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**EU Communications on Farm to Fork / Biodiversity / CAP reform and EU Green Deal
FEFAC position on animal nutrition solutions to contribute to Green Deal objectives**

FEFAC, representing the Europe Compound Feed & Premix Industry, would like to share its views on the key Green Deal objectives with regard to the future of EU agriculture and sustainable food systems. FEFAC would like to draw attention especially to the EU feed sector recommendations on how innovative animal nutrition solutions can help contribute to the development of sustainable feed, livestock and aquaculture sectors.

The feed industry has been over the years a key driver and partner in supporting sustainable development of livestock and aquaculture production, in particular by adding value to co-products of the agri-food chain through high-value feed for food producing farm animals, including farmed fish. Co-products represent currently 40% (62 mio tonnes in 2018) of the feed materials used by the feed industry.

EU feed manufacturers are recognised world leaders in resource efficiency, holding the capacity and knowledge to deliver solutions to societal demands such as enhancing animal health & welfare, by reducing the need for antibiotics at farm level, while reducing Green House Gas emissions (e.g. CO₂, methane and nutrient leakage (ammonia, Nitrogen and phosphates)).

Role of animal nutrition to Green Deal goals and resilience of the EU feed and animal production system

We strongly welcome the 9 objectives of the CAP reform contribution to the Green Deal (mainly relating to Farm to Fork and Biodiversity strategies, as well as the Climate law and the Circular Economy action plan) that were recognized as a key delivery mechanism of those strategies.

We expect that meeting all the objectives lined up in the Green Deal will require a strong scientific and evidence-based baseline. The EU feed and livestock sector production systems are unique in their diversity, which is a key characteristic of its resilience, capable of responding effectively to both societal and market demands.

In fact we consider, there is no sustainable food systems without animal production: EU livestock farming systems fit extremely well in a circular approach of the bio-economy, converting a large amount of human inedible forages and co-products of the food and biofuels industry into high value animal proteins, which constitute part of a balanced, healthy diet. In return, farm animals also provide organic fertiliser to arable lands and pastures, which are essential to close nutrient cycles and link arable crops and forage production to sustainable livestock production systems.

The EU feed industry is an integral part of any sustainable farm system as it is able to provide farmers tools (services of nutritional advice and feed formulation) to improve their performance

and reduce impact of livestock farming on the environment. Mitigation strategies such as precision feeding, dietary ingredients, grass and pasture management, protected protein and amino acids sources help to contribute to reduce CH₄ and NH₃ emissions. In addition, innovative animal nutrition solutions contribute to reduce the need for antibiotics at farm level, so-called tertiary prevention strategy (EFSA/RONAFA opinion 2017¹). Optimised health status improves the animal's ability to cope with pathogens and microbiological challenges thereof and thereby reduce the need for therapeutic treatments. The role of animal nutrition sciences is regrettably underrated in the public debate and FEFAC calls on EU authorities to consider public research in animal nutrition as a priority investment.

COVID-19 impact food security / Role of CAP and open markets

The COVID 19 crisis has shown that the EU feed & food supply chain for products of animal origin is able, in a very short period of time, to its sourcing and delivery channels. Livestock farmers and final consumers could rely on an uninterrupted access to healthy, affordable, safe feed and food supply, preventing any serious stockpiling or panic buying. All chain partners, including FEFAC have proved their resilience under very difficult conditions.

This would however not have been possible without the efficient governmental cooperation at EU and international level to safeguard open market access and trade both within the EU (Green Lanes agreement) and worldwide (G-20 & WTO-21 declarations).

We therefore highly welcome the EU's high-level support to maintain the functioning of the Single Market in order to prevent the temptation of calls for food sovereignty at national level, which could seriously undermine food security. We strongly recommend that the EU Commission focuses on effective safeguards tools to maintain a fully functional Single Market, thus upholding food security and a level playing field for feed and food sector operators.

The CAP should remain a Common policy. We welcome the focus on encouraging diversity of EU agricultural systems at Member State level as a key component of increasing further their resilience. However, the EU Commission needs to invest in robust tools when assessing National Strategic Plans to minimise the risk of renationalization of certain CAP elements to avoid serious market distortions.

Greenhouse gas emissions and nutrition efficiency

We strongly recommend that the EU Commission addresses potential conflicting targets between strategies (e.g. minimisation of usage of food and feed crops for energy production vs. reduction of dependency on third countries for supply of critical feed materials, local sourcing vs. decrease of greenhouse gas emissions, reduction of pest and weed control tools vs. safety status of crops) which may have a negative impact for the sustainable development of EU feed and livestock production systems. This should be a key element for evaluation in the inception impact assessment supporting any specific legislative proposal linked to the Farm to Fork and the Biodiversity strategies. The feed industry is willing to contribute to this task, for example by sharing its own sectoral impact assessments on the availability and

¹ <http://www.efsa.europa.eu/en/efsajournal/pub/4666>

competitiveness of home grown feed materials in order to reach an optimal balance between those potentially conflicting Green Deal targets.

We welcome EU Farm Commissioner Wojciechowski's recent public statement that "Any progress of the strategies has to be assessed against any potential negative impact"² as well as the Commission's intention to "work on nutrient management and development of a nutrient management tool to help farmers".

