



# Wood Shavings Package Labeling

Central Weights and Measures  
Association

May 4, 2009



# Outline

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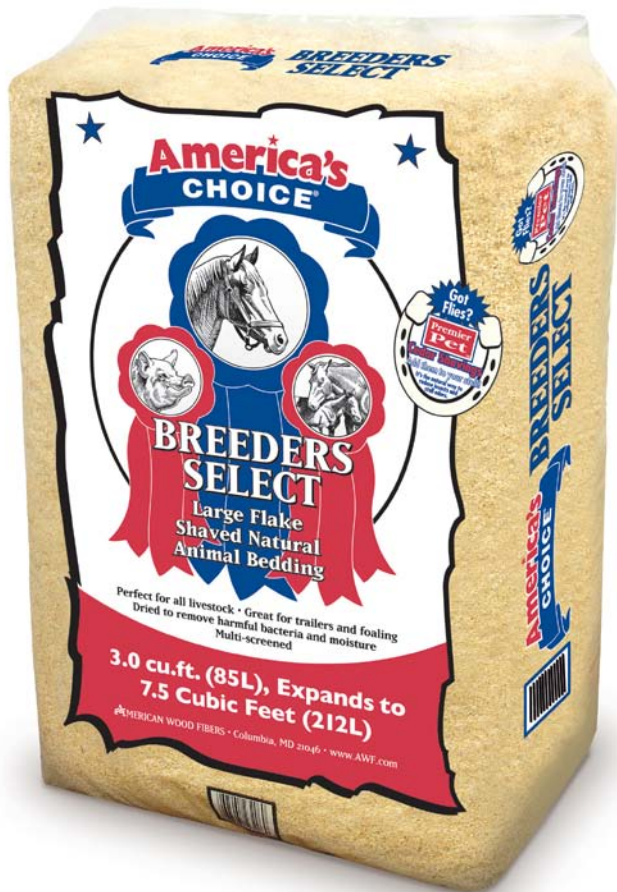
- # Pertinent Regulations
  - # Example Labels of Shavings Products
  - # Variability of Natural Fibers
  - # Conclusions
  - # Recommendations
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# Pertinent Regulations in Handbook 130

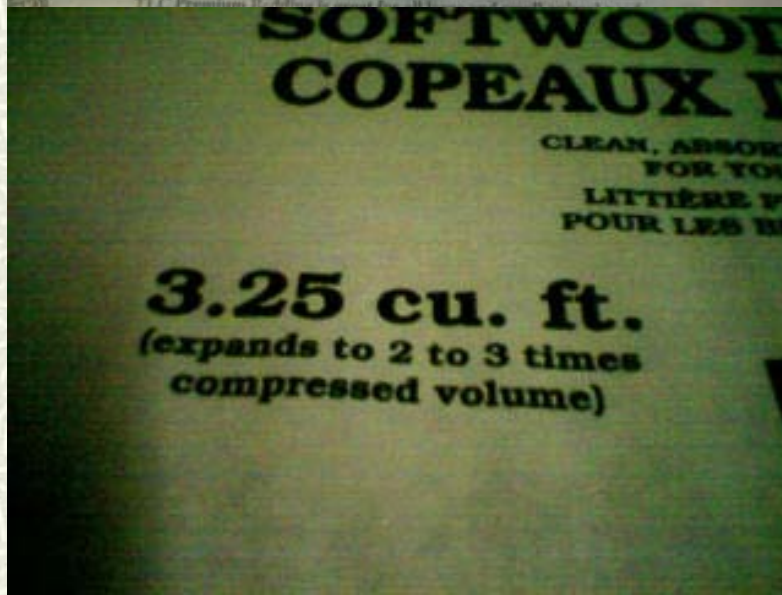
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- # Page 126, Method of Sale Regulations 2.23: **Animal Bedding** - Packaged animal bedding of all kinds, except for baled straw, shall be sold by volume, that is, by the cubic meter, liter or milliliter and by the cubic yard, cubic foot, or cubic inch. If the commodity is sold in a compressed state, the quantity declaration shall include both the quantity in the compressed state, and the usable quantity that can be recovered.
  - # Page 73, Packaging and Labeling Regulations 6.14: **Qualification of Declaration Prohibited:** In no case shall any declaration of quantity be qualified by the addition of the words "when packed", "minimum", or "not less than" or any words of similar import (e.g. "approximately"), nor shall any unit of weight, measure or count be qualified by any term (such as "jumbo", "giant", "full" or the like) that tends to exaggerate the amount of the commodity.
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# Compliant Bales



