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**FEFAC comments on
the EU Commission Communication on a One-Health Action Plan to support Member
States in the fight against Antimicrobial Resistance (AMR)**

Submitted as part of the public “feedback” procedure

FEFAC, representing the EU compound feed and premix industry, would like herewith draw your attention to the importance of promoting safe, high quality and nutritionally optimised animal feed as a key area of attention in the development of the EU One-Health Action Plan to support Member States in the fight against AMR.

Safe and nutritionally balanced feed is not only a prerequisite to the health and wellbeing of animals, but also a means to further enhance the overall animal health status through specific feeding strategies, feed composition, feed formulations or feed processing. We are convinced that, for the three proposed pillars of the future One-Health Action Plan, action points related to animal nutrition are appropriate. This could take shape through a recommendation to Member States to include a feed chapter in their national action plans to reduce AMR, through public research programmes fostering innovative nutritional solutions and by the sharing of good animal feeding practices at global level.

1. Promotion of nutritionally well-balanced feed as a prerequisite to maintain the health status of animals

Deficiencies in certain nutrients can translate into pathologies and immune-deficiencies, potentially requiring treatment. On the other hand, excess of certain nutrients may also lead to pathologies when for example the body is not able to regulate through homeostasis the excessive presence of certain vitamins or trace-elements in the diets. In addition, ratios between certain nutrients (e.g. macro-minerals) also impact on the health status of animals and the gap between deficiency and excess is sometimes very narrow. **It is in our opinion of primary importance that farmers, whatever the production system they exercise (including organic farming), are encouraged to make use of nutritionally optimised feed and can get expert advice on how to make best use of such solutions.**

Some examples of potential action points could be:

- To make sure that feeding strategies and animal nutrition are part of any advisory or training programme for livestock farmers developed by national authorities in collaboration with feed industry experts as part of their national action plans;
- To stimulate the development of incentive systems for livestock farmers to implement optimised feeding strategies that help to reduce the need for antibiotics;
- To evaluate the suitability of restrictions imposed on feed composition under certain marketing standards, such as organic farming, against the objective of reducing the need for antibiotics;
- To facilitate communication to farmers on the added value of certain feeding strategies or composition with regards to the health status of animals; this means among others more flexibility left to operators in feed claims.

2. Fostering research and innovation to enhance gut health and microbial diversity through specific strategies, formulations, ingredients and/or processes

The interaction of feed with the gut microbiota is a key factor for animal health. Already today, a number of publications demonstrate that the ability of the animal to control pathogens in the gut is enhanced thanks to specific constituents with effect on microbiota or specific processes: It has been shown that moderate amounts of fibre in poultry feed improves enzyme production and nutrient digestibility. Likewise, specific products like organic acids, probiotics, prebiotics and trace-elements have been proved to exert a positive effect on the intestinal microbiota. The feed processing, in particular the particle size, has an impact on gut microbiota and the rough grinding of feed is known as a way to control the multiplication of Salmonella in the gut, via the competitive microbial exclusion mechanism.

All these elements must be integrated in any feeding strategy aiming at enhancing animal health & immunological status, especially for young animals (piglets, chicken). Nevertheless, a lot more research involving innovative techniques is still needed to better understand the mechanisms at stake and therefore the ability to optimise these interactions to enhance the immune system of animals and therefore their resistance to diseases requires further scientific investigations. **This must be encouraged via the EU Horizon 2020 programme¹ and national research programmes.**

It is also extremely important that the legislative framework supports the practical use of innovative nutritional approaches as alternatives to antibiotics and therefore the REFIT of the feed additives legislation is very timely and should be a key action item for the One-Health action plan.

3. Disseminating EU expertise globally

We strongly welcome the present global antibiotic awareness week, which marks an important step to foster further engagement from all stakeholders and authorities to take concrete action following the commitment of governments in different instances (UN, OIE, WHO, Codex Alimentarius) to address as a matter of priority the critical question of resistance to antibiotics. The EU feed industry, via its international federation IFIF, has been invited by FAO to provide its input in the CODEX Ad Hoc Intergovernmental Task Force on Antimicrobial Resistance (TFAMR). FEFAC believes that animal nutrition is also a key element to be integrated in the CODEX Code of practice to minimize and contain antimicrobial resistance.

We do believe that the EU Commission One-Health action plan provides a unique opportunity to remind both decision makers and chain partners of the importance of good animal feeding practices and of creating the adequate legal and economic framework to enable farmers to make use of the existing and future know-how in terms of animal nutrition. Further elements are available in our Vision 2030 available on our [website](#).

¹ See [White paper on Research & innovation for a sustainable livestock sector in Europe](#) (Animal Task Force)