

**Comments Submitted on Behalf of  
Iowa Renewable Fuels Association**

**Animal Feeding of Distillers Dried Grains Study Committee  
Iowa Legislature**

**Charge: Consider issues related to standards for distillers dried grains that can be used in formulating rations for livestock**

The Iowa Renewable Fuels Association (IRFA) appreciates the opportunity to comment on issues related to standards for distillers dried grains. The IRFA is a trade association representing Iowa's renewable fuels producers. This organization was formed in 2002 to work on behalf of the state's renewable fuels industry in the areas of legislation, marketing, promotion, and regulatory issues. The IRFA is comprised of 45 operating and proposed ethanol and biodiesel plants, which direct the policies and priorities of the organization.

Iowa is the leader in renewable fuels production. Iowa has 29 operating ethanol refineries with the capacity to produce nearly two billion gallons annually. There are 18 ethanol refineries under construction or expansion that will add nearly 1.4 billion gallons of annual capacity. Many additional renewable fuels projects are under development.

A range of ethanol process technology exists. Ethanol refineries are considering expanding their production diversity by extracting oil for biodiesel production or refining into other value-added products. And, some plants are fractionating the corn to remove the fiber for further processing. Variances in process technology will ultimately impact ethanol co-products. The nutrient profiles of distillers grains will be reflective of the process technology incorporated at individual plants because nearly every plant is different in some way.

The next generation of process technology – using corn stalks, plant material and non-traditional crops – will yield new types of co-products with varying composition. The range of distillers grains composition makes it difficult to lump this feed ingredient into one category or just one description. Distillers grains are becoming specialized or “branded” based on the process used. Quality control measures currently in place at ethanol refineries provide a consistent, high-quality product that gives customers assurance that they are receiving a product of equal quality with every shipment.

Distillers grains play an important role in supplying a valuable feed ingredient to the livestock industry. Rations for ruminant feed (beef and dairy cattle) allow up to 40 percent of the mixture to be distillers grains. It provides an important protein source and, because it is not animal based, it also alleviates concerns about the spread of mad cow disease. Rations of distillers grains in poultry and swine (non-ruminants) markets are lower, in the range of 10 to 20 percent. In 2006, more than 85 percent of distillers grains was fed to ruminant animals (dairy and beef cattle), nine percent to swine, and three percent to poultry. Continuing research is underway to better understand the optimal ration of

distillers grains in poultry and swine feed. The results of this research may very well show that higher rations of distillers grains in all livestock feed provide better nutritional results.

In addition to domestic livestock feeding, distillers grains are becoming a growing component of our export market, helping to satisfy feed needs in other countries, such as China, Japan and Mexico.

### Co-Product Analysis

Generic brands are becoming popular for many consumer products; however, this does not and should not apply to distillers grains. Not all distillers grains are produced using the same process technology. Therefore, products differ based on the technology used to ferment corn into ethanol or the technology used to break down the kernel for processing into additional products. Any differences in the “front-end” processing at an ethanol refinery will ultimately impact the resulting co-products coming out the “back-end.”

Customers of any product want to know what they’re purchasing, and livestock producers are discriminating customers. The composition of a livestock feed ingredient is very important to animal health and performance. So, when a feeder purchases a load of distillers grains, a feed ticket is provided. The nutrient analysis of the shipment is provided and used to formulate rations for cattle, poultry, hogs, and dairy cattle.

Nutrient profiles of participating plants are posted on the Iowa Renewable Fuels Association website. This tool assists livestock producers in determining which plants have a distillers grains product that best fits their ration requirements for the species being fed.

### Standardized Testing

A thorough evaluation of standardization for distillers grains has been conducted by the ethanol and feed industries. Within the fuel ethanol industry there were no guidelines or recommendations on which analytical test methods should be used for the measurement of distillers grains. This led to various interpretations of data for moisture, protein, fat and fiber, all of which are critical feed quality parameters for distillers grains. Since the analytical community had not yet come to a consensus on what empirical method was best suited for the analysis of any given analyte in distillers grains, many different empirical methods were used among laboratories and even within a single laboratory. The use of various empirical methods for a single analyte led to results that varied significantly from lab to lab and thereby created confusion for producers, marketers, nutritionists, regulatory bodies, and most importantly the end users.

Therefore, test procedures for distillers grains was an issue identified by the ethanol industry and strategically addressed in 2005. A working group was formed to collectively analyze the problem and cooperatively design a study which would lead to recommendations on the most applicable test methods for distillers grains. The working

group was made up of the American Feed Industry Association, Renewable Fuels Association and National Corn Growers Association.

This group conducted a study to evaluate the variation of the most commonly used test methods by the analytical community for the analysis of moisture/loss on drying, crude protein, crude fat, and crude fiber -- the key factors in determining the market value of the product. As a result of this study, standardized test procedures were developed and adopted by the U.S. ethanol industry with endorsement by the feed industry.

These standardized test procedures are being used by ethanol refineries across the U.S. This test gives livestock feeders assurance that all co-products are measured for the same composition using the same test procedures. The Iowa Renewable Fuels Association has recommended that GIPSA/USDA adopt this test protocol and recognize it as the acceptable industry-wide standardized test procedure.

Ethanol co-products that are sold into the feed market are tested and labeled according to existing FDA regulations and guidelines developed by the American Association of Feed Control Officials (AAFCO). Purchasers of distillers grains may also require additional analytes that would be part of a private contract with the seller. There is a concern within the industry that further actions in the regulation of analytes would limit the ability of private industry to produce and market specialty distillers grains products.

AAFCO has also developed a legal definition of distillers grains. Members of the same working group addressed whether this legal definition should be amended. The group felt that the AAFCO definitions adequately define the distillers grains co-products available today. In the future, new terms may be needed to more accurately reflect these new generation co-products as new process technologies become commercially available.

#### Additional Evaluations

The National Grain and Feed Association (NGFA) also conducted an evaluation of distillers grains as it pertains to trading rules. A task force within NGFA was formed to conduct research and review documentation. With respect to trading rules, the task force determined that the NGFA Trade Rules and NGFA Arbitration already applied fully to distillers grains, and that no additional or new trading rules were warranted for distillers grains at this time. While trade issues are not part of the charge set forth by the Interim Study Committee, it is important to point out that distillers grains has undergone extensive evaluations on a number of fronts and procedures currently in place are more than addressing the marketing and distribution of distillers grains.

#### Summary

The IRFA believes the industry has adopted quality and process control measures that are serving the industry's ability to produce and market high-quality products to meet customer expectations. Ethanol refineries across the U.S. have collectively addressed any

concerns about co-product composition to enable the renewable fuels industry to continue growing.

Based on extensive evaluations, collaboration and consensus within the ethanol industry, the Iowa Renewable Fuels Association does not recommend the establishment of standards for distillers grains.

Respectfully submitted,

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