



## **FOOD SERVICES - ADVICE NOTE 70**

**The Animal Feed (Composition, Marketing and Use) (England) Regulations 2015 – SI 255**

**Regulation (EC) 767/2009 on the placing on the market and use of feed...**

### **And other related legislation.**

This advice note has been prepared for the guidance of feed businesses.  
It is not an authoritative document on the law and is only intended for guidance.  
Anyone concerned with the labelling of feeding stuffs is advised to read the full regulations, alongside these guidance notes.

### **OTHER RELATED ADVICE NOTES:**

ERYC Animal Feed page:

<http://www2.eastriding.gov.uk/business/food-services/animal-feedingstuffs/>

This Advice Note

[www.eastriding.gov.uk/assets//an70](http://www.eastriding.gov.uk/assets//an70)

Basic Requirements of Feed Law (Google Doc)

<https://goo.gl/avjjAK>

ERYC [ 71 ] HACCP For Small Feed Manufacturers

[www.eastriding.gov.uk/assets//an71](http://www.eastriding.gov.uk/assets//an71)

FEFAC Code of Good Labelling Practice For Compound Feed For Food Producing Animals

<http://www.fefac.eu/files/69688.pdf>

FEDIAF Code of Good Labelling Practice For Pet Food

[http://www.fediaf.org/fileadmin/user\\_upload/Reports/ProdCom/pet\\_food\\_code\\_20102011\\_1en.pdf](http://www.fediaf.org/fileadmin/user_upload/Reports/ProdCom/pet_food_code_20102011_1en.pdf)

## OTHER ASSOCIATED DOCUMENTS:

The Animal Feed (Composition, Marketing and Use) (England) Regulations 2015 – SI 255  
[http://www.legislation.gov.uk/uksi/2015/255/pdfs/ukxi\\_20150255\\_en.pdf](http://www.legislation.gov.uk/uksi/2015/255/pdfs/ukxi_20150255_en.pdf)

(EC) No 767/2009 - EU feed regulations:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2009R0767:20100901:EN:PDF>

Derogations:

(EU) No 454/2010 Amends implementation date with regards to pet food.

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:128:0001:0002:EN:PDF>

Amendments:

Commission Regulation (EU) 2017/2279

<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R2279&rid=1>

82/475/EEC - Categories of feed materials:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:1982L0475:19980701:EN:PDF>

2008/38/EC - Feed for particular nutritional purposes:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2008L0038:20101213:EN:PDF>

2002/32/EC - Undesirable substances

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2002L0032:20130226:EN:PDF>

(EU) No 68/2013 - Catalogue of feed materials

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:029:0001:0064:EN:PDF>

2017/1017 Amending (and effectively replacing) the above Catalogue of feed materials

<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R1017&rid=1>

EU Register of feed materials

<http://www.feedmaterialsregister.eu/>

(EC) No 1831/2003 - Additives

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2003R1831:20100901:EN:PDF>

Community Register of Feed Additives

[http://ec.europa.eu/food/food/animalnutrition/feedadditives/docs/comm\\_register\\_feed\\_additives\\_1831-03.pdf](http://ec.europa.eu/food/food/animalnutrition/feedadditives/docs/comm_register_feed_additives_1831-03.pdf)

## **Introduction**

The Animal Feed (Composition, Marketing and Use) (England) Regulations 2015 revoke The Animal Feed (England) Regulations 2010 and implement Regulation (EC) 767/2009 which is the European regulation controlling the placing on the market and use of feed.

(EC) 767/2009 applies to both food producing and non food producing animals; it specifies the requirements and responsibilities for labelling, permitted tolerances, marketing claims, etc.

It amends various pieces of European legislation and links to others (see above).

In the guidance below numbers and references refer to the articles and annexes of (EC) 767/2009 unless stated otherwise.

## **Food Producing, Non Food Producing & Pet Animals**

Some of the requirements (eg. additive & analytical declarations) vary depending on whether the feed is for food producing, non food producing or pet animals. These are defined as:

3.2(c) *'food-producing animal' means any animal that is fed, bred or kept for the production of food for human consumption, including animals that are not used for human consumption, but that belong to a species that is normally used for human consumption in the Community;*

This includes animals such as horses and rabbits which may previously have been considered as pets in the UK.

3.2(d) *'non-food producing animals' means any animal that is fed, bred or kept but that is not used for human consumption, such as fur animals, pets and animals kept in laboratories, zoos or circuses;*

3.2(f) *'pet' or 'pet animal' means any non-food producing animal belonging to species fed, bred or kept, but not normally used for human consumption in the Community;*

Pets are a sub-class of non-food producing animals. Food-producing animals can not be classed as pets.

## **Wild animals**

Animals living freely in the wild were outside the scope of the old Feeding Stuffs (England) regulations 2005 for everything apart from the levels of undesirable substances.

Whilst the definition of 'non-food producing animals' does not specifically include wild animals, neither does it exclude them. In the introductory recitals to the regulations it states:

Whereas: (7) *Given the risk of contamination of the feed and food chain, it is appropriate that this Regulation apply to feed for both food and non-food producing animals, including wild animals.*

Bearing this statement in mind, and the fact that the wording of 3.2(d) does not exclude wild animals, this means that feed for wild animals is within the scope of the regulations. The Food Standards Agency has confirmed that they are also of this opinion.

## **Safety and marketing requirements**

4.1 Feed may only be placed on the market and used if:

4.1(a) it is safe; and

4.1(b) it does not have an adverse affect on the environment or animal welfare

4.2 Feed business operators shall ensure that feed:

4.2(a) is sound, genuine, unadulterated, fit for purpose and of merchantable quality

Feeds cannot contain any **undesirable substance** above the level specified in *Annex I of 2002/32/EC* relating to undesirable substances (link on page 1).

## **Responsibilities and obligations of feed businesses**

- 5.2 Information must be made available to the competent authority to enable them to verify the accuracy of the labelling

## **Restriction and prohibition**

- 6.1 Feed cannot contain prohibited materials listed in annex III (of (EC) No 767/2009)

## **Content of feed additives**

- 8.1 Complementary feeds cannot contain additives at greater than 100 times the level allowed in complete feeds

## **Packaging**

- 23.1 Feed can only be placed on the market in tamper evident, sealed packages
- 23.2 By way of derogation from 23.1, the following feed can be placed on the market in bulk or in unsealed packages or containers
- (a) feed materials
  - (b) compound feed obtained exclusively by mixing grain or whole fruit
  - (c) deliveries between producers of compound feed
  - (d) deliveries of compound feed directly from the producer to the feed user
  - (e) deliveries from producers of compound feed to packaging firms
  - (f) quantities of compound feed not exceeding 50kg which are intended for the final user and are taken directly from a sealed package or container
  - (g) blocks or licks

## **Principles for labelling and presentation**

- 11.1 The labelling and presentation of feed shall not mislead the user, in particular:
- 11.1(a) as to the intended use or characteristics of the feed, in particular, the nature, method of manufacture or production, properties, composition, quantity, durability, species or categories of animals for which it is intended;
  - 11.1(b) by attributing to the feed effects or characteristics that it does not possess or by suggesting that it possesses special characteristics when in fact all similar feeds possess such characteristics
- 11.3 When feed is sold by distance selling e.g. over the internet or from a catalogue etc. the required information must be provided on the material supporting the distance selling, or must be provided prior to the conclusion of the sale; [ other than 15(b),(d),(e) and 16.2(c) or 17.1(d); which can be provided at the time of delivery ]
- 11.4 Annex II
- 1 contents or levels declared must relate to the weight of the feed
  - 2 dates must be in the format 'DD/MM/YY' and this abbreviation must appear on the label.
  - 4 instructions for use for complementary feeds shall state the maximum quantity to be fed
- 11.5 Permitted tolerances for discrepancies between the labelled composition values and those found on analysis are in annex iv (as amended)

## **Claims**

- 13.1(a) Claims must be objective, verifiable by the competent authorities and understandable by the user of the feed
- 13.1(b) Scientific substantiation of the claims must be available at the time the feed is placed on the market
- 13.3(a) Claims cannot be made that a feed will prevent, treat or cure a disease

## **General labelling [applicable to all feeds]**

- 14.1 The mandatory labelling information must be :
- given in their entirety
  - in a prominent place: } i.e. all together in one place
    - on the packaging / container
    - on a label attached to the package / container
    - on the accompanying documentation (for bulk)
  - conspicuous
  - clearly legible
  - in English (if for the UK market)
- 14.2
- easily identifiable
  - not obscured by other information } \* see comments below
  - in a colour, font and size that does not obscure or emphasise any part of the information unless it is to draw attention to warning statements.

\* This does not mean (as was the case in the previous regulations) that other information cannot be included, as long as the mandatory information is not obscured or difficult to identify.