# Non-Compliant Bales - Qualifiers



# Bales with Pre-compression Statements



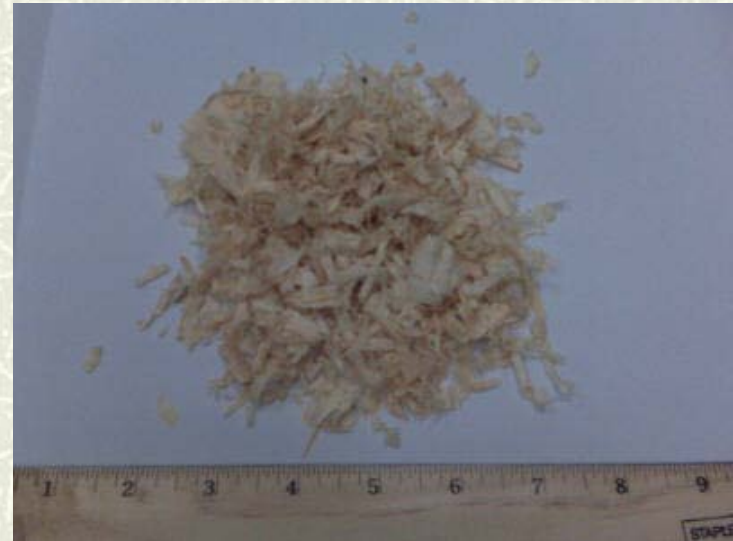
# Non-Compliant Bales

## - Insufficient Labeling

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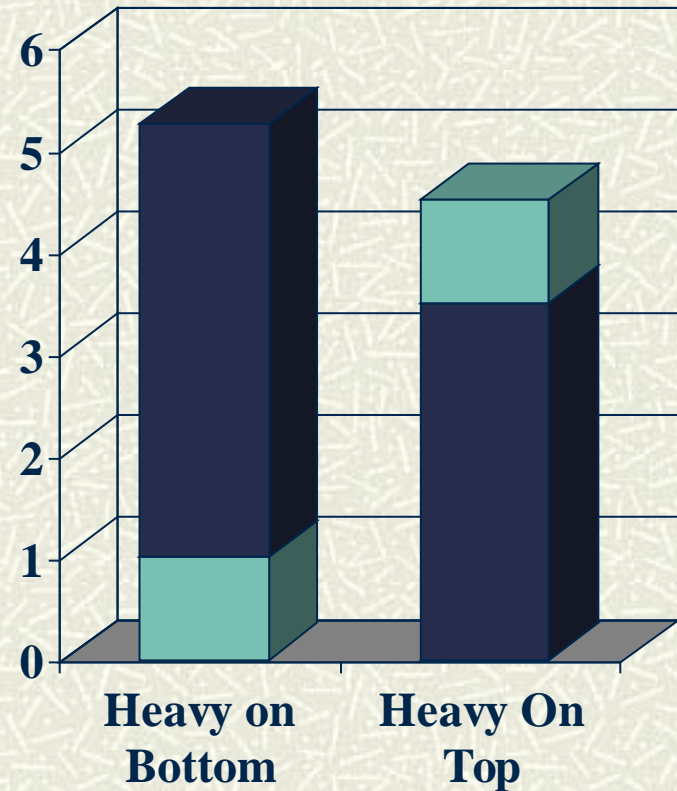
# Variations in Shavings Particle Size Distribution