The EU feed industry is a world leader in animal nutrition efficiency and is ready to contribute to the EU Commission climate change targets. FEFAC has already developed an LCA-based methodology for measuring the environmental performance of compound feed (the PEFCR Feed for Food-Producing Animals³), which was approved by DG ENVI and Member States in 2018. Together with the International Feed Industry Federation and its partner organisations in the US, Canada and Norway, we have launched the GFLI (LCA feed database) in 2019⁴, which consists of 15,000 datapoints concerning the feed materials enabling to perform an environmental impact assessment, which will support the feed industry's efforts to reduce its CO2 footprint, methane emissions and thereby minimise its environmental impacts, in particular through improved compound feed composition and formulation. This database has been developed in close consultation with FAO (LEAP project).

In terms of nutrient efficiency, we recommend the European Commission to consider establishing a scientific platform bringing together expertise in microbial, plant, animal, and human nutrition as tool to support the development of nutritionally efficient sustainable food systems.

EU Protein Plan

The EU feed industry is the largest user of vegetable proteins in the EU. Due to scientific and technological advances in animal nutrition and feed processing, the share of home grown protein rich co-products (oilseed meals) and protein crops in compound feed has continuously increased over the past 20 years. More can be achieved and FEFAC fully supports the development of an ambitious, realistic long-term EU protein plan to boost the productivity of EU oilseeds and protein crops, which should be a clear CAP reform ambition. Thus we recommend that the European Commission pays particular attention to support measures to the protein crop sector when evaluating National Strategic Plans and prioritise those as one of the inclusion targets of NSP.

As highlighted in the Farm to Fork Strategy, the COVID-19 crisis clearly showed open market access was essential when buffering temporary shortages of home grown-supplies of protein-rich feed materials due to the significant decline in demand and production resulting in reduced availability of rapeseed meals and other oilseed meals as well as dried distiller grains and solubles (co-product from ethanol industry). The availability of co-products from the food

² https://ec.europa.eu/commission/commissioners/2019-2024/wojciechowski/announcements/speech-commissioner-wojciechowski-during-webinar-ag-press-caps-contribution-farm-fork-strategy_en

³ https://ec.europa.eu/environment/eussd/smgp/pdf/PEFCR_feed.pdf

⁴ <http://globalfeedlca.org/>

industry was also affected by major shifts in consumer demand patterns. In addition, even though app. 80 % of all feed proteins are from EU origin (including forages and cereals), the EU protein deficit for high protein feed materials (30-50%) will continue to persist for many years, due to the persisting yield gap between grain crops and protein crops, and their lower yield stability. Therefore, despite continuing progress on homegrown protein availability, the EU needs to maintain an open access to the international market especially for high protein feed materials. In addition it should be acknowledged that the Farm to Fork target on reducing fertilizers use by 20 % might negatively impact the protein content of cereals and thus lead to a decrease of overall EU protein self-sufficiency.

The recent experience regarding lower market availability of EU biofuels and food industry co-products during the COVID 19 crises highlights again the need for policy coherence between CAP and other relevant EU policies (e.g. RED II) within the Green Deal framework. During the last years, the RED II directive has significantly helped increase the availability of vegetable EU proteins. CAP measures alone with its voluntary coupled support to vegetable protein and greening measures (incoming green architecture based on Eco-schemes) is not able to provide a sufficient economic stimulus to EU protein production in isolation, in our view.

The EU Commission therefore should consider how to boost societal acceptance for new genomic techniques, which may help accelerate the market launch of better protein plants, both from a yield (e.g. higher yielding soybean, peas, faba beans varieties) and protein quality perspective (elimination of anti-nutrients, improved amino-acid composition etc.). New more robust sustainable protein plant varieties will directly benefit the European agricultural production and its agri-food supply chain in the EU should also focus on additional economic incentives to market partners willing to boost EU plant protein production and help shorten supply chains of home-grown high protein feed materials to feed and livestock production.

EU Feed industry initiative to halt deforestation

The FEFAC Soy Sourcing Guidelines⁵ (SSG) have made a significant contribution to facilitate the mainstream market transformation of the EU soy supply chain, with almost 50% of soy used coming from ITC benchmarked soy programmes, meeting our stringent sustainability criteria. In addition, FEFAC has recently decided to update its SSG and include deforestation-free supplies as one of the new criteria. Based on its sectoral risk-exposure assessment, based on country of origin, FEFAC has recently estimated that around 80% of all soy use originates from low-deforestation risk areas (IDH soy monitoring report 2018⁶). FEFAC recommends to embed any future legal measure in a smart policy mix that includes government and corporate due diligence obligations combining voluntary and mandatory elements. A mixed approach ensures that responsibilities for implementing the expected standards are appropriately shared between competent authorities and private operators. Mandatory commitments should be applied only in case they are not taken up in voluntary systems.

⁵ <https://www.fefac.eu/fefac-positions/sustainability/21551/>

⁶ <https://www.idhsustainabletrade.com/uploaded/2020/05/IDH-European-Soy-Monitor-v2.pdf>