Federal Ministry
of Food, Agriculture and
Consumer Protection

Rules for Labelling of Feed in the European Union

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1. Legal Basis

- **Labelling of feed materials and compound feed** based on

  Regulation .(EG) No 767/2009 of the European Parliament and of the Council of 13 July 2009 on the placing on the market and use of feed, amending European Parliament and Council Regulation (EC) No 1831/2003 and repealing Council Directive 79/373/EEC, Commission Directive 80/511/EEC, Council Directives 82/471/EEC, 83/228/EEC, 93/74/EEC, 93/113/EC and 96/25/EC and Commission Decision 2004/217/EC

- **Labelling of additives and premixtures** based on

  Regulation (EC) No. 1831/2003 on additives for use in animal nutrition

- **Labelling of genetically modified feed** based on

  Regulation (EC) No 1829/2003 of the European Parliament and of the Council of 22 September 2003 on genetically modified food and feed

2. Presentation

The user of the feed **may not be misled** by

- labelling,
- advertising and
- presentation of feed .

***„Labelling** means the attribution of any words, particulars, trade marks, brand name, pictorial matter or symbol to a feed by placing this information on any medium referring to or accompanying such feed, such as packaging, container, notice, label, document, ring, collar or the Internet, including for advertising purposes.”*

***„Presentation** means the shape, appearance or packaging and the packaging materials used for the feed, further to the way in which it is arranged and the setting in which it is displayed.”*

3. Mode of labelling

The feed manufacturer who first brings a feed into circulation in the European Union or under whose name the feed is marketed is **responsible for proper labelling and the correctness** of the information. In case of work contracted out, the party placing the order is responsible for labelling.

The mandatory labelling particulars

- must be given entirely **on the packaging or container** or on an attached **label** or on an **accompanying document,**
- must be given in **the official language** of the Member State,
- must be applied **clearly visibly** in a prominent position,
- must be **clearly legible** as well as **indelible.**

