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FEFAC INPUT FOR THE EU BIOECONOMY STRATEGY

The livestock sector plays an essential role in any sustainable and circular bioeconomy, as a means to convert biomass resources, particularly those not suitable for direct human consumption, in fertilisers, leather and many other bio-based materials like vitamin D or gelatine but first and foremost in nutritious food of animal origin, thus supporting food security, resource efficiency, and climate goals. The feed industry plays a central role in not only collecting these resources, but also combining them in a way that maximise nutrient efficiency, thus minimising unwanted emissions in the environment.

FEFAC outlined a comprehensive vision for circularity in its 2022 publication Circular Feed – Optimised Nutrient Recovery through Animal Nutrition. The document highlights the proactive role the feed industry already plays in valorising co-products, by-products, and former foodstuffs, which are materials that would otherwise go to waste, thereby reducing pressure on primary resources. It also defines the circular feed concept and provides a wide range of examples of nutrient recovery practices already implemented across the sector.

We noted the ambition of the European Commission to increase resource-efficient and circular use of biological resources by creating an efficient demand. We hold the view that the demand exists, in particular in the feed sector, and the Bioeconomy Strategy should first and foremost explore opportunities to expand the range of biomass considered safe and eligible for feed use. In May 2025, FEFAC and its partners in the Circular Feed Platform published the EU Feed Circularity Catalogue – Outlines Barriers and Solutions for Advancing Circular Animal Feed. This publication includes a number of principles that should underpin the EU bioeconomy strategy, including:

- Safety must remain the overarching principle and the backbone of any bioeconomy strategy.
- Science must be the basis for any prohibition of access to a resource.
- Coherence should be ensured between the different legal acts and policies and be based on the food waste hierarchy.
- Coherence should be secured between the General Food Law, waste legislation, Animal By-products Regulation and other sectorial legislations (including end-of-waste status, supervision by authorities).
- Existing food/feed and ABP legislation and other relevant legislation should be checked for their contribution to circular bioeconomy and any impact assessment of new legal initiatives should include circularity as key evaluation criterion.

The Catalogue includes also 17 case studies of nutrient sources not legally usable as feed, in particular a number of animal by-products and waste streams. A re-evaluation of the scientific justification of these restrictions could serve as the foundation for an EU Feed Circularity Roadmap and should be considered in the implementation of the EU Critical Raw Materials Act (e.g. via recovery of phosphorous from certain types of animal by-products and waste streams, minimising reliance on phosphate rocks) as well as the very much needed review of the Animal By-Products Regulations No 1069/2009 and 142/2011, amongst other relevant EU policies.

A critical challenge for the Bioeconomy Strategy is ensuring that the animal feed and biogas sectors remain complementary. In some cases, both sectors compete for the same residual biomass, and biogas production is expected to grow significantly. Many food and non-food processing co-products, as well as former foodstuffs, have high nutritional value and should, where technically and legally feasible, be prioritised for feed use before being diverted to

energy recovery. This approach reflects both the waste hierarchy and the cascading use of biomass principles endorsed in EU circular economy policies.

The feed sector supports the development of renewable energy, including its broader benefits for sustainable livestock farming, but calls for a balanced approach that safeguards biomass availability for feed production. Incentive structures for biogas must be carefully designed to avoid unintended distortions that divert feed-eligible materials away from higher-value uses in nutrition. The EU must remain mindful that several policy frameworks currently prioritise carbon emissions reduction potential, whereas the animal feed and livestock sectors primarily focus on nutrient provision, thereby effectively steering these resources towards renewable energy production, where logically the biggest carbon emissions reduction potential can be achieved due to the high impact of fossil fuels. At the same time, the Bioeconomy Strategy should acknowledge that incentives for crop-based biofuels, such as those for sunflower and rapeseed, also support the production of valuable protein meals used in animal feed, this improving the resilience of the EU.