

Feed Labeling Committee
Baltimore, MD
Tuesday, August 1, 2023
8:00-9:00 AM

Introductions (5 mins)

- Roll call of members and advisors

Labeling of Products Containing Microorganisms (10 mins)

OP Edits Workgroup Recommendations (15 mins)

- Feed Labeling Guide: adding model labels

Feed Labeling Workshop (5 mins)

Labeling Definition Workgroup (5 min)

- Request from MBRC to join workgroup to discuss labeling definition
- Need 2 regulations and 2 advisors

Unique Identifiers (i.e., Lot Numbers) on Feed Labels (20 mins)

- Workgroup update
- Next steps?

Adjourn

LABELING OF PRODUCTS CONTAINING MICROORGANISMS

First, need to determine if a laboratory method is available. If no method exists, then regulators can't require something else. Once there are validated methods, then can proceed with determining what should be on the label.

Recommendation: Forward to Laboratory Services Committee to inquire about a validated method to separate microorganism guarantees.

If a validated method is available, could consider the following options:

~~1. Remove Total Microorganism Guarantee~~

- ~~–Require separate guarantees for each species or group of species.~~
- ~~–Note: Could be problematic with international trade.~~

~~2. Individual guarantees based on label claims. For example, this product contains (species name) for the purpose of (purpose of the microorganism).~~

- ~~–Would be for nutritional claims.~~
- ~~–Still have total microorganism guarantee with subguarantee for the claimed strain(s).~~

3. Separate groups of guarantees based on label claims. For example, this product is formulated with probiotics and prebiotics for (*state purpose of the probiotics and prebiotics*).

- If there are additional microorganisms, still have the total microorganism guarantee separately from the grouping of probiotics and prebiotics.
- Enumerate all lactobacillus, all enterobacteria, all bacillus but not each individual species.

OP EDITS WORKGROUP RECOMMENDATIONS

Within the Feed Labeling Guide (Pages 240–252 of the 2023 OP), insert the following:

Equine Mineral Supplement Feeds

YOUR PASTURE HORSE MINERAL

For maintenance of mature horses

Guaranteed Analysis

<u>Calcium (min)</u>	<u>12.0%</u>
<u>Calcium (max)</u>	<u>14.0%</u>
<u>Phosphorus (min)</u>	<u>12.0%</u>
<u>Salt (min)</u>	<u>4.5%</u>
<u>Salt (max)</u>	<u>5.5%</u>
<u>Sodium (min)</u>	<u>1.7%</u>
<u>Sodium (max)</u>	<u>2.2%</u>
<u>Copper (min)</u>	<u>860 ppm</u>
<u>Selenium (min)</u>	<u>0.20 ppm</u>
<u>Zinc (min)</u>	<u>3400 ppm</u>
<u>Vitamin A (min)</u>	<u>80000 IU/lb.</u>

Ingredient Statement

Calcium Carbonate, Dicalcium Phosphate, Salt, Copper Sulfate, Manganous Oxide, Molasses Products, Zinc Oxide, Ferrous Sulfate, Cobalt Carbonate, Calcium Iodate, Vitamin A Supplement, Processed Grain By-Products, Choline Chloride, Animal Fat, Ethoxyquin (a preservative), Sodium Selenite.

Feeding Directions:

Feed free-choice at an approximate rate of 2 oz/head/day. Provide fresh, clean water.

Manufactured By:
YOUR NAME FEEDS
City, State Zip

NET Wt.: 50 lb. (22.67 kg)

Goat Complete and Supplement Feeds

YOUR GOAT FEED

For breeding does

Guaranteed Analysis

<u>Crude Protein (min)</u>	<u>15.0%</u>
<u>(This includes not more than 1.0% equivalent crude protein from non-protein nitrogen)</u>	
<u>Crude Fat (min).....</u>	<u>2.0%</u>
<u>Crude Fiber (max).....</u>	<u>20.0%</u>
<u>Acid Detergent Fiber (max)</u>	<u>25.6%</u>
<u>Calcium (min).....</u>	<u>0.8%</u>
<u>Calcium (max).....</u>	<u>1.3%</u>
<u>Phosphorus (min).....</u>	<u>0.35%</u>
<u>Salt (min).....</u>	<u>0.35%</u>
<u>Salt (max).....</u>	<u>0.85%</u>
<u>Copper (min).....</u>	<u>10 ppm</u>
<u>Copper (max).....</u>	<u>20 ppm</u>
<u>Selenium (min).....</u>	<u>0.30 ppm</u>
<u>Vitamin A (min).....</u>	<u>7000 IU/lb.</u>

Ingredient Statement

Grain Products, Plant Protein Products, Processed Grain By-Products, Roughage Products, Ammonium Chloride, Vitamin A Supplement, Cholecalciferol (source of Vitamin D₃), Choline Chloride, Biotin, Thiamine Mononitrate, Pyridoxine Hydrochloride, Vitamin E Supplement, Copper Sulfate, Folic Acid, Ethoxyquin (a preservative), Calcium Carbonate, Dicalcium Phosphate, Monocalcium Phosphate, Manganous Oxide, Zinc Oxide, Ferrous Sulfate, Cobalt Carbonate, Potassium Chloride, Sodium Selenite.