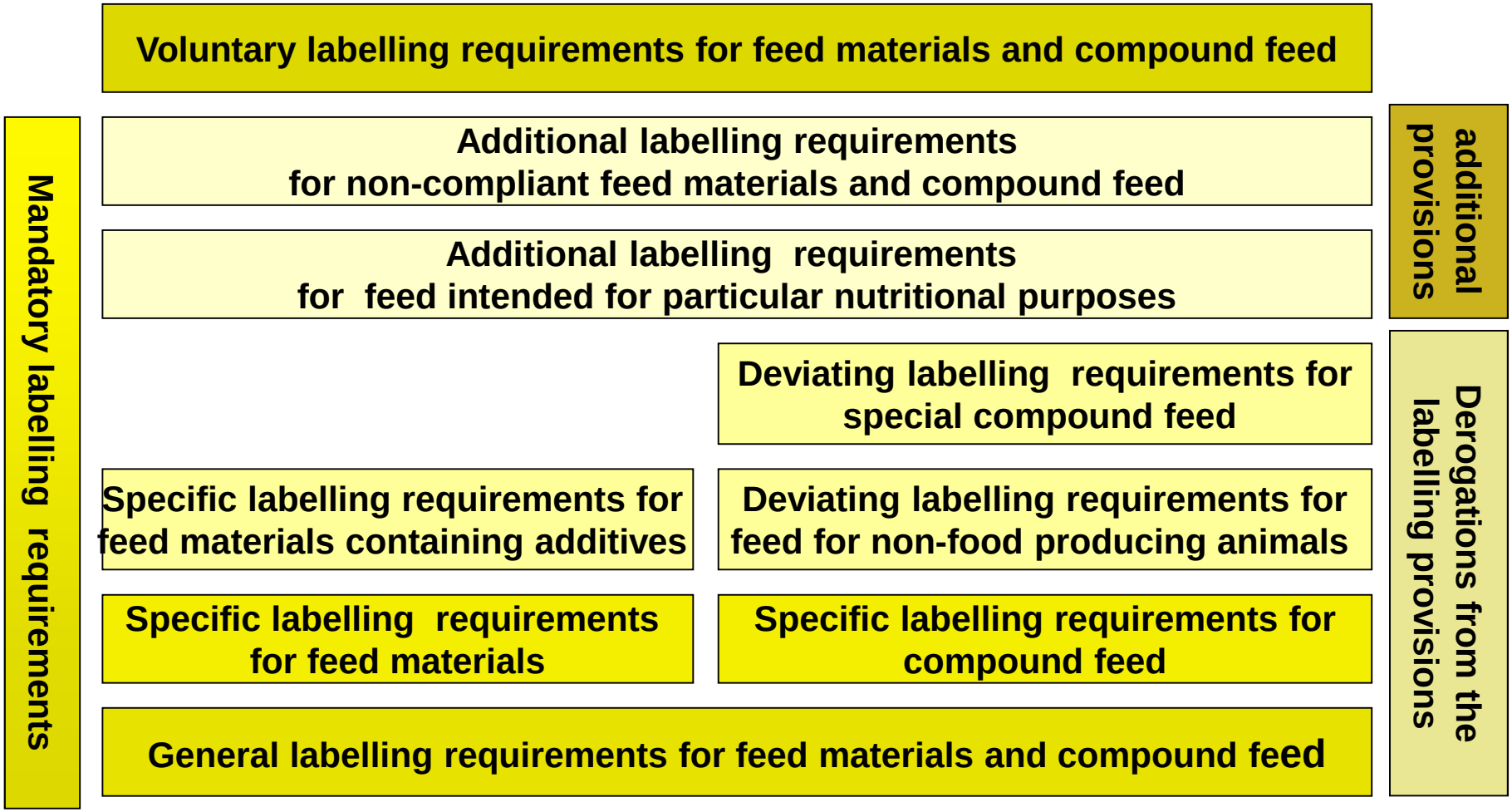
3. Mode of labelling

- The general requirements for labelling, apply to **all media** (including labels, advertising materials and the Internet).

- Printed matter with or without address
- Preprepared standard letters
- Press advertising with order sheet
- Catalogue
- Telephone communication with persons as the discussion partner, including video telephone
- Telephone communication with machines
- Teleshopping, videotext
- Internet
- Electronic mail and telefax

- All mandatory labelling particulars for a feed must be **provided** at the latest **at the time the offer to buy is made**.

4. Labelling of feed materials and compound feed



4.1 Labelling of feed materials and compound feed

General labelling requirements**:**

- ✓ **Feed type**, e.g. “feed material”, “complete feed”, “complementary feed”
- ✓ **Name and the address** of the person responsible for the labelling
- ✓ **Approval number** of the company, if available and necessary
- ✓ **Identification number of the batch or lot**
- ✓ **Net mass/net volume**
- ✓ **List of additives** (if added) in accordance to Annex VI and VII of the Regulation
- ✓ **Moisture content**, as appropriate
- ✓ **Content of ash insoluble in hydrochloric acid**, as appropriate
- ✓ **Instructions for proper use**

4.1 Labelling of feed materials and compound feed

Under the heading “Additives” or "Additives per kg“ shall be listed:

- Additives with maximum limits for any target species
- Additives of the categories “zootechnical additives” and “coccidiostats and histomonostats”
- Additives of the functional group “Urea and its derivatives” of the category “nutritional additives”

For each additive in feed for food-producing animals
✓specific name,
✓identification number,
✓added quantity, and
✓functional group or category

For each additive in feed for non-food-producing animals
✓specific name, or
✓identification number, and
✓added quantity, and
✓functional group or category

4.2 Special labelling of compound feed

In addition to the general labelling requirements:

- ✓ **Animal species and category**
- ✓ **Minimum storage life**
- ✓ **Composition** (List of feed materials of which compound feed is composed)
- ✓ **Instructions for proper use,** in particular if the content exceeds the maximum limit for the daily ration.
- ✓ **Analytical constituents** in accordance with Annex VI or VII of the Regulation (e.g. crude protein, crude fat, crude fibres, crude ash, methionine, lysine)

In case of feed for non food producing animals in addition:

- ✓ **Free telephone number** or other appropriate means of communication

4.2 Special labelling of compound feed (example)

- ✓ Feed type
- ✓ Category of animals
- ✓ Name of the FBO
- ✓ Composition
- ✓ Batch number
- ✓ Quantity
- ✓ List of feed additives
- ✓ Minimum shelf life
- ✓ Analytical constituents
- ✓ Instructions for use

Mineral feed
dairy cows

Analytical constituents

Calcium	16,0%
Sodium	10,0%
Phosphor	3,5%
Magnesium	6,0%
HCL insoluble ash	2,5%

Composition: calcium carbonate (37,9%), sodium chlorid (13,9%), magnesium sulfate (13,9%), monocalcium phosphate 6,9%), magnesium oxid (4,0); magnesium sulfate 3,3%), sugar-cane molasses(1,5%)

Additives
Nutritional additives: E 672 (400.000 IE vitamin A), E 671 vitamin D3 (80.000 IE vitamin D), E 4 copper (II)-sulfate-pentahydrate (1200 mg cooper), 3b8.11 selenium methionine from saccharomyces cerevisiae NCYC R397 (30 mg selenium)

Instructions for use: Because of the higher content of vitamin D, cooper and selenium at most 450g per animal and day should be fed.

