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FEFAC COMMENTS TO

The EU Commission draft regulation providing for the authorisation to feed non-ruminants with ruminant collagen / gelatine and with proteins from insects, pigs and poultry

FEFAC acknowledges the EU Commission draft regulation amending Regulation (EC) 999/2001 amending Annex IV to Regulation (EC) No 999/2001 of the European Parliament and of the Council as regards the prohibition to feed non-ruminant farmed animals, other than fur animals, with protein derived from animals. This draft regulation is the result of a long process of several years dedicated to the establishment of a robust, science-based legal framework including the development of effective methods of analysis for official controls.

Re-authorisation of non-ruminant PAPs in pig and poultry feed

We note that the additional legal requirements for the use of porcine Processed Animal Proteins (PAPs) in poultry feed and avian PAPs in pig feed and insect PAPs in pig and poultry feed are comparable to those established in 2013 for the re-authorisation of pig and poultry PAPs in fish feed. We therefore do not have specific comments on the proposal itself.

We would like however to share our reflections as to the expected practical impact of the initiative for potential feed users of these non-ruminant PAPs at stake:

1. **Safety is the prerequisite:** it is important to make clear that this re-authorisation step follows 20 years of implementation of strict measures to control the BSE risk, including intensive surveillance of the EU cattle population and leading to the successful eradication of classical BSE. In parallel, processes for the treatment of processed animal proteins were developed and validated for their ability to eliminate the prion. Finally, EFSA provided its advice ascertaining the safety of these products for feed use in non-ruminant farm animals.
2. **PAP's are an important source of highly concentrated proteins but can provide only a limited contribution to reducing the EU-deficit in proteins for feed use:** From a nutritional perspective, the quality of the protein profile, in terms of its amino-acid composition and its concentration makes porcine and avian PAPs a valuable source of highly digestible proteins for certain types of animals like piglets or turkey. However, there should be no false expectations as to the ability of processed animal proteins to replace imports of soybean meal from Third Countries, due to its limited availability and regulatory restrictions limiting its use in dedicated single-species production facilities in compound feed manufacturing of pig and poultry feeds.

3. **Re-authorising pig & poultry PAPs is one thing: reusing them is another one** : in our view, the successful reuse of non-ruminant PAPs in pig and poultry feed depends on **five parameters**:

- **The acceptance by the food value chain partners, from livestock farmers to consumers**: it is of paramount importance that the project of using non-ruminant PAPs in pig and poultry feed is shared by all chain partners;
- **The ability of operators all along the chain to comply with the legal requirements and to bear the costs**: only those compound feed manufacturers who can specialise production facilities for pigs (resp. poultry) feed will be authorized to use poultry (resp. pig) PAPs. This means the very large majority of compound feed manufacturers will legally not be authorised to reuse non-ruminant PAPs, which can be seen as discriminatory. In addition, operators will be bound to implement an effective monitoring programme to verify compliance with the 0-tolerance for the presence of ruminant DNA and with the intra-species recycling ban.
- **The competitiveness of pig and poultry PAPs**: a significant proportion of pig and poultry PAPs is nowadays used in petfood and fish feed. The re-authorisation of these products in pig and poultry feed is unlikely to affect the market interest of PAPs for these two existing feed destinations. The surplus of PAPs, which is today exported to third countries, will compete with sources of proteins of vegetable origin such as soybean meal. The effective reuse of PAPs in animal feed will to a large extent depend on its competitiveness with soybean meal.
- **The limitations to incorporation of PAPs due to high phosphorous content**: feed manufacturers are expected to minimize nutrient losses. This in the case of a feed material like non-ruminant PAPs with high phosphorous content means that feed formulators limit the incorporation rates in compound feed.
- **The fitness of analytical control tools and interpretation of results**: the methods that have been developed are based on the detection of DNA (i.e. ruminant DNA for the general ban and pig DNA and poultry DNA for the intraspecies recycling ban). As indicated these methods detect the presence of DNA, irrespective of whether the DNA is carried by an authorized or prohibited feed material of animal origin. For example, the presence of porcine DNA in pig feed may come from gelatin or blood plasma, which are legal feed materials and therefore do not constitute non-compliance.

For the reasons above FEFAC favours progressive reuse of non-ruminant PAPs in pig and poultry feed, leaving time to operators to validate their quality control procedures and to authorities to assess the performance of their official controls. Regular exchange of monitoring results and their interpretation and Progress reports on experience gained over time would be useful in that regard.

In any case, the decision to use non-ruminant PAPs in pig and poultry feed remains a decision of individual operators but should be also taken in concert with chain partners.

Re-authorisation of former foodstuffs containing ruminant gelatine and insect PAPs in pig and poultry feed

We **welcome the lifting of restrictions to the use of former foodstuffs containing ruminant gelatine and the use of insect PAPs in pig and poultry feed**. Feed manufacturers have already a long experience of the use of former foodstuffs in particular in pig feed. They will have no difficulty using the expected 100,000 t of additional former foodstuffs containing ruminant gelatine that was not usable until now. We also welcome insect PAPs as an additional source of highly concentrated proteins, which are already used in fishfeed production.