### **The following information is required for all feeds:**

- 15(a) The type of feed, one of :
- Feed Material
  - Complete Feed
  - Complementary Feed
  - Pet Food
  - + some others
- 15(b) The name and address of the person/company responsible for the labelling
- 15(c) If available; the **approval**\* number for the establishment issued under EC No 1774/2002 (Animal By-products) or EC No 183/2005 (Feed Hygiene)\*\* of the person/company responsible for the labelling\*\*\* (e.g. αGB86301234).
- \* There is no requirement under this article to list a registration number. There is however a requirement to list either the name and address or registration number of the producer of a compound feed under article 17.1(c).
- \*\* If the establishment has approvals under both 1774/2002 and 183/2005 then the one issued under 183/2005 should be used.
- \*\*\* This may not be the producer of the feed if it is made under another company's name.
- 15(d) The batch or lot number
- 15(e) The net quantity
- 15(f) A list of additives headed 'Additives' (see Additives below)
- 15(g) The moisture % if >14% or see Annex I (6)

[ 15(c), (d) & (e) can be sign-posted ]

## **Feed materials**

- 16.1(a) Name of feed material
- 16.1(b) Compulsory declarations from annex v;  
these can be replaced by the declarations in the Community Catalogue of feed materials (EU) 68/2013 (link on page 1). If the name from the catalogue is used as the name of the feed material then the declarations in the catalogue must used. (24.5)
- 16.2 [only applies when additives are incorporated ]
- 16.2(a) Species or category of animals the feed is intended for
  - 16.2(b) Instructions for use [ see annex ii (4) ]
  - 16.2(c) Minimum storage life for additives [ can be sign-posted ]

### **Compound feeds**

- 17.1(a) Species or category of animals the feed is intended for
- 17.1(b) Instructions for use
- 17.1(c) Name and address OR registration number of producer; this could be different from the person responsible for the labelling in 15 (b/c) [ can be sign-posted ]
- 17.1(d) Minimum storage life [ can be sign-posted ]
- 17.1(e) List of feed materials in descending order by weight, headed 'Composition' [ can be sign-posted ]
- 17.1(f) Compulsory nutritional declarations headed 'Analytical constituents' [ see chapter ii of annex vi or vii ]
- 17.2(a) The name and % of a feed material shall be indicated if its presence is emphasised
- 17.2(b) The % of feed materials in feed for food producing animals must be made available to the purchaser on request
- 17.2(c) For feed for non-food producing animals the name of the feed material can be replaced by the name of the category the feed material belongs to (from 82/475) subject to 17.2(a) above
- 21.5 Where the feed consists of no more than three feed materials and they are clearly indicated in the description the information in 17.1(a) & (b) is not required
- 21.4 The declarations referred to in 17.1(f) are not required for mixes of whole plant grains, seeds and fruit

### **Additional labelling for pet food**

- 19 A free telephone number or other appropriate means of communication must be provided on the label for purchasers to obtain further information relating to additives or feed materials referred to by category

- Annex II (3b) The type of feed from 15(a) can be 'Pet Food'
- Annex II (5) For pet food some of the wording can be changed:
  - 'crude protein' can be changed to 'protein'
  - 'crude fat' can be changed to 'fat content'
  - 'crude ash' can be changed to 'incinerated residue' or 'inorganic matter'

**Additives (see annex vi or vii)** as amended by EU 2017 / 2279

Additives must be listed where:

- a maximum content is set for at least one food producing animal in the case of feeds for food producing animals OR
- a maximum content is set for at least one non-food producing animal in the case of feeds for non-food producing animals
- they belong to the categories 'zootechnical additives' and 'coccidiostats' and 'histomonostats'
- the added amount exceeds the recommended maximum
- they are emphasised on the labelling

Information required to be included for listed additives  
(and must be disclosed to a purchaser upon request for other additives not listed):

Required information	Feed for food producing animals (annex vi)	Feed for non-food producing animals (annex vii)		
		Preservatives Colourants Antioxidants Flavouring Compounds	Other Additives	# When Emphasised
* Category or Functional Group	✓	* Functional Group	✓	
Specific Name	✓	Not required but must be disclosed to purchaser upon request	Either one or both	✓
ID Number [ eg E number ]	✓			✓
♣ Added Amount	✓		✓	✓

\* See (EC) No 1831/2003 for additive Categories (Article 6.1) and Functional Groups (Annex I); also see abbreviated functional group names below.

♣ Added Amount – there is currently no guidance regarding processing losses in relation to this declaration.

# These declarations are in addition to the requirements of the previous two columns.

**Added Amount:**

For additives that have to (or are chosen to) be declared; the amount can be declared in one of three ways depending on the type of additive:

1. The added amount of the additive compound (this is not necessarily the level of the active ingredient in the finished feed)
2. Where the legal act authorising the additive specifies a substance in the 'minimum/maximum content' column (e.g. most trace elements), it is the added amount of the substance that must be declared. E.g. 100mg of copper sulphate pentahydrate contains 25mg of copper, so the declaration should be 25mg not 100mg.  
[See Appendix 5 for information on calculating the amount of the element from the chemical compound]
3. For additives in the functional group 'vitamins, pro-vitamins and chemically well-defined substances having similar effect'; rather than the added amount being listed in the 'Additives' section the total guaranteed amount of the vitamin can instead be included in the 'Analytical Constituents' section. If this option is chosen the declaration must take into account the levels naturally present in the feed materials contained in the feed and any losses expected through to the end of the shelf-life for the feed.

**In all cases the other required information must still be declared in the additives section.**

The functional group names can be replaced with the following abbreviated names:

Functional Group	Full Name	Abbreviated Name
1h	Substances for control of radionuclide contamination: substances that suppress absorption of radionuclides or promote their excretion	Radionuclide controllers
1m	Substances for reduction of the contamination of feed by mycotoxins: substances than can suppress or reduce the absorption, promote the excretion of mycotoxins or modify their mode of action	Mycotoxin reducers
1n	Hygiene condition enhancers: substances or, when applicable, microorganisms which favourably affect the hygienic characteristics of feed by reducing a specific microbiological contamination	Hygiene improvers
2b	Flavouring compounds: substances the inclusion of which in feedingstuffs increase feed smell or palatability.	Flavourings
3a	Vitamins, pro-vitamins and chemically well-defined substances having similar effect	Vitamins
3b	Compounds of trace elements	Trace elements
3c	Amino acids, theirs salts and analogues	Amino acids
3d	Urea and its derivatives	Urea
4c	Substances affecting favourably the environment	Environment improvers

### **Additives (approval status)**

Additives can only be included in feed if they are approved by the EU.

To check the approval status of an additive open the *Community Register of Feed Additives* (link on page 2).

Search the register for the additive by 'E number' or name, then click the link(s) in column 7 to get details of what it is approved for and any other conditions eg. maximum inclusion rate, additional labelling requirements etc.

The additive may be entered more than once in both the community register and the linked documents so it is worth doing a full search of the documents. There may also be additional links in column 7 amending the main authorisation which it is important to read.



## Entry into force

The regulations apply from 1 September 2010; feed placed on the market or labelled in accordance with the old regulations prior to this date can remain on the market until stocks are exhausted.

Feed intended for pet animals, and labelled in accordance with the old regulations, can be placed on the market until 31 August 2011; and after that date can remain on the market until stocks are exhausted. [see amendment link on page 2]

Feed labelled in accordance with (EC) No 767/2009 can be placed on the market prior to these dates.

Amendments brought in by (EU) 2017/2279 come in to effect from 1st Jan 2019 for food producing animals and 1st Jan 2020 for non food producing animals.

## Additional information

The list of banned materials in annex iii, the permitted tolerances in annex iv and the way additives are labelled have all been changed, there is a link to the amended version of the regulations and the amending regulations on page 2.

## Other legislation affecting labelling

**Feed business operators are advised to familiarise themselves with all the requirements of these (and other applicable) regulations as there may be other requirements which are applicable to your business.**

### **Processed Animal Protein (eg. Meat & Bone Meal)**

Regulation 21 of schedule 6 of the TSE regs [Transmissible Spongiform Encephalopathies (England) Regulations 2010 (SI 2010/801)]; relating to cross-contamination with processed animal proteins (except fishmeal), says that if a **feed that is not for pets** is produced in a premises that uses 'processed animal protein other than fishmeal' the labelling must indicate that it was:

*'produced on premises where processed animal protein, other than fishmeal, is used'.*

This is most likely to apply to feeds produced by pet food manufacturers but not labelled as pet food, e.g. rabbit food or 'working' dog food.