Feeding Directions:

Feed as the sole source of grain to breeding goats at the rate of 2 to 3 pounds per head per day. Provide ad libitum access to forage.

CAUTION: Use as directed. For ruminants (cattle, sheep and goat) only.

Manufactured By:
YOUR NAME FEEDS
City, State Zip

NET Wt.: 50 lb. (22.67 kg)

Edit Page 249 of the Feed Labeling Guide with the 2023 OP to the following:

YOUR SHEEP FEED

For breeding ewes

Guaranteed Analysis

Crude Protein (min)	15.0%
(This includes not more than 1.0% equivalent crude protein from non-protein nitrogen)	
Crude Fat (min).....	2.0%
Crude Fiber (max).....	20.0%
Calcium (min).....	0.8%
Calcium (max)	1.3%
Phosphorus (min)	0.35%
Salt (min)	0.35%
Salt (max).....	0.85%
Copper (min).....	5.0 ppm
Copper (max).....	10.0 ppm
Selenium (min)	0.3 ppm
Vitamin A (min)	7000 IU/lb.

Ingredient Statement

Grain Products, Plant Protein Products, Processed Grain By-Products, Roughage Products, Ammonium Chloride, Vitamin A Supplement, Cholecalciferol (source of Vitamin D₃), Choline Chloride, Biotin, Thiamine Mononitrate, Pyridoxine Hydrochloride, Vitamin E Supplement, Copper Sulfate, Folic Acid, Ethoxyquin (a preservative), Calcium Carbonate, Dicalcium Phosphate, Monocalcium Phosphate, Manganous Oxide, Zinc Oxide, Ferrous Sulfate, Cobalt Carbonate, Potassium Chloride, Sodium Selenite.

Feeding Directions:

Feed as the sole source of grain to breeding ewes at the rate of 2 to 3 pounds per head per day.

CAUTION: Use as Directed. ~~For Sheep Only.~~ For ruminants (cattle, sheep, and goat) only.

Manufactured By:
YOUR NAME FEEDS
City, State Zip

NET Wt.: 50 lb. (22.67 kg)

UNIQUE IDENTIFIERS ON FEED LABELS

Recommendation #1:

Add lot identifiers definition to Model Bill Section 3. Definitions of Words and Terms

“Lot identifier” means a unique identifier, such as a run number, code, date, or other suitable identification for each batch or production run that enables the manufacturer to accurately trace the manufacturing and distribution history of a product. To facilitate tracing of packaged products, lot identifiers can be applied to the label, container, or package. For bulk products, lot identifiers can be applied to the label, invoice, or other documents accompanying the product.

Add below language to Section 5. Labeling of Model Bill

- (a) In case of a commercial feed, exempt a customer-formula feed, it shall be accompanied by a label bearing the following information.
 - (8) A lot identifier.
- (b) In the Case of a customer-formula feed, it shall be accompanied by a label, invoice, delivery slip, or other shipping document, bearing the following information:
 - (8) A lot identifier.

Add below language to Regulation 2. Label Format of Model Regulations

- (e) A lot identifier

Recommendation #2:

Move to insert Section 15. Recordkeeping Requirements in the Model Bill and move the current Sections 15–19 to follow Section 15. Recordkeeping Requirements in Sequential order

Section 15. Recordkeeping Requirements

- a) Records shall be maintained and be adequate to facilitate a recall of a specific batch or production run of commercial feed product that has been distributed.
- b) Records relating the lot identifier to the manufacture and distribution of the commercial feed product must be kept for one year after the last date of distribution.

Recommendation #3:

Move to insert Regulation 11. Recordkeeping Requirements in the Model Bill and move the current Regulation 11–13 to follow Regulation 11. Recordkeeping Requirements in Sequential order

Regulation 11. Recordkeeping Requirements for Manufacturing

- (a) For each commercial feed distributed, complete records shall be maintained in a manner that will facilitate the recall, diversion, or destruction of the commercial feed, if necessary. Such records shall be maintained for at least one years after the date of distribution by the manufacturer and shall include the following;
 - 1. Date of manufacture.
 - 2. Lot identifier.
 - 3. Date and quantity distributed.
- (b) Records required under this section shall:
 - 1. Be kept as original records, true copies, or electronic records.
 - 2. Be accurate, indelible, and legible.
 - 3. Be created concurrently with the performance of the activity documented.
 - 4. Be as detailed as necessary to history of work performed.