

## No 161: Implementation of New Labelling Legislation

### Implementation of new labelling legislation

**Starting from 17th October 2011**

Since our Urgent News No 140 was issued in June 2010 regarding the new feed labelling regulations 2010, there has been a protracted period of discussion within the EU, government advisors, the industry and the farmers union. Debate has raged around the practical and meaningful implementation of the legislation, which was actually brought in to force in the UK on 23rd November 2010 by the Animal Feed Regulations 2010.

There were many issues on which clarification was sought and some still remain to be addressed, such as the interpretation on claims. As such, the Code of Good Labelling Practice, the reference document designed to give guidance on the practical implementation of the legislation written by the industry and farmers unions as required in Article 25 of the over-riding EU legislation, EC 767/2009, remains to be reviewed and accepted by the EU legislators. In effect, the new feed labelling legislation remains in disarray.

That said, to support the FSA, the industry has agreed to implement the current labelling legislation as written. The key factor is the declaration in the 'additive' section of the label of the quantity of metal salt added and not the element. That means, for example, the added quantity of cupric sulphate pentahydrate and not the copper it supplies.

#### **Please do not shoot the messenger.**

We fully agree that this approach makes no sense and have been working with AIC, FEAC and legislators to come to a sensible application of the regulation – to no avail.

However, to establish some safety in the use of complementary feeds such as dairy compounds and ruminant farm minerals, the total content of copper and selenium should be voluntarily declared in the 'Analytical Constituent' section of the label. These trace elements are the highest risk of toxicity, further exacerbated by the fact that ruminants can receive them from a range of sources, including feeds, minerals, water treatment, boluses, etc.

We will be implementing the new labelling legislation from 17th October 2011, so there will be a new appearance to the layout starting from that date. An example mineral label is attached on page 3.

#### **What does this mean for you?**

Your labels will change in appearance and be clearly divided into sections. Of key importance, however, is the section on additive declarations. The section details:

1. The quantity added.
2. For trace elements, the quantity of metal salt added. The positive aspect of this is that copying products from labels will be more difficult because different salts have different elemental content. For example, zinc oxide could contain zinc typically ranging from 70% to 80%; organic (chelated) minerals can have the same label name and identification number (eg E4 Cupric chelate of amino acids hydrate, which may be Optimin, Availamin or Bioplex) but vary greatly in elemental content.
3. When trying to balance the mineral content of ruminant diets, it is critical to understand the label to ensure that input matches requirements without deficiency or toxicity.

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### Further points to note regarding this legislation

1. Premixtures are now further defined by the 100x rule. This means that a complementary feed with 100x or more of the permitted maximum of an additive is redefined as a premixture. For example a dairy mineral with 3500 mg copper per kg, 50 mg selenium per kg or 500 mg iodine per kg are now premixtures and generally cannot be used by farmers.
2. We will be adopting new labelling for premixtures according to the FEFAC/FEFANA/EMFEMA Premixture Code of Practice.
3. Claims made for the effects of products must now be able to be effectively substantiated. We advise you to maintain all relevant information to support any claims being made.

4. It is possible that labelling legislation will change in the future – but it is unlikely to be in the short term. For the time being we are stuck with what we have.

If you require any assistance in setting up labels or in understanding the new format, please contact the technical or sales team.

Further information can be obtained from the Frank Wright Trow Nutrition technical department on 01335 341102. Receive these technical publications directly via e-mail link. Contact Sarah Brandrick to register your interest on 01335 341128 or at: [sarah.brandrick@frankwright.com](mailto:sarah.brandrick@frankwright.com). You can also access this and past CONTACT and URGENT NEWS publications by registering on our website: [www.frankwrighttrow.com](http://www.frankwrighttrow.com)

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### Example Label

FWTNI Customer Limited Someplace, Somewhere SW1 1AA	Tel ##### ##### Fax ##### #####	11111110
<b>EXAMPLE CATTLE GP IF MINERAL</b>		
A complementary mineral feeding stuff for cattle.		
<b>ANALYTICAL CONSTITUENTS</b>		
Phosphorus 4.00%, Calcium 20.79%, Magnesium 4.00%, Sodium 9.83%		
Copper 2000 mg/kg		
Selenium 35 mg/kg		
<b>ADDITIVES</b>		
Vitamins:		
Vitamin A {E 672} 500000 iu/kg, Vitamin D3 {E 671} 100000 iu/kg,		
Vitamin E (all-rac-alpha-tocopheryl acetate) {3a700} 1000 mg/kg		
Trace Elements:		
(Iron - Fe) {E 1} Ferric oxide 5000 mg/kg, (Iodine - I) {E 2} Calcium iodate, anhydrous 551 mg/kg,		
(Cobalt - Co) {E 3} Basic cobaltous carbonate, monohydrate 160 mg/kg,		
(Copper - Cu) {E 4} Cupric chelate of amino acids hydrate 3333 mg/kg,		
(Copper - Cu) {E 4} Cupric sulphate, pentahydrate 6000 mg/kg,		
(Manganese - Mn) {E 5} Manganous oxide 3226 mg/kg,		
(Zinc - Zn) {E 6} Zinc oxide 4167 mg/kg,		
(Selenium - Se) {E 8} Sodium selenite 66.67 mg/kg,		
(Selenium - Se) {3b8.11} Selenised yeast inactivated 2500 mg/kg		
<b>COMPOSITION:</b>		
Calcium carbonate, Sodium chloride, Monocalcium phosphate,		
Magnesium oxide, (Sugar) cane molasses		
<b>DIRECTIONS FOR USE:</b>		
Mix into or sprinkle onto feeds to provide the daily allowance.		
Typical mineral intakes per head per day: Growing Cattle 50 to 100 g		
Dairy Cows 100 to 150 g Suckler Cows 100 to 150 g		
or as advised by a nutritional consultant.		
<b>DO NOT FEED TO SHEEP. STORE COOL AND DRY.</b>		
UFAS - Compound Feed (Reg No. 162) - Certificate end date: 30/04/14		
Establishment No. aGB061 R10022 Approval No. 2012597		
Harmful to aquatic organisms, may cause long-term adverse effects in the aquatic environment		
Do not breathe dust. Avoid release to the environment. Refer to special instructions/safety data sheet		
Contains Zinc Oxide		
Contains Copper Sulphate		

**Best Before:**  
**MMM/YYYY**

**Batch Number:**  
**1234567**

**Nett Weight:**  
**25KG**