

## Feed Labeling Committee Meeting Minutes

AAFCO Annual Meeting

Tuesday August 1, 2023

8:00 – 9:00 AM EDT

### Committee Recommendations:

- Update Feed Labeling Guide in the OP to include the “Your Pasture Horse Mineral”.
- Request Ingredient Definition Committee review the caution statement in the definition for Ammonium Chloride. The current language is confusing and doesn’t make sense that it would be word for word. If a feed is labeled for a specific species, then that caution statement should read for that species only. (FL to give this directly to IDC)
- Request Model Bills and Regulations Committee insert unique identifier language into the model bill and model regulations. v(FL to give this directly to MBRC)

### Board Recommendations: None

### Committee Participants:

- **Members Present:** David Husner (PA), Jamie Good (ND), Erin Bubb (PA), Liz Beckman (WA), George Ferguson (NC), Dragan Momcilovic (FDA), Jamie Spencer (KS), Jordan Mancini (MN), Adam Orr (FDA), Justin Hill (NC), Bailey Whiten (GA), Lisa Fantelli (VT).
- **Advisors Present:** Jan Campbell (NGFA), Meghan Dicks (AFIA), James Emerson (USPA), Emily Helmes (ETA), Chris Olinger (NGFA), Pat Tovey (PFI). Steve Younker (AFIA), Cathy Alinovi (NGPFMA), Bill Bookout (APPA), Charles Starkey (NARA), Patrick Fulling (PFI), Dave Dzanis (ACVM/APPA), and Renee Streeter (ACVM).
- **Absent:** Mark Ashcroft (UT), Stevie Glaspie (MI), Kelly Younker (NM), Tom Phillips (MD), Ashley Shaw (FDA), Angie Simmons (GA), and Julia Fidenzio (APPA).

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### Committee Report:

Meeting called to order at 8:00 AM EDT. A quorum for the meeting was established (12 of 19).

Announcement was made acknowledging Jamie Good (ND) as a new co-chair of the committee and Patrick Fulling (PFI) and Renee Streeter (ACVM) as new advisors.

### **Labeling of Products Containing Microorganisms**

As discussed during the 2023 AAFCO Mid-Year Meeting, it was requested the chair reach out to Laboratory Services Committee to determine if methods are available and validated to test for microorganisms and to report their recommendation back to the committee. Laboratory Services stated there are methods available. Furthermore, if Feed Labeling wishes to proceed with breaking out microorganism guarantees, they should go with Recommendation #3 of the workgroup.

- Only breakout microorganism to the genus level, not species.

A letter submitted to the committee by AFIA was displayed and summarized regarding their concerns with this topic.

- No validated method.
- Product is already misbranded if the microorganism is not found.
- Ingredient statement already lists organisms in order of predominance.
- Lack of harmonization of international standards.
- This change would be no benefit to consumers; and they are not advocating for this change.
- Currently, only claim allowed by FDA and state regulations is total microbial count.

Methods for Lactic Acid Bacteria, Yeast/Mold and Bacillus Bacteria received by Laboratory Services Committee were displayed. Dancia Wu clarified that some of the methods were validated for Lactic Acid and Yeast. Bacillus is not completely validated, though the method is good.

Emily Helmes: From industry perspective, there is an issue if the methods are not validated and verified for each matrix used. That has not been done. This would be a massive change to the DFM industry. When there are no methods verified, this needs further discussion before proceeding. The methods being shared were not seen for a while. Agree with AFIA's letter.

Pat Tovey: Emily's comments are spot on. There is a lot to consider with this. These organisms could also play a role in a firm's food safety plan and hazard analysis.

Cathy Alinovi: Would disagree the consumers don't care about the microorganism breakdown. Looking towards the future, I recommend we take this as an opportunity for improving the methods.

Meghan Dicks: The labels already list the microbials present in the product, however Cathy makes a good point about looking forward to the future, but let's start with working on validating methods.

