



Submitted by Email: compost.transfer.regs@calrecycle.ca.gov

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CHRIS ZANOBINI
Sacramento

December 5, 2014

Ken Decio
Waste Permitting, Compliance and Mitigation Division
California Department of Resources Recycling and Recovery
P.O. Box 4025
Sacramento, CA 95812-4025

Dear Mr. Decio:

The California Grain and Feed Association (CGFA) and the Pacific Coast Rendering Association (PCRA) is providing the following comments in response to the California Department of Resources Recycling and Recovery's (Department) proposal to amend California Code of Regulations, Title 14, Division 7, Chapters 1, 3, 3.1 and 5 and create Chapter 3.2; and, to amend Title 27, Appendix 1.

CGFA, founded in 1925 represents the legislative and regulatory interests of California's grain and feed industry. Our over 250 members are livestock feed and pet food manufacturers; brokers; ingredient suppliers; renderers; equipment manufacturers; retail feed stores; nutritionists; elevators and storage facilities; merchandisers; mill equipment manufacturers; and, transportation companies. Our members supply safe and wholesome animal food that supports California's \$12 billion livestock and dairy industry and the millions of other food animals and pets that call California home. Long before the Department came into existence California's feed industry began diverting agricultural and food processing by-products, surplus food and food wastes from disposal at landfill to animal feed.

Pacific Coast Rendering Association (PCRA) represents California's rendering industry. We recycle organic byproducts including meat and bone, fallen livestock, inedible kitchen grease and bakery products to be used in an assortment of applications. Our members process these materials into higher value products including livestock feed, pet food, biodiesel and industrial lubricants. Renderers' entire business is recycling organic material and agriculture byproducts.

CGFA and PCRA are fully committed to recycling organic and "compostable materials." We have been doing it for generations and operating in a free and open market. Our processes capture and recycle the carbon in organic materials in an environmentally and economically sustainable manner. We are proud to be one of California's original recyclers.

Our review of the proposed regulation revealed a concern to our members regarding the applicability of the regulation to licensed feed facilities and the materials they received from agricultural and food processing and the commercial and retail food sector.

Prior to addressing the specific comments relating to the grain and feed and rendering industries, we felt there was value in providing general observations:

If not properly implemented, this package of regulations may actually result in more compostable material being directed back into traditional disposal methods. By classifying some traditional food processing byproducts and nutrients as “waste,” this could unnecessarily increase regulatory burdens on storing, transporting and managing some of these materials. If fees are enacted on currently recycled material and the regulatory burdens increased, the unintended result may be producers of these byproducts sending them into traditional disposal methods such as landfills or publicly owned treatment works (POTW’s) rather than shoulder the burden of compliance with these new requirements.

The justification in the Statement of Reasons for these regulations is very minimal, and in some cases nonexistent. The portion of the regulatory package addressing compostable materials and land application has minimal justification for action. All of these materials are regulated depending on their final use. For example, animal feed is regulated by CDFA, FDA and local health and environmental officers. Rendering materials are regulated by CDFA, FDA and local entities as well. Food and feed safety is a priority for all handlers of this material. Land application of materials is regulated by the Regional Water Quality Control Boards, local enforcement agencies (LEA’s), in some counties local ordinances and local/regional air districts. The rationale for regulation based on odors is covered by local nuisance ordinances, state statute, and often state permitting agencies. The justification for regulating these materials and possibly interfering with federal and state food safety rules or local land use and nuisance governance is not supported in this package.

Applicability of the Regulation to Animal Feed. Several of our members have reported over the years that some local enforcement agencies have made determinations that these regulations apply to processing by-products diverted and stored at our facilities as animal feed, e.g. dried nut hull or cottonseed. We believe the LEA made the determination – wrongly - exclusively on the basis that the stored animal feed fit the regulatory definition of a “compostable material” without regard to the actual end use of that product, which is animal feed not compost or compostable material destined for compost or land application. In several cases, our members reported that the LEA made a decision that the stored animal feed met the definition of an excluded activity because it was stored at temperatures below 122F. We are grateful that the LEA decided to exclude that particular animal feed from storage rules, but it clearly was made based on an incorrect initial determination that the material was regulated as a compostable material in the first place. In our opinion, facilities that receive agricultural and food processing by-products, surplus food or food waste for use as animal feed – should not be regulated as composting operations or facilities based on the fact that those materials are diverted for the exclusive use as animal feed not as compost nor compostable material destined for composting or land application.