### **Fishmeal**

Regulation 8.3 of schedule 6 of the TSE regs says that **feeds for farmed animals** containing fishmeal must be labelled in accordance with the EU TSE regs (EC 999/2001), Annex IV, Part 2 B(d). Which says that fishmeal or feeds containing fishmeal must be labelled with the warning statement:

*'contains fishmeal — must not be fed to ruminants'.*

This warning statement must be permanently attached i.e. not on a stitched on label which comes off when the package is opened.

### **Genetically Modified Organisms in Feed Materials & Ingredients**

Products containing more than 0.9% GMO in a feed material must be labelled as containing GM.

The declaration should be part of the ingredients list and be in the form:

*Genetically modified (name of organism)*

or *Produced from genetically modified (name of organism)*

If the ingredient is declared as part of a category e.g. 'Derivatives of vegetable origin' then the declaration should be in the form:

*Contains genetically modified (name of organism)*

or *Contains (name of ingredient) produced from genetically modified (name of organism)*

If no ingredients list is required then the label should clearly state:

*Genetically modified (name of organism)*

or *Produced from genetically modified (name of organism)*

### **Weights and Measures**

Weights and measures legislation specifies the size of the weight marking indication required on the label (see table on right).

15(e) of (EC) 767/2009 specifies that solid products should be labelled in units of mass and liquid products in units of mass or volume.

Weight of package:	Size:
<= 50g	2mm
>50g but <=200g	3mm
>200g but <=1kg	4mm
>1kg	6mm

## **Labelling and Packaging of Additives and Premixtures of Additives**

Regulation (EC) 1831/2003 'on additives for use in animal nutrition' lays down the procedures for authorising, placing on the market and use of feed additives. It does not cover processing aids or veterinary medicines other than coccidiostats and histomonostats.

In this part of the guidance note, numbers and references refer to the articles and annexes of (EC) 1831/2003 unless stated otherwise.

Article 8.1 of (EC) No 767/2009 sets the maximum limit for additives at 100 times the maximum level allowed in a complete feed (or 5 times for coccidiostats and histomonostats). Any feed over this level is classed as an additive or premixture of additives.

The labelling of additives and premixtures of additives is different to other feeds. The main requirements are detailed in Article 16 of (EC) No 1831/2003 as detailed below.

### **Definitions:**

2.2(a) 'feed additives' means substances, micro-organisms or preparations, other than feed material and premixtures, which are intentionally added to feed or water in order to perform, in particular, one or more of the functions mentioned in Article 5(3);

Article 5(3) states:

The feed additive shall:

- (a) favourably affect the characteristics of feed,
- (b) favourably affect the characteristics of animal products,
- (c) favourably affect the colour of ornamental fish and birds,
- (d) satisfy the nutritional needs of animals,
- (e) favourably affect the environmental consequences of animal production,
- (f) favourably affect animal production, performance or welfare, particularly by affecting the gastro-intestinal flora or digestibility of feedingstuffs, or
- (g) have a coccidiostatic or histomonostatic effect.

2.2(e) 'premixtures' means mixtures of feed additives or mixtures of one or more feed additives with feed materials or water used as carriers, not intended for direct feeding to animals;

### **Approval**

Additives can only be included in feeds if they have been approved. (EC) No 1831/2003 details this process, but it is beyond the scope of this guidance note.

See 'Additives (approval status)' on page 6 of this guidance note for details of how to check the approval status of an additive.

Some additives also have maximum inclusion rates set or other conditions of use; it is important these are checked when including any additive or premixture in a feed.

### **Packaging**

16.5 Additives and premixtures shall be marketed only in closed packages or closed containers which must be closed in such a way that the fastener is damaged on opening and cannot be re-used.

- i.e. Sealed, tamper evident packaging.

## Labelling

- 16.1 Additives and premixtures must be labelled in English (if for the UK market)
- 16.1 Information must be given in relation to each additive contained in the material
- 16.1(a) Name of the functional group the additive belongs to
- 16.1(b) Name of the additive given in the authorisation\*
- 16.1(b) Name and address of the person responsible for the labelling\*
- 16.1(c) The net weight, or for liquids the weight or volume
- 16.1(d) The approval number (under 183/2005) of the manufacturer\*
- 16.1(e) Directions for use and any safety recommendations\*
- 16.1(e) Any specific requirements mentioned in the approval, inc. animals intended for.\*
- 16.1(f) The identification number
- 16.1(g) The batch reference number\*
- 16.1(g) The date of manufacture

\* In the case of premixtures, (b), (d), (e) and (g) apply to the premixture, not the included additives.

- 16.2 For flavouring compounds, the list of additives may be replaced by the words 'mixture of flavouring compounds'. This shall NOT apply to flavouring compounds subject to a maximum inclusion rate.
- 16.3 In addition to the information required by 16.1 the details in Annex III must be included where applicable.

### ANNEX III : Specific Labelling Requirements For Certain Feed Additives And For Premixtures

- (a) Zootechnical additives, coccidiostats and histomonostats:
    - the expiry date of the guarantee or the storage life from the date of manufacture,
    - the directions for use, and
    - the concentration;
  - (b) Enzymes, in addition to the abovementioned indications:
    - the specific name of the active component or components in accordance with their enzyme activities, in conformity with the authorisation given,
    - the International Union of Biochemistry identification number, and
    - instead of concentration: units of activity (units of activity per gram or units of activity per millilitre);
  - (c) Micro-organisms:
    - the expiry date of the guarantee or the storage life from the date of manufacture,
    - the directions for use,
    - the strain identification number, and
    - the number of colony-forming units per gram;
  - (d) Nutritional additives:
    - the active-substance level, and
    - the expiry date of the guarantee of that level or storage life from the date of manufacture;
  - (e) Technological and sensory additives with the exception of flavouring compounds:
    - the active substance level;
  - (f) Flavouring compounds:
    - the incorporation rate in premixtures.
- 16.4 In the case of premixtures the word 'premixture' must be on the label.
  - 16.4 Carriers must be declared in compliance with article 17.1(e) of (EC) No 767/2009  
i.e. list of feed materials in descending order by weight headed 'Composition'
  - 16.4 If water is used as a carrier the moisture content must be declared
  - 16.4 Only one minimum storage life may be indicated for a premixture; this shall be determined from the minimum storage life of each of its components.

## **Advice and Information**

If you would like to obtain further information with regard to the subject of this advice note, or in relation to any aspect of food safety or food standards please contact us on (01482) 396301.

Alternatively visit the council web pages at: [www.eastriding.gov.uk/foodservices](http://www.eastriding.gov.uk/foodservices)

If you are based outside the East Riding please contact your local Trading Standards department for further advice. You can find your local TS department here:

<https://www.gov.uk/find-local-trading-standards-office>

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If you spot any errors, or have suggestions for improvements please email [dean.lee@eastriding.gov.uk](mailto:dean.lee@eastriding.gov.uk)

An up to date copy of this guidance note can be found here: [www.eastriding.gov.uk/assets//an70](http://www.eastriding.gov.uk/assets//an70)

<b>Amendments / Changes log</b>		
<b>Issue</b>	<b>Date</b>	<b>Comments</b>
3.1	18/01/2018	Changes to example labels
3.0	03/01/2018	Updated with changes made by (EU) 2017/2279
2.6	30/06/2017	Added link to new catalogue of feed materials & updated wording on checklists in relation to additive listings
2.5.4	13/09/2016	Added link to EU code of good labelling practice for compound feed for food producing animals
2.5.3	18/02/2016	Added link to feed materials register
2.5.2	04/06/2015	Updated link to feed additive register
2.5.1	20/03/2015	Changed name & link for UK regs on front page
2.5	07/05/2014	Added section on additives and premixtures
2.4	27/02/2014	Updated URLs
2.3	02/04/2013	Amended 11.3 re distance selling requirements to fix error
2.2	05/02/2013	Updated links to latest consolidated versions of legislation Changed References to 575 / 2011 to 68 / 2013
2.1	29/01/2013	Added links to feed labelling checklists
2.0	01/10/2012	Minor layout changes
1.9	10/09/2012	Updated links to latest consolidated versions of legislation Added definition of pet animals Added discussion of additive declarations vs analytical declarations
1.8	01/06/2012	Updated links to latest consolidated versions of legislation Changed references to EU 242 / 2010 to 575 / 2011 Changed feed material labels in line with 575 / 2011
1.7.2	04/04/2012	Included working dogs as a non pet animal example in relation to PAP
1.7.1	06/01/2012	Added link to FEDIAF Code Of Good Labelling Practice for Pet Food
1.7	19/10/2011	Added section on packaging (23.1 & 2) to page 3
1.6	04/05/2011	Amended requirements of 15(c) to state approval rather than registration + changed appendix 2 & 3 accordingly. Added Appendix 4 – Other Labelling Issues
1.5	22/03/2011	Added W&M weight indication sizes Max qty req'd to be indicated on complementary feeds if additives > allowed in complete feeds, + minor (wording & layout) changes to various parts
1.4.2	21/03/2011	Amendments to tables in appendix 2 (composition & analytical requirements)
1.4.1	14/03/2011	Minor amendments to Labelling Requirement Checklists Updated URL for this document
1.4	11/03/2011	Added Labelling Requirement Checklists For Feed Types From Flow Chart as appendix 2 Moved example labels to appendix 3
1.3.2	04/03/2011	Changed 'Additional information' to reflect the updated link [1.1] to 767
1.3.1	28/02/2011	Changed link to updated version of undesirable substances regs
1.3	17/02/2011	Changes made to additives declaration table Added requirements of 24.5 to 16.1(b) – use of catalogue of feed materials
1.2	14/02/2011	Introduced Flow Chart as appendix 1 Moved example labels to appendix 2
1.1	08/02/2011	Introduced changes log Updated links 17.1(c) Changed manufacturer to producer Set example labels as appendix 1

