

July 15, 2016

Sergio Toluoso  
Canadian Food Inspection Agency  
Animal Feed Division  
59 Camelot Drive  
Ottawa, ON K1A 0Y9

Re: Formal Comments on the Permissible Claims on Feed Labels Proposal

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Dear Mr. Toluoso:

The Enzyme Technical Association (“ETA”) is a trade association that represents manufacturers and marketers of enzyme products in North, Central, and South America. It has been in existence since 1970 and maintains an active role in assisting in the development of regulations and policies that affect the enzyme industry. ETA represents the majority of the enzyme product industry in the Americas.

ETA welcomes the opportunity to submit the following comments to the Canadian Food Inspection Agency’s (“CFIA”) in connection with the Permissible Claims on Feed Labels Proposal (“Proposal”).<sup>1</sup> The Proposal would allow the labelling of certain ingredients and mixed feeds with claims set out in an established list without the need for pre-market assessment and approval by the CFIA of labels on a product-by-product basis. ETA supports CFIA’s work in establishing a Permissible Claims List as this will enable a more streamlined approach to regulation of feed claims, while still requiring that data be available to support such claims. We have a few comments in response to the specified questions and recommendations for your consideration. In addition, please see Attachment A to review ETA’s recommended revisions to “Appendix I – Permissible Claims List.”

**QUESTION: Would this proposed modernization of the Feeds Regulations be effective in characterizing livestock feed fairly in the marketplace?**

ETA believes that the proposed changes aid in characterizing livestock feed fairly; however, ETA suggests several clarifications to be made to Tables 1 and 2 to further enhance the utility of the Permissible Claims List. (see comments for Table 1 and 2 in Attachment A).

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<sup>1</sup> Canadian Food Inspection Agency, Permissible Claims on Feed Labels Proposal, June 2016, <http://inspection.gc.ca/animals/feeds/consultations/permissible-claims-on-feed-labels/eng/1465237710544/1465237738472> (last visited July 6, 2016).

**QUESTION: Are there conditions associated with the proposed claims in Appendix I that you feel should be modified or added?**

As indicated in Attachment A, in order to provide CFIA with a greater degree of flexibility, ETA proposes that CFIA use standard conditions (approved label claims) for 4 classes of enzymes (carbohydrases, lipases, proteases, and phytases), plus additional claims that are substrate-specific.

**QUESTION: Are there other options not mentioned in this proposal that should be considered and further explored?**

ETA recommends that the following conditions be included as performance claims for enzymes in Table 3 of the Permissible Claims list:

- Reduction of digesta viscosity in poultry as affected by several hemicellulases (e.g., xylanase, beta-mannanase) and beta-glucanase.
- Given that feed efficiency is the aggregate of the digestibility of individual feed components, feed efficiency improvement should be included. On the other hand, one could allow implied claims such as: "Improved energy digestibility may result in improved overall feed efficiency."

In closing, ETA thanks CFIA for reaching out to its stakeholders and appreciates the opportunity to comment on the proposal; we hope our comments will be considered for incorporation into the regulation; we remain available for further discussion with CFIA.

Sincerely,



Ann M. Begley  
Secretary & General Counsel  
Enzyme Technical Association

Cc: John Sedivy  
Chair, Enzyme Technical Association

## ATTACHMENT A

### SUGGESTED REVISIONS TO APPENDIX I – PERMISSIBLE CLAIMS LIST

Table 1: General Claims (Related to the composition/manufacture of the product)

1. Modify Claim Type 5 to state, “Enzyme” (not Phytase (or other Enzyme))
2. For Claim Type 5, modify Column 4, Conditions - Approved Statement or Claim, to “Contains XX as a source of Enzyme”. Example (from Feed Reg 5.4.3) is “Contains *Aspergillus niger* fermentation product dehydrated (or Dried *Aspergillus niger* fermentation product) as a source of Xylanase”.

Table 2: Nutritional Claims (Related to animal nutrition parameters)

1. Modify Claim Type 2 to include the following 4 classes of enzymes, and their logical permitted label claims, which could be updated to include additional classes in the future if necessary:
  - a. Carbohydrases - promotes energy digestibility
  - b. Lipases - promotes fat digestibility or energy digestibility
  - c. Proteases - promotes protein digestibility
  - d. Phytases - promotes phosphorous and calcium digestibility
2. Modify Claim 2, Column 2, to Enzymes – contains an approved source of XX (type of Enzyme) at the approved level. “Type of Enzyme” includes alpha-amylase, beta-amylase, cellulase, alpha-galactosidase, beta-glucanase, etc.
3. Modify Claim Type 2, Column 3, to Guarantee for XX (type of Enzyme) on the label.
4. Expand Claim Type 2, Column 4, to include other claims such as,
  - a. “Promotes digestibility of XX (specific substrate such as xylans for xylanase; glucans for beta-glucanase; beta-mannans for beta-mannanase) present in feed”