There was no further discussion on this topic, nor any motions from committee members.

TOPIC DIES FOR LACK OF ACTION.

ACTION: Committee chairs hereby disbands this workgroup.

### **OP Edits Workgroup Update**

As per the request of the committee, FDA reviewed the labels to add to the Feed Labeling Guide within the OP. Upon review, they noticed the ingredient Ammonium Chloride requires a caution statement when used in a feed.

Richard Ten Eyck: The label for Goat Feed would be ok, because it isn't a concentrate, supplement or premix. The sheep feed would need to have the caution statement. Since it is in quotations, it needs to be verbatim.

MOTION: Jamie Spencer moves to accept the equine label. Jamie Good seconds. MOTION CARRIES.

MOTION: Jamie Spencer moves to table the goat feed as well as the sheep until we receive additional information about the quotations and what needs to be in the caution statement. Jamie Good seconds.

Adam Orr: Confused about what additional information is needed. The definition states what is required. This would require IDC to amend the definition.

Dragan Momcilovic: Concern related to use for medicated feed when ammonium chloride is present on the label. This language would be contradicting to the drug approvals.

Jan Campbell agrees with tabling to have further discussion.

Adam Orr: To keep this moving, tabling the motion would not be best. Feed Labeling can't move this forward. The point that Dragan was making with medicated feeds would be addressed in IDC. Recommends moving this to IDC to modify the definition.

(Discussion ended with no amendments to the original motion.)

MOTION TO TABLE CARRIES.

MOTION: Adam Orr moves that IDC reviews the caution statement in the Ammonium Chloride definition for accuracy. Dragan Momcilovic seconds.

Jamie Spencer: Since it is in quotes, it must be that exact wording, however it makes it confusing. If a product is goat feed, it should say goat only, not cattle, sheep and goats.

David Husner: The motion is just for IDC to review the caution statement, not actually offering a recommendation.

Jamie Spencer: It would be good to include a note that says if a feed is labeled for a specific species, then that caution statement should read for that species only. This could be included in the remarks to IDC.

Paul Mostyn: Why not use the same statement that is used for Urea?

Jamie Good: That is a good point and one that has been discussed. Maybe this is something IDC could also consider.

(Discussion ended with no amendments to the original motion.)

MOTION CARRIES

The workgroup was never formed to put together the workgroup. The content from the previous workshop still exists, thus it shouldn't be an issue to proceed with hosting the workshop.

David Husner will reach out to committee members and advisors to solicit volunteers to be on this workgroup.

### **Labeling Definition Workgroup**

A summary was provided on the charge given to the Feed Labeling Committee and Pet Food Committee by the AAFCO Board of Directors, requesting a combined workgroup be formed to review the definition of Labeling that was passed by Model Bills and Regulations Committee at the 2023 AAFCO Mid-Year meeting.

The representatives from Feed Labeling Committee are Tom Phillips, Jamie Spencer, James Emerson and Charles Starkey. Tom Phillips has agreed to lead the combined workgroup.

Representatives from the Pet Food Committee are Jo Lynn Otero, Kristen Green, Bill Bookout and Pat Tovey.

### **Unique Identifiers (i.e. Lot Numbers) on Feed Labeling**

History was briefly discussed about the workgroup recommendations and how this topic was tabled at the 2023 AAFO Mid-Year Meeting to allow people additional time to think about the recommendation.

MOTION: Erin Bubb moves to remove the Unique Identifier recommendations from the table. Jamie Good seconds. MOTION PASSES.

The workgroup recommendations were reviewed as well as a brief overview of previous discussions.

David Husner stated that conversation during this meeting was to provide new recommendations or thoughts about this topic and not to rehash previous discussion points.

Pat Tovey: There was concerns about semantics, such as naming and if this is different than the federal requirements. There was also an opinion submitted from AFIA, which he agrees with.