Secondarily, there are very robust air quality, animal feed, food and animal feed safety and water quality regulatory programs that provide oversight to the manufacture, distribution, sale, and storage of animal feed that includes diverted agricultural and food processing by-product, surplus food and food waste material.

Each of our members who manufacture, distribute, sell or store animal feed are licensed and regulated by the California Department of Food and Agriculture (CDFA). In addition to CDFA and the federal Food and Drug Administration food and feed safety oversight, those same facilities are regulated by their respective air quality management districts, Regional Water Quality Control Boards and other local agencies for compliance with state and federal air and water quality laws and regulations – which are protective of the environment and prevent nuisances.

In California, CDFA's Feed Inspection Program regulates all aspects of the manufacture, handling and distribution of animal feed. Their laws and regulations are found in the Food and Agriculture Code, Chapter 6, Sections 14901 et seq. and 3CCR Section 2675 et seq. Every business, location and/or site involved with the manufacture, distribution, sale, or storage of animal feed is required to be licensed.

CDFA's Feed Inspection Program has historically occupied the regulatory field where processing by-products, surplus food or food wastes are diverted to animal feed. The Department has recognized this on their website with notes to its constituencies reflecting CDFA's authority over diversion of what the Department considers "waste" to animal feed. An example of this oversight is found in CDFA's September 2013 "Notice to the Industry, California Commercial Feed License Requirements" (Attachment 1) that included the following:

Food Processing Waste

A Commercial Feed License must be obtained for the location of origin for products classified as food processing by-product or waste that are offered directly to the marketplace as feed, unless the product is shipped to a licensed feed facility to be further processed and labeled as animal feed. This includes by-product which is diverted directly to animal feed to avoid landfill tipping charges which would otherwise apply. All products must be approved for use in animal feed and properly labeled as identified in the California Commercial Feed Laws and Regulations.

Bakery By-Product

A Commercial Feed License must be obtained for the location of origin for pasta and bakery by-products, (including bread, cookies, cake, crackers, flours, and dough), that are offered directly to the marketplace as feed, unless the product is shipped to a licensed facility to be further processed and labeled as animal feed. The locations where the food is produced are not required to be licensed unless they send their products directly to livestock producers. All producers must be approved for use in animal feed and properly labeled as identified in the California Commercial Feed Laws and Regulations.

Food from Retail Stores

A Commercial Feed License must be obtained for retail stores where food waste is offered directly to the marketplace as animal feed. The retail store is not required to have a license if their waste is picked up by a holder of a Commercial Feed License. The Licensee picking up the food is responsible for the proper storage, quality, and safety, (that it is not adulterated with metal or glass and does not contain any non-food items such as flowers, nursery plants or trash). The Licensee is required to properly label the food which is offered as feed with a guaranteed analyses including moisture maximum percentage if the

product is over 15 percent moisture and sodium maximum percentage of the product is over 0.5% sodium.

CDFA provides the industry with terms and definitions and standards for animal feed; they include hundreds of terms and official definitions and standards for agricultural and food processing by-products and food materials. The official terms are found in CDFA's "Official Feed Terms" (Attachment 2) while definitions and standards are found in 3CCR Article 14. Definitions and Standards, Section 2773 et seq.

California Feed Licensees are regulated by state and federal food and animal food safety rules and regulations – which require for example, that animal feed is manufactured, handled and stored to prevent growth of mold, fungi or bacteria; or, contamination by toxins – the same preventative conditions that would prevent decomposition or active composting. If, by chance animal feed did compost, by regulation it would be considered damaged and/or adulterated and not fit for use as animal feed. The feed industry is committed to producing wholesome and safe animal feed which entails making significant economic investment into human and capital resources to prevent the conditions that are conducive to active composting.

Recommendation. CGFA recommends that the Department amend the regulation to provide an exclusion from the compostable handling operations and facility regulation to CDFA Commercial Feed Licensees that handle or store agricultural and food processing by-product or food material that has been approved by CDFA for use as an animal feed.

The exclusion is supported by the fact that agricultural and food by-products and food material diverted to California Feed Licensees is utilized as animal feed – not compost or handled as a compostable material going to compost or land application. In addition, once the diverted material moves from the generator, the material itself and the facilities that handle and store it are exposed to significant regulatory oversight by CDFA, the federal FDA and other environmental agencies to ensure safe and wholesome animal feed that is handled and stored under conditions that are protective of animal and human health and the environment.