## **Appendices:**

**Appendix 1** Feed Labelling Flow Chart

**Appendix 2** Labelling Requirements For Feed Types From Flow Chart

**Appendix 3** Example Labels

FPA = Food Producing Animal

NFPA = Non-Food Producing Animal

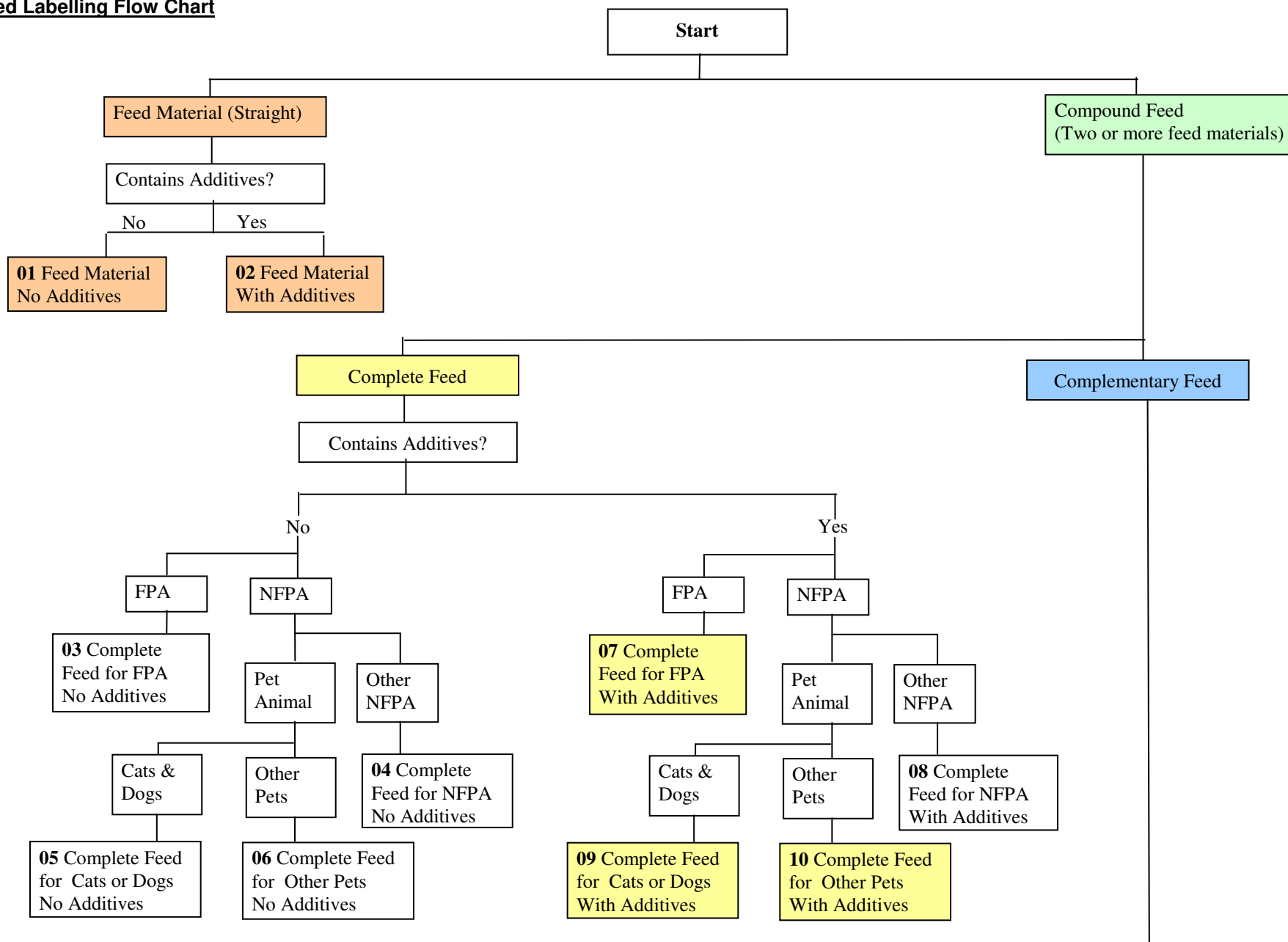
Follow the flow chart in appendix 1 then find the corresponding box in appendix 2 for the labelling requirements applicable to that type of feed. Coloured boxes have an example label in appendix 3.

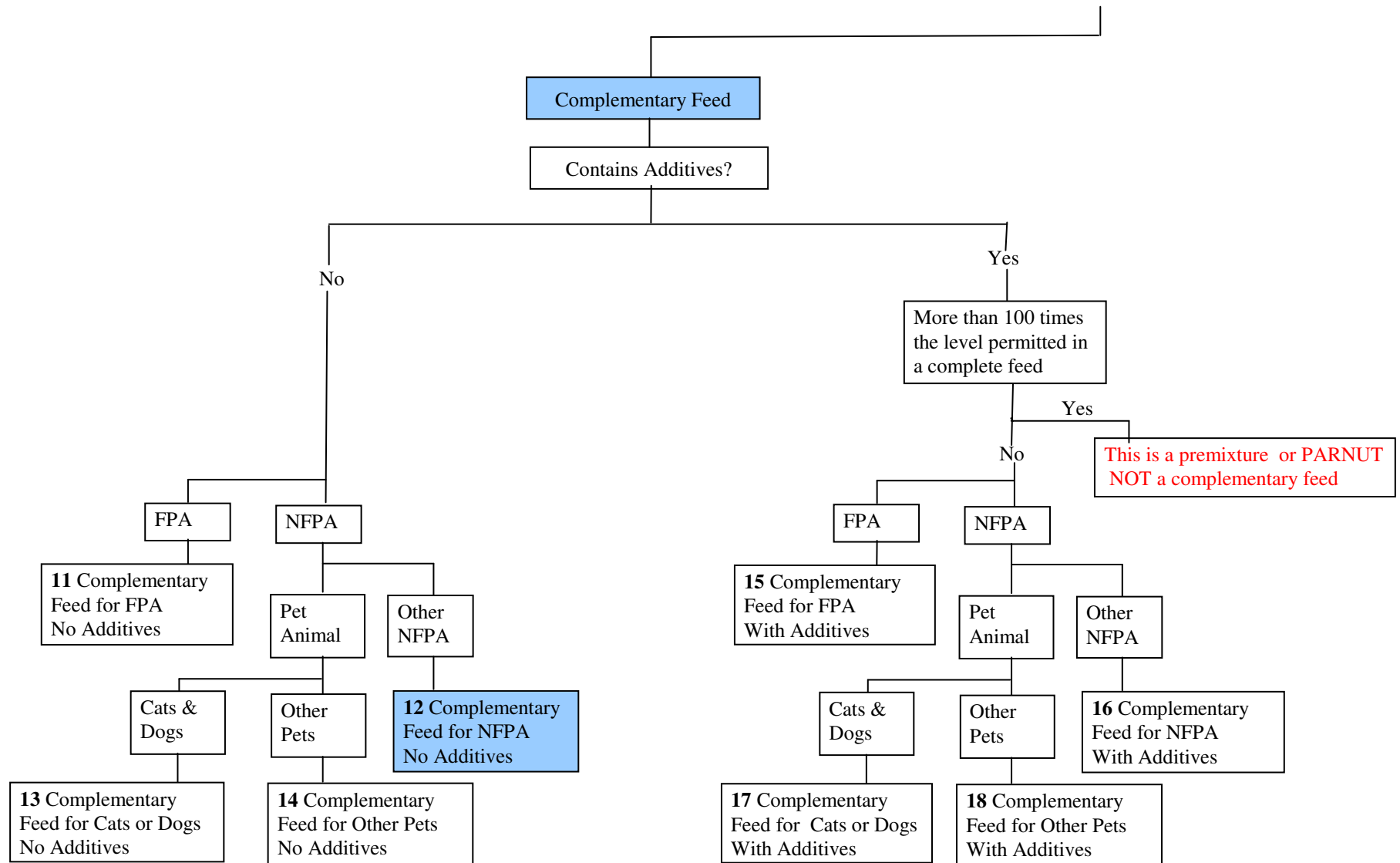
**Appendix 4** Other Labelling Issues

- Additives in former foods
- Labelling of compound ingredients

**Appendix 5** Added Amount for additives

**Feed Labelling Flow Chart**





**Labelling Requirements For Feed Types From Flow Chart**

[ Coloured boxes have example labels in appendix 3 ]

