

AAFCO Regulations Pertaining to Carbohydrate Inclusion on Feed Tags

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Take Home Message

- Feed labeling is evolving due to research addressing consumer needs. Horse feed Labels should guarantee nutrients important to equines.
- If a commercial feed is intended to provide modified amounts of carbohydrates there is now specific terminology to be used to express the levels of these fractions to the consumer.

Who or What is AAFCO?

The Association of American Feed Control Officials (AAFCO) is a voluntary organization of state and federal regulators. In consultation with stakeholders, they establish model bills and regulations that States and other countries may adopt. This framework provides orderly commerce between states in a standardized format. AAFCO has no direct regulatory authority but their decisions ripple into every state feed law.

The organization goals are to: 1) Ensure consumer protection; 2) Safeguard the health of animals and humans; 3) Provide a level playing field of orderly commerce for the animal feed industry.

Most state feed laws and regulations reflect those in the AAFCO model bill. They require feed manufacturers to only use ingredients listed in the AAFCO Official Publication (OP) and to list them by their defined common name. The state feed regulations also require the feed label to follow a set format and to guarantee a specific set of nutrients for each intended species. Evolution of the defined ingredient list and required label format is done during AAFCO meetings and then eventually adopted into state law or regulations. The process moves at a glacier pace for full adoption of any change.

AAFCO also provides a forum for regulators and stakeholders to come together to solve common problems with feed manufacturing, ingredient sourcing and feed labeling. Regulators use the contacts made at meetings to streamline enforcement actions and share investigative information. For example, a commercial feed manufacturer would work with one or two states to resolve unsubstantiated claims made on a label instead of working with all 50 states to gain compliance.

For more information on AAFCO, visit their website at www.aafco.org.

How is Label Content Decided?

AAFCO's Feed Labeling Committee, chaired by Ricky Schroeder, Texas, meets twice a year at the AAFCO meetings. The committee has the charge of recommending changes in the model bill or regulations that impact a feed label.

A nutritionist panel of industry and academic experts recommends to the committee what nutrients are "important" to a particular species and those nutrients are then listed in the Guaranteed Analysis section of a label. This panel is rarely assembled. Only one panel has been brought together in the last several years and they looked at goat feed labeling.

Until recently, AAFCO had an established rule that anything that was historically listed on a feed label must continue to remain a requirement. At last month's meeting, they changed the rule allowing a nutrient to be removed from the label if 2/3rds of the expert panel members agree. The path is now open to move away from archaic guarantees and towards guarantees that provide better information to the consumer.

The Feed Labeling Committee is also working to establish how to substantiate claims such as "low" or "reduced" for a particular nutrient. This proved to be a challenge for carbohydrates guarantees in horse feeds. Though the original charge of the work group was to define how to substantiate low carbohydrate claims in horse feeds, six years later the workgroup has developed language for certain claims but did not agree on a standard for the term "low".

One of the remaining challenges for carbohydrate fraction labeling is establishing affordable analytical methods to test for the guaranteed fractions. This is needed to verify the consumer is getting a feed that meets the manufacturer's claims. Oregon has recognized some indicator tests that will be used until official methods are developed and validated.

Labeling Carbohydrates in Oregon

The Association of American Feed Control Officials (AAFCO) in August adopted rules on labeling carbohydrate fractions in animal feeds. This was the culmination of a six-year project.

Oregon adopted the AAFCO language in their administrative rules in July this year.

603-058-0140 Expression of Guarantees.....

(13) Guarantees for dietary starch, sugars, and fructans:

- (a) A commercial feed which bears on its labeling a claim in any manner for levels of "dietary starch", "sugars," "fructans," or words of similar designation, shall include on the label:
 - (i) Guarantees for maximum percentage of dietary starch and maximum percentage sugars, in the Guaranteed Analysis section immediately following the Crude Fiber guarantee;
 - (ii) A maximum percentage guarantee for fructans immediately following sugars, if the feed contains forage products;
 - (iii) Feeding directions shall indicate the proper use of the feed product and a recommendation to consult with a veterinarian or nutritionist for a recommended diet.

Oregon Recognized Analytical Methods

Use Starch for Dietary Starch. The lab will tell you they are only measuring plant starch but the method actually pulls microbial and animal sources of starch.

Use Ethanol Soluble Carbohydrates (ESC) for sugars. It measures mono and disaccharides. The sugar methods are being reviewed. There is a lot of variability between the methods currently.

Use WSC-ESC to indicate fructans. An economical direct measure method is being developed but may take several years to bring to the commercial lab. In most feeds, this will be a very small number but there are some forages that can be significant fructan sources. They will behave metabolically like sugars and cannot be ignored.

What to Expect in the Near Future

States will slowly adopt the language for labeling carbohydrate fractions as the need arises. AAFCO will work to verify a sugar and fructans methods that can be cheaply and quickly run in state regulatory labs. Consumers will need to be educated on how to use these values to choose the proper feed for their horse.

Notes