We appreciate the opportunity to comment on this proposed regulation. If you need any further information in regards to the operations of the feed and grain industry in California please get in touch with me at (916) 441-2272 or chris@cgfa.org.

Sincerely,

A handwritten signature in black ink that reads "Chris Zanobini". The signature is written in a cursive, flowing style with a large loop at the end of the last name.

Chris Zanobini, Chief Executive Officer

cc: Rick Jensen, Director, Division of Inspection Services, CDFA
Amado Ba, Chief, Feed, Fertilizer and Livestock Drugs Regulatory Services, CDFA
Jenna Arias, Chief, Feed and Livestock Drugs Inspection Program, CDFA



September 25, 2013

NOTICE TO THE INDUSTRY

California Commercial Feed License Requirements

This notice is to provide clarification of the California Department of Food & Agriculture's (CDFA) requirements for a commercial feed license. The California Commercial Feed Inspection Program uses licensing information to ensure food and feed safety, and to assure the consumer-buyer of commercial feed that the product is properly identified and meets quality and quantity represented by the commercial feed manufacturer or the guarantor. California law and regulations require a commercial feed license to be held if any of the following apply pursuant to the California Food and Agricultural Code:

- Section 15051 (a) Each person shall obtain a license from the secretary for each location where commercial feed is manufactured, distributed, sold, or stored for later sale. Persons who do not have a permanent place of business, but who otherwise manufacture, sell, or store feed shall also obtain a license from the secretary.*
- (b) This section also shall apply to a person whenever the person's name and address appears on the label of commercial feed as the guarantor.*
- (c) The following persons are exempt from this section:*
- (1) A person that makes only retail sales of commercial feed which bear the tag or other approved indication that the commercial feed is from a licensed manufacturer or guarantor who has assumed the full tax responsibility for the tonnage tax due under this chapter.*
 - (2) A person who manufactures commercial feed exclusively for feeding his or her own animals.*

Out of State Licensing

The licensing requirements apply to every location; including the location of origin from which product is imported into California. This includes product which is shipped to a licensed location or has the label of a licensed firm.

Licensing Grain Elevators

The licensing requirements also apply to grain elevators that ship grain to feed licensees in California. Whole grain, unmixed is not subject to the inspection tonnage tax, but a commercial feed license is required. The licensing requirements do not apply to farmers' selling their own produced whole grain.



Repackaging Commercial Feed

If a firm repackages commercial feed, they must obtain a license and re-label the feed with their firm listed as the guarantor. This applies to feed stores who repackage feed, or sell feed by the pound for the convenience of the customer. If the original manufacturer's bag or lot is broken down, the person responsible for repackaging the product assumes responsibility for the safety and quality of the feed product. Additionally, proper labeling as identified in Section 14992 of the California Commercial Feed Laws and Regulations, is required, and must accompany each package or load of commercial feed.

Feed Label Guarantors

Licensing requirements apply to every person whenever the person's name and address appear on the label of a commercial feed as a guarantor. This includes nutritionists, veterinarians, and consultants whose name appears on the label, even if the feed was manufactured by a licensed feed mill.

Food Processing Waste

A Commercial Feed License must be obtained for the location of origin for products classified as food processing by-product or waste that are offered directly to the marketplace as feed, unless the product is shipped to a licensed feed facility to be further processed and labeled as animal feed. This includes by-product which is diverted directly to animal feed to avoid landfill tipping charges which would otherwise apply. All products must be approved for use in animal feed and properly labeled as identified in the California Commercial Feed Laws and Regulations.

Bakery By-Product

A Commercial Feed License must be obtained for the location of origin for pasta and bakery by-products, (including bread, cookies, cake, crackers, flours, and dough), that are offered directly to the marketplace as feed, unless the product is shipped to a licensed facility to be further processed and labeled as animal feed. The locations where the food is produced are not required to be licensed unless they send their products directly to livestock producers. All producers must be approved for use in animal feed and properly labeled as identified in the California Commercial Feed Laws and Regulations.

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Restaurant Grease

Restaurants or other commercial food facilities that produce vegetable oil and inedible kitchen grease are not required to obtain a Commercial Feed License. However, transporters of inedible kitchen grease must be licensed by CDFA's Meat, Poultry and Egg Safety Branch. Firms that offer the vegetable oil and/or inedible kitchen grease for feed are required to have a Commercial Feed License.