**01 Feed Material  
No Additives**

Article	Requirement	Detail	Can Signpost
15(a) 16.1(a)	Type of Feed & Name of Feed Material	Feed Material: <i>name</i> (If the name from the catalogue of feed materials is used then its requirements must be complied with)	
15(b)	Name and Address of person responsible for labelling	This might not be the manufacturer	
15(c)	Approval number of person responsible for labelling	( If available )	✓
15(d)	Batch or lot number	For traceability	✓
15(e)	Net Quantity	kg (or g) for solids, litres (or ml) for liquids	✓
15(g)	Moisture if >14%	or the value in annex i (6)	
16.1(b)	Compulsory Nutritional Declarations (Analytical Constituents)	Varies depending on feed material and whether the declarations from annex v or the catalogue of feed materials are used	

**02 Feed Material  
With Additives**

**All the above plus:**

Article	Requirement	Detail	Can Signpost
16.2(a)	Species or category of animals the feed is intended for	May include age, size, sex etc	
16.2(b)	Instructions for use	Eg. storage instructions, feed guidelines (including maximum feeding rates) etc	
16.2(c)	Minimum storage life for additives	Eg. Best Before (DD/MM/YY) 31/12/11	✓
15(f)	List of additives, headed Additives	<p>See page 5 for which additives need to be declared. For the additives that have to be declared the following information is required:</p> <p><b>If the feed material is for a food producing animal:</b>                      Category or Functional Group                      Name of additive                      ID Number (eg E number)                      Added Amount</p> <p><b>If the feed material is for a non-food producing animal:</b>                      For preservatives, colourants, antioxidants or flavouring compounds just the words Preservatives, Colourants, Antioxidants or Flavourings as applicable.                      For other additives:                      Category or Functional Group                      Name of additive                      Added Amount</p>	

Feed Material Labelling Checklist: [www.eastriding.gov.uk/assets//an70b](http://www.eastriding.gov.uk/assets//an70b)



**03** Complete  
Feed for FPA  
No Additives

**11** Complementary  
Feed for FPA  
No Additives

Article	Requirement	Detail	Can Signpost
15(a) 17.1(a)	Type of Feed & Species or Category of animal intended for	As applicable, Either: A Complete Feed for <i>animal</i> A Complementary Feed for <i>animal</i>	
15(b)	Name and Address of person responsible for labelling	This might not be the manufacturer	
15(c)	Approval number of person responsible for labelling	( If available )	✓
15(d)	Batch or lot number	For traceability	✓
15(e)	Net Quantity	kg (or g) for solids, litres (or ml) for liquids	✓
15(g)	Moisture if >14%	or the value in annex i (6)	
17.1(b)	Instructions for use	Feed rate, storage etc. For complementary feeds containing levels of additives greater than that allowed in complete feeds the maximum amount to be fed must be included.	
17.1(c)	Name & Address OR Registration number of producer	GB number of producer (manufacturer) if this is not the same as 15(b) & (c)	✓
17.1(d)	Minimum storage life	Eg. Best Before (DD/MM/YY) 31/12/11	✓
17.1(e)	List of feed materials making up the feed in descending order by weight, headed Composition	'Ingredients' list; must be headed 'Composition' A list of the feed materials in the feed	✓
17.1(f)	Compulsory Nutritional Declarations (headed Analytical Constituents)	<u>Declaration</u>	<u>Required for:</u>
		Crude Protein	All Species
		Crude Fibre	All Species
		Crude Fat	All Species
		Crude Ash	All Species
		Lysine	Pigs & Poultry
		Methionine	Pigs & Poultry
		Sodium	All Species
		Calcium	For a complete feed: all species For a complementary feed: all species, but only if $\geq 5\%$
		Phosphorus	For a complete feed: all species For a complementary feed: all species, but only if $\geq 2\%$
Magnesium	Not required for complete feeds For a complementary feed: ruminants, but only if $\geq 0.5\%$		

**04** Complete Feed  
for NFPA  
No Additives

**05** Complete Feed  
for Cats or Dogs  
No Additives

**06** Complete Feed  
for Other Pets  
No Additives

**12** Complementary  
Feed for NFPA  
No Additives

**13** Complementary  
Feed for Cats or Dogs  
No Additives

**14** Complementary  
Feed for Other Pets  
No Additives

Article	Requirement	Detail	Can Signpost
15(a) 17.1(a)	Type of Feed & Species or Category of animal intended for	As applicable, either: A Complete Feed for <i>animal</i> A Complementary Feed for <i>animal</i>  or alternatively if for a pet either: A Complete Pet Food for <i>type of animal</i> A Complementary Pet Food for <i>animal</i>  or for pets other than cats and dogs the words complete or complementary can be replaced with the word Compound	
15(b)	Name and Address of person responsible for labelling	This might not be the manufacturer eg own brand produce	
15(c)	Approval number of person responsible for labelling	( If available )	✓
15(d)	Batch or lot number	For traceability	✓
15(e)	Net Quantity	kg (or g) for solids, litres (or ml) for liquids	✓
17.1(b)	Instructions for use	Feed rate, storage etc. For complementary feeds containing levels of additives greater than that allowed in complete feeds the maximum amount to be fed must be included.	
17.1(c)	Name & Address OR Registration number of producer	GB number of producer (manufacturer) if this is not the same as 15(b) & (c)	✓
17.1(d)	Minimum storage life	Eg. Best Before (DD/MM/YY) 31/12/11	✓
15(g)	Moisture if >14%	or the value in annex i (6)	
17.1(e)	List of feed materials making up the feed in descending order by weight, headed Composition	'Ingredients' list; must be headed 'Composition' Can either list the feed materials or the categories the feed materials belong to	✓
17.1(f)	Compulsory Nutritional Declarations (headed Analytical Constituents) <b>Only for cats, dogs &amp; fur animals</b> there are no compulsory nutritional declarations for other non-food producing animals.	<u>Declarations required</u>	<u>Alternative wording can be used for pets</u>
		Crude Protein	Protein
		Crude Fibre	Crude Fibre
		Crude Fat	Fat Content
		Crude Ash	Inorganic Matter
19	A free telephone number or other appropriate means of communication	Only required for pet food	

07 Complete  
Feed for FPA  
With Additives

15 Complementary  
Feed for FPA  
With Additives

Article	Requirement	Detail	Can Signpost
15(a) 17.1(a)	Type of Feed & Species or Category of animal intended for	As applicable, Either: A Complete Feed for <i>animal</i> A Complementary Feed for <i>animal</i>	
15(b)	Name and Address of person responsible for labelling	This might not be the manufacturer	
15(c)	Approval number of person responsible for labelling	( If available )	✓
15(d)	Batch or lot number	For traceability	✓
15(e)	Net Quantity	kg (or g) for solids, litres (or ml) for liquids	✓
15(g)	Moisture if >14%	or the value in annex i (6)	
17.1(b)	Instructions for use	Feed rate, storage etc. For complementary feeds containing levels of additives greater than that allowed in complete feeds the maximum amount to be fed must be included.	
17.1(c)	Name & Address OR Registration number of producer	GB number of producer (manufacturer) if this is not the same as 15(b) & (c)	✓
17.1(d)	Minimum storage life	Eg. Best Before (DD/MM/YY) 31/12/11	✓
17.1(e)	List of feed materials making up the feed in descending order by weight, headed Composition	'Ingredients' list; must be headed 'Composition' A list of the feed materials in the feed	✓
15(f)	List of additives, headed Additives	See page 5 for which additives need to be declared. For the additives that have to be declared the following information is required: Category or Functional Group Name of additive ID Number (eg E number) Added Amount	
17.1(f)	Compulsory Nutritional Declarations (headed Analytical Constituents)	<u>Declaration</u>	<u>Required for:</u>
		Crude Protein	All Species
		Crude Fibre	All Species
		Crude Fat	All Species
		Crude Ash	All Species
		Lysine	Pigs & Poultry
		Methionine	Pigs & Poultry
		Sodium	All Species
		Calcium	For a complete feed: all species. For a complementary feed: all species, but only if >= 5%
		Phosphorus	For a complete feed: all species. For a complementary feed: all species, but only if >= 2%
Magnesium	Not required for complete feeds. For a complementary feed: ruminants, but only if >= 0.5%		

