Feeds and Supplements was moved to the end of the agenda to allow for more time for discussion

#### **Committee Participants**

##### **Members Present:**

David Dressler (PA), Heather Bartley (WI), Erin Bubb (PA), Lizette Beckman (WA), Jason Schmidt (LA), Caitlin Price (NC), Mika Alewynse (FDA), Richard Ten Eyck (OR).

##### **Advisors Present:**

Dave Dzanis (ACVN/APPA), Meagan Dicks (AFIA), Jan Campbell (NGFA), Chris Olinger (NGFA), Ken Gilmurray (NGFA) (joined late).

**Others Present:** Tom Phillips (MD), Leah Wilkinson, Dave Fairfield, Wenjuan Jobgen (Eurofins), and Elaine Joygen. Lori Chavez (PFI) is filling in for Pat Tovey.

##### **Absent:**

Tim Darden (NM), George Ferguson (NC), Stevie Glaspie (MI), Karissa McCaw (FL), Angela Mills (AFIA), James Emerson (USPA), Julia Fidenzio (APPA), Emily Helmes (ETA), Pat Tovey (PFI), and Chelsea Kent.

### **Committee Members and Advisor Changes**

The following members have requested to be removed from the committee: Dave Phillips (ND), Steve Gramlich (NE) and Al Harrison (KY). Since Dave Phillips has left the committee, Heather Bartley (WI) has been appointed the new vice-chair.

Karissa McCaw (FL) has joined the committee as a new member. Chelsea Kent and Ken Gilmurray have joined as advisors.

### **Topic Submissions to the Feed Labeling Committee**

Suggested process: Going forward, any topic for future committee meetings must be submitted prior to the meeting in writing to chair and vice-chair. The person suggesting topic, or designate, shall be present during the meeting to explain the background and facilitate the discussion.

### **Labeling Workshop**

Education and Training Committee has requested a feed labeling workshop to take place just before the AAFCO mid-year meeting on Monday, January 20, 2020. FDA is willing to organize and prepare all material for the entire 1-day workshop. The workshop will be a medicated feed labeling workshop. MOTION: Erin Bubb moves to hold a medicated feed labeling workshop on January 20, 2020. Richard seconds. MOTION PASSES.

### **Vitamin D Guarantees for Rabbit Complete Feeds and Supplements**

The Feed Labeling Committee received a request from Oregon Department of Agriculture and Washington State Department of Agriculture to make a request to Model Bills Committee to require maximum guarantees for complete feeds and supplements for rabbits. MOTION: Richard Ten Eyck moves to insert “(9) Maximum Vitamin D3, in IU per pound into Regulation 3(a)(4)(X)(b) of the AAFCO model regulations so that it reads: Regulation 3 (a)(4)(X)(b)(9) Maximum Vitamin D3, in IU per pound.” Erin Bubb Seconds.

Discussion included background of the topic, laboratory challenges to running vitamin D, and the NRC for Rabbits (1977, 2nd revised edition) advisory level for toxicity of vitamin D in rabbits at 23,000 IU/kg.

A roll call vote was taken.

Ayes: Richard Ten Eyck, Liz Beckman, and Erin Bubb

Nays: Heather Bartley, Caitlin Price, Jason Schmidt, and Dave Dressler.

Abstain: Mika Alewynse.

MOTION FAILS.

**Meeting adjourned at 1:56 PM EDT**



May 23, 2019

Dave Dressler, Chair, Feed Labeling Committee  
Association of American Feed Control Officials  
Via email: [davdressle@pa.gov](mailto:davdressle@pa.gov)

Re: Vitamin D3 labeling on all rabbit Feeds

Hi Dave,

As members of the Association of American Feed Control Officials (AAFCO), Oregon and Washington State Departments of Agriculture, would like to request the Feed Labeling Committee make a recommendation to the Model Bill and Regulations committee to concur with placement and language and pass to BOD and Association Membership the following amendment to the AAFCO model regulations:

insert **“(9) Maximum Vitamin D3, In IU per pound.”** Into regulation 3(a)(4)(X)(b) of the AAFCO model regulations. So that it reads:

Regulation 3. (a)(4) (X) (b) **(9) Maximum Vitamin D3, In IU per pound.**

Since this addresses a feed safety concern, we would request the Committee to use exception I (d) listed in the 2019 Official Publication Rev. 1 on page 138 and act promptly.

Links to the relevant recalls of rabbit feed with toxic levels of vitamin D are listed below:

<https://www.fda.gov/safety/recalls-market-withdrawals-safety-alerts/grange-co-op-recalls-rogue-all-purpose-rabbit-pellets-high-vitamin-d-health-risk>

<https://www.fda.gov/safety/recalls-market-withdrawals-safety-alerts/intermountain-farmers-association-issues-recall-rabbit-feed-high-vitamin-d-content>

The two incidents in the RFR list continued undetected for at least 6 months and caused a severe impact to the rabbit production industry. Had the animal feed industry been required to guarantee a Vitamin D3 level, there would have been reasons for testing and monitoring of the nutrient when regulators collected samples, resulting in an earlier detection.

*“Rabbits consuming this feed would be at risk for developing clinical hypercalcemia when fed diets containing very high levels of vitamin D, as a sole source of nutrition. Clinical signs of hypercalcemia include such things as increased thirst, increased urination, weakness, decreased appetite and possibly death.”*



We appreciate the Committee's attention to the resolution of the above issue and will make proposals to amend our respective rules at the state level.

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