Raw Meat Products

All raw meat products that will be converted to animal feed must be processed by a licensed renderer. Inspected meat products, such as plate waste, which have been cooked and offered for human food must be further heat processed before it can be offered as commercial feed. The location heat processing this food must have a Commercial Feed License. A CDFA Animal Health Branch Retail Processing License is also required for each location that feed meat garbage to swine.

A Commercial Feed License is valid for one year, beginning July 1st and expiring June 30th of the following year. The current annual licensing fee is \$400.00 per location. Applications are available through the online database link available at: <http://www.cdfa.ca.gov/IS/FFLDRS> or via our webpage at: http://www.cdfa.ca.gov/is/apply_register.html.

Your cooperation and efforts to comply with the California Commercial Feed Laws and Regulations is greatly appreciated. For additional questions, please contact the Feed, Fertilizer, and Livestock Drugs Regulatory Services Branch at the number listed below.

California Official Feed Terms

Alfalfa Products

Chopped Alfalfa
Alfalfa Meal
Alfalfa Leaf Meal
Forage Meal
Alfalfa Stem Meal
Alfalfa Pellets, Cubes, Wafers
Alfalfa Nutrient Concentrate
Concentrated Alfalfa Solubles

Almond Hull Products

Almond Hulls
Almond Hull and Shell
Almond Shell

Animal Products

Meat Meal
Meat and Bone Meal
Blood Meal
Poultry By-Product Meal
Poultry Hatchery By-Product
Hydrolyzed Poultry Feathers
Dry Rendered Tankage
Dried Meat Solubles
Fleshing Hyrdolysate
Animal By-Product Meal
Hydrolyzed Hair
Hydrolyzed Leather Meal
Sprayed Dried Animal Blood
Egg Shell Meal
Egg Product
Poultry Meal
Blood Meal, Flash Dried
Glandular Meal and Extracted Glandular
Meal
Animal Plasma
Ensiled Paunch Product
Leather Hydrolyzate

Processed Animal Waste Products

Dried Poultry Waste
Dried Poultry Litter
Dried Ruminant Waste
Processed Animal Waste

Apple Products

Dried Apple Pomace
Dried Apple Pectin Pulp
Wet Apple Pomace

Barley Products

Ground Barley
Rolled Barley
Ground Light Barley
Rolled Light Barley
Barley Mixed Feed
Barley Hulls
Barley Feed
Hulled Barley
Ground Hulled Barley
Rolled Hull Barley

Beet Products

Dried Beet Pulp
Wet Beet Pulp
Molasses Dried Beet Pulp
Molasses Dried Beet Pulp Product

Brewers' and Distiller's Products

Brewers Dried Grains
Brewers Wet Grains
Malt Sprouts
Malt Cleanings
Malt Hulls
Dried Spent Hops
Molasses Distillers Dried Solubles
Potato Distillers Dried Residue
Distillers Dried Solubles

Distillers Dried Grains
Condensed Distillers Solubles

Coconut Products

Coconut Meal
Copra Meal
Coconut Meal, Solvent Extracted
Copra Meal, Solvent Extracted

Corn Products

Corn Bran
Corn Feed Meal
Ground Corn
Corn Meal
Cracked Corn
Corn Chop
Screened Corn Shop
Screened Ground Corn
Screened Cracked Corn
Corn Grits
Hominy Grits
Ear Corn Chops
Corn Gluten Feed
Hominy Feed
Corn Germ Meal (Wet Millet)
Corn Germ Meal (Dry Milled)

Cottonseed Products

Cottonseed Meal, Mechanically Extracted
Cottonseed Meal, Solvent Extracted
Cottonseed Cake, Mechanically Extracted
Cottonseed Flakes, Mechanically Extracted
Cottonseed Flakes, Solvent Extracted
Whole-Pressed Cottonseed, Mechanically
Extracted
Low Gossypol Cottonseed Meal,
Mechanically Extracted
Low Gossypol Cottonseed Meal, Solvent
Extracted
Cottonseed Hulls
Whole Cottonseed
Prime Whole Cottonseed

Cracked Pima
Ground Pima

Fats and Oils

Animal Fat
Fat Product, Feed Grade
Vegetable Fat or Oil
Hydrolyzed Fat or Oil
Ester (feed grade)
Corn Endosperm Oil
Corn Syrup Refinery Insolubles, Feed Grade
Calcium Salts of Long-Chain Fatty Acids
Hydrolyzed Sucrose Polyesters, Feed Grade
Vegetable Oil Refinery Lipid, Feed Grade

