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FEFAC CONTRIBUTION TO THE EU COMMISSION CONSULTATION ON THE ROADMAP FOR THE EVALUATION OF THE FEED ADDITIVES LEGISLATION

FEFAC welcomes the initiative of the EU Commission to proceed to an evaluation of the feed additives legislation: Regulation (EC) No 1831/2003 has been in force for 14 years now and included a number of very important provisions concerning in particular the re-authorization procedure for feed additives. Since 2003, the landscape of the livestock sector has dramatically changed, with challenges of key importance such as the fight against antimicrobial resistance, climate change or animal welfare at the forefront and it is perfectly legitimate to evaluate the extent to which the legal framework regarding the authorization and placing on the market and use of feed additives is robust enough to encourage innovation and support investments to make new tools available to the feed chain to address these challenges.

The EU Commission roadmap provides an exhaustive overview of the key elements of the feed additives legislation that worth an evaluation. However, we believe that it should be further clarify that the evaluation will not only focus on feed additives but also on premixtures, in particular as far as labelling and placing on the market are concerned. We also believe that the extent to which the authorization procedure has facilitated access to innovative feed additives for minor species should also fall in the scope of the evaluation. This would in particular be relevant in the context of the EU guidelines for the sustainable development of aquaculture in the EU released in 2013.

In terms of priorities, beyond the authorization procedure which is a major element of Regulation (EC) No 1831/2003, FEFAC would consider labelling rules as a major item for assessment, in particular the consistency of these rules with those established for compound feed under Regulation (EC) No 767/2009.

FEFAC is definitively committed to provide its best expertise for a successful evaluation process.