Compound Feed (Food Producing Animals) Labelling Checklist: [www.eastriding.gov.uk/assets//an70c](http://www.eastriding.gov.uk/assets//an70c)

**08 Complete Feed**  
for NFPA  
With Additives

**09 Complete Feed**  
for Cats or Dogs  
With Additives

**10 Complete Feed**  
for Other Pets  
With Additives

**16 Complementary Feed**  
for NFPA  
With Additives

**17 Complementary Feed**  
for Cats or Dogs  
With Additives

**18 Complementary Feed**  
for Other Pets  
With Additives

Article	Requirement	Detail	Can Signpost										
15(a) 17.1(a)	Type of Feed & Species or Category of animal intended for	As applicable, either: A Complete Feed for <i>animal</i> A Complementary Feed for <i>animal</i>  or alternatively if for a pet either: A Complete Pet Food for <i>type of animal</i> A Complementary Pet Food for <i>animal</i>  or for pets other than cats and dogs the words complete or complementary can be replaced with the word Compound											
15(b)	Name and Address of person responsible for labelling	This might not be the manufacturer eg own brand produce											
15(c)	Approval number of person responsible for labelling	( If available )	✓										
15(d)	Batch or lot number	For traceability	✓										
15(e)	Net Quantity	kg (or g) for solids, litres (or ml) for liquids	✓										
17.1(b)	Instructions for use	Feed rate, storage etc. For complementary feeds containing levels of additives greater than that allowed in complete feeds the maximum amount to be fed must be included.											
17.1(c)	Name & Address OR Registration number of producer	GB number of producer (manufacturer) if this is not the same as 15(b) & (c)	✓										
17.1(d)	Minimum storage life	Eg. Best Before (DD/MM/YY) 31/12/11	✓										
15(g)	Moisture if >14%	or the value in annex i (6)											
17.1(e)	List of feed materials making up the feed in descending order by weight, headed Composition	'Ingredients' list; must be headed 'Composition' Can either list the feed materials or the categories the feed materials belong to	✓										
15(f)	List of additives, headed Additives	For preservatives, colourants, antioxidants or flavouring compounds just the words Preservatives, Colourants, Antioxidants or Flavourings as applicable. For other additives: Category or Functional Group Name or ID Number of additive Added Amount											
17.1(f)	Compulsory Nutritional Declarations (headed Analytical Constituents) <b>Only for cats, dogs &amp; fur animals</b> there are no compulsory nutritional declarations for other non-food producing animals.	<table border="1"> <tr> <td>Declarations required for NFPA</td> <td>Alternative wording that can be used for pets</td> </tr> <tr> <td>Crude Protein</td> <td>Protein</td> </tr> <tr> <td>Crude Fibre</td> <td>Crude Fibre</td> </tr> <tr> <td>Crude Fat</td> <td>Fat Content</td> </tr> <tr> <td>Crude Ash</td> <td>Inorganic Matter or Incinerated Residue</td> </tr> </table>	Declarations required for NFPA	Alternative wording that can be used for pets	Crude Protein	Protein	Crude Fibre	Crude Fibre	Crude Fat	Fat Content	Crude Ash	Inorganic Matter or Incinerated Residue	
Declarations required for NFPA	Alternative wording that can be used for pets												
Crude Protein	Protein												
Crude Fibre	Crude Fibre												
Crude Fat	Fat Content												
Crude Ash	Inorganic Matter or Incinerated Residue												
19	A free telephone number or other appropriate means of communication	Only required for pet food											

Compound Feed (Non Food Producing Animals) Labelling Checklist: [www.eastriding.gov.uk/assets//an70d](http://www.eastriding.gov.uk/assets//an70d)

**Example Labels**

Example of a dog food label

**09 Complete Feed  
for Cats or Dogs  
With Additives**

**Eryc Adult Dog – Chicken & Rice**

A complete pet food for adult dogs

**Analytical Constituents:**

Protein 20%  
Fat Content 8%  
Crude Fibre 4%  
Inorganic Matter 9%

**Composition:**

Rice(26%), Poultry Meal(26%), Cereals, Poultry Fat, Beet Pulp, Fishmeal, Brewers Yeast, Yucca extract, Minerals and Vitamins.

**Additives:**

Preservatives; Antioxidants; Nutritional additives: Vitamin D3 [2 250 iu/kg], Vitamin A [30 000 iu/kg], Copper sulphate pentahydrate [15 mg/kg of copper], Zinc oxide [56 mg/kg of zinc]

See back of pack for batch code, best before date (DD/MM/YY) and manufacturer's registration number.

**Feeding Guide:**

<b>Adult Weight</b>	<b>Grams per day of food</b>
1 – 5 kg	35 – 115
5 – 20 kg	115 – 330
20 – 30 kg	330 – 445
30+ kg	445+

Ensure fresh water is always available  
Store in a cool, dry place.

Eryc Feeds Ltd, Burnby Hall, Pocklington, East Riding Of Yorkshire, YO42 2QF.  
Tel. 0800 111 1111 www.eastriding.gov.uk

**Net Weight: 15kg**

The type of feed has been described as a pet food in accordance with Annex II(3b).

As this is a pet food the declarations under analytical constituents have been replaced with those allowed under Annex II(5).

The feed materials in the composition section have been declared by both individual name and category (eg cereals)

As the chicken and rice have been highlighted the percentage has been declared.

For preservatives, colourants and antioxidants only the functional group (from Annex I of EC 1831/2003) needs to be declared for non food producing animals (unless the presence is emphasised)

The names of the additives are taken from the community register of feed additives.

The total guaranteed amount of the vitamins in the feed could have been declared in the Analytical Constituents section rather than declaring the added amount in the Additives section.

The added amount declared for the copper sulphate pentahydrate and the zinc oxide is the amount of actual element not the compound.

The storage instructions are provided as part of the instructions for use.

A freephone telephone number has been included for purchasers to obtain further information relating to the additives and feed materials declared by category.

Example of a feed label for a non food producing (pet) animal other than a cat or dog

**10 Complete Feed  
for Other Pets  
With Additives**

## **Eryc Dwarf Hamster**

A complete pet food for dwarf hamsters

### **Composition:**

Seeds, Cereals, Derivatives of vegetable origin, Oils and fats, Insects, Minerals and Vitamins.

### **Additives:**

Nutritional additives: Vitamin D3 [2 250 iu/kg], Vitamin A [12 000 iu/kg], Copper sulphate pentahydrate [10 mg/kg of copper]

See back of pack for batch code, best before date (DD/MM/YY) and manufacturer's registration number.

### **Feeding Guide:**

7 to 10 grams per day according to their size.  
Introduce the feed gradually over a few days.  
Ensure fresh water is always available  
Store in a cool, dry place.

Eryc Feeds Ltd, Burnby Hall, Pocklington, East Riding Of Yorkshire, YO42 2QF.  
Tel. 0800 111 1111  
www.eastriding.gov.uk

**Net Weight: 500g**

No analytical constituents are required to be declared for feed for non food producing animals other than cats, dogs and fur animals, i.e. some analytical constituents have to be declared for cats, dogs and fur animals but none are required for other non food producing animals.

This information could still be included voluntarily.

As this is a feed for non food producing animals the feed materials declared in the composition have been declared by their category name.

The additives are declared by category, name and added amount.

There is no analytical declaration required so the added amount of the vitamins is included in the additives section rather than the guaranteed amount of the vitamin being declared in the analytical constituents.

The added amount declared for the copper sulphate pentahydrate is the amount of actual copper, not the copper sulphate pentahydrate compound which would be 40mg/kg

## **Eryc Wild Bird Feed**

A complementary feed for wild birds

### **Composition:**

Canary Seed, Millet, Sunflower Hearts, Naked Oats,  
Sorghum, Rapeseed, Peanut Nibs, Aniseed

### **Feeding Guide:**

We recommend either hanging or table-top bird feeders, in a secluded place, off the ground and if possible away from fences and trees (to avoid the birds being attacked by cats!). Clean any residues off the feeder when putting new feed out. Increase the amount of feed put out in cold weather. Ensure fresh water is always available

Store in a cool, dry place.

Best before: 6 months from date of manufacture  
For batch number see date of manufacture

Eryc Feeds Ltd, Burnby Hall, Pocklington,  
East Riding Of Yorkshire, YO42 2QF.  
Email: feeds@eastriding.gov.uk  
www.eastriding.gov.uk  
Manufacturer: GB86399997

**Net Weight: 750g**

**Manufactured on (DD/MM/YY):** 03/01/18

This is similar to the Eryc Dwarf Hamster label but as there are no additives in the feed this section is not required.