Grape Products

Grape Pomace
Raisin Stem Meal
Raisin Seed Meal

Flax Products

Linseed Meal, Mechanically Extracted
Linseed Meal, Solvent Extracted
Flaxseed Screenings Meal, Solvent Extracted
Flax Plant Product
Flax Straw By-Product

Marine Products

Fish Meal
Fish Residue Meal
Fish Market Scrap Meal
Crab Meal
Shrimp Meal
Anchovy Oil
Condensed Fish Solubles
Tuna Oil
Condensed Fish Solubles
Fish Glandular and Liver Hydrolysate

Milk Products

Dried Buttermilk
Condensed Buttermilk

Dried Skimmed Milk
Dried Cultured Skimmed Milk
Condensed Cultured Skimmed Milk
Dried (Dry) Whey
Condensed Whey
Dried (Dry) Whey Solubles
Condensed Whey Solubles
Dried Hydrolyzed Whey
Condensed Hydrolyzed Whey
Condensed Whey-Product
Dried (Dry) Whey-Product
Condensed Cultured Whey
Whey
Casein
Cheese Rind
Dried Lactalbumin
Dried Whole Milk
Dried Hydrolyzed Casein
Condensed Whey Permeate
Condensed Delectated Whey Permeate
Fermented Ammoniated Condensed Whey
Dairy Food By-Products

Mineral Feeds

Shell Marl
Marl
Trace Mineralized Salt
Bone Ash
Bone Charcoal
Calcite
Oyster Shell Flour
Shell Flour
Chalk Rock
Calcium Carbonate, Precipitated
Calk, Precipitated
Limestone, Ground
Calcium Carbonate
Limestone
Magnesium
Dolomite
Phosphate, Defluorinated
Bone Phosphate

Rock Phosphate, Soft
Diammonium Phosphate
Bone Charcoal, Spent
Bone Meal, Steamed
Phosphoric Acid, Feed Grade
Rock Phosphate, Ground
Rock Phosphate, Ground, Low Flourine
Ammonium Polyphosphate Solution
Metal Proteinate
Smectite-Vermiculite
Calcium Periodate
Mono-ammonium Phosphate

Ammonium Sulfate
Metal Polysaccharide
Calcium Gluconate
Calcium Iodate
Calcium Iodobehenate
Calcium Sulfate (Anhydrous)
Calcium Sulfate (Dihydrate)
Cobalt Acetate
Cobalt Carbonate
Cobalt Chloride
Cobalt Oxide
Cobalt Sulfate
Copper Carbonate
Copper Chloride
Copper Gluconate
Copper Hydroxide
Copper Orthophosphate
Copper Pyrophosphate
Copper Sulfate
Cuprous Iodide
Dicalcium Phosphate
Diiodosalicylic Acid
Ethylenediamine
Dihydriodide
Ferrous Fumarate
Iron Ammonium Citrate
Iron Carbonate
Iron Gluconate
Iron Oxide

Iron Phosphate
Iron Pyrophosphate
Iron Sulfate
Reduced Iron
Magnesium Carbonate
Magnesium Oxide
Magnesium Sulfate
Manganese Acetate
Manganese Carbonate
Manganese Chloride
Manganese Citrate (Soluble)
Manganese Gluconate
Manganese Orthophosphate
Manganese Phosphate (Di-basic)
Manganese Sulfate
Manganous Oxide
Monocalcium Phosphate
Monosodium Phosphate
Potassium Bicarbonate
Potassium Carbonate
Potassium Chloride
Potassium Iodate
Potassium Iodide
Potassium Sulfate
Salt
Sodium Bicarbonate
Sodium Iodate
Sodium Iodide
Sodium Selenate
Sodium Selenite
Sodium Sulfate
Sodium Tripolyphosphate
Sulfur
Thymol Iodide
Tricalcium Phosphate
Zinc Acetate
Zinc Carbonate
Zinc Oxide
Zinc Sulfate

Dicalcium Phosphate
Monocalcium Phosphate

Molasses Products

Beet Molasses
Citrus Molasses
Cane Molasses
Starch Molasses
Hemicellulose Extract
Concentrated Separator By-Product (CBS)
Concentrated Steffen Filtrate (CSF)

Non-Protein Nitrogen

Urea
Feed Grade Biuret
Diammonium Phosphate
Ammonium Polyphosphate
Ammonium Sulfate
Mono-Ammonium Phosphate