David Husner: Workgroup recommends this be added to the model bill for states to adopt into law. The committee could pursue this route and forward the recommendation to the Model Bills and Regulations Committee. Another avenue would be to forward this to Education and Training Committee to develop education and outreach materials to promote the use of lot numbers.

MOTION: Erin Bubb moves to accept Recommendation #1. Jamie Good seconds.

This creates a definition of lot number in the model bill. Modifies Section 5 of the model bill to add lot identifier to commercial feed labels and customer-formula labels. Adds to Regulation 2 in model regulations a lot identifier.

Adam Orr: Since states would not be automatically adopting this, the education piece would be a way of getting this information out.

David Husner: There will be a delay until states adopt this into their language.

Steve Younker: Including this as part of the labeling requirements isn't the right spot, because most people don't put the lot number on the label. With regards to doing recommendation #1 before proceeding to Recommendation #2 and #3 isn't necessary. They could separate items.

Richard Ten Eyck: Oregon put similar language in place 12 years ago and everything has been working fine. The difference is Oregon states you must state "lot number" on the label so it can clearly be seen.

Ashley-Rose Ferguson: Washington has this requirement as well.

Erin Bubb: Recommendation #1 states it could be on the label or labeling. There would be no difference having it on the container, which is part of the labeling. We see unique identifiers or lot codes stamped on bags.

MOTION CARRIES (10 Yea, 1 Nay).

MOTION: Erin Bubb MOVES to accept Recommendation #2 in the model bill. Jamie Good seconds.  
MOTION CARRIES.

MOTION: Erin Bubb MOVES to accept Recommendation #3 in the model bill. Jamie Good seconds.

George Ferguson: Recommendation #3 has several grammatical errors that need corrected. Specifically (a) years is pluralized. There appears to be some language missing in (b)(4), because it doesn't make sense as currently displayed.

Jan Campbell: I believe it says to be as detailed as necessary to document the history of the work performed. We can go back and look at what was shared.

Jordan Macini: A lot of this was copied from Part 507, so that is likely what we should go with.

Meghan Dicks: The FSMA regulations state, "information adequate to identify the plant or facility the name and where necessary the location, the date and where appropriate the time. Instead of "document the history", it should read "document the activity".

David Husner: Can't locate the actual recommendation.

Richard Ten Eyck: If going back to the workgroup, recommend this align with FSMA so the record keeping requirements is two years.

David Husner: The record retention timeline was part of Recommendation #2, which already passed.

Erin Bubb: What is the outcome of the discussion? I think the 1 year doesn't need to align with FSMA. We need to clarify what (b)(4) is, however I would like to keep the motion going forward with the vote, with the understanding that (b)(4) be modified to what was actually in the workgroup report

Unknown: Could find some of the language in Part 225 for non-licensed medicated feed mills. That language looks very familiar to what (b)(4) is attempting to say.

Erin Bubb: For record, the missing word is probably provided, so it would say "to provide history".

MOTION Carries

ACTION: Since this topic has been moved out of Feed Labeling Committee, the committee chairs hereby disband the Unique Identifier Workgroup.

**Meeting adjourned at 9:03 AM EDT**

**Action Item Table**

Responsible	Item	Action	Timing / Status
David Husner	Feed Labeling Guide in Official Publication	Send notification to BOD to update the Feed Labeling Guide in the Official Publication to include a label for "Your Pasture Horse Mineral	September 2023
David Husner	Modify caution statement in definition of Ammonium Chloride.	Submit recommendation to the BOD to have IDC review the caution statement in the definition of Ammonium Chloride.	September 2023
David Husner	Feed Labeling Workshop	Form workgroup to develop a feed labeling workshop at 2024 Annual Meeting	August 2023
David Husner	Unique Identifiers on Labels and Labeling	Submit recommendation to the BOD to have MBRC add language to the model bills and model regulations to include unique identifiers.	September 2023