Feed Mill Company
Miller street
90900 Millhouse
25 kg
20000013
use before 01/10/15

4.3 Special labelling of feed materials

In addition to the general labelling requirements:

- ✓ **Name** of the feed material in accordance to the Catalogue of feed materials
- ✓ **Analytical constituents** (e.g. starch, crude protein, crude fats, crude fibres) in accordance to Annex V or to the Catalogue of feed materials
- ✓ **Species and animal category** if any added additive is not authorised for all species or a maximum limit has been established for certain species or categories
- ✓ **Instruction for proper use,** if the content exceeds the maximum limit for the daily ration
- ✓ **Maximum shelf life** of the added additive - except technological additives-, if added
- ✓ **Other feed material** used for denaturing or binding, if added.

4.3 Special labelling of feed materials (example)

- ✓ Feed type
- ✓ Name of the feed
- ✓ Name of the FBO
- ✓ Approval number
- ✓ Batch number
- ✓ Quantity
- ✓ List of feed additives
- ✓ Minimum shelf life of additives
- ✓ Analytical constituents
- ✓ Moisture content

Feed material
Fish meal

Analytical constituents
Crude protein 64%
Crude fat 8%

Moisture content 11%

Additives
Antioxidants 200 mg E 320 Butylhydroxyanisol
200 mg E 321 Butylhydroxytoluol
Flavoring compounds 5 g Oregano tincture

Happy Fish Company
Fisherman street
10100 Fishburg

1 000 kg

DE 01 123 4567 89
20000013
Oregano tincture best before 10/15

7. Claims

The labelling and the presentation of feed **may draw particular attention**

- to the **presence or the absence of a substance** in the feed,
- to a **specific nutritional characteristic** or **process** or
- to a **specific function** related to any of the above effects.

7. Claims

The labelling and presentation of feed **shall not claim that**

- it **prevents, treats or cures a disease**, except for coccidiostats and histomonostats;
- this shall **not apply**
  - ✓ to claims concerning **nutritional imbalances** provided that there is no pathological symptom associated therewith, and
  - ✓ to claims concerning **optimization of nutrition and support or protection of the physiological conditions**.

Nutritional imbalances *should be regarded as a form of nutrition in which the feed is composed in such a way that it does not satisfy the physiological needs of the animal, with the result that an insufficiency of nutrients (such as proteins, vitamins and minerals) or a health-damaging over-supply thereof can occur in the course of time.*

7. Claims

The **labelling and presentation of feed shall not claim that**

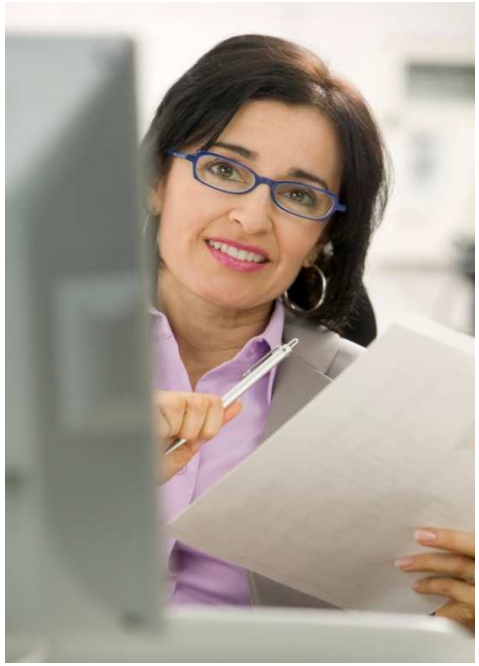
- it has a **particular nutritional purpose** due to the list*) of intended uses, unless it satisfies the requirements laid down therein.

For **updating the list** an application including a dossier must be submitted to the European Commission.

*"**Particular nutritional purpose** means the purpose of meeting the specific nutritional needs of animals whose process of assimilation, absorption or metabolism is, or could be, temporarily or irreversibly impaired and who can therefore benefit from the ingestion of feed appropriate to their condition".*

7. Claims

- All Information must be **objective, verifiable** by the competent authority and **understandable** for the user.



