

Feed Labeling Committee Meeting Minutes
AAFCO Mid-Year Meeting
Thursday January 19, 2023
10:00 – 11:00 AM CDT

Committee Action Items:

- Modify Regulation 3(a)(4)(II) within the model regulations; revising the required guarantees for formula poultry feeds.
- Request Education & Training Committee to host a Feed Labeling Workshop during the 2024 Annual Meeting

Board Recommendations: None

Committee Participants:

- **Members Present:** David Dressler (PA), George Ferguson (NC), Justin Hill (NC), Jamie Good (ND), Bailey Whiten (GA), Erin Bubb (PA), Jordan Mancini (MN), Jamie Spencer (KS),
- **Advisors Present:** Pat Tovey (PFI), James Emerson (UPA), Bill Bookout (APPA), Cathy Alinovi (NGPFMA), Steve Younker (AFIA), Meghan Dicks (AFIA), Jan Campbell (NGFA), Chris Olinger (NGFA), Dave Dzanis (ACVN).
- **Absent:** Mark Ashcroft (UT), Stevie Glaspie (MI), Dragan Momcilovic (FDA), Kelli Younker (NM), Tom Phillips (MD), Lisa Fantelli (VT), Adam Orr (FDA), Ashley Shaw (FDA), Angie Simmons (GA), Julia Fidenzio (APPA), Emily Helmes (ETA), Kevin Ragland (PFI).

Committee Report:

The meeting was called to order by David Dressler at 10:00 AM CDT. Roll call of members and advisors was taken, with a quorum established (8 of 16).

OP Edits Workgroup

- David Dressler presented workgroup report and discussed recommendation to the committee.
 - Recommendation #1: Modify Regulation 3(a)(4)(II) within the model regulations; revising the required guarantees for formula poultry feeds.
 - Recommendation #2: Insert sample labels for horse mineral and goat feed into the feed labeling guide in the AAFCO Official Publication.
 - MOTION: George Ferguson moves to accept the workgroup report. Jamie Good Seconds.
 - Paul Mostyn: Recommend changing hay on the goat feed label to forage.
 - Richard Ten Eyck: If gluten shows up in any label, it should be aligned with the revisions accepted by membership on January 17, 2023

▪ MOTION PASSES

- Recommendation 1: Modify Regulation 3(a)(4)(II) within the model regulations; revising the required guarantees for formula poultry feeds
 - George Ferguson: Since an error was already caught, is the workgroup confident to move this forward?
 - David Dressler: The changes were mentioned on the labels in the feed labeling guide. These changes haven't been worked on for over a year. The workgroup feels this section is good enough to proceed.
 - Jan Campbell: CVM was on the workgroup and has reviewed the document. Jan feels confident about the document, but not opposed to giving more time for others to review.
 - George Ferguson: Need to make sure everything is correct, because any edits would delay the process.
 - Richard Ten Eyck: Procedurally, this would go to Model Bills, so there would be time for review and edits.
 - MOTION: Erin Bubb moves send Recommendation #1 to Model bills. Jordan Mancini seconds. MOTION PASSES.
- Recommendation #2: Insert sample labels for horse mineral and goat feed into the feed labeling guide in the AAFCO Official Publication.
 - Erin Bubb: Do we know why white salt free-choice was listed in ingredient statement for the horse mineral?
 - David Dressler: This language was found in the stand-alone feed labeling guide.
 - Cathy Alinovi: Do we have to assume there is always salt in the minerals? Otherwise, you would need to offer the salt lick.
 - David Dressler: It seems this needs to go back to the workgroup for more discussion.
 - Committee agrees with having the workgroup look into this further. NO ACTION.

Unique Identifiers (i.e. Lot Numbers) on Feed Labels

- David Dressler presented workgroup report and discussed recommendations.
 - MOTION: Erin Bubb Moves to accept the report. Bailey Whiten seconds. MOTION PASSES.
- Jan Campbell: The workgroup did a good job of covering any possibility.