Oat Products

Ground Oats
Pulverized Oats
Crushed Oats
Crimped Oats
Oat Grouts
Oat Hulls
Feeding Oat Meal
Clipped Oat By-Product
Oats
Mixed Feed Oats
Oat Mill By-Product

Peanut Products

Peanut Meal and Hulls, Mechanically
Extracted
Peanut Meal and Hulls, Solvent Extracted
Peanut Skins
Peanut Meal Mechanically Extracted
Peanut Hulls

Rice Products

Rice Polish
Rice Bran

Rice Bran, Solvent Extracted
Ground Rough Rice
Ground Paddy Rice
Ground Paddy Rice Screenings
Rice Hulls
Rice Mill By-Product
Chipped Rice
Broken Rice
Brewers Rice
Parboiled Rice Bran
Stabilized Rice Bran

Rye Products

Rye, Mill Run
Rye Middlings

Safflower Products

Safflower Meal
Whole-Pressed Safflower Seed
Safflower Hulls

Screenings

Grain Screenings
Seed Screenings
Mixed Screenings

Sesame Products

Sesame Oil
Sesame Oil Meal

Sorghum Products

Ground Grain Sorghum
Grain Sorghum Gluten Feed
Grain Sorghum Gluten Meal
Grain Sorghum Germ Cake
Grain Sorghum Germ Meal
Rolled Grain Sorghums
Grain Sorghum Grits
Gelatinized Sorghum Grain Flour
Partially Aspirated Gelatinized Sorghum
Grain Flour
Grain Sorghum Mill Feed

Soybean Products

Ground Soybean
Ground Soybean Hay
Soybean Hulls
Soybean Feed, Solvent Extracted
Soy Flour
Soybean Meal, Mechanically Extracted
Soybean Meal, Solvent Extracted
Soybean Meal, Dehulled, Solvent Extracted
Soybean Mill Feed
Soybean Mill Run
Soy Phosphate
Soy Lecithin
Heat Processed Soybeans
Soy Protein Concentrate
Kibbled Soybean Meal
Condensed Soybean Solubles
Soy Flour

Sunflower Products

Sunflower Meal, Dehulled, Mechanically
Extracted
Sunflower Meal, Dehulled, Solvent
Extracted
Sunflower Meal, Mechanically Extracted
Sunflower Meal, Solvent Extracted
Sunflower Hulls

Other Oilseed Products

Canola Meal
Rapeseed Meal, Mechanically Extracted

Wheat Products

Wheat Bran
Wheat Feed Flour
Wheat Germ Meal
Wheat Mill Run
Wheat Middlings
Wheat Shorts
Wheat Red Dog
Defatted Wheat Germ Meal

Yeast Products

Primary Dried Yeasts
Dried Yeast
Irradiated Dried Yeast
Yeast Culture
Active Dry Yeast
Brewers Dried Yeast
Torula Dried Yeast
Candida Dried Yeast
Molasses Yeast Condensed Solubles
Brewers Liquid Yeast

Miscellaneous

Oil Cake
Oil Meal
Silage
Ground Bean Screenings
Ground Pea Screenings
Charcoal
Dried Citrus Pulp
Citrus Meal
Wet Citrus Pulp
Coca Bean Shells
Coca Bean Hulls
Ground Cull Nut Meats
Ground Hut Meat Screenings
Feeding Dried Fruits
Ground Straw
Chopped Straw
Ground Dried Vegetables
Buckwheat Middlings
Dried Kelp "Dehydrated Kelp"
Dehydrated Silage Pellets
Paunch Product, Dehydrated
Bagasse
Coastal Bermudagrass Hay, "Coastal
Bermudagrass Meal" "Dehydrated
Coastal Bermudagrass Hay"
"Dehydrated Coastal Bermudagrass
Meal"

Dried Tomato Pomace, "Dried Spiced
Tomato Pomace"
Ground Straw, "Ground Bluegrass Straw"
"Ground Alfalfa Straw"
Ground Grass
Dehydrated Garbage, "Dehydrated
Degrease Garbage"
Cereal Food Fines
Dried Bakery Products
Buckwheat Hulls
Guar Meal
Synthetic Fatty Alcohol

Lignin Sulfonate

Spent Lignin Sulfonate

*For more information about these feed
terms consult the California Commercial
Feed Law and Regulations document.*