



PROPONENT TESTIMONY ON SENATE RESOLUTION 382
SENATE AGRICULTURE COMMITTEE
6 JANUARY 2018

Chairman Hacket, Vice Chair Hoagland, members of the Agriculture Committee, thank you for the opportunity to provide proponent testimony on behalf of Senate Resolution 382, sponsored by Senator Frank LaRose. As Senator LaRose provided in his sponsor testimony, and as the resolution states, is to recognize the existence of two distinct alfalfa products: Direct Dehydrated Alfalfa and Sun-cured Alfalfa.

The original alfalfa entity now known as Alfagreen Supreme was formed as an Ohio corporation in 1960. Recognizing the importance of a fresh and consistent forage ingredient for use within the feed manufacturing industry; Alfagreen Supreme adopted the use of thermal heat to dry the high moisture freshly cut alfalfa to an acceptable level of moisture to maintain the storage integrity and consistency while allowing the dehydration process to enhance the nutrients found within the alfalfa through the process known originally as Dehydrated Alfalfa.

With increased demand for specialty pet and animal diets the demand for dehydrated alfalfa has and continues to grow domestically and internationally within the feed manufacturing industry. Additionally, through the increased demand so did various alfalfa processors' perspectives and or processes that were being performed and labeled as Dehydrated Alfalfa.

You may ask how can a difference in process impact the quality or buying decision or consistency of an alfalfa ingredient? With that said, historically there has been only two (2) different approved alfalfa definitions approved for use within the feed manufacturing industry which have been outlined within the AAFCO "Association of American Feed Control Officials" Official Publication which the FDA "Federal Drug Administration" recognizes as approved ingredient definitions.

There are two processes employed when sourcing alfalfa products within the feed manufacturing industry as stated above. One process entails alfalfa harvested into bales or stacks that are stored for an unknown duration of time as bails and/or stacks, then ground and heat applied. This is Sun Cured alfalfa, as the alfalfa was stored as "bales or stacks" (AAFCO 3.1). AAFCO clarified this even more when the body voted to not include sun cured alfalfa within the definition of Dehydrated Alfalfa (AAFCO 3.2, and T3.2 which was defeated January 18, 2016). Parenthetically, AAFCO did not make any change within its existing definition of Dehydrated Alfalfa (AAFCO3.2), and has yet to delete same from the Official Publication.

Link to minutes: http://www.aafco.org/Portals/0/SiteContent/Meetings/Association-Business/General_Session_Minutes_2016_Midyear-Isle_of_Palms.pdf



Alternatively, and simultaneously with the clarification that Sun Cured Alfalfa was not to be included in Dehydrated Alfalfa, AAFCO decided to create a new definition, Direct Dehydrated Alfalfa (AAFCO 3.5). Although we felt this could have been done within the existing Dehydrated Alfalfa definition (AAFCO 3.2) mentioned above, this new definition was to further differentiate the two processes and specifically excludes sun cured alfalfa from being included within Direct Dehydrated Alfalfa Meal or Pellets. This is the process that we employ at Alfagreen Supreme, and what we sell to consumers.

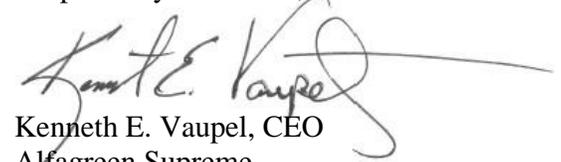
The distinctions created between the two (2) products are crucial to the ultimate end user, the animal who consumes the finished feed. The labeling process demonstrates what the consumer looks to purchase and intends to receive. This is why we have worked diligently through the AAFCO process, and now are working with our Ohio Legislature to provide final assurance to our consumers. This will fully educate, and notify the consumer of what alfalfa product they are purchasing, and allow the market to decide. The issue also relates to how respective States can uniformly, or just internally, regulate and/or apply the definitions. Regulators want to be able to consistently and correctly do their job, which ultimately benefits all parties involved, especially the consumer.

For all the reasons that are stated herein, and briefly mentioned above, it is also our position that AAFCO must delete Dehydrated Alfalfa (AAFCO 3.2) from its Official Publication. In so doing, it will finally clarify and distinguish to the two products for all who source alfalfa, but also for those who ultimately purchase and consume the alfalfa products. When Ohio provides its guidance and leadership, which is the purpose behind requested Senate Resolution 382, we know that other states will adopt similar policy positions and procedures. Ultimately, we may need to again meet directly with the FDA to finalize this matter, but Ohio will solidify our position moving forward to the ultimate benefit of Ohio and all consumers of alfalfa products.

Moving forward, we at Alfagreen Supreme will continue to label our product what it truly is, Direct Dehydrated Alfalfa. We do not believe that any other term should be utilized, and that competitors using sun cured alfalfa must label their product as Sun Cured Alfalfa.

Thank you for the opportunity to provide my proponent testimony in writing today as I am unable to be present in Columbus due to my business travel obligations. I am available to answer any questions via telephone and/or through Drew J. Mihalik, who is also an advocate on our behalf. It will be my intention to attend the Hearing scheduled for next Tuesday, February 13, 2018 at 4:00 p.m. for me to provide further insight, and answer any direct questions from the committee, if requested. Again, thank you to Senator LaRose, the Ohio Senate, and the Senate Agriculture Committee for providing me this opportunity today.

Respectfully submitted,



Kenneth E. Vaupel, CEO
Alfagreen Supreme