



Section 3.3

Recycled Food Products and Distillers' Grains

REFERENCED IN THIS SECTION:

Number/ Identifier	Name	Importance
 RECORD		
R-W	Letter of Guarantee – Recycled Food Products and Distillers' Grains	Mandatory
 FACT SHEET		
F-20	Recycled Food Products and Distillers' Grains	

SECTION 3.3

RECYCLED FOOD PRODUCTS AND DISTILLERS' GRAINS

This section must be completed by producers that use recycled food products (RFPs) or distillers' grains (DGs).

REQUIREMENTS

1. If RFPs or DGs are used on-farm, a letter of guarantee for the use of RFPs or DGs (R-W) must be provided by the supplier of the products demonstrating that the CFIA Feeds Regulations requirements have been met, i.e., that the ingredients provided are listed in schedules IV and V of the Feeds Regulations. This requirement does not apply if the complete feed is manufactured by a commercial feed mill.
2. If the RFPs or DGs used on-farm do not meet the ingredient description in Schedule IV, is a new ingredient not listed in the schedules Part I or is listed in Part II of Schedule IV and V, a registration number must be issued by CFIA for the product used.

For your convenience, a template for the Letter of Guarantee for the use of RFPs and DGs have been developed for you to use.

RATIONALE

- a. Due to the risk of zoonotic and exotic diseases, meat products, meat by-products and products suspected of containing meat are not permitted in RFPs intended for livestock feed unless they:
 - i. have been processed in a manner which would prevent the introduction of disease (subject to approval by the CFIA's Animal Health Directorate) and
 - ii. have been registered as a feed or are listed in Schedule IV or V of the Feeds Regulations.
- b. Distillers' Grains (DGs) resulting from fuel ethanol production are not automatically considered equivalent to the DGs listed in the Feeds Regulations. It is apparent that some of the additives used in the fuel ethanol manufacturing process are different from those used in the beverage alcohol production process, and some have not been assessed for safety.

GUIDANCE

- a. **What are Recycled Food Products (RFP)?**

RFPs are materials that remain after, or are produced during, the processing, manufacture, preparation or sale of human food. Under certain conditions, RFPs may be suitable for use as livestock feeds.
- b. **What are Distiller's Grain (DG)?**

DGs are the by-products obtained after the removal of ethyl alcohol (ethanol), for the production of human beverages or fuel.
- c. **Product registration:**

Ingredients listed in Part I of either Schedule IV or V are exempt from registration provided they meet the standards for composition described in the ingredient definition, meet the standards as defined, and are labelled appropriately. The following feed ingredients require a product registration number from CFIA and it is the responsibility of the supplier, manufacturer or importer of these feed ingredients to register the product.

 - i. Ingredients that are listed in Part II of either schedule must be registered separately by the CFIA for each source.
 - ii. Ingredients with additional label guarantees or claims, or that carry labels in languages other than English or French.

- d. For additional information about the Feed regulation related to RFPs and DGs consult the fact sheet.

AUDIT QUESTIONS

Q#	Audit Questions and Interpretations	Verification			
		Compliant	NC-Minor	NC-Major	N/A
Q3.3.1	<p>The Letter of Guarantee for Recycled Food Products and Distillers' Grains (R-W) is to be signed by the supplier to confirm the recycled food product or distillers' grain is listed in Schedule IV, Part I of the <i>Feeds Regulations</i>.</p> <p>This letter of guarantee demonstrates that the ingredients used: are in accordance with the ingredient description, meet appropriate guarantees and standards, and that ingredient labelling requirements have been met. This requirement does not apply if the complete feed is manufactured by a commercial feed mill.</p>	<p>Full and Partial Validation:</p> <p>➤ R-W: Letter of Guarantee for Recycled Food Products and Distillers' Grains</p>			
	<p>If recycled food products and/or distillers' grains are used on-farm, has the supplier completed the letter of guarantee and a copy is kept on file on-farm?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q3.3.2	<p>The supplier must include the registration number issued by the Canadian Food Inspection Agency (CFIA) on the letter of guarantee if:</p> <ol style="list-style-type: none"> the recycled food products and/or distillers' grains used on-farm are not fed according to the standard and purpose listed in schedule IV or if the recycled food products and/or distillers' grains used on-farm are listed in Part II of schedules IV and V. 	<p>Full and Partial Validation:</p> <p>➤ R-W: Letter of Guarantee for Recycled Food Products and Distillers' Grains showing the registration number issued by the CFIA</p>			
	<p>If a registration number is required, has it been included on the letter of guarantee?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

N/A = not applicable



LEVELS OF COMPLIANCE – EXAMPLES

COMPLIANT

- › The letter of guarantee for Recycled Food Products or Distillers' Grains (R-W) is available for all Recycled Food Products and/or Distillers Grain used on-farm.

MINOR NON-COMPLIANCE – Not applicable

MAJOR NON-COMPLIANCE **Timeline: 60 days**

- › The letter of guarantee for Recycled Food Products or Distillers' Grains (R-W) is not available for Recycled Food Products and/or Distiller's Grains.
- › There are no registration numbers for recycled food products and/or distillers' grains used on-farm that are listed in Part II of schedules IV and V or that do not meet the standard and purpose listed in schedule IV.