Verification of claims:

- ☒ Form and content of the description and the claims
- ☒ Form of the presentation and the design
- ☒ Form and content of the statements
- ☒ Statements on the effects and function of the feed
- ☒ Impression of a medicinal product
- ☒ Deviation from the good trade practice
- ☒ Impression of better characteristics
- ☒ Claims regarding the prevention, treatment or curing of diseases which are not a result of wrong nutrition
- ☒ Claims regarding particular nutritional purposes

7. Claims

- The competent authorities can request that the person responsible for the labelling provides evidence of the **scientific substantiation of the claims.**

Suitable evidence can be

- **publicly accessible scientific knowledge** or
- **documented company-internal research results**.

- The competent authorities evaluate **the scientific substantiation case-by-case.**

7. Claims

The following examples are **not very conclusive,** e.g.:

- Declarations from manufacturers or importers
- Statements from individual persons
- Statements from stakeholder bodies
- Official certificates of marketability or
- Quality certificates

without evidence of a scientific substantiation.

7. Claims

The following examples can be considered as **evidence of scientific substantiation**:

- ✓ Specialised scientific articles and studies (orientated on the Guideline*) for proving the efficacy of additives)
- ✓ Extracts from specialist books
- ✓ Expert opinions
- ✓ Official statements (e.g. EFSA, national institutes for risk assessment)
- ✓ Tests by independent organisations and test institutes.

Regulation (EC) No 1829/2003

- Information of the consumers by **labelling** of the products containing, consisting of or produced from GMOs
- Establishing of **threshold levels** for labelling
- Requirements on **traceability** across the feed chain
- Harmonized **authorization** system in Europe
- Consideration of **environmental impact**

Regulation (EC) No 1829/2003

- Feed must carry a **label** which refers to the presence of GMOs.
- The labelling requirements do **not apply** to feed which contains, consists of, or is produced from **GMOs in a proportion no higher than 0.9 % of the feed ingredients** considered individually and if **this presence is adventitious or technically unavoidable**.
- In order to establish that the presence of this material is adventitious or technically unavoidable, **operators** must be in a position to supply evidence to satisfy the competent authorities **that they have taken appropriate steps to avoid the presence of such material.**
- The labelling requirements **do not apply** to feed **which is produced using GMO** (e.g. enzymes, vitamins).

Regulation (EC) No 1829/2003

Labelling requirements for feed

In the case of feed consisting of, or containing, GMOs, the list of ingredients must indicate

“genetically modified“ [name of the organism]"

Maize
(genetically modified)

Regulation (EC) No 1829/2003

Labelling requirements for feed

In the case of feed produced from GMOs, the list of ingredients must indicate

"produced from genetically modified [name of the organism]"

Soya meal
(produced from genetically modified soya)

Regulation (EC) No 1829/2003

Labelling requirements for feed

In the case a feed is different from its conventional counterpart and it is fixed in the authorization in the list of ingredients must be indicate specific information

Rice middlings
(produced from genetically modified rice with high content of beta carotene)

Regulation (EC) No 619/2011

- Prior to this Regulation, GM food and feed legislation did not provide rules for the **control of the presence in feed** of material which contains, consists of or is produced from **GMOs undergoing EU authorisation or for GMOs with an expired authorisatio**n.

- Consequently, EU countries' official controls applied different approaches for these GMOs.

- The Regulation EC 619/2011 harmonizes the implementation of the **zero-tolerance policy on non-authorised genetically modified material** in feed.

- This Regulation should avoid legal uncertainty regarding **feed imported from non-EU countries**.

Regulation (EC) No 619/2011

Key points

- ✓ Sets a **technical zero at a level of 0.1 %** - the lowest level of GM material considered by the EU Reference Laboratory for the validation of quantitative methods.
- ✓ Harmonizes sampling and testing controls in all EU countries.
- ✓ Limited to GM feed material under specific conditions.

Regulation (EC) No 619/2011

GM material must comply with the following criteria:

- ☒ be authorised for commercialisation in a non-EU country
- ☒ have a valid EFSA application or have an expired authorisation in the EU
- ☒ authorisation pending for more than 3 months
- ☒ EFSA has not identify an adverse effects on health or the environment when present under 0.1%;
- ☒ quantitative method of analysis published by the EU reference laboratory;
- ☒ certified reference material must be available for EU-countries and third parties.