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Consolidated answers to the questionnaire on disclosure of feed materials on compound feed labels

Q1: It appears that the quantity of raw materials used as carriers in compound feeds generally represents only a small proportion of the total compound feed.

Q1.1 What is the typical percentage of carrier raw materials in a compound feed?

Answer: Premixtures are incorporated at levels ranging between 0.1 and 1.5% in complete feed and the carrier makes between 20 and 90% of the premixture depending on species. The typical percentage of carrier raw materials in compound feed is between 0.1 and 0.5%.

Q1.2 Is it possible for the carrier to be present at a level exceeding that of other raw materials in the compound feed?

Answer: although not common, some functional feed materials may be present at levels around 0.1%.

Q2: What is the added value of labeling raw materials used as carriers in compound feed labeling?

Answer: There is no perceived added value, whether for compound feed manufacturers, farmers or control authorities. It must be noted that, to be able to declare on the compound feed labels the feed materials contained in the premixture while complying with the obligation to declare them by descending order of weight, the compound feed manufacturer should have access to the inclusion rates of the feed materials in the premixtures, which is not an information that the premix manufacturer is bound to provide by law.

Labelling feed materials used as premix carriers on compound feed labels unduly overloads the labels, increases administrative burden and obliges compound feed manufacturers to change their labels when the premix manufacturer changes its carriers or the feed manufacturer changes supplier of premixtures.

Q2.1 Does it contribute to the proper application of legislation, traceability, and controls? (For example, the possible presence of contaminants in the carrier that need to be traced)

Answer: Feed materials used as carrier may carry contaminants, like other feed constituents, including feed additives whose declaration on compound feed label is not mandatory. This does not affect traceability and controls since the information on the carrier is mentioned on the label of the premixture and therefore available in case of incident / investigations, considering that these investigations in case of incident / non-compliance usually start at the level of the compound feed manufacturer and internal traceability is ensured.

Q2.2 Does it meet the need to inform the buyer so they can make an informed choice? (For example, if the carrier contains a substance that is not suitable due to the particular sensitivities of certain animals)

Answer: typical carriers are wheat middlings, rice bran, limestone flour, and corn cob meal; they are of an inert nature, have a low nutritional value and are selected by experts in animal nutrition so that they pose no specific problem when used in feed for whatever species. Still for certain quality schemes (PDO), information on all feed materials may be required but this can be provided on a B2B basis. Whenever the feed materials is or is produced from a GMO, it shall be declared anyway on the label of the premixture and the label of the compound feed in compliance with R1829/2003.

Q3 What is the current market practice regarding the labeling of raw materials used as carriers in premixes contained in compound feed (based on Article 17(1)(e) of Regulation 767/2009)?

Answer: situation is extremely different across countries. For 9 EU Member States, the main practice is as follows:

- *No indication at all on the compound feed label: 2 countries*
- *Indication under “composition” of the word “premixture” at the bottom of the list of feed materials: 3 countries*
- *Indication on compound feed labels of those feed materials contained in the premix that have a nutritional value (e.g. mineral feed materials) and/or have a technological function: 2*
- *Different national practices (No indication or declaration of individual feed materials contained in the premixture on compound feed labels): 2*

In practice, there may be different ways of doing within the same country. Some reported as another way the indication on the compound feed label at the bottom of the header “composition” of the sentence “premix containing ...” with the list of feed materials included in the premixture.