

June 1, 2005

**Oregon Department of Agriculture Guidelines  
For Labeling of Horse Feeds For Non-Structural Carbohydrates**

Industry has requested guidance on how to label horse feeds low in sugars and starches (ie. low-carb). AAFCO and Oregon do have a policy against labeling for carbohydrates or health claims. Most ingredients for horse feeds are relatively high in carbohydrates. There are claims that some horses may benefit from consuming diets lower in sugars and starches. However, current feed regulations do not provide specific requirements or allowances to assist the horse owner in deciding which feeds are low in carbohydrates.

The following are guidelines for registering horse feeds:

- 1.) Labeling must follow the format and requirements of the Oregon commercial feed law and rules.
- 2.) No claims (other than provision of nutrient(s) ) will be permitted on the labeling (or advertising) that would cause the feed to be declared a drug or food additive unless the claim has been accepted by FDA.
- 3.) The label must explain what NSC (Non-Structural Carbohydrates) is if the abbreviation NSC is used on the label.
- 4.) The maximum percentage of NSC as-fed must be guaranteed. The methods used to determine the level will be those generally recognized by experts (such as those used by Dairy-One Laboratory in New York).
- 5.) If the product makes a “Low-NSC” claim, the maximum percentage of NSC guaranteed shall be 11% or less.
- 6.) The terminology “Low-Carbohydrate” will not be allowed. “Low Carbohydrate” is too vague to be useful to consumers because low is not defined and carbohydrate has a large number of fractions.

Note: This is an interim policy applicable only for Oregon. It may not have any recognition by other states and does not alter existing AAFCO

requirements, FDA statutory authority, or preclude action by other regulatory agencies. This policy will be utilized as the basis for Oregon registration and labeling pending development of national requirements that may supersede this policy.

Questions about this policy should be directed to the Departments' Feed Specialist at 503-986-4691.