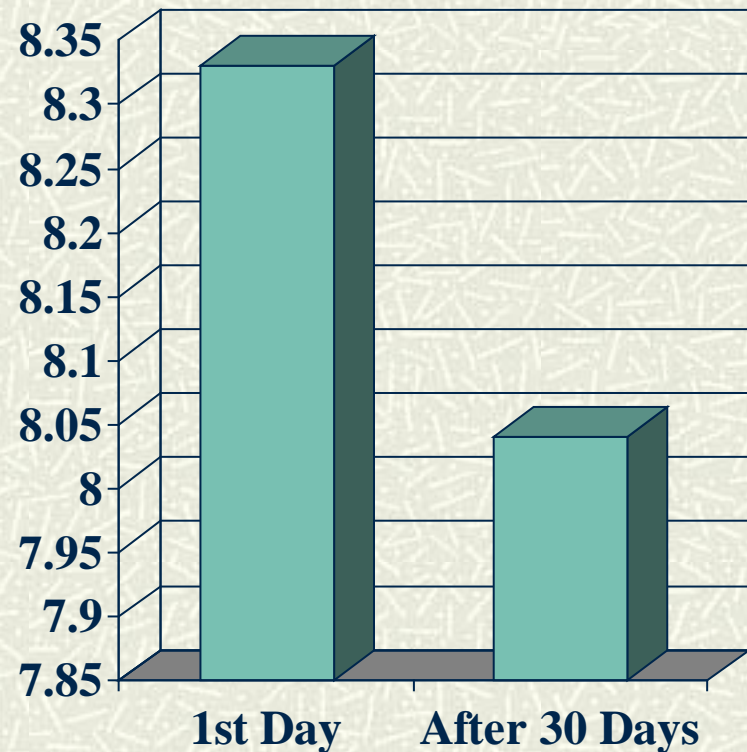
# Animal Bedding Recovery Tests

- Product stratifies while falling in the baling machine and the heavier pieces collect in the bottom of the bag.
- Recovered volume varies depending on which end of the bag is emptied first.
- Tests with the same material showed a 15% reduction in recovery if heavy material was placed on top.



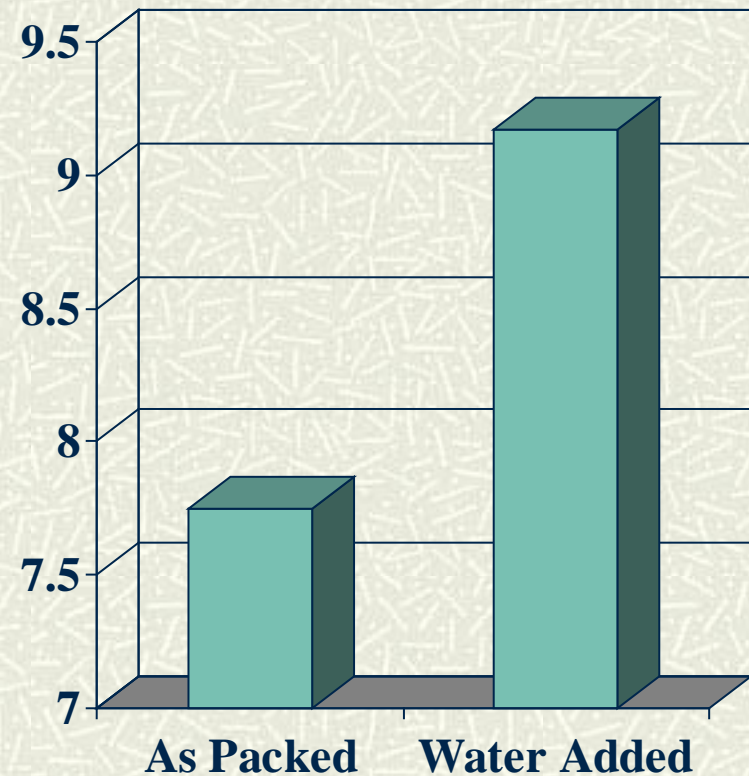
# Animal Bedding Storage Tests

- A controlled sample set was tested for recovery on the day of packing and then rechecked thirty days later.
- The recovered volume went down by an average of 3.5% after 30 days.



# Animal Bedding Moisture Tests

- When water is added to a set volume of shavings the recovered volume increases.
- In this test 728 ml of water was added to a bale of shavings and it produced an average of 18.3% increase in recovered volume.



# Conclusions

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- Because the number of variables - PSD, storage time, moisture and test method – all of which can affect the recovered volume, we believe the current 1% MAV is too stringent.
  - For small particle bedding products, or products not compressed when packaged, volume is not a satisfactory comparative tool.
  - There is wide spread non-compliance with package labeling standards
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# Recommendations

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- # Disallow qualifying and “before compression” statements
  - # Higher allowable MAV for recoverable volume testing
  - # Allow weight as a primary volume declaration in non-compressed products
  - # Uniform enforcement of all applicable regulations from Handbooks 130 and 133
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