- Jamie Spencer: The definition states it needs to be on the label, but doesn't address labeling. For example, if you have a lot identifier on the bag, it is part of labeling, not the label.
- Jan Campbell: The concern is changing the language for Section 5 of the model bill , where it states that the product shall be accompanied by a label bearing a lot identifier.
- David Dressler: The definition of lot identifier states "label, container or package", thus putting it on the package would be acceptable. Regarding how Section 5 is worded, that is what is in the current model bill.
- Jordan Mancini: Putting a lot number on the seam of the bag would still fit the definition.
- Steve Yonker: The confusion seems to be with the other items listed in Section 5(a), which describe the product (i.e. Guaranteed Analysis, Ingredient Statement). A lot identifier doesn't really fit with the other seven items in this section. There would be no issue with Section 5(b), because it has the extra caveats of invoice, delivery slip, etc.
- Paul Mostyn: It could be on the container, which is no where near the label.
- Bill Bookout: Was there any question about "must be accompanied" versus "shall be accompanied"? This is still too prescriptive and should be left to industry.
- Jan Campbell: Shall is what is in the current OP.
- Meghan Dicks: Would we make a recommendation to model bills to add language from Section 5(b) to Section 5(a)?
- Dave Dzanis: The definition of label already includes invoice or delivery slip.
- George Ferguson: I'm okay with putting the definition of lot identifier in the OP, but not comfortable with the other items. The last two sentences from the workgroup recommendation of the definition of lot identifier should be removed, because those are covered in Section 5. With regards to changing language in Section 5, that is already current language, and everyone has a long-time understanding about what is considered a label.
- Chris Olinger: Would like to see Section 5(a) be consistent with Section 5(b).
- Pat Tovey: We all use lot codes and don't see a reason for this. There is a concern about it being too prescriptive. Lot codes should be used to align with FSMA. Did workgroup consider what is in the federal regulations?
- Jan Campbell: There was a concern within the workgroup to ensure language is in alignment with federal requirements.
- David Dressler: Looking at the workgroup report, it doesn't get prescriptive. It doesn't

state how things are supposed to be done, it just says that firms have to do it.

- Steve Yonker: There are other sections of the OP that adopt the federal regulations by reference. Since they are adopted, I don't see a reason for these.
- Erin Bubb: There are feed mills not doing this. You could reference the federal regulations, but that still doesn't mean all feed is given a unique identifier. I think we need to go through with the project.
- Meghan Dicks: The companies that attend AAFCO are already doing this. If they don't, then regulations need to work with those companies directly.
- David Dressler: Regulators have no authority to make companies do this. What is proposed will give us that authority.
- George Ferguson: There is a concern about firms picking what they want as a lot identifier. They could use state a brand name is a lot identifier; therefore, the entire brand would be considered a lot.
- Richard Ten Eyck: Oregon and Washington have had lot number requirements in their law for years. Firms have not had any issues with compliance.
- George Ferguson: Recommends this topic to be tabled until this 2023 Summer Annual Meeting to give more time for people to think about the workgroup recommendation.
- TOPIC TABLED

Labeling of Products Containing Microorganisms

- David Dressler presented the workgroup report.
 - MOTION: Erin Bubb moves to accept the workgroup report. Jamie Good seconds. MOTION PASSES.
- Pat Tovey: These seems to be hard to harmonize. Would state laboratories be able to do this?
- George Ferguson: Recommend sending this to Lab Services Committee to get the conversation started. We can see what is available and go from there.
- MOTION: George Ferguson moves to follow the workgroup recommendation as provided. Jamie Good seconds.
 - Jamie Good: Feels the laboratory group could provide a lot of feedback with the possibility of this.
 - Dave Edwards: The recommendation to lab services must be edited, because

probiotics are not microorganism. Also, can we numerate the actual organism?

- MOTION PASSES

Feed Labeling Workshop

- There is an opening to host a feed labeling workshop during the 2024 Summer Annual Meeting. David Dressler requested the committee move to host this workshop, with the understanding that a workgroup would be formed to work out the details.
- MOTION: Erin Bubb moves to have the feed labeling workshop at the 2024 Annual Meeting. Jamie Good sections. MOTION PASSES.

Meeting adjourned at 11:04 CST

Action Item Table

| Responsible | Item | Action | Timing / Status |
|----------------|---|--|-----------------|
| David Dressler | OP Edits Workgroup | Forward Recommendation #1 to BOD and Model Bills Committee. | March 2023 |
| David Dressler | Guarantees for Microorganisms Workgroup | Forward workgroup recommendation to BOD and Lab Services Committee | March 2023 |
| David Dressler | Feed Labeling Workshop | Form workgroup to develop a feed labeling workshop at 2024 Annual Meeting | March 2023 |
| David Dressler | Feed Labeling Workshop | Notify BOD and Education & Training Committee about wanting to host a workshop at the 2024 Annual Meeting. | March 2023 |