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FEED INDUSTRY MEMORANDUM NO. 8-1

ROUGHAGE PRODUCTS IN FEED LABELS

OBJECTIVE:

To define the term "roughage product" and describe how such products are to be declared on the label.

BACKGROUND:

Section 141.051 (A)(6) of the Feed Act requires that each label of commercial feed list the name and percentage of any "low grade feeding materials or fillers." Questions have arisen concerning the interpretation of that phrase.

POLICY:

All products containing 5% or more roughage products as listed in Section 22, Collective Terms, of the latest edition of Association of American Feed Control Officials' Official Publication must declare such products as a percentage of the total ration immediately preceding or the term "roughage products" in the ingredient listing or immediately following each individual roughage product ingredient listed. Below the 5% level, low-grade feeding materials are no longer considered fillers and declaration of the percentage need not be made. As provided by Commercial Feed Rule 61.22 (5)(k), carrier ingredients in products used solely as drugs or vitamin premixes need not be named in the ingredients statement if (a) changes in the carriers do not affect the purposes of the product, and (b) the carrier ingredient is recognized as safe by this Office.

Since some State feed control services do not allow use of percentages in the ingredient listing, those firms marketing products in multiple states may contact this Office for permission to place the required percentage declaration at other places on their feed label(s) if they plan to license and distribute their products in this state.

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