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FEFAC COMMENTS TO THE COMBINED EVALUATION ROADMAP / INCEPTION IMPACT ASSESSMENT FOR THE REVISION OF THE FEED ADDITIVES REGULATION (EC) No 1831/2003

The European Feed Manufacturers' Association (FEFAC) welcomes the possibility to comment on the Combined Evaluation Roadmap / Inception Impact Assessment for the revision of the feed additives regulation (EC) No 1831/2003. As representative of the European manufacturers of compound feed and premix for food producing animals, FEFAC would like to remind that animal nutrition science can offer a number of solutions to help the EU livestock industry face the challenges of the transition to more sustainable food systems. Feed additives, in combination with other functional components of the diet, do/will play a very important part in such solutions, in particular to improve nutrient efficiency, minimise environmental impact of feed consumption and reduce the need for antimicrobial treatment while improving animal welfare.

FEFAC believes that the current EU Feed additive Regulation (EC) No 1831/2003 has now reached its limits and requires a serious upgrade to ensure that it can deliver on some of the key objectives set out in the EU Farm to Fork communication (Climate change & AMR reduction & Nutrient management). In FEFAC's views, the following key challenges should be addressed as a matter of priority when reviewing EU Regulation (EC) No 1831/2003:

- **How to secure authorization of generic feed additives**, in particular technological and nutritional feed additives? The situation is critical for minor uses and for certain functional groups such as antioxidants with only a few substances left. The legal framework must be adapted to reduce the high costs of the (re-) authorization process and provide to applicants incentives to submit applications otherwise, we may quickly lose access to key additives in terms of resource efficiency and animal welfare.
- **How to stimulate innovation in areas of high political importance** such as the reduction of the needs for antimicrobial treatment, animal welfare or reduction of environment emissions? No single feed additive has yet been authorised for these functions, due in particular to the unpredictable outcome of the evaluation process.
- **How to reduce dependency on third countries** for the supply of feed additives? The EU is too dependent on Asia in particular for its supply of certain essential feed additives, in particular those produced by fermentation, due especially on the gap in regulatory production costs. This puts the EU not only at risk of shortage of supply of key substances for animal welfare like vitamins but increases also the vulnerability of the EU to fraud.

FEFAC agrees therefore with the diagnosis presented by the EU Commission on the problems that the initiative to review the feed additives legislation aims to tackle and welcomes the proposed policy options and other actions to be considered, bearing in mind that, for most of them, the status quo is simply not viable. As spokesman of the main users of feed additives, i.e. premixtures and manufacturers of compound feed for food producing animals, FEFAC is willing to share with the EU Commission its expertise for the Impact Assessment of the different policy options.

However, for a number of issues that the EU Commission mentions as “problems the initiative aims to tackle”, no specific action / policy option is suggested. This concerns in particular:

- **Efficacy**: the reduction of the costs linked to the “efficacy” criterion requires policy options such as “no efficacy requirement” for any additive, concept of “generally recognised as efficient”, efficacy required only when absence of efficacy may drive prejudice to animal health or welfare and possibly others;
- **Modernisation of labelling requirements**: digitalisation offers opportunities to minimise administrative burden while ensuring that all people purchasing, handling or using feed additives or premixtures as well as control authorities have easier access to the information they need; this should be reflected;
- **Strategic status of certain feed additives**: the EU Commission points to the dependency on Third Countries for its supply of vitamins as an issue to address but no policy option is proposed. We believe that the granting of a status of “strategic feed additive” should be considered in the future EU legislation on feed additives, in connection with the EU Communication on the EU Industry policy.

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