The feed materials could have been declared by category but in this case have been declared individually.

The best before date has been declared in the form X months from date of manufacture. The date of manufacture is also used as the batch number.

As no freephone number has been provided an email address has been included as another 'appropriate means of communication'.

This feed has been manufactured for Eryc Feeds by another company; the registration number of that company has therefore been included. Eryc feeds' registration number is not required as it is not an approval number.

## **Eryc Layer Meal**

A complete feed for laying hens

**Contains Fishmeal — Must Not Be Fed To Ruminants**

### **Analytical Constituents:**

Crude Protein	17%	Sodium	0.25mg/kg
Crude Fibre	4%	Lysine	1.0%
Crude Fat	4%	Methionine	0.45%
Crude Ash	13%	Vitamin A	4000 iu/kg
Calcium	4.5%	Vitamin D3	2500 iu/kg
Phosphorus	0.4%		

### **Composition:**

Wheat, Hi-pro Soya ext \*, Calcium Carbonate, Sunflower ext, Wheatfeed, Maize Germ, Soya oil \*, Fishmeal, Minerals and Vitamins, Mono Calcium Phosphate, Salt, Sodium Bicarbonate

\* produced from genetically modified soya

### **Additives:**

Colourants: Lutein (E161b)[30mg/kg], Capsanthin (E160c)[20mg/kg], Zeaxanthin (E161h)[20mg/kg]; Zootechnical Additives: Natuphos 5000G (4a1600)[400FTU/kg]; Nutritional additives: L-lysine HCl (3c323) [9.5 kg/t], DL-Methionine (3c301) [4 kg/t], Vitamin D3 (E671), Vitamin A (E672), Copper sulphate pentahydrate (E4) [20 mg/kg of copper].

### **Feeding Guide:**

Feed from point of lay (up to 3 weeks before the first eggs are expected to be laid) and during lay to laying hens producing eggs for human consumption. Ensure fresh water is always available. Store in a cool, dry place.

For net weight see bag or delivery note.

Eryc Feeds Ltd, Burnby Hall, Pocklington, East Riding Of Yorkshire, YO42 2QF.  
GB86399999; Tel. 01482 39 39 39; www.eastriding.gov.uk;  
Manufacturer: GB86399998

**Best Before (DD/MM/YY):**

03/01/18

**Batch No:**

LM-003-18

The required analytical declarations for a complete feed for food producing animals are crude protein, crude fibre, crude fat, crude ash, calcium, sodium and phosphorus. Additionally lysine and methionine are required for pigs and poultry.

The total guaranteed amount of the vitamins A and D3 have also been declared in the analytical constituents section rather than the added amount being declared in the additives section.

As this feed is for farmed animals and contains fishmeal the warning statement from the TSE regulations is included.

The ingredients (composition) include genetically modified soya, a declaration has therefore been made to comply with The Genetically Modified Animal Feed (England) Regulations 2004 which implement (EC) 1829/2003 & 1830/2003.

As this feed is for food producing animals the additives have been declared with the functional group (in the case of the colourants) or category (for the zootechnical and nutritional additives), name, id number and added amount.

As the total guaranteed amount of the vitamins A and D3 have been declared in the analytical constituents section the added amount has not been declared in the additives section.

The added amount declared for the copper sulphate pentahydrate is the amount of actual copper, not the copper sulphate pentahydrate compound which would be 80mg/kg

The net weight has been signposted

As this is not a pet food label there is no need for a free telephone number, a normal telephone number has been included voluntarily.

This feed has been manufactured for Eryc Feeds by another company; the registration number of that company has therefore been included. Eryc feeds' registration number has also been voluntarily included.



Example of a feed for a 'species that is normally used for human consumption in the Community;' (classed as a food producing animal)

**07 Complete  
Feed for FPA  
With Additives**

## **Eryc Rabbit Mix**

A complementary feed for Rabbits

### **Analytical Constituents:**

Crude Protein	16.0%
Crude Fibre	9.5%
Crude Fat	3.7%
Crude Ash	5.0%
Calcium	3.2%
Phosphorus	0.4%
Sodium	0.25 mg/kg
Vitamin D3	1 000 iu/kg
Vitamin A	7 000 iu/kg
Copper	19 mg/kg

### **Composition:**

Pellets(dried grass, wheat, vitamins & minerals); Cooked Flaked Peas, Cooked Flaked Wheat, Cooked Flaked Maize\*, Cooked Flaked Barley, Dried Grass Nuts, Oats, Cooked Flaked Soya\*, Dried Grass, Linseed Lozenges, Dried Carrots, Soya Oil\*.

\* genetically modified

**Produced on premises where processed animal protein is used**

### **Additives:**

Nutritional additives: Vitamin D3 (E671), Vitamin A (E672),  
Copper sulphate pentahydrate (E4)[15 mg/kg of copper]

### **Feeding Guide:**

Feed to appetite alongside hay.

Other green feeds and vegetables can be fed in small quantities.

Ensure fresh water is always available.

Store in a cool, dry place.

**Net Weight 15kg.**

Eryc Feeds Ltd, Burnby Hall, Pocklington, East Riding Of Yorkshire, YO42 2QF.  
GB86399999; Tel. 0800 111 1111; www.eastriding.gov.uk;

**Best Before (DD/MM/YY):** 03/01/18  
**Batch No:** LM-003-18

Rabbits are classed as food producing animals. This is not classed as a pet food.

The required analytical declarations for a complete feed for food producing animals are crude protein, crude fibre, crude fat, crude ash, calcium, sodium and phosphorus.

The guaranteed minimum total amount of the vitamins D3 and A have been declared in the Analytical Constituents section, therefore the added amount has not been declared in the Additives section.

The total amount of copper in the feed (added + naturally occurring) has also been (voluntarily) declared in the analytical constituents section but there is no derogation from the requirement to declare the added amount in the additives section as it is a trace element not a vitamin. However, as there is a maximum level of the substance (copper) permitted in the legal act authorising the additive the added amount of actual copper rather than the amount of copper sulphate pentahydrate compound has been declared.

The ingredients (composition) include genetically modified maize and soya, a declaration has therefore been made to comply with The Genetically Modified Animal Feed (England) Regulations 2004 which implement (EC) 1829/2003 & 1830/2003.

Processed animal protein is used on the premises in other feeds; although it is not an ingredient of this feed there is a risk of cross contamination. The warning statement from the TSE regs is therefore required.

As this feed is for food producing animals the additives have been declared with the category (nutritional additives), name, id number and added amount.

Examples of a feed material labels

**Eryc Rape Meal**

Feed Material: Rape seed meal (extracted)  
Low in glucosinolate

**Analytical Constituents:**  
(Not Rumen Protected)  
Crude Protein           40%

Store in a cool, dry place.

For net weight & batch number see delivery note.

Eryc Feeds Ltd, Burnby Hall, Pocklington,  
East Riding Of Yorkshire, YO42 2QF.  
GB86399999

**Eryc Maize Gluten**

Feed Material:  
Dried Maize Gluten Feed

**Analytical Constituents:**

Crude Protein	22%
Crude Fibre	34%
Crude Fat	4%
Starch	18%
Moisture	10%

Net weight: 25kg  
Store in a cool, dry place.

Eryc Feeds Ltd, Burnby Hall, Pocklington,  
East Riding Of Yorkshire, YO42 2QF.  
GB86399999

Batch number:           43652

**Eryc Hi Pro Soya Meal**

Feed Material:  
Genetically modified, toasted,  
cooked & crushed Soya bean,

**Analytical Constituents:**  
(Rumen Protected: Heat Treated)  
Crude Protein           44%

Net weight: 25kg  
Store in a cool, dry place.

Eryc Feeds Ltd, Burnby Hall, Pocklington,  
East Riding Of Yorkshire, YO42 2QF.  
GB86399999

Batch number:           379385

The feed material name is taken from the Catalogue of feed materials (EU) 68/2013 [see link on page 1]; which also indicates the analytical constituents declarations required. The name also includes any process the feed has gone through e.g. cooking or crushing.

The compulsory declarations for extracted rape meal are Crude Protein and Method of Rumen Protection if applicable.

The declarations for maize gluten feed vary depending on the moisture content, the above declarations are applicable when the product is less than 40% moisture.

The only required declaration for toasted soya beans is the Method of Rumen Protection if applicable. The Crude Protein % has been declared voluntarily.

As the hi-pro soya is from genetically modified soya, a declaration has been made to comply with The Genetically Modified Animal Feed (England) Regulations 2004 which implement (EC) 1829/2003 & 1830/2003.

There is no requirement for a best before date for feed materials unless they contain additives (see next label)

Many companies choose to include a best before date for due diligence purposes.

Eryc feeds' registration number has been included voluntarily; only approval numbers are compulsory.

The weight and batch numbers can be sign-posted as in the first label, or declared as in the second and third labels.

Example of a feed material with additives included

## **Eryc MaizeMatch Molasses**

Feed Material: Cane Molasses (with urea)

### **Analytical Constituents:**

Total Sugar (calculated as sucrose)	55%
Crude Protein	40%
Moisture	32%

### **Additives:**

Nutritional additives: Urea (2.1.1)[12%]

### **Storage:**

Ensure tank is emptied and cleaned out between loads.

### **Feeding:**

For adult cattle from approximately six months of age.  
Feed at 1 – 2 kg per head per day depending on dietary requirements.

For net weight & batch number see delivery note.

Best Before (DD/MM/YY): 03/07/17

Eryc Feeds Ltd, Burnby Hall, Pocklington,  
East Riding Of Yorkshire, YO42 2QF.  
GB86399999

The compulsory declarations in analytical constituents are Total sugar calculated as sucrose and Moisture if >30%. Crude Protein has been voluntarily declared.

The urea has been declared as an additive.

Because additives are included instructions for use are required, as is the minimum storage life for the additives.

**Other Labelling Issues**

**None 'feed approved' additives in food which is used as a feed.**

For example food grade crystallised fruit containing SO<sub>2</sub> (sulphur dioxide) being included in a compound feed.

SO<sub>2</sub> is not an approved feed additive.

The FSAs opinion was that despite the fact that SO<sub>2</sub> was not approved as an additive, use of the crystallised fruit may still be possible.

Their reasoning was as follows:

- In this particular case, the sulphur dioxide is being (legally) used to either act as a preservative, an antioxidant or a colour stabiliser in a food. All of the ingredients (including permitted food additives) form part of a bona fide material that is being diverted to feed. The sulphur dioxide would not therefore be acting as a feed additive, and would not therefore require authorisation as such. Ergo, the material can be used in feed providing it complies with other feed legislation.

Several people have said that in their opinion the additive (SO<sub>2</sub>) in the above example is performing a function in the feed as it is still preserving the crystallised fruit within the feed; it is certainly a grey area, but the general consensus is that 'former foods' should be able to be used as feed materials where possible as they are a good source of nutrition and often the alternative is for them to go to landfill.

The feed would, of course, still need to comply with the general safety requirements; so the manufacturer would be expected to ensure that the additive(s) would not harm the animal the feed was intended for.

**Labelling of a compound-ingredient included in a feed.**

Eg. a concentrate pellet included in a feed mix:

- rolled barley, concentrate pellet, rolled oats, molasses.

With food this is done by listing the compound ingredient the same as the other ingredients (as above) but including the compound ingredients in brackets:

- rolled barley, concentrate pellet (wheat, barley, oil seed rape meal, hi-pro soya, soya oil), rolled oats, molasses.

It is (in my opinion) easier for the person reading the list to understand this way and easier for the manufacturer to calculate the 'composition' list, though it can lead to a long list with a lot of repeats if several compound ingredients are used.

The regulations say the feed materials from which the feed is composed should be listed in descending order; the above method does not, strictly speaking, comply with this requirement.

I have contacted several other enforcement officers and the general consensus is that whilst they agreed that the above method does not fully comply with the regs none of them would be likely to take any enforcement action over it. Indeed, one had already advised manufacturers that this was the best way to label feed in similar situations.

Additives: Added Amount

The amount of an element vs. amount of the compound

Where the legal act authorising a feed additive indicates a substance in the “minimum/maximum content” column the added amount of the additive must be expressed as the amount of that substance rather than the amount of the compound. This mainly applies to trace elements e.g.

EEC No	Element	Additive	Chemical formula	Maximum content of the element in mg/kg of the complete feeding-stuff	Other provisions
E 4	Copper — Cu	Cupric acetate, monohydrate Basic cupric carbonate, monohydrate Cupric chloride, dihydrate Cupric methionate Cupric oxide Cupric sulphate, pentahydrate	$Cu(CH_3COO)_2 \cdot H_2O$ $CuCO_3 \cdot Cu(OH)_2 \cdot H_2O$ $CuCl_2 \cdot 2H_2O$ $Cu(C_5H_{10}NO_2S)_2$ $CuO$ $CuSO_4 \cdot 5H_2O$	Pigs for fattening: — in Member States where the mean density of the porcine population is equal to or higher than 175 pigs per 100 ha of utilizable agricultural land: — up to 16 weeks: 175 (total) — from 17th week up to slaughter: 35 (total) — In Member States where the mean density of the porcine population is lower than 175 pigs per 100 ha of utilizable agricultural land:	

For example, copper [ Cu ] is often added to feed in the form of copper sulphate pentahydrate [  $CuSO_4 \cdot 5H_2O$  ] which is approximately 25% copper by weight.

Therefore if 80mg/kg of copper sulphate pentahydrate is added to feed 25% of it is copper so the declared amount would be 20mg/kg of copper.

To calculate the percentage the atomic weight of the element divided by the atomic weight of the compound as a whole needs to be calculated.

Using copper sulphate pentahydrate as an example:

Compound =  $CuSO_4 \cdot 5H_2O$

This is broken down to:

One copper element (Cu)

One sulphur element (S)

Four oxygen elements ( $O_4$ )

Five water molecules ( $5H_2O$ )

Each water molecule contains 2 hydrogen elements ( $H_2$ ) and one oxygen element (O) so 10 hydrogen ( $5 * 2$ ) and 5 oxygen ( $5 * 1$ ) elements.

The atomic weight can be found by looking at a periodic table of the elements.

Number of molecules	Element	Number of elements	Atomic weight	Total atomic weight
1	Cu	1	63	<b>63</b>
1	S	1	32	32
1	O	4	16	64
5	H	2	1	10
5	O	1	16	80
Total =				249
weight of element / by total weight =				0.253
as a percentage =				<b>25.3</b>

**Some more examples:**

E1 - Iron as iron oxide - Fe <sub>2</sub> O <sub>3</sub>				
	Element	Number of elements	Atomic weight	Total atomic weight
9				
1	Fe	1	56	<b>56</b>
1	O	1	16	16
Total =				72
weight of element / by total weight =				0.778
as a percentage =				<b>77.8</b>

E2 - Iodine as sodium iodide - NaI				
Number of molecules	Element	Number of elements	Atomic weight	Total atomic weight
1	Na	1	23	23
1	I	1	127	<b>127</b>
Total =				150
weight of element / by total weight =				0.847
as a percentage =				<b>84.7</b>

E3 - Cobalt as cobaltous chloride hexahydrate - CoCl <sub>2</sub> 6H <sub>2</sub> O				
Number of molecules	Element	Number of elements	Atomic weight	Total atomic weight
1	Co	1	59	<b>59</b>
1	Cl	2	35	70
6	H	2	1	12
6	O	1	16	96
Total =				237
weight of element / by total weight =				0.249
as a percentage =				<b>24.9</b>

E5 - Manganese as manganous sulphate monohydrate - MnSO <sub>4</sub> H <sub>2</sub> O				
Number of molecules	Element	Number of elements	Atomic weight	Total atomic weight
1	Mn	1	55	<b>55</b>
1	S	1	32	32
1	O	4	16	64
4	H	2	1	8
4	O	1	16	64
Total =				223
weight of element / by total weight =				0.247
as a percentage =				<b>24.7</b>

E6 - Zinc as zinc oxide - ZnO				
Number of molecules	Element	Number of elements	Atomic weight	Total atomic weight
1	Zn	1	65	<b>65</b>
1	O	1	16	16
Total =				81
weight of element / by total weight =				0.802
as a percentage =				<b>80.2</b>

E7 - Molybdenum as sodium molybdate - Na <sub>2</sub> MoO <sub>4</sub> 2H <sub>2</sub> O				
Number of molecules	Element	Number of elements	Atomic weight	Total atomic weight
1	Na	2	23	46
1	Mo	1	96	<b>96</b>
1	O	4	16	64
2	H	2	1	4
2	O	1	16	32
Total =				242
weight of element / by total weight =				0.397
as a percentage =				<b>39.7</b>

E8 - selenium as sodium selenite - Na <sub>2</sub> SeO <sub>3</sub>				
Number of molecules	Element	Number of elements	Atomic weight	Total atomic weight
1	Na	2	23	46
1	Se	1	79	<b>79</b>
1	O	3	16	48
Total =				173
weight of element / by total weight =				0.457
as a percentage =				<b>45.7</b>